TRANSPORTES VERASAY SPA

Cyanide Transport Operation in Chile

Summary Audit Report

for the

International Cyanide Management Code

May 2025

Tel +51 947 259 440 | Email bpizzorni@cyanideauditor.com | Web CYANIDEAUDITOR.COM

Contenido

Operation General Information

Name of Cyanide Transportation Facility:	TRANSPORTES VERASAY SPA
Name of Facility Owner:	TRANSPORTES VERASAY SPA
Name of Facility Operator:	TRANSPORTES VERASAY SPA
Name of Responsible Manager:	Carlos Malefante Cruz
Code Certification Leader:	
Address:	Fundo lo Mandiola Lote-B Ruta C-35, Tierra Amarilla, Region de Atacama
State/Province/Country:	CHILE
Telephone/E-Mail:	+56522256904 / cmalefante@verasay.cl
Dates of the audit:	29, 30, 31-OCT-2024

Location and Description of the Operation

Transportes Verasay Ltda. (Verasay) is a sodium cyanide transporter to mines in Chile and was founded in the 1950s. The original focus was the transport of minerals in the South American region. In the 1960s, Verasay extended its transport coverage to Santiago, Copiapó and other intermediate cities. Verasay has been providing professional transport of hazardous materials for decades. Verasay currently operates with its headquarters in the city of Copiapó. Verasay's processes are certified to ISO 9001:2015, ISO 14001:2015, ISO 45001:2018 and becomes a Signatory to International Cyanide Management Code since 01-dec-2009.

Transportes Verasay has a large range of trucks and tractors with different capabilities, selected specifically for each of the services they perform. Verasay transports cyanide to different mining operations within Chile in sealed containers, from the ports of Valparaiso, Mejillones, Antofagasta and San Antonio. Cyanide from the port of Antofagasta is transported by Verasay directly to mine (ca.80% of all transport) or to an interim storage located at La Negra, a 30 minutes' drive from the port (ca.20% of all transport). An on-site audit of the La Negra interim storage location was part of this audit. Cyanide from other ports is transported directly to the mines, without stopping at secondary storage facilities. Verasay transports cyanide produced by Draslovka Mining Solutions (previously The Chemours Company), among others.

The interim storage of sodium cyanide in maritime containers is managed by Verasay in an open yard on its property. In accordance with the client's requirements, the containers holding cyanide are dispatched to

mine operations. Depending on the free demurrage period of the maritime containers and the mine's dispatch schedule, the containers may remain sealed or be opened to transfer the sodium cyanide packages to another maritime container.

The interim cyanide storage is in the commune of Antofagasta, specifically in the industrial neighborhood La Negra, Lot PA-470, 17 km SE of the Port of Antofagasta at the intersection of Routes 28, B-475 y 5. The facility is used periodically, depending on the client's needs of sodium cyanide, the general length of time containers is stored in the facility is less than a month. In occasion of the audit, there was no cyanide stored.

Cyanide is transported to Chile by ship. Unloading of the cargo ships is performed by the Port Authority which releases the container by placing it on a truck's trailer. At this point, the cyanide becomes the responsibility of the transporter and the consignor. The transport routes from Chile's Ports to the different mines are from 163 to 1,232 km long. The preferred ports are those with the shortest route to the mines. They perform services from ports to mining sites, through caravans of trucks with escorts.

At the time of the audit there are two routes to which Sodium Cyanide transportation services are being provided,

1) Salares Norte (Gold Fields): Puerto Columbo – Salares Norte;

2) La Coipa - Mantos de Oro (Kinross Gold Corporation): Mejillones Port – La Negra – La Coipa (Mantos de Oro). The loading of the container is the responsibility of the Port, and the unloading of the container is the responsibility of the Mining company. There is no travel at night and the units do not stop in places other than authorized ones.

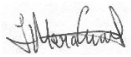
Auditor's Finding

The International Cyanide Management Institute (from now ICMI) ICMI-approved Auditor verified that TRANSPORTES VERASAY SPA **is in Full Compliance** with ICMI Cyanide Code requirements for Transport operations.

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

Auditor's Information

Audit Company:	Cyanide Auditors S.A.	
Lead Auditor	Álvaro Fuentes Huanqui	Signature:
Lead Auditor Email:	Alvaro.fuentes@e-quelle.net	

Technical Auditor for transport	Marcos Mera Escala	Signature: 
Date(s) of Audit:	29, 30, 31-OCT-2024	

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

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

TRANSPORTES VERASAY SPA		JANUARY 20, 2025
Name of Operation	Signature of Lead Auditor	Date

Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

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

The company has a general Procedure for Land Transportation of Sodium Cyanide from Ports or Warehouses to different clients (P2-10), includes "Route Evaluation Procedure" P1-13-I-04, includes determination of the route, main cities, background for description and categorization of the route, considers Population density, Infrastructure (roadway, rail, port) construction and condition, Pitch and grade, Prevalence and proximity of water bodies and fog.

We reviewed the Case is evident: Minera Mantos de Oro, its specification is for land transport of sodium cyanide from ports in Chile to Compañía Minera Mantos de Oro P2-10.03 is reviewed every 02 years. The details of the route, road condition, slopes, sharp curves, landslides, slippery roads, bad roads, bridges, snow areas, proximity to bodies of water, type of population and density, type of traffic are included. It includes the requirements of the drivers, the requirements of the client. The evaluation and selection of routes are limited and approved by the governmental authorities through the authorization RCA (Environmental Qualification Resolution, for its acronym in Spanish), to transport dangerous goods through roads and cities. Routes selection is also limited because by the route authorized by the clients, the mining companies.

