October 2025

INTERNATIONAL CYANIDE MANAGEMENT CODE

SUMMARY AUDIT REPORT FOR DRASLOVKA - CHILE WAREHOUSE

2025 Audit Cycle

Submitted to:

International Cyanide Management Institute (ICMI)
888 16th Street, NW-Suite 303
Washington, DC 20006
United States of America

Draslovka Mining Process Solutions
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Operation General Information

Name of the production operation:	Draslovka Mining Process Solutions Santiago de Chile Warehouse
Name of the facility owner:	Sudamerica Comercial S.A.
Name of the facility operator:	Sudamerica Comercial S.A.
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Email:	joaquin.corres@draslovka.com

Operation Location Detail and Description

Draslovka Mining Solutions (former DuPont and Chemours) manufactures solid sodium cyanide for the gold mining sector. Draslovka Mining Solutions (Draslovka) is part of the Draslovka Holding a.s. company, which is headquartered in Prague, Czech Republic. Draslovka originally started operating in 1906 and is dedicated to producing cyanide-based chemicals globally. Draslovka Memphis, Tennessee plant was one of the original 14 Cyanide Code signatory companies announced on November 3, 2005. The Plant was the first Cyanide Producer to achieve certification in June 2006 and has successfully maintained compliance and its International Cyanide Management Code (the Cyanide Code or the Code) certification since.

The Draslovka Global Ocean Supply Chain, last certified by the International Cyanide Management Institute (ICMI) on April 7, 2022, is utilized for shipments from the Memphis Plant that are transported by rail and subsequently by ocean carriers. The rail segments between Memphis and U.S. ports were included in the scope of the Global Ocean Supply Chain re-certification audit. Chilean ports integrated into Draslovka's Global Ocean Supply Chain encompass San Antonio, Valparaiso, Angamos (Mejillones), Antofagasta, Arica, Iquique, and Punta Arenas.

Draslovka's cyanide warehouse located at Carretera General San Martín N° 9400, Quilicura commune, Metropolitan Region, Chile, is operated by Sudamerica Comercial S.A. (Sudamerica or Draslovka Distributor), the facility owner.

Sudamerica was founded in 1983. In 2009, the company acquired its current facilities in the municipality of Renca, where it has 12,500 m2 of warehouse space. In 2021, the company opened

a sales unit focused on the mining and related industries. It is ISO 9000:2015 certified. The warehouse has authorization from the Chilean Government for storage of hazardous substances (hazmat) IMO (International Maritime Organization) 6.8 and 9 class chemicals, according to Chilean regulations to be carried out at the premises located at 9400 San Martín General Highway, Quilicura.

The scope of cyanide operations permitted in the facility is limited to the following: unloading of maritime containers containing solid sodium cyanide, storing cyanide in Intermediate Bulk Containers (IBC) and Eco bags in the warehouses, loading cyanide containers for dispatch to customers, and cleaning the interior of the cyanide hold.

The facility employs a total of five staff members and operates two forklifts. The built area encompasses 2,260 square meters divided between two warehouses. Warehouse 1 consists of a covered area of 1,728 square meters, while Warehouse 2 comprises a covered area of 527 square meters.

Warehouse 1 is next to Warehouse 2 and separated by a 5-meter distance from the nearest dividing wall. It is constructed with a metal supporting structure and perimeter walls of reinforced concrete blocks topped with metal sheets, standing at 2.4 meters high. The roof comprises metal decking, and the floor is smooth, polished, and sealed concrete.

Warehouse 2 is adjacent to Warehouse 1 and similarly separated by a 5-meter distance from the nearest dividing wall. It features a metal supporting structure and perimeter walls of reinforced concrete blocks and metal sheets, also standing 2.4 meters high. The roof is metal, and the floor is smooth, polished, and sealed concrete.

Regarding storage conditions, Warehouse 1 can store up to 1,000 tons. Products are stored on the floor, with bags on pallets reaching up to 3 units high. Warehouse 2 has a maximum storage capacity of 695 tons. Chilean regulations require a minimum storage distance from perimeter walls of 0.5 meters and a separation of 2.4 meters between incompatible hazardous substances such as acids and bases.

