SUMMARY AUDIT REPORT

For The

International Cyanide Management Code

Orica Latin America Supply Chain

Transport Operation

June 2021

BP Cyanide Auditors

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Information on the audited operation

Name of Transportation Supply Chain	Orica Latin America Supply Chain
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Location detail and description of operation

Orica Australia Pty Ltd

Orica is an Australian-owned, publicly listed company with global operations. Orica is managed as discrete business units that produce a wide variety of products and services. The Mining Chemicals unit is based in Australia and exports products to Asia, Africa and the Americas, as well as supplying the local Australian industry. The unit's main product is cyanide, which is manufactured at Orica's Yarwun cyanide production facility (Yarwun Facility) in Queensland, Australia. Orica Mining Chemicals is the world's second largest producer of cyanide.

Yarwun Production Facility

Orica's Yarwun Facility, which is located approximately eight kilometers (km) by road from Gladstone, Queensland, commenced operations in 1989 and is engaged in the manufacture of cyanide (both solid and liquid forms), ammonium nitrate, nitric acid, chlorine, sodium hydroxide, sodium hypochlorite, hydrochloric acid and expanded polystyrene balls.

Solid cyanide is packaged in either sparge isotainers, which have a maximum gross weight of 26 tonnes, or in Intermediate Bulk Containers (IBC), which in turn, are packed into sea containers. Cyanide briquettes in IBC are packed in double bags, one of polyethylene and the other of polypropylene of 1,135 kilograms that are contained in wooden box which arrive to Callao port in 20' sea containers with 20 boxes each. A maximum of 20 IBCs can be packed into a single sea container with a maximum gross weight of 28 tonnes. Cyanide manufactured at the Yarwun Facility is used in gold mining operations. Orica's Yarwun Facility was last re-certified as being in full compliance with the Code on September 17, 2020. Orica's Yarwun Facility is not part of the scope of this audit.

Orica Australia Supply Chain

The Australian Supply Chain covers the transportation of solution cyanide and solid cyanide from the manufacturing facility in Yarwun, Australia, by road and rail direct to its end point users within Australia, to the Ports of Brisbane, Gladstone, Alma and Melbourne and storage within the Toll Customized Solutions production

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facility. Orica's Australian Supply Chain was recertified as being in full compliance with the Code on August 20, 2018. The Australian Supply Chain is not part of the scope of this audit.

Orica Global Marine Supply Chain

The Global Marine Supply Chain is a consolidation of all marine carriers and ports used by Orica to distribute their cyanide from Australia to their global customers. The Global Marine Supply Chain is the marine link between the certified Australia Supply Chain and the Latin America Supply Chain. The Global Marine Supply Chin is not part of the scope of this audit.

Orica Latin America Supply Chain

The Latin American Supply Chain (Latam Supply Chain) is a consolidation of the Peruvian, Colombian and Argentinian supply chains used by Orica to distribute solid sodium cyanide to their cyanide to the mining customers in Latin America. Latam Supply Chain was last recertified in January 31, 2018

The Peru Supply Chain covers the ground transportation of solid cyanide from the Port of Callao (port included in the scope of Orica Global Marine Supply Chain) to the mining clients. Cyanide is transported by International Cyanide Management Code (ICMC or the Code) certified trucking company APM Terminals Inland Services S.A. (APM), in 20 foot sea containers from the Port of Callao to APM´s Terminal in Ventanilla, Callao, for customs clearance and interim storage. APM transports cyanide to Orica´s Box to Sparge Tank Transfer Facility, located within APM´s Terminal boundaries. Also, from APM´s Terminal, cyanide is transported in sea containers to mining clients by DCR Minería y Construcción S.A.C. (DCR), also an ICMC certified company. Orica Peru maintains a sodium cyanide supply chain that is compliant with the requirements of the Code.

Orica Colombia Supply Chain delivers 20 foot sea containers with solid sodium cyanide within Colombia territory from the Port of Cartagena to the mine sites, through Transportes TDM S.A. (TDM) a local trucking company included in the scope of this audit. Orica´s Colombian Supply Chain was pre-operationally certified on November 13, 2019. In accordance with the International Management Institute (ICMI) requirements, Orica has been subject to a full operational audit once transporting cyanide, which has been accomplished in occasion of this Orica Latin America Supply Chain audit. No interim storage is considered in this transport operation. Orica Colombia maintains a sodium cyanide supply chain that is compliant with the requirements of the Code. The ports of Cartagena and Buenaventura are included in the scope of Orica Global Marine Supply Chain which was last Code certified in 2021 as including the shipping lines of all marine carriers and ports used by Orica to distribute their cyanide to their global customers.

Orica´s Argentinian Supply Chain delivers solid sodium cyanide in 20 foot sea containers from the Port of Buenos Aires to its mining clients within the Argentinian territory by mean of the ICMC certified trucking company Víctor Masson Transportes Cruz del Sur S.A. (Cruz del Sur). Orica Argentina maintains a sodium cyanide supply chain that is compliant with the Code. The Port of Buenos Aires is included in the scope of Orica Global Marine Supply Chain.

Below is a graph synthesizing Orica´s cyanide supply chains from the production center in Yarwun Australia to its distribution in Latin America. The segment of the supply chain within the dotted lines shows the scope of this audit.

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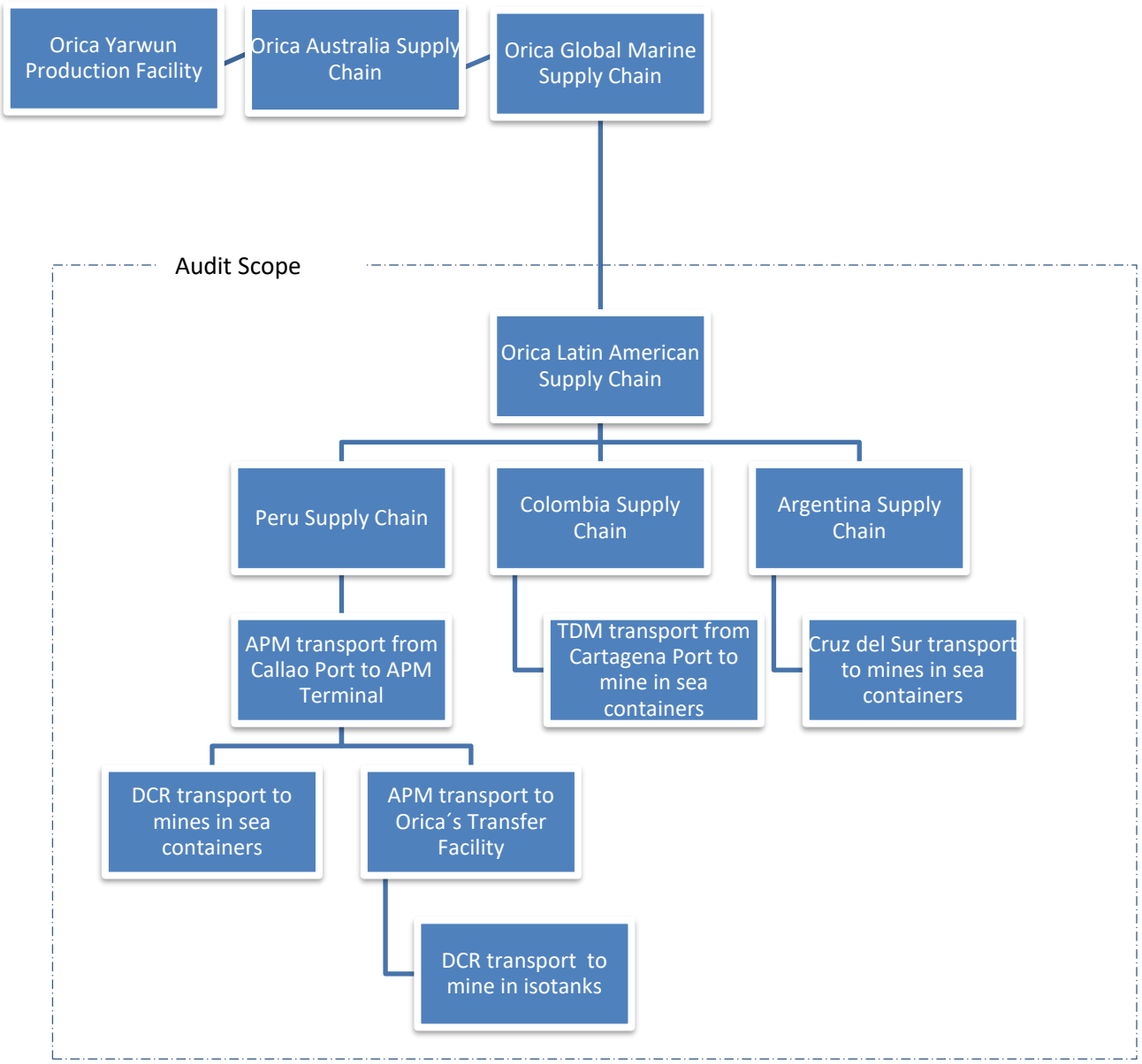