The routes evaluation and selection reports include 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.

Records of completed route risk assessments and approvals were found to be acceptable for all documented routes. In many situations, there is only one truck route possible. Verasay management personnel performs the risk ranking with input from truck drivers, road information available through the internet and personal knowledge of the routes. When options exist, the route with the lowest risk is chosen to minimize the potential for accidents and/or releases. Interviews confirmed that drivers adhere to designated routes and request authorization prior to deviating from the established routes.

Verasay's procedure P2-10 Cyanide Transport mention that every route used prior to the service must have a technical evaluation based on what is established in the procedure for route evaluation, P1-13-I-04 includes two appendices Route Evaluation and Risk Assessment. Risks such as pitch and grade of roads, traffic congestion, seasonal traffic issues, and proximity to water bodies were considered during the

development of the routes. In some cases, the pitch and grade of the roads are significant and transit through cities is a lower risk. Stakeholder input (cyanide producer, mine customers, and local authorities) is considered when routes are determined. Appropriate risk mitigation measures are used. Weather conditions are constantly monitored and deliveries are postponed if a route is unsafe.

P2-10 Cyanide Transportation, General Procedure for Land Transportation of Sodium Cyanide from Ports or Warehouses to different clients, within point 6 Functions of the convoy leader (solely responsible for the development of transportation), in clause 6.18, mentions that upon arriving on a trip, the Convoy Leader must write down his observations and/or comments on the route in his travel log, specifying the date, as well as comments on the route if there are abnormalities. From this, a Trip Report is derived that will be sent to The Supplier. It also includes in the point 6.19 From the information obtained from the Convoy Leader's report, the route evaluation, contained in this procedure, will be updated, as well as subjecting this system to continuous improvement upon arrival of the trip.

Every time a trip begins, the preventionist and the driver generate the Operational Risk Analysis (ARO) and Essential Transportation Permit (PET) P1-13-F30. There are cases of Cyanide transport from Mejillones Port – La Negra – Mantos de Oro, includes work stages, potential incidents/risks and control measures as well in case is Land transportation of sodium cyanide Valparaiso – Salares Norte (Gold Fields).

Transportes Verasay has implemented the MIGTRA platform, which considers in its compliance evaluation the speeds established, therefore, in this specific case the supervision area must request reports and compare the speeds entered with those evaluated on the ground, asking for change as appropriate.

The routes for hazardous substances are approved through the Environmental Qualification Resolution (Spanish acronym: RCA), issued by the Environmental Impact Assessment Service (Spanish acronym: SEIA) under the Ministry of the Environment. The approval covers the route, origin, destination, tonnage, substance, quantity to be transported, and the transportation technology.

Transporte Verasay submits an Environmental Impact Declaration (Spanish acronym: DIA) to the SEIA, which then requests input from various state organizations with environmental oversight (Spanish acronym: OAECA). These include the SEREMI for the Environment in the Atacama region, the SEREMI of Public Works (MOP) in the Atacama region, SERNAGEOMIN, the National Fishing Service, municipalities along the transportation route, and other relevant stakeholders, with opportunities for citizen participation.

Transportes Verasay has RCAs applicable to Cyanide, shared on the public platform of the Ministry of Environment for the different routes of transport.

At the time of the audit there are two routes to which Sodium Cyanide transportation services are being provided, 1) Puerto Columbo – Salares Norte (Gold Fields); 2) Mejillones Port – La Negra – La Coipa (Mantos de Oro - Kinross).

In the case of Gold Fields, 01 or 03 units plus escort pickup truck including the safety supervisor, as leader of the convoy.

In the case of Mantos de Oro, 03 units plus escort pickup truck including the safety supervisor, as leader of the convoy, in some exceptional cases there are 06 units, but the number of safety supervisor does not change.

In both cases, the escort pickup trucks carry the emergency response kit (first response), which includes satellite phone, antidote, among others, within the emergency response team.

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.

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

All Verasay drivers are licensed to operate the transport equipment according to jurisdictional requirements. They have a professional A-5 class driver's license that allows them to drive articulated vehicles weighing more than 3,500 kg. All drivers transporting cyanide have an initial training P2-60 (new man induction transport driver Safe operation of equipment for transporting dangerous and non-hazardous cargo) P2-60-2 (hazardous materials transport), indicated in P2-10 Transport of Cyanide in 4.2 human resources requirements.

P2-10 Cyanide Transport Rev.02. 4.2 human resources requirements include training in defensive driving in high mountains, risk evaluation, safety standards in management of cyanide. During the hiring process, drivers must also go through a process of medical examinations, including psychological tests. Requirements are detailed in the procedure Identification, Description and Job Profile.

Operational training is given upon hire and there is a skills evaluation process to ensure that drivers are competent to perform their jobs and able to drive the designated route prior to their first solo 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 release and exposures. The training is carried out using videos, computer-based training, and classroom sessions. Drivers were interviewed and were found to have an appropriate level of knowledge and safety awareness.