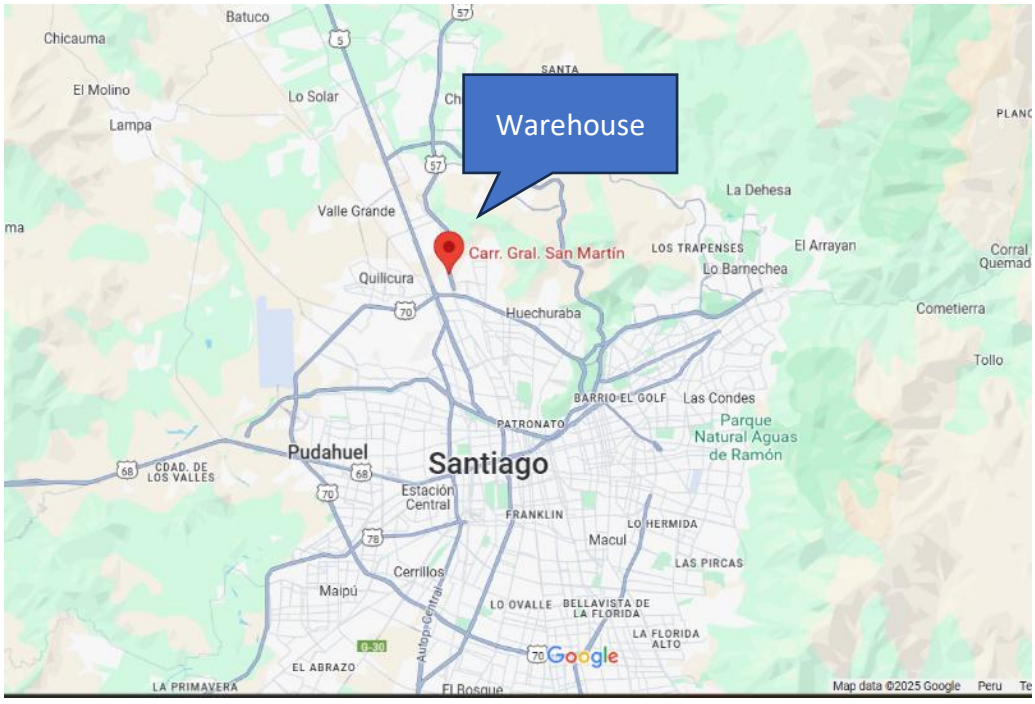
Both warehouses have fire control systems with smoke detectors, manual alarm buttons, and dry chemical powder extinguishers. The perimeter wet network is disabled for indoor use. Ventilation includes louvers and wind extractors ensuring 12 air changes per hour. For spill control, liquid collection channels with galvanized gratings direct spills to an underground tank holding 1.1 m3 wastewater. Chemical products follow Chilean Standard 2190 of 2003. The company coordinates its fire emergency plan with the local fire department. Eyewash showers are installed outside each warehouse. Emergency doors have automatic opening, and workers are trained in chemical risks.

Draslovka's Product Stewardship policy requires an evaluation of human and environmental safety before shipping cyanide to a new distributor site and then, periodic re-evaluation. On September 3, 2024, Draslovka´s Technical and Supply Chain Consultant South America, visited Sudamerica hazardous substances Quilicura Warehouse and evaluated the suitability of the site. Interviewed

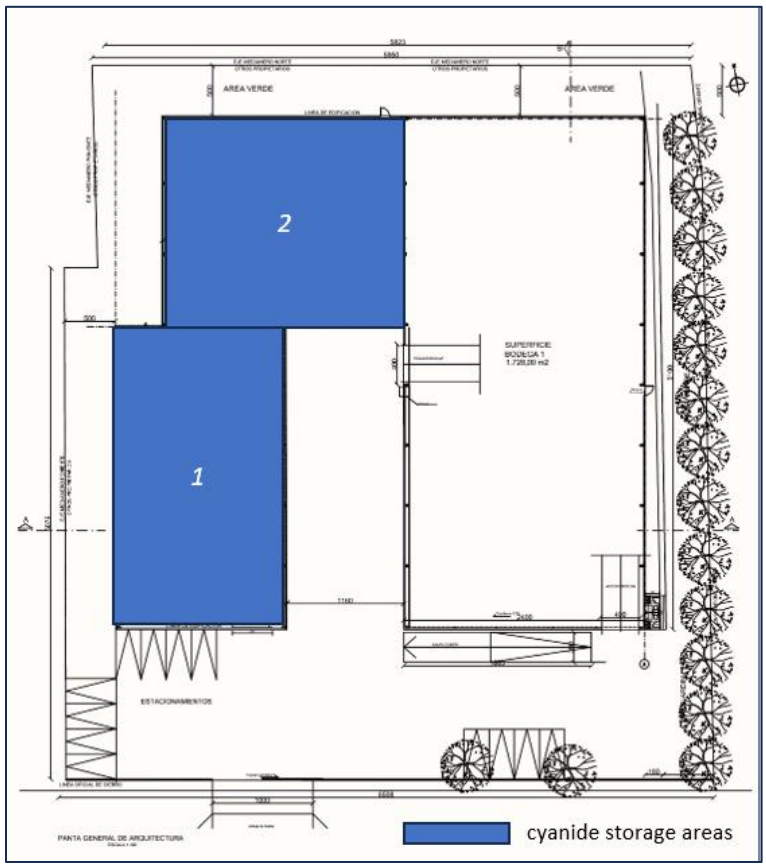
the workers and managers, conducting the initial on-site evaluation of a potential distributor's ability to transport, store, use, handle and dispose of cyanide in a safe and environmentally responsible manner using a questionnaire developed with this purpose, which would also be used during follow-up visits.