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Audit Scope

Orica's Latin America Supply Chain as the cyanide consignor, includes the following supply chain actors:

- APM Terminals Inland Services S.A. (APM), Peru – ICMC certified transport company
- DCR Minería y Construcción S.A.C. (DCR), Peru - ICMC certified transport company
- Orica Mining Chemicals Box to Sparge Tank Transfer Facility, Ventanilla, Peru - ICMC certified production facility
- Transportes TDM S.A. (TDM), Colombia – transport company
- Víctor Masson Transportes Cruz del Sur S.A. (Cruz del Sur), Argentina - ICMC certified company

The audit was based on a sampling of information and therefore deficiencies may exist which have not been identified. The audit was performed by an independent third-party auditor who is pre-approved by the ICMI as a Lead Auditor and Technical expert for International the Cyanide Management Code audits of cyanide transportation, production plants and mining operations. All supply chain components noted above were included in this ICMC recertification audit.

Supply chain transporters APM, DCR and Cruz del Sur trucking companies, as well as Orica´s Transfer Plant were not subject to an ICMC verification audit as they are already certified in the Code. Colombian transporter TDM was subject to an onsite ICMI verification during Colombia Supply Chain audit. Each organization noted in this report was found to be in compliance with ICMC requirements.

APM Terminals Inland Services S.A. (APM), Callao, Peru

APM Terminals is a member of the Danish group AP Moller- MAERSK. APM Terminals Callao is the operator of the North Multipurpose Terminal of the Port of Callao, the largest in Peru and on the west coast of the South American Pacific. On July 2011, the first commercial unloading was made. The terminal operates 365 days per year. The North Terminal of the Port of Callao is a multipurpose maritime terminal, prepared for the handling of containerized cargo, among others. APM Terminals port operator is included in the scope of Orica Global Marine Supply Chain.

APM Terminals has inland service facilities in strategic locations across Peru, including Callao. The facility complies with General Customs Law, and procedures established by the National Supervision, to ensures safe and suitable storage. APM liaise closely with the port to prevent any problems that may arise during operations, to ensure cargo is handled correctly and promptly before, during, and after goods delivery.

The company operates a fleet of almost 100 vehicles and 70 trailers, equipped with Global Positioning System (GPS), a satellite locator and monitoring. Transport services are offered for dry and refrigerated containerized cargo, and oversized and project cargo. APM has adopted road safety with road-safety standards and is certified with ISO Standard 39001 - Road Traffic Safety Management System.

APM Terminals Inland Services S.A. Callao, was last certified in the Code on November 6, 2018 as a cyanide supply chain made up of the Ventanilla terminal and the transport company.

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DCR Minería y Construcción S.A.C. (DCR), Peru

DCR Mineria y Construcción SAC (DCR) is a land freight transport company, which has more than 40 years of experience in transport, associated since its inception with the mining sector. The transporter provides services of hauling, rental of yellow machinery, land transport of hazardous materials and merchandise in general for mining or industrial companies nationwide. Since 2004 is transporting cyanide to the main companies in the country. DCR has a large fleet of tractor trailers for transporting loose cargo and containers. All their vehicles are monitored with radio frequency systems and GPS. DCR does not have storage facilities and does not remove the product from the containers. DCR certified the Code in 2010; recertified in 2014, 2017 and last recertification was on August 12, 2020.

Transportes TDM S.A. (TDM), Colombia

Orica Colombia as the cyanide consignor, delivers sea containers with solid sodium cyanide within Colombia territory from the Cartagena Port to the mine sites, through the local trucking company Transportes TDM SA (TDM), which is included in the scope of this audit.

TDM is a trucking company dedicated to logistics and to transport diverse cargo, included hazardous materials with headquarters in Medellín, Antioquia, Colombia. TDM transports the cyanide from the port of Cartagena to the mining clients in convoys with an escort vehicle. The audit was conducted at TDM´s headquarters in Medellín, Colombia, through a review of procedures and records and interviews with the Orica Operations Supervisor and TDM personnel as the Health and Safety Manager, Convoy Supervisors, DCR drivers and the Maintenance Superintendent.

TDM has the capacities required to carry out the transport of goods nationwide. Between main cities and to different destinations throughout the Colombian geography. A fleet of more than 100 vehicles allows them to move merchandise from the main cities to a large number of destinations throughout the national geography. TDM has a great fleet of semi low bed trailers, which are driven by certified drivers and are supported by a demanding control and maintenance program. They have a wide range of equipment and vehicle configurations.

TDM was found in compliance with the Code during the preoperational evaluation audit and also during this ICMC confirmation evaluation audit commissioned by Orica Colombia Supply Chain on January 20, 2021.

Víctor Masson Transportes Cruz del Sur S.A. (Cruz del Sur), Argentina

Víctor Masson Transportes Cruz del Sur S.A. (Cruz del Sur), with 62 years in the market, is one of the main providers of comprehensive transport and logistics services in Argentina. Throughout its history, it has provided services to the different industries at country level. Its various business units include Transportation Department, Integral Logistics Department, Distribution Department and Mining Department.

Cruz del Sur offers services through a fleet of more than 800 units, which allows the most remote points of the country to be joined, providing coverage at national level.

Cruz del Sur is a sodium cyanide transporter in Argentina, transporting sealed containers with cyanide from Argentina ports, directly to mine sites, without the intervention of secondary storage facilities. Currently Cruz

del Sur transports cyanide in standard 20-foot shipping containers. The transporter was last certified in the Code on March 10, 2020.

Orica Mining Chemicals Box to Sparge Tank Transfer Facility, Ventanilla, Peru

Orica Mining Services Peru S.A. operates a Box to Sparge Transfer Facility (transfer plant) within the APM Terminals Inland Services S.A. (APM) containers warehouse located at Ventanilla Callao, Perú. This is a new sparge plant built in 2019 with state-of-the-art technology. Orica's box to sparge tank facility was pre-operationally audited on October 29, 2019, began operations on December 23, 2019 and certified on March 3, 2021.