The auditors verified that such training has been provided and that it has included elements appropriate to the nature of the transport and the responsibilities of the operator. Specific training records reviewed included: cyanide transport, emergency response, first aid, dangerous goods with an emphasis on cyanide, defensive driving, alcohol and drug prevention policy, and chemical handling safety. The auditors reviewed training material including the cyanide transportation work procedure, and the reach stacker operator and forklift certificates and attendance records made up of signature sheets. The auditors also interviewed the transport supervisor of the equipment verifying that they have received the training. Training is refreshed periodically and testing is performed to confirm competency.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

There is a general procedure for land transportation of sodium cyanide from ports or warehouses to different clients P2-10 Cyanide Transportation, which includes clause 4.3. Characteristics of the trucks, Transportes Verasay uses its own trucks. The age of the trucks does not exceed the legal requirements of 15 years and the years of age are determined by the client. In the case of Gold Fields, it requires units no older than 7 years and the client Mantos de Oro requires units no older than 5 years min 380-420 HP.

The technical requirements for semi-trailers up to 15 years according to legal requirements.

There are two types of maintenance, internal and maintenance carried out by the dealership until the end of its warranty.

The gross weights of the shipment are available in the electronic delivery guide generated by the supplier of sodium cyanide in Chile DRASLOVKA CHILE LTDA. In which the gross weight to be transported per container is indicated.

Truck inspections and preventive maintenance actions are performed regularly to ensure that the equipment is safe to operate and that it can continue to carry the loads for which it is designated.

In addition to ensuring that the load capacity of their transport equipment indicated by the manufacturer is adequate, the carrier also verifies that the capacity of that equipment is adequate by inspecting and testing their equipment to identify signs of stress or overload, including a checklist to verify the adequacy of the reach stacker for the loads it must bear. For this purpose, it uses a routine preventive maintenance

inspection program. The auditors reviewed completed inspections records and through interviews with maintenance personnel and equipment operators confirmed compliance with this provision.

Verasay is responsible to verify the adequacy of the equipment for the load it must bear according to their procedures, performing inspections regularly before departing the cyanide convoy.

The maintenance program is well organized, defined checklists showing all necessary maintenance activities are used and records were available to demonstrate that equipment is checked regularly. Regulatory-required inspections are scheduled, tracked, and documented. Each tractor and trailer have its own file that is maintained. The file shows all preventive maintenance activities, repair activities, and inspection activities that were performed on the truck and/or trailer over time.

The transportation procedures establish that the convoy leader must inspect every truck and trailers prior to departure. A checklist, which includes questions about the truck's condition, the driver, the required documents, and truck accessories, is used to document the inspection. A checklist form is completed for each truck in the convoy.

Within P2-10 Cyanide Transport Rev.02, 4.3.7 is included. It mentions that only one container can be loaded per trailers and each tractor can only haul one trailer. Secured the container to the twist locks of the trailer. This is consistent with the information included in the inspection checklist and was confirmed during interviews with the convoy leader.

P2-10 Transportation of Cyanide Rev.02, indicates No shipment may be split. Sodium cyanide should not be deconsolidated from the container that brings it; therefore, the trailer truck assembly must withstand the total weight and comply with the maximum weight law per axle that each country has.

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. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weights are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. Office personnel and drivers showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

Shipping paperwork and Verasay´s policies 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.

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

Procedure P2-10 Cyanide Transportation Rev.02 mentions that you will not be able to carry other loads along with sodium cyanide. You will not be able to split any shipment. Sodium cyanide should not be deconsolidated from the container that brings it; therefore, the trailer truck assembly must withstand the total weight and comply with the maximum weight law per axle that each country has. Prior to the departure of the trucks from the carrier's premises, the Convoy Leader will be responsible for the final visual inspection of each of the trucks that transport the sodium cyanide to the destination, which will include the correct condition of the containers, as well as the twist lock assurance, will keep these inspection records in its files for eventual verifications. Container inspection checklist is evident. Perform the visual inspection of the trucks together with the driver of the inspected vehicle, before being loaded with the container or immediately after the container has been loaded and ensure that the resulting information is what appears on the check list.

Equipment inspections are done every day before the trip. Review of the condition of the containers, that they are suitable for travel, without holes and with the identification labels for solid sodium cyanide (1689) and Maritime Pollutant.

The inspection covered the truck, driver, documents, and controls. It also included verification of the security seal used to seal the container at the point of origin. The seal is only opened at the mine when shipped directly. In cases involving the intermediate warehouse at La Negra, if the container must be opened, the security seal is replaced with a padlock and a new seal provided by Transportes Verasay.

There are legal requirements: Supreme Decree 57 - Storage and transportation of dangerous substances, indicates the signage required for dangerous substances in the transportation of dangerous materials. Supreme Decree 298 - regulations for the transportation of dangerous loads by road. Indicates the obligation of Signage on the 4 sides of the unit, National Fire Protection Association (from now NFPA) diamond, UN 1689, hazard class 6.1 and Maritime Pollutant. The maritime container comes with signage from the supplier DRASLOVKA, in the event that container boxes are transferred to another container in the intermediate warehouse La Negra, Transportes Verasay places the respective signage on the new container. A truck inspection checklist is evident, which includes verification of the truck labeling.

Shipments of cyanide are identified with the plates and signage required by local regulations and international standards. The auditors inspected the plates and signs used to identify the presence of cyanide in transport vehicles and concluded that this requirement is being met. Transportes Verasay mandates that all sea containers display the appropriate placards indicating UN 1689 (solid cyanide) on all four sides. Additionally, drivers are required to visually inspect the containers before each movement, a process verified through the vehicle inspection checklist.