The warehouse operator has two years of experience handling cyanide. The product is transported from Chilean ports, mainly San Antonio, by a third-party trucking transporter in 20-foot sea containers to the warehouse. There, it is stored in IBC and Eco bags within enclosed, ventilated structures. Warehouse activities include receiving the product, deconsolidating cargo with a forklift via a metallic ramp, and stacking the product up to three rows. When needed, the product is loaded into maritime containers using a reversed procedure, ensuring correct stowage. All tasks are performed by warehouse personnel, with no cyanide packages being opened in the warehouse. Forklifts used to move and store cyanide containers.

There is an emergency response plan (ERP) for cyanide emergencies, detailing actions for spills, fires, and earthquakes, along with the roles of the emergency response team. Neighbors include industrial companies, and a motel across the highway. The site has a safety policy on cyanide storage, handling, and use, with training provided for safe handling procedures.




Warehouse
Av. Puente Verde
Carr. Gral. San Martín
Aux. San Martin
Autop. los Libertadores
Bitumix
Vivero y Jardín Pumahuida Limitada
SITIO
Galvarino
Centro Logistico Cencomex
TERMOFRIO
Novofarma Service S.A
Victor Uribe
Sistemas Graficos Quilicura SA
Los Chercanes
Los Zorzales
Google


AREA VERDE
AREA VERDE
2
1
SUPERFICIE BODEGA 1 1.720,00 m2
ESTACIONAMIENTOS
PANTA GENERAL DE ARQUITECTURA
cyanide storage areas

Auditor's Finding

This operation is

- ✓ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance

with the International Cyanide Management Code.

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 Cyanide Code 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 Production Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Auditor Information

Audit Company:	Cyanide Auditors S.A.	
Lead Auditor and Production Technical Auditor:	Bruno Pizzorni	bpizzorni@cyanideauditor.com
Dates of Audit:	May 6 and 7, 2025	

PRODUCTION VERIFICATION PROTOCOL

Principle 1 | OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1

Design and construct cyanide production facilities consistent with sound, accepted engineeringpractices and quality control/quality assurance procedures.

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

Summarize the basis for this Finding/Deficiencies Identified:

The warehouse has been professionally designed and constructed. Building floors and walls provide impermeable barriers to potential releases, forklifts are used to move and store cyanide containers. Spilled liquids (such as wash water) drain into an underground concrete chamber containing a PVC tank with a capacity of 1.1 cubic meters.

Records demonstrating the implementation of quality control and quality assurance programs during construction and modification of these facilities were not available at the time of the audit. Draslovka provided records of the review and approval of the facility's design and construction by Chilean regulatory agency Seremi (*Secretaría regional ministerial*) authorizing the premises as Hazardous Substances Storage Warehouse based on the inspection visit of the health authority to the premises, qualifying the project for storage of dangerous products IMO 6.8 and 9 as favorable.

It is constructed with a metal supporting structure and perimeter walls of reinforced concrete blocks topped with metal sheets, standing at 2.4 meters high. The roof comprises metal decking, and the floor is smooth, polished, and sealed concrete. The structure guarantees the protection of the products from any possible external contamination.

Draslovka also provided a pavement certificate dated November 18, 2024, issued by the General Manager of the construction company *Masservicios SpA* www.masservicios.cl certifying the pavements in the warehouses located at Av. General San Martin 9400, Quilicura, were built in early 2012 using a 17 cm thick concrete slab across the entire covered area of the warehouse. The pavements were made with reinforced concrete with steel mesh, finished with a smooth and polished finish. The concrete slabs were left with a 0.5% slope toward the side of the warehouse, where channels were constructed to collect and channel potential spills to a buried tank with a capacity of 1,100 liters.

On September 3, 2024, Draslovka´s Product Stewardship Technical and Supply Chain Consultant South America, visited the warehouse evaluating the suitability of the site, determining it was “fit for service” and can be safely operated according to Draslovka’s procedures. Surfaces on which cyanide is managed, the walls and roof of the storage buildings, and the structure of the underground tank for contaminated wash water and storm water were evaluated concluding, from a stability and containment perspective, as appropriate, these built facilities are fit to continue functioning as currently operated. The auditor reviewed the initial on-site evaluation of the distributor's ability to store, use, handle and dispose of cyanide in a safe and environmentally responsible manner using a questionnaire developed with this purpose, which would also be used during follow-up visits.

The warehouse exclusively handles cyanide in closed packages such as Intermediate Bulk Containers and Eco bags, no reagents are used or processing takes place. No containers are opened.

Handling, transloading and storage of packaged solid cyanide at the facility operation is conducted on concrete surfaces impermeable elements that prevents seepage to the subsurface. Concrete surfaces protect the ground throughout all the facility, which is adequate to minimize seepage to the subsurface.

During the inspection to the cyanide warehouse, the auditor noticed the concrete slab was in good conditions, as well as the construction/expansion joints between slabs were properly sealed with waterproofing material.