The transfer plant was constructed to supply mine site customers in Peru with cyanide transported within sparge isotanks. The transfer facility comprises a purpose-built structure that houses material handling equipment and associated facilities.

After the import process to the Port of Callao, sea containers are transported by land by to APM´s Terminal Inland facility. Containers will be moved to the transfer plant according to need and / or request of the plant.

The box to sparge tank facility transfers solid sodium cyanide in IBC to sparge tanks (isotanks). Isotanks are cylindrical metal containers, which are mounted on a platform to fit a truck for transport to the mine. Twenty IBC are transferred into each isotank. Transport operation to the mine site is performed by DCR trucking company.

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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 is in full compliance with the International Cyanide Management Code.

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

Audit Company:	BP Cyanide Auditors SAC
Audit Team Leader and Technical auditor | Email:	Bruno Pizzorni | bpizzorni@cyanideauditor.com
Audit Dates:	• Orica Perú Supply Chain - January 13 to 15, 2021 • Orica Colombia Supply Chain - January 19 to 20, 2021 • Orica Argentina Supply Chain – June 8, 2021 • Orica Latin America Supply Chain – June 8, 2021

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 Summary 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.

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Transport Verification Protocol

Principle 1: Transport

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

Transport Practice 1.1

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

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

Orica Latam (Orica or the Consignor), as the cyanide consignor, has implemented the corporate Risk Route Analysis (RRA) standard procedure for selecting transport routes that minimizes the potential for accidents and releases or the potential impacts of accidents and releases, also has corporative procedures in Group Standard (GS) 32 related to safe procedures for hazardous materials (HAZMAT) transportation, which among others, requires ICMC considerations to evaluate as population density, road infrastructure, pitch , grade, prevalence and proximity of water bodies and fog. It is required the transporter to evaluate any route previous to the first cyanide shipment and that all trucking transporters in his cyanide supply chain implement procedures for selecting transport routes that minimizes the potential for accidents and releases.

Orica procedures requires that each transporter implement route selection procedures that minimize the potential for accidents and releases and the potential impact of accidents and releases. The responsibilities of the transport companies involved in this supply chain are described in each agreement with the contractors. Orica, as the cyanide consignor, has overall accountability for the supply chain route planning, but individual trucking companies are responsible for the road portion of route planning.

The agreements were reviewed, Orica and transporters personnel interviewed. Leadership's understanding of Consignor responsibilities was excellent. All Orica personnel demonstrated a high level of commitment to ensuring that cyanide shipments are made in compliance with the Code requirements.

Transportes TDM S.A. (TDM), the trucking company for Orica Colombia Supply Chain, transports sodium cyanide in 20 foot sea containers. The transporter has a formal procedure called Route Study to select routes in order to identify transport hazards and reduce risks during its different transport operations and has already performed the route evaluation between Cartagena Port to the vicinity of Continental Gold mine. After the route assessment is performed, each driver receives a copy of the roadmap where issues in the route are highlighted in red letters. Orica Colombia and TDM interact to integrate their routes evaluations, as stated by Orica´s Import/Export Specialist. The auditor reviewed the Route Risk Assessment (RRA) performed between the port of Cartagena and Continental Gold mine site from 2020. This analysis allowed them in collaboration with Orica and the mine, to choose between two possible routes after evaluating a series of factors which

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determined the safer route to operate, including population density, roadway infrastructure construction and condition, pitch and grade, and prevalence and proximity of water bodies and fog, among others.

The auditor also reviewed route analysis from DCR, the Peruvian transporter. Orica Perú supply chains along with their respective transporters, performs periodically route analysis to the different mine sites. Route evaluations were also available for mine destinations from the APM´s interim storage to Orica sparge plant. These route analyses considered all ICMC criteria when determining the routes. Orica collaborates closely with their transporters to ensure that all new routes are formally evaluated for risk against ICMC criteria before delivery to a mine.

Víctor Masson Transportes Cruz del Sur S.A. (Cruz del Sur), the Argentinian Orica Argentina Supply Chain transporter, has performed its respective route analysis and was found in compliance with the Code during their last recertification audit.

Interviews confirmed that before Orica qualifies a new customer for sodium cyanide delivery, the customer must follow a standard practice to determine that the cyanide can be safely delivered to their mine site. Orica does not control the routing of the trucking companies; however, they do utilize ICMC certified trucking companies or that have been found to be compliant with all the Code requirements, as TDM in Colombia.

The risk evaluations associated with this supply chain focus primarily on the selection of routes to the mine sites. The evaluations ensure that safety and security standards are acceptable. Trucking companies are selected based on being certified in the ICMC, their ability to deliver cyanide safely and on their qualifications for transporting dangerous goods according to local regulation requirements.

Orica policies and procedures require that each transportation company must have a process to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. Risk mitigation measures include the development and implementation of an improved tracking process, the revision of the Emergency Response Procedures, and the coordination of additional emergency response resources to accompany shipments to mine sites. All trucking companies involved in this supply chain were audited and found to be compliant with this requirement during their ICMC certification audits.

Both Orica Colombia and TDM evaluated the risks of the selected cyanide transport route and take the measures necessary to manage these risks by mean of Orica´s RRA and TDM´s Route Study procedure, respectively. These procedures establishes to perform a risk analysis and the steps to follow for the preparation of roadmaps for all routes covered by the organization during the execution of the transport service. Once identified the risks is required to establish the necessary control measures to minimize and manage these risks.

TDM transporter requires in its procedure to prepare and update the roadmap when there is a new route, modification of conditions or a request from the customer recording the aspects related to: unsafe conditions (road condition, weather conditions and traffic), speed of handling by sections, signs and prohibitions of the road, heights of bridges, tunnels, ridges of hills, water, population density, mist zones and other aspects of transport safety. The auditor reviewed Orica and TDM route analysis documents from Cartagena to the mine site, confirming controls are stablished to manage the risks identified.

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All trucking companies involved in this supply chain were found to be compliant with the requirements of this Transport Practice 1.1 of the Code during their ICMC certification audits.

Orica´s procedures requires its transporters to periodically reevaluate their routes used for cyanide deliveries or when road conditions require an update. Also, require the drivers to provide feedback on the route conditions. Feedback regarding routes chosen is gathered during the partner re-evaluation process.

Orica maintains a policy to only utilize transporters evaluated for ICMC compliance for cyanide transport, collaborating closely with its transporters, to ensure that all new routes are formally evaluated before delivery to a mine can commence. Orica as the Cyanide Consignor maintains formal documentation with its transportation partners to ensure that roles and responsibilities are clearly defined and agreed upon by all parties. Orica periodically solicits feedback regarding the routes and other supply chain topics from its transportation partners as part of its partner re-evaluation process. Recurring route evaluations are performed by the trucking companies and audited during re-certification. Orica does not have any role or responsibilities for soliciting feedback from the drivers of the transportation companies.

TDM management members were interviewed and confirmation was made that feedback regarding routes is discussed between them and Orica for the current transport operations. When feedback from a driver suggests that a route needs to be revised, the trucking company revise the routes and communicates new information to drivers.

Orica documents the measures taken to address risks identified with the selected routes, maintaining records of transportation routes, associated risks, and mitigation measure deployed.

Orica and TDM management members 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. Records showing that TDM shipping routes are maintained up-to-date with current risk and risk mitigation information were reviewed during the audit.

The truck carrier use a formally documented procedure to determine routes. Route evaluations for the transportation routes used for shipments were complete and records were available for review. Routes are also evaluated for security issues and for cell phone coverage. Only those routes deemed to be safe are approved.