The convoy leader carries additional placards in case one or more are missing from the container. Operation files were reviewed, and the presence of placards was confirmed through the inspection checklists. Equipment markings were found to be adequate and compliant with the required standards.

Within P2-10 Cyanide Transportation, it mentions that the inspection of the trucks must be carried out together with the driver of the inspected vehicle, before being loaded with the container or immediately after the container has been loaded and ensure that the resulting information is what appears in the check lists. Equipment inspections are done every day before the trip.

Drivers conduct pre-trip inspections before the vehicle departs to the port facility for loading (documented through the vehicle inspection checklist). Issues that would affect safety and/or legal compliance are resolved prior to moving off-site. Confirmation was made during the interviews with the trucking company management that perform pre-trip inspections to ensure that trailers are locked and secured and that placards are on all four sides of the trailers, that they perform preventive maintenance to their vehicles according to a stablished schedule. Drivers were also interviewed and demonstrated good understanding of the process for performing pre-trip inspections. Drivers perform a driver vehicle inspection at the end of each day of operation. Pre-trip inspection checklists were reviewed and found to be acceptable.

It also mentions that the trucks and trailers will be under a preventive maintenance program. Transportes Verasay has developed and implemented a procedure for preventive maintenance of its vehicles and trailers, the document named “Maintenance and Repair of Units, Equipment, Trucks and Compressors” code P2-02. Frequency of maintenance activities is as specified by the vehicle manufacturer and as scheduled; it informs the various areas weekly to make the vehicles available for maintenance and reports weekly to operations on the operating hours of the vehicles. Pre-defined checklists showed the required maintenance tasks are used to record actions. The incoming and outgoing condition of the equipment is recorded on the checklists and associated repair orders.

For vehicles out of warranty, the repairs and maintenance are carried out in the Transportes Verasay´s headquarters workshops in Copiapó. The maintenance for the reach stacker is carried out by the transporter in the temporary warehouse facilities. The maritime containers are inspected upon receipt of the sodium cyanide in the port, any damage to these is recorded and reported to the port, the cyanide consignor and the mining client and according to this a decision is made about to transport the product or not. Transportes Verasay does not maintain maritime containers.

The auditors reviewed maintenance records including records of completed work orders and interviewed employees to determine that this provision is being complied with. Records were sampled for tractors and trailers covering the recertification period and were found to be acceptable. Records indicate that the maintenance is being conducted as scheduled. The preventive maintenance program was found to be compliant.

Transportes Verasay limits the drivers’ hours of operation. The drivers of the trucks that transport sodium cyanide to their final destination must have rested at least 8 hours before the start of the trip.

The workday of Drivers traveling with sodium cyanide may not exceed 12 discontinuous hours per day, allowing stops every 2 hours for 10 minutes or more to check the equipment, food and others. At the end of 12 hours, the driver must rest in his bunk or equivalent for 8 hours. should not drive for over twelve consecutive hours. Breaks are at pre-selected stop points where the risk has been assessed and ranked as low. The convoy leader ensures that these are the only pre-established stops. The fulfillment of these requirements was confirmed through the operation logs Convoy Control and Monitoring, and the procedure P2-21 Fleet Monitoring via GPS, and interviews with the drivers and the convoy leader.

The Safety Program includes limitations on drivers' hours in accordance with local regulations and states that drivers transporting cyanide only drive during day light hours. Drivers are informed of the legal requirements regarding limits on driving hours.

Once out of port, the driver must position the twist lock anchors (twist locks) in the securing position. This must be verified by the Verasay supervisor (escort).

Verasay´s transport procedure requires drivers to perform pre-trip inspections validated by the convoy leader to ensure that trailers are locked, and containers secured. Trailers have pins where the container is embedded preventing it from shifting. Cyanide travels in sealed containers, which are secured to the trailer safely, minimizing the possibility of displacement during transport. The transport procedure establishes that load shifting within the container is not considered possible as all containers are filled with twenty boxes and block and brace is applied at the cyanide production plant to prevent load movement.

The movement of the convoy will depend on climatic/social/political/environmental conditions. The supervisor accompanying the convoy, as leader, consults with the Verasay Transportation Contract Administrator to decide whether the trip stops or continues. Additionally, the client can contact the transportation company to communicate any condition that requires suspension or modification of transportation.

Drivers and convoy leaders are empowered to pull over whenever weather, fatigue or other conditions are unsafe to continue a trip. In such instances the convoy leader is to call into the office. Prior to departure, the convoy leader assesses the weather conditions and gets information about political issues on the road. If he deems it necessary, he can postpone the trip and this decision is communicated to the mine and the cyanide provider. This information is recorded in the convoy control vehicle and follows the format included in the operation file. This policy was reviewed and confirmed through driver interviews.

The transporter has a drug abuse prevention program which includes drugs as well as alcohol. Prior to the departure of every shipment the drivers are given an alcohol test (blow tests were documented in the convoy leader report). The auditors reviewed several alcohol testing registers for the re-certification audit period. The records were found to be acceptable.