The auditor inspected the operation and confirmed that concrete surfaces are intact and do not have cracks that compromise their ability to contain released cyanide.

The facility does not employ, inspect, test, or maintain systems -- such as level indicators and high-level alarms -- to prevent the overfilling of cyanide process and storage vessels because the warehouse operations managing solid cyanide in unopened containers and packaging, such as IBCs and Eco bags.

The warehouse building’s floor and walls serve as sufficient secondary containment for stored containers of solid cyanide. Outside the storage, the pavement slopes are designed in such a way that they do not allow the entry of surface runoff water from rain into the warehouses.

Compliance with this provision was determined through the auditor’s inspection of the facility and review of maintenance records. The auditor also verified that the building’s floor and walls are competent.

There are no cyanide solution pipelines. The facility only manages dilute water such as wash water and water used to decontaminate clothing and equipment.

The buildings to store cyanide are roofed and have closed structure to avoid contact with rainfall. Within the buildings there are no potable water systems; the water fire system is canceled and the

safety showers that are present are designed in such a way that leaks or other potential releases do not come into contact with the cyanide containers as they have secondary containment and adequate slopes that drain into a sump connecting the buried tank for contaminated wastewater. Outside the storage, the pavement slopes are designed in such a way that they do not allow the entry of surface runoff water from rain into the warehouses.

The enclosed areas where cyanide is stored have particularly good ventilation by windows with fixed metal lattices to prevent the accumulation of cyanide dust and hydrogen cyanide gas. The auditor determined the adequacy of ventilation by visual confirmation that enclosed storage areas are, in fact, ventilated.

For security reasons, cyanide is stored in a manner that prevents access by the public and unauthorized personnel. It is inside a secure building that have gates and padlocks, additionally the entire property has a perimeter wall made of cement block bricks. The wall is at least three meters high and is crowned by rolls of barbed wire all around. The warehouse has permanent surveillance 24/7 and access limit controlled by security personnel of the operation. Additionally, cameras with human motion recognition connected to an alarm have been installed inside the cyanide warehouses. The warehouses remains closed with a metal gate with a padlock. Access to the area is restricted. The warehouse only has operational personnel at the time of receiving, storing or dispatching to the node, it then remains closed.

In occasion of the audit site visit only cyanide was stored, but in the future Sudamerica (the warehouse operator) plans to also store ferric chloride in warehouse one. Separation of incompatible materials is a stablished practice in the management of all hazardous materials, including cyanide, by the warehouse operator and a requirement of Draslovka.

The auditor observed during his visit to warehouse 2 that it is adjacent to a warehouse rented to a third party which share a common gutter. Although at the moment the neighbor warehouse does not store incompatible substances with cyanide, Sudamerica cannot guarantee that incompatible substances such as acids, strong oxidizers like chlorine, and explosives will not be stored in the neighboring warehouse in the future.

Sudamerica was asked to implement an independent gutter or another suitable solution to prevent any potential mixing of leachate. Following the audit, the warehouse provided photos showcasing the solution they adopted—a 4.5-meter-tall metal sheet wall separating the adjoining area from the third-party warehouse. This measure ensures also in the base that leachates remain completely isolated and do not cross-contaminate. No additional information was requested to find this protocol question in compliance with the Code.

Production Practice 1.2

Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has written procedures (instructives) plans and manuals in place to operate its cyanide facilities in a way that protects its workers and the environment. Instructives are in place for unloading and storing incoming cyanide, storing and loading cyanide for delivery to customers, handling cyanide containers, and handling any contaminated water, such as water captured in secondary containment or wash water. The procedures describe how the operation's cyanide management activities are conducted in a safe and environmentally sound manner that avoids cyanide releases and exposures. The documents reviewed are:

- I-D-OPE-001 Cyanide Warehouse Operations Instructions v2
- I-D-OPE-003 Cyanide Operations Plan
- I-D-MAN-001 Cyanide Warehouse Maintenance Instructions for its Equipment and Machinery v3
- M-D-INF-001 Change Management Manual
- I-D-EME-001 Cyanide Warehouse Emergency Instructions
- P-D-INV-001 Cyanide Handling Incident Investigation Plan
- P-D-CAP-001 Training Plan
- M-D-CAP-002 Cyanide Warehouse Role-Based Training Matrix

The facility is certified in ISO 9001 : 2015 Quality Management since year 2018, also is certified in HACCP (Hazardous Analysis Critical Control Point) system, which is a logical, scientific approach to control food safety hazards in food production.

The auditor reviewed the facility written operating procedures, among other documents, confirming that they address the safe management of cyanide. Implementation of procedures was confirmed through observation of these activities during the auditors' site visit. The auditor also had interviews with the personnel responsible for performing these tasks, and reviewed the

available documentation, finding it in conformance.

On reviewing the work procedures that include contingency plans, the auditor noticed that actions were missing before contingencies such as treatment for boxes found in poor condition, so he requested to include and describe actions for this contingency. After the audit Sudamerica included a description in this regard indicating that they have designated an area where these boxes will be quarantined and will immediately inform Draslovka, the cyanide consignor and will follow instructions in this regard. No additional information was required to find this requirement in full compliance.