Orica seeks input from communities, other stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. During Orica sparge plant ICMC certification audit, confirmation was made that Orica has engaged its local community and emergency response centers. During this certification audit, the auditor reports that DCR trucking company advised local agencies effectively.

Orica supply chain in Perú is engaged with the APELL (Awareness and Preparedness for Emergencies at Local Level) program and interacts with this purpose with local communities, external responders and mining clients for emergency response. APELL consists of an association of companies with the objective of preparing the community for the correct performance and adequate reaction to chemical emergencies at the local level.

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The auditor reviewed letters of alliance with the northern part of the country as well as agreements for the strategic alliance of cooperation in response to emergencies.

During 2019 and 2020 has been interaction in the route between Orica Colombia and the firefighters, the police and with hospitals. Orica distributed letters delivering the cyanide Safety Data Sheet (SDS) and a safety brochure regarding cyanide including the name and address of contact in the card and where symptoms due to exposure to cyanide were also identified. In this opportunity people could also express their questions, doubts and concerns in this regard.

TDM, as a chemicals transporter, has an agreement with emergency response contractor “Destino Seguro” (Safe Destiny), a Colombian company with 14 years of experience in the market, meeting the needs in monitoring, vehicle logistics control and emergency care arising from the transport of dangerous goods. Destino Seguro maintains permanent contact in the route with stakeholders. In addition, TDM is member of the support net to chemicals emergency response “Plan Nacional de Respuesta ante Emergencias” (National Emergencies Response Plan). TDM also participates in safety meetings with the “Frente de Seguridad Empresarial” (Business Security Front),a voluntary initiative where the companies meets with authorities as the police, to discuss safety issues on route. Orica has monthly meetings with TDM as the auditor saw in the meeting minutes, where incidents are shared, learned lessons learned, an action plans are made.

Where routes present special safety or security concerns, Orica´s cyanide transport procedures require the transporter to use convoys, escorts or other additional safety or security measures to address the concern. The interviewed management personnel from Orica Colombia and TDM confirmed that the cyanide transport operations are performed in convoys escorted by a vehicle with the necessary implements of communications, first aid and equipment to contain spills.

Trip reports and recommendations are provided by convoy supervisor in the report issued for each trip. The interviewed drivers confirmed all the cyanide operations are performed in convoys. Trip reports and recommendations are provided by TDM’s convoy supervisors.

According to local regulations, in addition of its contractor personnel and equipment, Orica uses escorts and its own personnel to accompany all shipments in Perú, to ensure the safe and secure transportation of the materials. An escort vehicle has to be used every 3 vehicles transporting HAZMAT according to local regulations. The use of an escort has been generally required by mines in the region primarily because of concerns over the safety of the mine roads. All intermodal containers are sealed by the shipper and isotanks inspected by Orica Transfer Plant in order to mitigate the risk of having unauthorized personnel access the product during transit.

Cruz del Sur transports also in convoy of six sea containers and a pickup truck as escort, although is no required by Argentinian regulations. On arriving the convoy to the city of San Juan, an additional escort of firefighters is added to the cyanide convoy, as required by local regulations. On each convoy travels supervisors of Cruz del Sur, Orica and companion of the local firefighters. After each shipment delivered to the mine site, a report on the trip is issued.

The interviewed drivers confirmed all the cyanide operations are performed in convoys. Trip reports and recommendations are provided by the Orica’s convoy supervisors in the report issued for each trip.

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Orica has provided external responders, medical facilities and communities of their roles and mutual aid during an emergency response. Information was spread by mean of letters and brochures to emergency responders, medical centers, and fire fighters along the route. There is evidence of the request for support to transportation to related entities such as firefighters, police, hospitals and communities along the routes, according to the established in their cyanide transport procedures.

TDM has an agreement with Destino Seguro, the emergency contractor for response to any incident with hazardous materials (HAZMAT) on route. This contractor has several support points along the routes nationwide.

Orica also advises local external responders, medical facilities, and communities of their role during an emergency response. Some convoy leaders at Orica are active members of the Callao, Perú, firefighters brigades and provide the firefighters with training in cyanide awareness.

Orica only contracts with transport companies that have gone through an ICMI certification audit successfully or through an evaluation audit being found in compliance with the Cyanide Code. None of the transport companies in this supply chain sub-contract the cyanide handling or transport activities. Tractors and trailers are owned by the transporters and drivers are employees of the companies.

Transport Practice 1.2

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

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

Orica maintains a policy to only utilize ICMC evaluated transporters and collaborates with its transporters to ensure that all drivers will be qualified and trained in the operation of cyanide transport equipment, cyanide safety, and emergency response procedures.

Orica´s transporters use have licensed operators to transport its products. Orica performs due diligence evaluations to ensure that transporters operate according to recognized Environmental Health and Safety (EHS) standards and are experienced in the handling of hazardous goods.

According to local regulations in the 3 countries: Perú, Colombia and Argentina, all drivers must pass psych technical and a medical examination to be able to drive. Drivers are also trained in defensive driving, firefighting, first aid, sodium cyanide and its emergencies (cyanide spill and poisoning). Orica requires the convoy leader must have transport background, to be knowledgeable on basic mechanics, and leadership qualities. The current convoy leaders have over five years of experience escorting hazardous materials convoys.

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DCR driver's and convoy leaders were interviewed and were found to have an appropriate level of knowledge and safety awareness. DCR drivers had around 10 years' experience in HAZMAT transport operations.

TDM requirements for drivers transporting hazardous materials are, among others: 3 to 5 years previous experience transporting HAZMAT, proved experience driving heavy cargo vehicles, to pass a theoretical and driving skills tests, a psycho sensometric and ophthalmological medical exams, and a home visit evaluation. The auditor reviewed TDM´s drivers database where, for each driver, information is kept on their driving experience, municipal license to drive, and if they are authorized to transport dangerous loads and cargo in general. Through this database they have control over the expiration dates of driver's licenses.

Orica Argentina employees involved in the cyanide transportation operation received training in the program called Awareness in the Safe Use and Handling of Sodium Cyanide which consists of six modules ranging from introduction to cyanide management to emergency response. Cruz del Sur, the transporter, was found in compliance with this Protocol Question during its recertification audit.

All trucking companies involved in this supply chain were found to be compliant with the requirements of the Code´s Transport Practice 1.2 during their ICMC certification audits.

Orica´s operational training is given upon hire and there is a skills evaluation process to ensure that, convoy leaders and administrative personnel involved in the cyanide transport operations, are competent to perform their job in a manner that minimizes the potential for cyanide releases and exposures and to drive the designated route prior to their first delivery. Safety- related training is given at defined intervals to ensure that all personnel operating cyanide transportation equipment can perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. Orica´s training records were reviewed and found to be acceptable.

Transport Practice 1.3

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

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

Orica only uses supply chain partners with equipment designed and maintained to operate within the loads being handled. All transport companies involved in this supply chain were found to be compliant with this requirement during their ICMC certification audits.

DCR´s trucks and trailers were reviewed during the audit. All available tractors and trailers have been checked and were rated for weights that exceed maximum loaded weights. The load capacity of the platforms used is

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larger than the gross weight of an isotank or a maritime container fully loaded with cyanide which is approximately 22 t.

TDM uses trailer loading checklists to ensure that trailers are suitable for transportation prior to loading cyanide, and use formal procedures and checklists to ensure that loads are evenly loaded as well as blocked and braced. Fleet specification files were available for review during the TDM audit. The tractors and trailers were found to be capable of carrying the loads for which they were being used. Tractor and loaded trailer weights are carefully monitored to ensure that trucks are not overweight. The transporter has formal preventive maintenance program to ensure that its tractors and trailers are safe for transport.