Records were available to demonstrate that the requirements of each of the above-mentioned safety programs for cyanide transport had been fulfilled. Records are maintained in hard and electronic copy at the office. Record retrieval was found to be acceptable.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

Verasay does not ship cyanide by sea or by air. This section of the Cyanide Code does not apply to the operation.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Yes, the convoy has a fixed radio in each unit, for communication between the transport units, the convoy leader and the mining company if it is in their facilities. All personnel have a cell phone and in case of dark areas, the convoy leader has a satellite phone. All units are monitored by GPS. The GPS sends the satellite location every 5 seconds when it is on and 30 minutes when it is off, it sends location, speed alarms, GPS antenna cutoff, hours worked, severe braking, preventive maintenance and prohibited stops.

The auditors verified that the transport vehicles and drivers have means of communication such as radio and cell phone, carry written procedures and a checklist where the necessary equipment for each shipment is reviewed. Vehicle operators have the contact information for emergency notification to appropriate individuals and organizations and entities along the route as needed to mobilize appropriate response capabilities.

GPS is tested continuously with fleet control equipment. Mobile equipment such as cell phones and satellite phones are included in the emergency kit pre-trip control checklist P2-10-F-01. The light vehicle checklist P2-60-F-02 verifies that the radio is operational.

The communication and tracking equipment are part of the pre-trip inspection and is maintained along with the formal preventive maintenance program for each tractor. Each truck has a GPS. A demonstration of real-time tracking capability was observed during the audit. The system is used each day and correct operation of the system is confirmed at that time. Communication equipment is tested prior to the

departure of the convoy. The test is part of the vehicle inspection checklist. The auditors reviewed completed pre-trip inspection records checking that these include fields allowing to review the correct operation of the communications equipment.

According to the interview with the convoy leader, there are areas with no cellular coverage; however, the convoy leader carries a satellite phone which has coverage all along the route. In addition, trucks have a two-way radio transmitter. Trucks are monitored along the route in real time, and any delay will be immediately noticed at the control board. The auditors interviewed the operators and also inspected the travel records verifying that the procedure is applied.

Yes, In the procedure P2-9-F-01 Tracking and control by Convoy Monitoring, which fills out the convoy supervisor, it includes time, activity and location. In addition, a WhatsApp group is created that includes all management, contract administrator, supervisors and risk prevention advisors. In the WhatsApp it indicates the activities during the tour, such as arrival, start of unloading by units, convoy departures.

Verasay has GPS units in each truck, a procedure P2-21 Fleet Monitoring via GPS describing the GPS tracking system and a full-time operator which allows continuous monitoring of the location of the convoy. The convoy leader communicates with Verasay´s Traffic Coordinator upon dispatch, upon arrival at the customer sites, and after unloading is complete. The procedure establishes that the convoy leader must report the progress of the convoy at pre-selected points. The progress report is provided by phone to the base which informs the interested parties of the convoy's progress by email. A tabular report is generated with the estimated and actual time of arrival to the selected stop points. Any incident is reported immediately to Verasay and to the interested parties.

Personnel responsible for tracking the shipment status from Verasay were interviewed, the GPS system was demonstrated, and logs showing that shipment status were reviewed and were found to be complete. Verasay's procedure for tracking of a shipment's status was reviewed during the audit and found to follow current practices.

Inspection of the security seal that seals the container from origin is included and the seal is opened at the mine when it is shipped directly. In the case of La Negra intermediate warehouse and the container must be opened, the security seal is replaced with a padlock and another seal from Transportes Verasay.

The transport document (Delivery Guide) issued by the cyanide provider is carried by each driver and a copy is carried by the convoy leader. The transport document (delivery guide) includes the number of the container and net weight. The mine stamps the delivery guide as received when it arrives. This document is used for invoicing and 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 in person by the driver and remotely through the Verasay dispatch office. Drivers were interviewed regarding this process of monitoring amounts delivered and maintaining control over the shipment. Awareness and process knowledge was excellent.

Shipments that involve interim storage utilize a chain of custody procedure by means of the Customs delivery Guide with a sign-off upon receiving the cyanide in the interim storage yard and when delivering it

to the mine site. The procedure includes inspection of locks or seals on sea containers. The auditors reviewed its implementation through inspection records of the delivery Guides completed during the shipments and through interviews with operators.

The gross weights of the shipment are available in the electronic delivery guide generated by the sodium cyanide supplier DRASLOVKA CHILE LTDA., in addition to the safety data sheet that is included with the convoy. There are physical documents in the units included in the unit folders, during truck inspections it is verified that the safety sheets are available.

Shipping paperwork is conformant to Cyanide Code 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. The drivers have an on-board file that includes copies of his/her training, licenses, and the sodium cyanide MSDS. The convoy leader confirms that these documents are available prior to travel. The amount of cyanide delivered is carefully monitored in person by the driver and remotely through the Verasay office.

Principle 2 | INTERIM STORAGE

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

Transport Practice 2.1

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

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

Signs have been installed in visible places warning about the presence of cyanide, about the prohibition of smoking, generating open flames, eating and drinking in that area. The sign with the mandatory use of Personal Protective Equipment (PPE) is also specified, in accordance with the general safety program in the staging facility and the training that personnel receive.

Also, there are signs about the emergency meeting point and warning about the stacker and forklift operations.

Cyanide is stored securely, without access to the public, within a fenced area, with limited access to the area. Only authorized personnel enter this area. The temporary storage area is checked and monitored 24/7 with a security guard. The auditors verified that the measures are appropriate through an inspection of the site.