The operation's work instruction I-D-OPE-001 Cyanide Warehouse Operations Instructions include in page 8 contingencies related to damaged cyanide boxes, presence of white powder or label in poor conditions include contingency plans for non-standard operating situations. Include situations such as damage to a cyanide box on arrival inside a damaged container or during handling cyanide boxes or shutdown of the operation due to machinery breakdown. In general, it contemplates some sufficiently probable situations that have been developed with previously planned responses.

The facility has the procedure M-D-INF-001 Change Management Manual v1 dated February 2025, as a formalized way of managing changes to the facility. This change management procedure has been developed to identify, among others, changes to the facility or its operating practices that may increase the potential for cyanide releases and adverse impacts on worker health and safety before such changes are implemented so that they can be evaluated and addressed as necessary. The procedure requires written notification to environmental, health and safety personnel and a sign-off before the change can be instituted.

The auditor reviewed the written procedure, finding it was incomplete, needing to develop the documentation the procedure states to use during change evaluation: the change management register, the impact assessment matrix and the change log and lessons learned. Sudamerica was required to have a complete Management of Change (MOC) procedure. After the audit the warehouse completed the procedure as requested. No additional information was required.

The warehouse operation has the cyanide Warehouse Maintenance Plan for its Equipment and Machinery v2, dated January 2025 which includes a preventive maintenance program for its operational equipment which includes the forklift and portable steel ramp, the only equipment used to unload, load and manage containers of product cyanide to prevent a failure that results in a cyanide release or exposure. The tank, gutters and piping associated with managing contaminated wash water are included in the infrastructure preventive maintenance program. Sea containers maintenance is not the responsibility of the warehouse. The 3 ton capacity forklift has preventive maintenance frequency every 500 hours, the ramp is maintained annually, and infrastructure is inspected monthly.

The auditor inspected the cyanide facility, reviewed completed maintenance records Annex A Infrastructure Inspection Checklist Register, Annex B Record Sheet Checklist Inspection of

Operating Equipment Sheet; Annex C Inspection and Maintenance for Infrastructure and Equipment; Annex D Infrastructure Maintenance Record Form; Annex E: Maintenance Record form for Equipment and Machinery and interviewed employees determining compliance with this provision.

There are no process equipment in use at this warehouse that require calibration.

The cyanide warehouse has impermeable concrete floors and walls that provide secondary containment in the event that cyanide is released from stored containers.

The facility does not store cyanide solution on-site but may produce small amounts of contaminated wash or cleaning water in case of a spill. To prevent unauthorized discharge, gutters and sumps direct water to an underground septic tank. This tank is separate from the drainage system, and water is collected and disposed of by a contractor. The system is regularly inspected and maintained.

The operation follows the written procedure I-D-EME-001 Emergency Instructions in Cyanide Warehouse, which outlines the handling and disposal of water collected in the building that is contaminated with cyanide. According to the procedure, once an emergency is resolved, any liquid collected in the septic tank must be properly disposed of. Contaminated water and waste must not be discharged into the sewer. Instead, 5% sodium hypochlorite (commercial leach) should be used in sufficient quantities to destroy any traces of cyanide. The authorized contractor must then collect and dispose of the waste and provide a certificate of proper final disposal.

The operation procedures I-D-OPE-001 Cyanide Warehouse Operations Instructions v2 and the Emergency Instructions in Cyanide Warehouse describe management of cyanide materials such as spilled product and cyanide-contaminated materials such as used equipment.. Tyvec suits and contaminated cleaning material such as floor sweepings, rags, and debris gathered by the floor cleaning machine, along with dust removed from its filters, must be disposed of as hazardous waste. Tools and Personal Protection Equipment (PPE) used during emergency management must be decontaminated with 5% sodium hypochlorite. The authorized contractor must then collect and dispose of the waste and provide a certificate of proper final disposal. The auditor observed in each building a plastic drum properly marked for hazardous waste storage and reviewed examples of shipping manifests, including contaminated water from the septic tank.

Procedure I-D-OPE-001 Cyanide Warehouse Operations Instructions v2 includes statements to ensure cyanide is packaged and labeled as required by the Chilean regulations. Ecopaks are properly packaged at the Draslovka Plant in Memphis, Tennessee; the site staff check and replace straps as needed. The packaging is designed in the USA and complies with international and national standards. The operation procedure requires to confirm that labelling and packaging have not been compromised when shipped to customers. The auditor observed all packaging to be in good condition at the time of the site visit.

Production Practice 1.3

Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation inspects the integrity of its infrastructure including all pavements acting as secondary containments, such as loading, unloading and cyanide storage areas, to identify situations that pose a risk of cyanide release such as cracks in impermeable surfaces., the roof covering and walls for its waterproofing and rain, ventilation and rain downpipes, as well as the condition of electrical and plumbing installations and security systems.