APM and Cruz del Sur transporters were found to be compliant with this requirement during their ICMC audits.

Although Orica´s transportation partners area responsible to verify the adequacy of the equipment for the load it must bear, Orica inspects and performs regularly preventive maintenance actions before departing any cyanide convoy, Orica´s SH&E Supervisors are present and if required travels along with the convoy to ensure that its transporter operates according to recognized EHS standards and are experienced in the handling of hazardous goods.

TDM manages standard amounts of cyanide with known weights to load into its transporters trailers. Loading instructions with loading diagrams are maintained by the transporter, including instructions to verify the adequacy of the equipment for the load it must bear. The transporter train its operators to inspect the trailers prior to loading. Pre-trip inspections of the truck are formally performed by the transporter as part of its agreement with Orica.

All trucking companies involved in this supply chain were found to be compliant with the Code´s Transport Practice 1.3 during their ICMC certification audits.

According to interviews with Orica´s personnel, the transport of cyanide in sea containers is of standard weights. Cyanide arriving to the ports are 20 foot sea containers where the ICMC-certified producers are responsible for the blocking and bracing of the shipments. The cargo is sealed when it is packed into the sea containers. The sea containers are not opened until they arrive to the mining clients or to the Orica´s Ventanilla sparge plant for transfer into isotanks. Orica´s personnel use formal procedures and checklists to ensure that trailers are loaded evenly and that the trailer is not overloaded.

Loading is done by the port operator using scales to confirm the shipment weight. The loads being hauled are standard loads that do not vary in weight. Records were checked against weight capacities and weight limit regulatory information. Shipping papers indicate the number of packages shipped and the weight of the cargo. This information is used by transportation partners to ensure that overloading does not occur.

TDM´s 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. TDM office personnel showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

Shipping paperwork and Orica´s policies and procedures were reviewed, and TDM and DCR trucking 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. Orica´s office personnel and TDM

and DCR´s drivers showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

As the cyanide consignor, Orica has prepared a formal safety program for the receipt, load, transport, and unloading of maritime containers with solid sodium cyanide. Procedures and formal checklists were available to demonstrate that Orica manages several of the Transport Practice 1.4 requirements in addition to these requirements being met by the trucking company. Formal procedures and contracts are in place to ensure that roles and responsibilities between Orica and its transporters are clearly defined.

The trucking companies involved in this supply chain have established a safe method for transportation. Their procedure describes the administrative, operational and safety measures for the proper transportation of sodium cyanide. The procedures were found to be compliant with this requirement during their ICMC certification audits. Transport of cyanide to the mine sites is monitored by Global Positioning Systems (GPS). The position of each vehicle is provided continuously.

TDM performs pre-trip inspections to ensure that trailers are locked and secured and that placards are on all four sides of the trailers. TDM´s procedure describes the administrative, operational and safety measures for the proper transportation of sodium cyanide. TDM transports only solid cyanide in Intermediate Bulk Containers (IBCs) within sealed containers. Normal safe driving procedures and unloading procedures ensure that the truck and the trailer are not damaged during transit. The transport procedures establishes that the load cannot be altered during the transportation process. To ensure this, tags are placed in the sea container's locks at the manufacturing facility. These tags can only be removed at the mine. The containers received in the port are placed on platform trailers hauled by trucks without the need of changing the packaging. Per the interviewed personnel, the load is not removed from the container. The procedure was found to be compliant with this requirement during the ICMC certification audit.

Orica sparge plant has implemented a procedure to ensure cyanide containers are unloaded in a manner that maintains the integrity of the producer's packaging. Orica controls the amount and appearance of the package during unloading/loading of sodium cyanide. The cargo is then locked by the driver. Orica conducts routine inspections to ensure the integrity of the cyanide transport.

As the cyanide consignor, Orica requires all sea containers to have appropriate placards showing UN 1689 (solid cyanide) are displayed on all four sides of the sea containers. Also, it is required drivers visually inspect the containers prior to each movement.

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TDM transporter procedures establishes that placards with UN number and poison signs must be placed on all sea containers to identify the product; this is verified through the vehicle inspection checklist. Containers carrying cyanide are marked with easily identifiable placards and signage. This signage identifies the shipment as containing cyanide and warns of the presence of a toxic chemical as required by local regulations and international standards. Per the reviewed operation files, the presence of the placards is verified through a checklist.

Inter-modal containers arriving to the ports are controlled by the ocean carriers that transport them. Containers carrying cyanide are marked with easily identifiable placards and signage. This signage identifies the shipment as containing cyanide and warns of the presence of a toxic chemical as required by local regulations and international standards. The Peruvian port operator procedure calls for confirmation that appropriate placards showing United Nations (UN) 1689 (solid cyanide), National Fire Protection Agency (NFPA) diamond number placards and poison signs are displayed on all four sides of the sea containers.

Per procedure, when cyanide containers and isotanks are dispatched, Orica and the transporter personnel confirm that signage is in place that identifies the shipment as containing cyanide. Drivers visually inspect the containers prior to each movement. Equipment markings were found to be adequate and conformant. The auditor reviewed a sampling of completed dispatch checklists and found them to be complete.

Although Orica is not directly responsible for pre-trip inspections, the health and safety supervisors personnel inspect each cyanide convoy departing to the mine sites. Pre-trip checklists performed by Orica to its transporters were reviewed and found to be complete. Pre-trip checklists showed that escort and transport vehicles are in optimal condition, that load capacity is reviewed, that weights to be transported conform to the vehicular configuration, and that characteristics of the transport unit (lights, brakes, chassis, container among others) are without cracks or flaws. All companies involved in this supply chain were found to be compliant with this requirement during their ICMC certification audits including vehicle inspections prior to each departure, preventive maintenance programs, limitations on operator and drivers' hours, procedures to prevent loads from shifting, procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered. Orica´s policies and procedures require that each transportation company have a drug abuse prevention program

According to interviews with Orica personnel, the trucking companies use standard instructions to ensure proper loading, blocking and bracing of vehicles and containers. Orica policies and procedures were reviewed and trucking personnel were also interviewed to confirm that appropriate practices are used.

The load shifting within the sea container is not considered possible as all containers are filled with 20 IBCs and block and brace is applied at the cyanide production plant to prevent load movement. At the same time, trailers have pins where the container is embedded preventing it from shifting. Cyanide travels in sealed containers, which are secured to the platform safely, eliminating the possibility of displacement during transport.

According to the transporter's procedures, the transport will only be carried out during daytime hours. In the same way, drivers must rest at least eight hours before departing on the trip. The drivers working day traveling with sodium cyanide may not exceed twelve hours a day discontinuous, allowing stoppings every two to three hours for ten minutes or more for equipment review, feeding and active stops.

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An interview with the health and safety supervisor from DCR´s truck transport company determined that the convoy supervisor is responsible for suspending a trip if anything with the load, driver or the environment does not meet safety requirements and to go ahead when conditions are safe and all requirements have been met. DCR´s driver takes an alcohol test before leaving the APM´s installations with a cyanide shipment. Orica performs periodic drug tests. Records were reviewed and found to be complete.

TDM procedures requires the convoy supervisor to report the state of progress of the operation and in any unsafe event can stop the convoy. Transport can continue only if the leader of the convoy has provided the relevant conditions. It also indicates that if something happens.

According to the ICMC certifications reports, all transporters of this supply chain maintain records with details of route incidents, sensitive areas found and any other relevant information.