Transportes Verasay considers the separation of incompatible materials as a common practice in the handling of hazardous materials and is a specific consideration when it comes to the storage of cyanide, keeping it away from incompatible products such as acids, strong oxidants and explosives. During the site visit, the auditors verified that storage of cyanide is carried out in accordance with what is indicated in the standards of material compatibility tables. When the containers of sodium cyanide are stored in the interim storage, Verasay tries to not schedule the storage of the containers of other products in this temporary warehouse.

The sodium cyanide is stored exclusively in 20-foot sea containers, which are enclosed to prevent contact with rain. Although the Antofagasta region is classified as arid and experiences a desert climate, with minimal annual rainfall averaging just 148 mm, proper precautions are still taken.

There is no water piping system for drinking water in the area. However, a safety shower is installed near the cyanide storage area and is specifically designed to prevent any potential water leaks from coming into contact with the cyanide containers. Auditors inspected the storage facility and confirmed that all necessary requirements have been met.

The containers with solid sodium cyanide are stored in an open yard and therefore they have sufficient ventilation that prevents the accumulation of cyanide dust and hydrogen cyanide gas. The auditors inspected the storage facility confirming compliance with this provision.

The floor and surrounding walls of the storage yard provide sufficient secondary containment for trucks with solid sodium cyanide shipments. Transportes Verasay has established measures to control any release of solid sodium cyanide, such as procedures, trained personnel, materials and tools to collect any cyanide release.

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

They have document P2-11 Procedure for action in case of cyanide transport emergencies and the Emergency Transfer Procedure P2-11.01

The Emergency Response Plan (ERP) fully complies with all Code requirements for the transportation of cyanide. The most recent version of the plan has been reviewed and deemed acceptable.

The convoy leader's primary responsibilities during an emergency are to notify the relevant parties and isolate the affected area. After notification, the management and resolution of the emergency are handled by designated emergency responders or mine personnel if the incident occurs at a mine site.

All drivers receive training in hazardous materials handling and emergency response safety. Additionally, they always carry a copy of the Emergency Response Plan during cyanide transport.

Verasay exclusively transports solid sodium cyanide via truck, and the ERP addresses scenarios specifically related to truck accidents. The plan also covers considerations such as roadway infrastructure variations, the physical properties of solid sodium cyanide, and the roles and responsibilities of various emergency responders.

Document P2-11 Procedure for action in case of cyanide transport emergencies, includes within the scope of the procedure its applicability to all emergencies that occurred during the transportation of sodium cyanide and to all persons, property and the environment affected by said emergency. Applies to the two transportation routes reviewed during the audit.

Document P2-11 Procedure for action in case of cyanide transport emergencies, includes in point 5 the physical and chemical form of cyanide.

Document P2-11 Procedure for action in case of cyanide transport emergencies, includes within the scope of the procedure its applicability to all emergencies that occurred during the transportation of sodium cyanide and to all persons, property and the environment affected by said emergency. Additionally, point 6. includes the transportation methods, which include the type of cargo and the required transportation infrastructure and vehicle design.

The document P2-11 rev13 Procedure for action in case of cyanide transport emergencies, includes in point 7, Transport infrastructure and this is carried out through the preliminary route evaluation (roadmap/parameter of the degree of risk and complete with the reports made by the escorts after each trip - P2-09-F-01 Follow-up and control by monitoring the convoy.

The document P2-11 rev13 Procedure for action in case of cyanide transport emergencies, includes in point 8 vehicle design which includes the maximum age of the tractor truck of 15 years, on-board radio communication system, tachograph system duly configured with driver information, Semi-trailers (trailers) with or without railings and twist locks in good condition, signage in accordance with the regulations for the

transportation of sodium cyanide (Supreme decree 298), maritime containers from 20 to 40 feet in good condition, maintenance plan current equipment and day.

Document P2-11 Action in cyanide emergencies, point 11 and in the Emergency transfer procedure P2-11.01 - REV08 point 5.1, both mention the emergency situations provided. In the case of ERP P2-11 Action in response to cyanide emergencies, the following emergency situations have been identified:

- Incident without injuries / continues trip
- Mechanical problems / trip does not continue
- Overturning with spill
- Spill in water/snow and when it is raining
- Tip-over without spill
- Truck Fire
- Crash with injuries / without injuries
- Crash / driver disabled
- Forest fires
- Affectation of flora and fauna
- First aid, hydrogen cyanide gas poisoning

The plan include descriptions of response actions, as appropriate for the anticipated emergency situation, including the actions before , during and after the emergency situation.

In document P2-11 action in cyanide emergencies is included in point 11.3, the support of the ambulance, firefighters, even in the case of a water/snow spill, the third company with whom the remediation is carried out is included and the second responder AMBIPAR (formerly SUATRANS), a commercial contractor specialized in environmental remediation and adequate final disposal of contaminated materials and debris.

In the drill report, overturning with spill and first aid, and evidence of participation of firefighters, SENAPRED, police, and representatives of the mining sector as evidence of the communication of their functions in an emergency response. The Emergency transfer procedure P2-11.01 point 5.1.4 includes also AMBIPAR functions for the case of spill.