Routine inspections are performed to ensure the proper functioning of equipment and containments. The site does not manage cyanide process solutions and therefore does not have any tanks, piping, pumps, and valves to be inspected. The site inspects the containers used for transport cyanide such as the sea containers, IBC´s boxes and Eco bags on arriving and departing the site to check their good condition. The operation is not responsible for their maintenance. The workers were knowledgeable regarding the aspects that could present a treat and that they have to notify the site manager.

Documentation is retained and was available for the auditor's review demonstrating that inspections have been conducted and that necessary cleaning measures and maintenance and repairs are performed in a timely manner when deficiencies have been identified. The auditor reviewed completed checklists used for these inspections, which direct the inspector to evaluate specific items and provides sufficient detail regarding what to look for. As an example, the infrastructure inspection checklist includes the following items:

- if the warehouse's lighting is working properly;
- ventilation louvers in good condition to ensure ventilation inside the warehouse is adequate to prevent buildup of hydrogen cyanide gas (HCN);
- if eyewash shower works correctly and maintains a constant flow of water without leaks;
- gutters inside and outside the warehouse are clean and without obstacles;
- the contaminated water receiver (septic tank) is clean, unobstructed, and has no leaks;
- the warehouse floor is properly waterproofed; the floor seals are free of wear.
- the warehouse's internal and external walls remain airtight, free of corrosion, perforations, or breaks to prevent water from entering the interior;

- warehouse roofs remain airtight, free of corrosion, perforations, or breaks to prevent rainwater from entering the interior; security cameras operating in real time and if recording images are stored;
- if safe zones are defined, and evacuation routes are marked and clear of obstructions; and
- is there information and warning signs regarding the product handled inside the warehouse;

The operation inspects the equipment and installations at appropriate frequencies, according to state in the maintenance plan I-D-MAN-001 Cyanide Warehouse Maintenance Instructions for its Equipment and Machinery v3, to assure they are functioning as intended. Infrastructure inspections are performed monthly and quarterly for roofing, floors and walls. The forklift is inspected before each use and then weekly, the metallic portable unloading access ramp is inspected biannually. The auditor reviewed examples of inspections records confirming frequencies are sufficient to assure that equipment and installations are functioning as desired.

The facility inspections and maintenance records are documented in checklists and include the date of the inspection, the name of the inspector and any observed deficiencies. The nature and date of corrective action are documented in the inspection records. The auditor reviewed examples of the following completed inspection records among others:

- R-D-MAN-004 Infrastructure Inspection Checklist v3
- R-D-MAN-005 Operating Equipment Inspection Checklist v3

The nature and date of corrective actions are documented and records are retained. The auditor reviewed example of completed records in the following registers:

- R-D-MAN-006 Maintenance Record Form to Infrastructure
- R-D-MAN-007 Maintenance Record Form to Equipment and Machinery

Principle 2 | WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1

Develop and implement procedures to protect facility personnel from exposure to cyanide.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation addresses all aspects that are necessary for worker protection, including its inspection programs for its cyanide facilities and its preventive maintenance programs for critical equipment. These work procedures are developed and implemented to minimize worker exposure during normal operations for cyanide unloading, storage and loading for shipping to the mining clients. The procedures include actions to take in case of non-routine and emergency operations and maintenance related activities

- I-D-OPE-001 Cyanide Warehouse Operations Instructions v2
- I-D-OPE-003 Cyanide Operations Plan
- I-D-MAN-001 Cyanide Warehouse Maintenance Instructions for its Equipment and Machinery
- M-D-INF-001 Change Management Manual
- I-D-EME-001 Cyanide Warehouse Emergency Instructions
- P-D-INV-001 Cyanide Handling Incident Investigation Plan
- P-D-CAP-001 Training Plan
- M-D-CAP-002 Cyanide Warehouse Role-Based Training Matrix

The operating procedures address safety issues explicitly and implicitly by describing safe practices. The level of detail of these procedures is proportional to the risks involved in the task.

The facility has a Health and Safety (H&S) Committee that meets monthly where worker representatives are responsible for giving their opinion on work procedures, among other safety and health things. Another opportunity is during training sessions, when they are given a space to give their opinion. In total, there are 35 workers, all of whom are trained in the development of work procedures since the beginning of operations, including general management. The auditor reviewed the training records which have also have space for comments, observations, and suggestions. There is a company safety delegate who receives suggestions directly. Additionally,

they have weekly health and safety talks or as needed.

The operation has identified areas and activities where workers may be exposed to hydrogen cyanide gas or cyanide dust and has required the use of personal protective equipment while working in these areas and conducting these activities. The warehouses and transloading area have been identified as areas with the potential for exposure. The auditor confirmed by direct observation of the signaling in place, that the operation has determined these areas and activities where such exposures may occur and require appropriate personal protective equipment and has established administrative controls, as necessary. The auditor also interviewed the workers to confirm that the administrative measures are being implemented.