All trucking companies involved in this supply chain were found to be compliant with this Transport Practice during their ICMC certification audits.

Transport Practice 1.5:

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

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

This Orica supply chain does not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

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

Orica Cyanide Transport Procedure states that all vehicles carrying cyanide shipments must have a GPS system in each of the trucks to provide their exact location and information, cell phone in the truck, escort and satellite phone if necessary.

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All trucking companies involved in this supply chain were found to comply with this Transport Practice their ICMC certification audit. They all have the means to communicate with the cyanide consignor, transport company, the mining operation and emergency responders. Adherence to this requirement was confirmed through the ICMC audit of Orica´s Peruvian supply chain operations.

Drivers have mobile phones as a back-up means of communication. The convoy leader is provided with a cellular phone and a satellite phone if necessary, to communicate with the transport company, the mining operation, the cyanide consignor and emergency responders. The convoy leader is responsible of communications with Orica in case of an emergency.

TDM´s communication system is part of the pre-work inspections and is maintained along with the formal preventive maintenance program. The system is used each day and correct operation of the system is confirmed at that time. They prove their communications and actions to be taken through the drills performed.

The certification audits reports show that the communication equipment of all the trucking companies involved in this supply chain are periodically tested and were found to be in compliance with ICMC. DCR check the operation of the cell phone prior to the commencement of trips; tests the mobile phones before each trip, controlled by individual drivers. The trucking companies' mobile equipment, including cellular phones and GPS were operating at the time of the transport certification audits.

Orica and DCR conduct periodic route evaluation for its main routes for sodium cyanide transportation. During the route evaluation they identified, among others, communication blackout areas along the routes.

When entering these areas DCR drivers communicate with their central dispatcher or the mine to announce entry into the uncovered area, they communicate again when they leave this area. In areas without signal coverage, the GPS system saves the information to be transmitted and delivers it when exiting out of the blackout area.

Communications blackout areas are identified in each route risk assessment. The transporter's procedure describes procedures implemented for the blackout areas. DCR' s control room has set geofences identifying this places and they expect to recover communication with the convoy after an established time.

Communication blackout areas along the planned transport route have been identified during the routes risk assessments performed both by Orica and TDM. As these areas are minimal, they consider there is no need to implement a special procedure for the blackout areas. Trucks GPS equipment have a "panic button" which is considered to be actioned in an emergency. Also, trucks are monitored along the route in real time, and any delay will be immediately notice at the control board.

Orica and its transportation partners have communication and GPS tracking systems which allows continuously monitoring of the location of the convoy. The convoy leader communicates Orica upon dispatch, upon arrival at the customer sites, and after unloading is complete. Personnel responsible for tracking shipment status from Orica were interviewed, the GPS system was demonstrated, and logs showing that shipment status was being recorded were reviewed and were found to be complete.

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Logs at TDM showing that shipment status, other than cyanide, was being recorded were reviewed and were found to be complete. TDM procedure for tracking of shipment status was reviewed during the audit and found to follow current practices. Orica supply chains, DCR and TDM procedures for tracking of shipment status was reviewed during the audit and found to follow current practices.

Orica has inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer.

The transport documents shows the amount of cyanide delivered. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The amount of cyanide delivered is carefully monitored by the driver and remotely through the Orica dispatch office.

Shipping paperwork is conformant to ICMC requirements, including chain of custody requirements. A waybill will accompany the transportation which includes chain of custody data such as container numbers, the amount of cyanide delivered, waybill number, shipping documentation, Safety Data Sheets (SDS), packing list, bill of lading, customs declarations and producer invoice, among others.

Additionally, the containers are locked are tagged at the manufacturer's facilities as well as isotanks at the transfer facility at Ventanilla, and these tags are only removed at the mine. The auditor reviewed the trucks cyanide shipment bill of ladings matching the port scale reports, coinciding the weights always.

The transport document, the SDS, and emergency response information are carried by each driver. The drivers have an on-board file that includes copies of its, licenses, and the cyanide SDS.

A waybill accompany the cyanide transportation in TDM, which includes chain of custody data such as container numbers, the amount of cyanide delivered and the SDS, among others. The amount of cyanide delivered is carefully monitored by the driver and remotely through Orica and TDM´s office.

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Principle 2 - Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures

Transport Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental

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

APM Inlands Services (APM) operates has a cyanide interim storage yard in a containers facility cyanide at Ventanilla, Callao, Perú where cyanide is stored until its nationalization. From here sodium cyanide in 20 foot sea containers is transported to Orica's transfer plant located within APM´s facility and also transported directly to the mines. APM operations includes transportation from Callao Port to the containers interim storage yard.

APM is an ICMI certified company and was found in compliance with the Code during its recertification audit. Warning signs are posted alerting workers that cyanide is present, that smoking, open flames, eating and drinking are not allowed and detailing what personal protective equipment must be worn.

Access to APM´s facility is restricted, forbidden for the public. Has a tall perimeter fence, security guards and permanent surveillance with closed system of security cameras. The cyanide storing area has signals prohibiting entering unauthorized personnel.

APM´s area where the cyanide containers are stored is dedicated to dangerous goods taking into account the compatibility to store different chemicals and separated from incompatible materials such as acids, strong oxidizers and explosives with berms, bunds, walls or other appropriate barriers to prevent mixing.

The area where cyanide is stored has no or minimal potential for contact of solid cyanide with water as it has an asphalt pavement with adequate slopes to avoid water impoundments. Cyanide is only stored in sea containers, which offers protection against rainwater; Ventanilla is located in an arid area with minimal rain precipitations. The sea containers also protect cyanide from any humidity contained in the sea breeze, considering the Ocean Pacific is about 500 m from the facility.

Cyanide interim storage at APM´ is an open yard with no roofing. This open area has excellent ventilation to prevent build-up of hydrogen cyanide gas.

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APM has all necessary systems in place with the capacity to contain any spilled cyanide materials to minimize the extent of a release. APM was found in compliance with this Code requirement during their last certification audit.

Principle 3 - Emergency Response:

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

Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

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

Orica as the cyanide consigner, requires that each transporter implement an Emergency Response Plan (ERP or Plan) against potential accidents and releases. The responsibilities of each transportation company involved in this supply chain are detailed the respective agreement. Orica has overall accountability for the supply chain, but individual trucking companies are responsible for the emergency response in his transport segment. Orica´s and the transporters emergency response plans were reviewed and personnel interviewed. Leadership understanding of Consignor ICMC responsibilities was excellent. All personnel demonstrated a high level of commitment to ensuring that cyanide shipments are made in compliance with ICMC requirements.

Orica at Colombia, Perú and Argentina has their respective emergency response plan for cyanide transport according to the corporative procedure Group Standard (GS)30. The Plans, are appropriate for each country supply chain to respond to potential releases of cyanide during transport. The Plans include details regarding the responsibilities of each actor of the cyanide supply chain, communications procedures to be used in case of incidents and an updated list of notification numbers for emergency responders.

TDM, within its management system, establishes the contingency plan, where care protocols are defined for an unwanted event. For this, they have the procedure Business Continuity Plan, which addresses among others, an action plan to deal with emergencies during different transport operations, including cyanide.

APM, DCR, Cruz del Sur and Orica´s transfer plant in this supply chain are ICMI certified and found to be in compliance with this Transport Practice. TDM was found in compliance with the Code during Orica´s Colombia preoperational ICMC audit as well as in the confirmation audit.