Transport Practice 3.2

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

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

The organization has an internal training and induction procedure, P2-60, covering defensive driving and the safe operation of equipment for transporting both dangerous and non-dangerous cargo. This procedure includes the P2-60 Induction Course, designed for new employees and pre-professional drivers involved in cargo transportation. The training encompasses general emergency actions, such as responses to mechanical failures, threats, fires, accidents, spills or leaks of dangerous substances (distinguishing between leaks of less than 200 liters and those exceeding 200 liters), and weather-related emergencies. It also incorporates an emergency communications diagram.

Before being authorized to operate as a driver, new employees are required to complete 2–3 accompanied trips under supervision.

Additionally, the organization has implemented a 2024–2025 corporate training program that includes sessions such as the annual 175 Emergency Plan Training. The organization provides refresher emergency response training to appropriate personnel at least ones a year and when the Emergency Respond Plan has changes.

P2-11 Procedure action facing cyanide transport emergency, in chapter 3 about responsibilities, includes responsibilities for management, safety escort, contract administrator, emergency chief and driver.

Emergency transfer procedure P2-11.01 - REV08, in chapter 3 about responsibilities, includes responsibilities for management, person in charge of the Storage Yard, Convoy Leader Supervisor, Emergency Response Group, operator.

The Emergency Transfer Procedure P2-11.01 , which includes the Emergency Kit Inspection Form and Support Equipment, Ambu, Oxygen bottle 8 L, Tyvek overall, Pairs of leather gloves, Pairs of rubber boots, Goggles or safety glasses, Pairs of waterproof gloves, Rolls of danger tape, Flashlights, Roll of cloth sealing tape, Cyanide gas detector, Cyanide in water analyzer equipment, N95 or KN95 masks, Ampoules of amyl nitrite, shovels, among other materials.

Before each trip, check list P2-10.03 is filled out, land transportation of sodium cyanide from ports in Chile to the Mantos de Oro mining company. Emergency kit pre-trip control checklist.

The auditors reviewed the completed checklist of the equipment and materials to make it available and ready for use as required in the Emergency Kit, covering the recertification period.

The Emergency Transfer Procedure P2-11.01, check list P2-10.03, land transportation of sodium cyanide from ports in Chile to the Mantos de Oro mining company. Emergency kit pre-trip control checklist. Safety equipment for emergencies is included such as Tyvek overalls, leather gloves, rubber boots, safety glasses, waterproof gloves. In addition, there is a truck inspection record that includes space for driver PPE.

The convoy leader transports all the emergency equipment listed. The contents of the emergency equipment are listed on a checklist. The content is checked prior to each cyanide delivery. The emergency equipment is transported in the safety escort vehicle (including PPE, safety equipment, etc.). Drivers also carry PPEs in the trucks. In addition, amyl nitrite ampoules and a cyanide gas detector are transported inside

the safety escort vehicle. A checklist is used to verify that it is available. The checklist is part of the operation files.

The emergency transfer procedure, P2-11.01, and the pre-trip checklist, P2-10.03, govern the land transportation of sodium cyanide from ports in Chile to the Mantos de Oro mining company. The emergency kit pre-trip control checklist ensures the inclusion of safety equipment such as Tyvek overalls, leather gloves, rubber boots, safety glasses, waterproof gloves. Additionally, a truck inspection record includes provisions for verifying the driver's personal protective equipment (PPE).

Checklists are completed before each trip and stored in a travel folder in the contract administrator's office, where they are retained for at least three years.

Verasay has written provisions in its Emergency Response Plan (ERP) requiring that emergency response equipment is regularly inspected and tested to ensure it is in good working condition when needed. Monthly inspections, as well as checks before each convoy departure, are conducted to meet this requirement. The carrier implements these inspections and maintains comprehensive records, which auditors reviewed. On-site verification confirmed that the equipment is in excellent condition and ready for cyanide transport.

The ERP specifies the equipment required in the convoy leader's vehicle and any additional PPE stored in the trucks. During truck maintenance and inspections, a standard procedure is followed to inspect the emergency equipment boxes. The transport procedure mandates that emergency response equipment must accompany the convoy leader in the safety escort vehicle or one of the trucks.

A checklist is used to verify the availability of emergency equipment prior to each convoy's departure, and this checklist is retained in the operation file. The audit confirmed that the emergency equipment was in place, readily accessible, and that the checklists were being completed and adhered to in accordance with the ERP.

Verasay ensures that AMBIPAR is aware of its emergency response actions and remediation activities and that the contractor's responsibilities comply with the applicable provisions of this Transport Practic.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

The emergency procedure transfers P2-11.01, and in P2-11 Action in cyanide emergencies, there is a communication flow chart (10.3), it is included in annex 16.1 emergency numbers of assistance center, location, name of contact, address, management numbers, state organizations.

The carrier has in its plan procedures and flowcharts of communications for emergencies, as well as updated contact information for the necessary internal notification and external notifications in case of a cyanide emergency during transport and interim storage. The notification procedures described include the flow of communication and the names of people to contact in the event of an emergency. The notification call list is checked for accuracy once per year when the plan is reviewed and tested. The interim storage facility maintains current contact information for notifying appropriate entities in case of an emergency.

The auditors reviewed the notification procedures and the carrier's contact information telephone list verifying compliance with this provision. It lists current emergency numbers for local hospitals, and for ambulance, fire, and environmental responders as Ambipar (former Suatrans), and up-to-date contact information of mine sites.