The facility has two fixed HCN gas monitors and two portable monitor to limit worker exposure to hydrogen cyanide gas and cyanide dust. Fixed monitors are installed at the back of each warehouse on the opposite side of the entrance door, since it is considered the least ventilated area. These monitors transmit online and would activate the alarms in case of high levels of HCN gas. All HCN gas monitors are set with low and high alarms at 4.7 and 10.0 parts per million, respectively. The required action for both alarms is the same – leave the area and report to supervision for an evaluation of risk. The auditor confirmed by interview that the operators knew the alarm levels and understood that the required action was the same for both alarm levels. The auditor observed the employees' pairs with the portable monitors. Compliance with this provision was verified by observation of the monitoring equipment, calibration records and employee interviews.

The operation has maintained, tested, and calibrated portable monitors every six months, as required by the manufacturer and as scheduled in the Cyanide Warehouse Maintenance Instructions for its Equipment and Machinery v3 and has retained the records. Fixed monitors are new and just installed. This maintenance instructions include the equipment calibration and maintenance schedule. The auditor reviewed the calibration certificates of the CFG Micro IV brand portable monitors carried out on December 24, 2024, after 6 months. The calibration is carried out by the Chilean contractor NLT Chile.

The operation has implemented a buddy system in accordance with the Cyanide Warehouse Emergency Instructions to ensure that workers can provide help or aid to each other or can otherwise notify or communicate with other personnel for assistance. The procedure states that before starting any operation with cyanide in the warehouse, the team in charge of carrying out the operation must verify there must be three or more people present at all times. One person must always be away from potential sources of contamination, so as not to compromise the health of all operators at the same time. The operators have cell phones and two intercom radios; one carried by the forklift operator and the other by the supervisor who acts as an observer from a fixed point.

All personnel must work under the "buddy system" and must follow the rules established to reduce the risks of accident or injury. This system is a technique implemented to increase the

safety of personnel in a risky or dangerous situation and consists of at least two people entering or carrying out some activity together and must maintain continuous visual contact or by other means of effective communication between them, in case of an emergency to either of these two people, the other may offer help or ask for help from other people. The auditor observed buddy pairs with radios. The operation has also manually installed alarm systems and closed-circuit TV in the work areas to ensure assistance is available when needed. The auditor confirmed compliance with this provision by reviewing safety procedures and interviewing and observing employees.

The facility woks with Chilean Mutual ACHS. The Chilean Safety Association (ACHS) is a private, non-profit corporation with medical services presence throughout Chile. According to Chilean regulations, all employers in the country, regardless of size, must be affiliated with an administrative body for Social Security against Workplace Accidents and Occupational Diseases, as provided by Law No. 16,744. One of these bodies is the ACHS, whose role is to develop risk prevention programs and provide health coverage and compensation for work-related accidents, commuting accidents, and occupational diseases. Within the framework of the ACHS, health benefits under this coverage workers are provided with the medical evaluation Periodic Occupational Assessment occupational medical evaluations for hired individuals who begin their work under hazardous conditions and require a periodic health assessment during their tenure in that position. The results are considered confidential medical information and are held by ACHS.

As during the audit medical evaluations records were not available or failing that, some way of demonstrating what they are doing, the auditor found this as a Substantial Compliance. After the audit, Draslovka sent examples of scheduling and confirmation of medical examinations performed in the workers' personnel file and accepted that the program was implemented as required. The medical assessments included the ability to use a respirator, hearing and vision, and pulmonary function, among others. The workers medical records are kept by ACHS. No additional information was required to find this Protocol Question in Full Compliance.

The warehouse Cyanide Operations Plan defines that all workers must wear the clothing, accessories, and equipment necessary to carry out operations. Among the clothing is required long-sleeved shirts and pant to cover the extremities. Cyanide Warehouse Operations Instructions v2 states on item Activities at the End of the Operation, that upon completion of operations in the cyanide warehouse, the following activities must be carried out among others: to leave the warehouse space clean and tidy, leaving utensils and equipment in designated areas, to wash hands with plenty of soap and water and to wash clothing used during the operation. During operations with cyanide, workers use Tyvek suits which discard ending the operation. The auditor confirmed compliance with this provision by reviewing the procedure and interviewing and observing employees.

As during the handling of cyanide containers these remain closed, and they also have an industrial Rongen R1200 sweeping car used to collect dust which performs frequent cleanings in the

warehouse, the auditor considers these precautionary measures to be sufficient.

The facility has placed legible signage throughout the operation as necessary to ensure that all workers who may be exposed to cyanide are aware of the risks and take appropriate protective measures. The auditor required to install signs indicating the presence of cyanide at the entrance to the warehouses. Soon after the site visit, the facility sent pictures showing these signal were installed.

Workers have been alerted to the presence of cyanide and the need for appropriate personal protective equipment. Mandatory use of specific personal protective equipment is indicated for the sodium cyanide zone.