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Orica´s and its transporters Plans are appropriate for the selected transportation routes and include information specific to responding to emergencies within the supply chains. The Plans identify possible emergency situations as sodium cyanide release to road, land, surface water, robbery during transportation, including the interim storage facility at APM Inland Services in Ventanilla, Callao, Perú.

Orica Colombia Plan considers appropriate response actions for emergencies that could arise during cyanide transportation between Cartagena Port and the mining clients in the country. The plan was found to be up-to-date and appropriate for this solid sodium cyanide transport operation.

The auditor reviewed Orica´s and its transporters Plans during this audit. The Plans consider the physical and chemical form of the cyanide. The only form of cyanide to be shipped using this supply chain is solid sodium cyanide. The Plans include the sodium cyanide SDS where is defined the physical and chemical form of cyanide: solid white granular cyanide and specific information regarding the hazardous material to be transported. Emergency response procedures address actions to be taken in response to a solid sodium cyanide spill.

All Plans reviewed consider the method of transport by truck in 20 foot sea containers and isotanks to the mine sites. No other methods of transport are used in this trucking companies. The Plans consider the transport of cyanide in its own trucks and appropriately addresses the emergency response actions. The Plans were found appropriate for the selected transport routes, based on a review of the hazards and risk assessments after the completion of the route sheet. Whenever transport of sodium cyanide is performed, an evaluation is conducted.

The Plans reviewed consider all parts of the transportation infrastructures, as it was identified in the route risk analysis, including the conditions of the roads (mine road versus highway) and urban areas. The Plans consider the conditions of the roads, existing water courses, bridges conditions and danger of landslides on the route, among others and addresses the emergency response to events that occur in relation to these risks and hazards.

Orica and its transporters Plans consider the trucks design of the transport vehicles. They describe the appropriate trucks and chassis to use to transport cyanide, also indicates cyanide is transported in 20’ sea containers and isotanks.

The Plans define the appropriate trucks and chassis to use to transport cyanide. It states that must follow local regulation and that trailers must be of conventional type or of the low bed type. The plans indicate how cyanide will be transported and describes the appropriate trucks and chassis to use to transport cyanide.

All Plans reviewed include descriptions of response actions appropriate for the potential emergency situation. The Plans can be applicable for such cases individually as sodium cyanide release to road, land, surface water, robbery during transportation and interim storage and taken away by criminal suspect during transportation. The ERPs define steps from starting of emergency to finalizing the emergency situation. The detail response actions, responsibility and relevant external responder were defined in each step.

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Orica´s and it transporters emergency response plans include detailed response actions for each case, including spills in both current and standing open water bodies and for the other risks identified on the routes. The plans consider a series of instructions covering the potential hazards that could occur during the loading, transportation and unloading of the cyanide cargo, including emergency response actions against collision or rollover, spillage of dry cargo to water sources, on the road and landslides.

The Plans, also establishes the logical line of actions that the leader and convoy drivers must take when irregularities arise during transport of sodium cyanide, including civil commotion, adverse conditions, bad weather, traffic congestion and unplanned stops.

APM, DCR, Cruz del Sur and Orica´s transfer plant in this supply chain are ICMI certified and found to be in compliance with this requirement. TDM was found in compliance with the Code during Orica´s Colombia preoperational ICMI audit as well as in the confirmation audit.

Orica as the cyanide consigner, requires that each transporter implement its ERP for potential for accidents and releases. The responsibilities of each transportation company involved in this supply chain are described in the contract agreement with each transporter.

All ERPs reviewed in Orica´s Latin America supply chain companies clearly outline the roles and responsibilities of internal and external responders, as the customer, the medical facilities, fire fighters and local government. The police will provide support and safety to the transport units during the passage through cities and towns medical facilities and will take control of traffic routes in case of an accident.

TDM´s plan clearly outline the roles and responsibilities of internal and external responders, as the emergency response contractor *Destino Seguro*, the customer, the medical facilities, fire fighters and local government. The police will provide support and safety to the transport units during the passage through cities and towns medical facilities and will take control of traffic routes in case of an accident. In case of fire, the firefighters on arrival, will be advised by the trucking company personnel regarding prohibition of water on cyanide. TDM as a hazardous material transporter, has an agreement with emergency response contractor *Destino Seguro*, contractor that will be attending the emergency and will be in charge of the remediation measures.

APM, DCR, Cruz del Sur and Orica´s transfer plant in this supply chain are ICMI certified and found to be in compliance with this requirement. TDM was found in compliance with the Code during Orica´s Colombia preoperational ICMI audit as well as in the confirmation audit.

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Transport Practice 3.2

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

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

Orica requires in its emergency plans, that all its transport partners must provide emergency response training to drivers, convoy leaders and supervisors.

Training on emergency response in Orica is given periodically to convoy leaders and supervisors according to an Annual Training Program reviewed in the "Globo" intranet training platform. They are 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.

Orica´s Globo platform has been developed to provide remote (virtual) training and coaching to its employees according to the program, including cyanide hazards. Instruction material deals with risks of cyanide, poisoning symptoms, alert and first aids, medical treatment, investigation of facility failures, cyanide emergencies and cyanide recognition. The procedures to follow in the event of exposure are set out. The auditor reviewed several training records both in hard copies and in the recently implemented Globo platform, covering the recertification period.

Training in Orica Perú is also provided by Orica´s Transference Plant Supervisor, the Convoy Leader and by the Cyanide Transport Supervisor, all fairly experienced employees. The auditor reviewed training records covering the recertification period in the Emergency Response Plan, HAZMAT transport, first aids, use of personal protection equipment, SDS management, Job Safety and Environmental Risk Assessment (JSERA), among others. In occasion of the audit, the auditor was present during a cyanide convoy departure, where DCR drivers were interviewed showing good awareness of emergency procedures.

TDM drivers are trained in appropriate emergency response for diverse transport emergencies, including cyanide spills and exposures, firefighting and first aids among others. TDM personnel has an annual training program that includes training in cyanide emergencies. Transporter's TDM Managers and drivers were interviewed, and awareness of emergency procedures and documentation was confirmed.

All Orica´s supply chain transporters are ICMI certified and were found in compliance providing emergency response training to their personnel. TDM was found in compliance with the Code during Orica´s Colombia preoperational ICMI audit as well as in the confirmation audit.

Orica´s agreements describe the emergency response duties and responsibilities of each company involved in all his supply chain. The roles and responsibilities of relevant internal and external personnel are clearly described in Orica´s supply chain partner's emergency response plans. The roles and responsibilities of the Emergency Response Team are defined in the emergency plans. The Plans address actions to be taken in

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response to a number of different emergencies including spill, fire, and medical incidents. Contact information is kept up-to-date and revised as necessary. Emergency contact information is included for the Emergency Response Team members, local hospitals, and the local fire department. The information in the Plans was found to be acceptable.

Orica´s 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.

All Orica´s supply chain transporters are ICMI certified and were found in compliance. TDM was found in compliance with the Code during Orica´s Colombia preoperational ICMI audit as well as in the confirmation audit.

Orica and its transporters have defined in their respective emergency response plans the 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, area isolating tape rolls, HCN detector, cyanide antidotes, disposable respirators, oxygen, shovels, sweeps, polyethylene bags, and empty containers. Orica' s escort personnel are trained as first responders and several of them are active firefighters members.

TDM emergency response plan define 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.

All Orica´s supply chain transporters are ICMI certified and were found in compliance. TDMwas found in compliance with the Code during Orica´s Colombia preoperational ICMI audit as well as in the confirmation audit.

Orica requires the convoy escort vehicle to have a complete emergency response equipment, including personal protective equipment, spills containment kit and cyanide kit among others. It is also required the emergency equipment and materials to be checked prior to each cyanide delivery.