There is a program to update cyanide procedures that includes, P2-10 Transportation of Cyanide, P2-10-3 Transportation of Cyanide Manto de Oro, P2-10-4 Transfer of containers with sodium cyanide, P2-11 Action in emergencies cyanide, P2-11.01 Emergency transfer procedure. In the cases of documents with code P2, the biannual update is carried out, the APR (risk prevention advisor) internally reviews the contact numbers every 6 months.

The ERP P2-11 action in cyanide emergencies includes within the functions of the Emergency Committee, Informing the International Cyanide Management Institute (from now ICMI) about the situation and condition of the incident that affects the organization. The emergency communication diagram includes the ICMI communication. During the previous period, no significant cyanide incidents have been reported, specific to the transportation and scope of the service.

Transport Practice 3.4

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

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

Procedure P2-11 addresses actions in cyanide emergencies, including remediation and the final disposal of waste as outlined in Chapter 13.

Remediation

After decontamination, the affected area will be monitored using a pH meter to ensure the land is free of cyanide salts. Detoxification of the area is prioritized. If cyanide has been recovered in contact with humidity or water, it must be transported to the mine under police or external brigade escort, as required.

Final Disposal Options

Option A: Use in the Process at the Mine

Sodium cyanide containers and briquettes may be transferred to the mine for immediate use in the process.

If the sodium cyanide cannot be emptied directly into the process tank:

Open the boxes, remove the polyethylene bag, and allow the polypropylene bag to dry in the sun and open air. The material should be used as soon as possible.

The lifting equipment used to remove the boxes must remain on-site until the operation concludes. If removed earlier, it must be thoroughly washed with water.

Personnel unloading the container must wear disposable suits, boots, and waterproof gloves. At the end of their shift or upon leaving the area, they must wash their protective equipment appropriately.

In case of skin exposure to cyanide solutions, the affected area should be washed immediately with plenty of water.

Any water used for washing equipment, clothing, or personnel must be retained within the cyanide box drying/handling area for treatment before disposal.

Precautions for Handling Cyanide:

Personnel involved must be informed about cyanide poisoning symptoms, handling precautions, and response actions.

A portable container or pond containing a 5% sodium hypochlorite solution (with a pH above 11) should be available to detoxify boxes, bags, and other materials.

Sodium cyanide boxes must be emptied into the process tank immediately, and the associated bags and boxes must be washed and detoxified appropriately.

After all boxes have been removed, the container must also be washed thoroughly.

Option B: Transfer to a Final Disposal Plant

Waste may be transferred to a final disposal plant with the appropriate sanitary resolution for this type of product.

The transfer can be made to a Confined facility authorized for the final disposal of waste resulting from emergency processes, remediation, or other contaminated elements.

The auditors reviewed the remediation elements included in the ERP. The auditors also verified that AMBIPAR remediation contractor has procedures in place to provide safe and environmentally appropriate remediation and handling and disposal of cyanide waste materials.

In the ERP P2-11 emergency action cyanide Spill in wet or water courses - recovery, neutralization includes the application of some detoxifier (hypochlorite, peroxide, ferrous sulfate, etc.), is limited only to if the spill is limited to a puddle, pool, etc., no detoxification should ever be applied to a moving body of water that has biodiversity, etc.

Verasay would not be directly involved in the remediation of a cyanide spill. The ERP, however, does address the requirement that no chemicals such as sodium hypochlorite, ferrous sulfate, or hydrogen peroxide be used to treat a release to surface water. The remediation contractor's procedures do prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide that has been released into surface water.

Transport Practice 3.5

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

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

In cases of documents that have the P2 category, such as P2-11 ERP, P2-10 Cyanide Transportation, among others, the biannual update is carried out, the APR (risk prevention advisor) internally reviews the telephone numbers of contact every 6 months.

The carrier has a process in place to ensure that the emergency response plans are reviewed, evaluated, and updated as needed to account for changes in potential spill scenarios and necessary response actions that may vary over time such as transport routes, the form of cyanide transported and the types of transport equipment used.

The auditors reviewed these provisions contained in the ERP, assessing the process and its implementation by reviewing the documentation of the various versions of the Plan and through interviews with staff. Verasay´s ERP states to periodically review the emergency procedures and to evaluate the plans adequacy. The Plan reviewed was maintained as latest version and under formal document control. Records were available to show that this was done. Interviews and written procedures confirmed that the plan would also be reviewed after any deployment.

The organization has an annual drill program, which includes emergency drills for sodium cyanide transportation. The drills evaluate the effectiveness of Procedure P2-11, which outlines actions during emergencies involving sodium cyanide.

About the Emergency Response Team, the safety escort and operations team serve as the first emergency responders during an incident. For severe cases, additional support is provided by Ambipar, firefighters, and police. Ambipar is the contractor for the emergency response.

The organization has a Procedure for Non-Conformities and Corrective Actions (P1-03, Rev. 12), which addresses safety incidents and negative environmental impacts. The procedure incorporates cause analysis using the "why" questioning method and verifies the effectiveness of the corrective actions implemented.

Tue procedures also include provisions to evaluate, and revise as necessary, the operation’s emergency response plans and procedures following incidents.

Additionally, the Incident Investigation Procedure P1-09 applies to all incidents involving personnel, equipment, materials, and environmental factors. The organization uses APPSHEET, a custom-designed digital application, to store and manage information.

This systematic approach ensures effective management of safety and environmental risks while maintaining robust documentation and accountability through digital tools.