Each truck has the required emergency response equipment. The emergency equipment and materials are checked prior to each cyanide delivery. A checklist is used to verify that it is available and it is part in the operation files.

The auditor also found that Orica maintains appropriate emergency equipment at the Ventanilla Transfer Plant and from the documents review to the Peruvian trucking companies was found that the types of equipment maintained were appropriate.

All Orica´s supply chain transporters were found in compliance with this Transport Practice.

Orica personnel receives initial and periodic refresher training in emergency response procedures and was confirmed during the on-site audits. Training includes initial safety training inductions, safety briefings and scheduled formal training in emergency response.

As stated in the last SAR (Summary Audit Report) for and DCR, APM and Cruz del Sur transporters in the ICMI website, all transporters provide initial and periodic refresher emergency training to all his drivers and

employees. They use the emergency response plan as training material, the training results are recorded and maintained at least for 3 years.

During the interviews with the H&S Coordinator and drivers and convoy supervisors from DCR trucking company, they expressed to be trained in emergency response on cyanide (spill and intoxication), and other courses like defensive driving, firefighting, first aid and hazardous materials. Training is renewed annually complying with the training plans. In addition, prior to each operation the drivers receive refresher training regarding cyanide handling and emergency response. This training session is provided by the convoy leader prior to the start of the convoy.

TDM provides its drivers with appropriate level of training to enable them to fulfill their role in emergency response. TDM has provided formal training in cyanide emergency response to its personnel involved in the cyanide transport operation. Records were checked during interviews with TDM Managers and awareness of emergency procedures was appropriate. Prior to each cyanide transport operation, TDM provide the drivers with refresher training regarding cyanide handling and emergency response. This training session is provided by the convoy leader prior to the start of the convoy.

All Orica´s supply chain transporters are ICMI certified and were found in compliance. TDM was found in compliance with the Code during Orica´s Colombia preoperational ICMI audit as well as in the confirmation audit.

Orica ensures through contractual terms and periodic review that the emergency response equipment maintained by its trucking contractors is available at all times. Orica conducts routinely inspections to first aid kits and emergency equipment, according to his procedures; inspection records were reviewed. Among the control measures to adopt for the transportation of hazardous materials, the emergency plans addresses to perform inspections to the emergency response equipment before loading the truck. A checklist is used to verify that it is available prior the convoy's departure and it is kept in the operation file. The availability and completeness of the material was confirmed during the audit.

According to the SAR, DCR, APM and Cruz del Sur maintains personnel protective equipment and treatment equipment as defined in list and their respective emergency plan. The emergency response equipment in trucks and escort vehicles are inspected periodically and before each cyanide transport operation and results are recorded. In all cases, both the driver and the convoy supervisor have the responsibility to verify the readiness of the response kit for spills and poisoning (antidote kit), and personal protective equipment. This verification needs to be made before the start of the trip.

TDM ensures that the emergency response equipment is inspected and maintained to have it available when needed. Emergency equipment is checked as part of the pre-trip inspection process. This practice was confirmed through interview with their managers and drivers. A checklist is used to verify that it is available prior the convoy's departure and it is kept in the operation file. Completed checklist were reviewed during the audit.

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Transport Practice 3.3

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

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

Orica supply chain partners have developed procedures and maintains current contact information for notifying regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

Orica´s emergency response plans addresses actions to be taken in response to a number of different emergencies including spill, fire, and medical incidents. Contact information is kept up-to-date and revised as necessary. Emergency contact information is included for the local hospitals, and the local fire department. During the audits these information was found to be acceptable.

The Plans have current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

Depending on the magnitude of the emergency Orica will activate the crisis committee made up of the leaders of the supply chain of each country and also by the regional leaders in health and safety at work. Orica Latin America supply chain has a matrix of notifications depending on the categorization of the incident.

All Orica´s supply chain transporters were found in compliance with this Transport Practice during the ICMC audits.

Orica´s supply chain Plans requires that internal and external emergency notification and reporting procedures are kept current. Contact numbers and reporting information is reviewed at least annually, or as needed. During this activity, the phone numbers are checked for accuracy to ensure that internal and external emergency notification contacts are kept current. Records were available to show that this is done.

According to DCR, APM, Cruz del Sur and Orica´s transfer plant, all partners ensure emergency contact information is updated periodically as addressed in their respective SAR posted in the ICMI website. TDM was found in compliance in the ICMI confirmation audit to Orica Colombia supply chain.

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Transport Practice 3.4

Develop procedures for internal and external emergency notification and reporting.

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

As the cyanide consignor, Orica requires its transporters partners to describe how the recovery will take or neutralize the solid, the decontamination of soils, or other contaminated media and how these wastes are managed. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the documents.

Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within Orica´s ERP and its supply chain partner's emergency response procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the documents. The Plans address the immediately actions to follow in case of spills, preventive measures to avoid, cleaning methods and how to treat waste. Each transporter, with the help pf Orica, will perform spill cleanup and remediation in case of small cyanide spills.

TDM has developed, the immediately actions to follow in case of cyanide spills, preventive measures to avoid, cleaning methods and how to treat waste. TDM has an agreement with the external contractor Destino Seguro Specific regarding the remediation, neutralization, decontamination, and disposal of clean-up debris.

According to the DCR, APM, Cruz del Sur and Orica´s transfer plant summary audit reports, the Plan are ERP is appropriate to overall emergency situations and is defined the procedure for recovery and protect for released sodium cyanide, decontamination of soil and water, control & disposal of wastes etc.

Orica and its supply chain partner's procedures specifically prohibit in the ERP the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water. The ERPs 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.

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Transport Practice 3.5

Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

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

Orica partners in the supply chain periodically review their emergency response plans and evaluates the Plan's adequacy. Orica states that it must be updated periodically when the conditions or circumstances of the transfer plant and its activities vary significantly. Also states the Plan will be updated according to the results of the drill or when an emergency occurs; in other cases, possibilities for improvement are identified for emergency care The Plans reviewed for Orica Perú, Colombia and Argentina as well as TDM´s Plan , were maintained as latest versions and under formal document control. The plans states to be reviewed once each year. Records were available to show that this is done.

According to the DCR, APM, Cruz del Sur and Orica´s transfer plant ICMC summary audit reports, all these supply chain partners were found in compliance during their respective certification audit.

Orica partners in the supply chain periodically conduct mock emergency drills and evaluates their performance, according to the ICMI SARs, they check the overall process and adequacy of emergency response plan and recorded the results.

At Orica emergency drills are conducted regularly with all necessary personnel (all people who would be expected to respond to the emergency). Records were available during both on-site Due Diligences.

During the current operation, Orica conducted several drills. In all cases the scenarios were analyzed, and recommendations developed. The scenarios highlighted several issues during the evaluations processes. The recommendations have been highlighted in the debrief reports and responsible persons have been assigned to close out the required actions.

During the current operation, Orica conducted several drills. In all cases the scenarios were analyzed, and recommendations developed. The scenarios highlighted several issues during the evaluations processes. The recommendations have been highlighted in the debrief reports and responsible persons have been assigned to close out the required actions. The auditor reviewed the drill reports finding to be effective. The scenarios simulated human exposure with the testing of the decontamination procedures.

Orica´s ERP requires to be evaluated and a report produced, including a photographic record, chronological record, and final recommendations, after any emergency that required its implementation. Such reviews have not been conducted as the Emergency Plan was not activated to date.

During this recertification period the emergency response plan was not activated due to an incident. No review of the Plans was performed for this reason.

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