The auditor confirmed by observation the presence of signage around the facility. Interviews with site personnel and review of the overall safety and training program with respect to cyanide safety also confirmed the workforce has been alerted to the presence and risks of cyanide.

The operation prohibits personnel from smoking, eating, drinking, and having open flames by means of extensive signage in areas where there is the potential for cyanide contamination; the prohibition is included in the operation's safety training and is re-enforced by signage in these areas. Signage has been installed according to Chilean worker safety laws. Smoking and open flames are prohibited in the entire warehouse. Eating and drinking are allowed only in a designated room away from the areas where cyanide is present. The auditor reviewed the training plans and records, interviewed the employees and observed on-site signage throughout the facility, finding compliance with this provision. Employees showed awareness of the restrictions and of the potential dangers of not following the rules.

Production Practice 2.2

Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The operation is	✓ in full *compliance* with	Production Practice 2.2
	☐ in substantial *compliance* with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The operation has the written emergency response plan I-D-EME-001 Cyanide Warehouse Emergency Instructions and the Sodium Cyanide Warehouse Emergency Plan, detailing the

specific emergency response procedures to respond to cyanide exposures and the processes to be followed in the event that cyanide is ingested, skin or eye contact made, and/or inhaled. The use of cyanide antidotes are also detailed. The document addresses the transfer of exposed victims to medical centers. The emergency response procedures to cyanide exposure are suited for the facility.

The operation has a safety showers and eyewash station inside each of the warehouses buildings and fire extinguishers in the warehouse areas and transfer area, where workers may be exposed to cyanide. This equipment is regularly maintained and tested to ensure it is working properly when needed. The extinguishers are of the non-acidic dry chemical powder type, the eyewash stations operate at low pressure, and nozzles are protected with overlapping caps to prevent the water from the line from carrying contaminants into the eyes. To prevent potential contact with cyanide, solid cyanide storage areas are designed, constructed and maintained to minimize the chance of water coming into contact with the cyanide containers or with the cyanide released from the containers during handling.

The auditor inspected the operation confirming that showers, emergency showers eyewash stations and dry powder extinguishers were available where they may be needed and tested each shower to confirm that they are functional. These water emergency stations are installed at the edge of the gutter so that the washing water immediately goes directly into it where it drains into the septic tank. The eyewash stations were in good working order and they operate with low water pressure. The auditor checked the inspection tags to verify that the extinguishers had received their monthly visual inspections and annual hydrostatic testing and certification by an outside vendor.

The auditor reviewed inspection and maintenance records for showers, low-pressure eye wash stations and non-acidic fire extinguishers demonstrating that this safety equipment has been routinely evaluated to ensure that it is available when needed.

The facility was required to include in it emergency first aids equipment, a resuscitator as an AMBU (Artificial Manual Breathing Unit) and an oxygen mask with reservoir to complete the necessary equipment available for emergency response to a worker's exposure to cyanide. The operation has provided oxygen, Cyanokit antidot and multiple means of communication/notification that are readily available in the facility. First aids kits are located inside an emergency cabinet located on the left hand side entering to each warehouse. Cyanokit is to be used by doctors at a medical center. After the audit, the facility sent the purchase order and pictures of the AMBU mask and the oxygen mask with reservoir, provided for each warehouse. No additional action was required.

For emergency communication it has reliable means of communication and emergency notification such as radios, alarm system and cell phones. Employees carry radios and there is a red emergency alarm button in the facility. They have emergency telephone lists in the operation office and in the guardhouse. The auditor confirmed compliance with this provision through a facility inspection and interviews with employees.

The facility performs monthly inspections to its cyanide first aid equipment according to requirements in the procedure I-D-MAN-001 Cyanide Warehouse Maintenance Instructions for its Equipment and Machinery. By mean of the checklist R-D-MAN-005 Operating Equipment Inspection Checklist they perform this monthly inspection. Inspection records were available for the auditor's review, verifying that monthly inspections are carried out on the first aid equipment. However, the auditor found this inspection register to be too general for the first aid equipment. Given the importance to ensure this equipment is available when needed, the auditor requested to specify each component of this equipment in the checklist.

After the audit, the operation sent the new version of the Operating Equipment Inspection Checklist (version 3) and completed inspection records, where each element of the cyanide first aid equipment had been individually detailed requiring inspection to indicate whether it complies or does not, and a field for any observations or expiration dates if apply. No additional information was required to find this in compliance. The detailed inspection checklist requires inspection for:

- Cyanokit antidote: stored in a cooler for temperature protection. Check and indicate the expiration date.
- Oxygen tank: test contents and its functionality.
- Activated carbon sludge.
- Bottled water. Indicate the refill date.
- AMBU.

On the other hand, the operation requires that prior to any work involving unloading or loading containers with cyanide, a pre-task checklist be made prior to the operation. This checklist details the items to be verified before carrying out the work, among which is the first aids equipment.

The auditor reviewed the dates of the antidote to make sure they had not expired and to determine if they were stored at the temperature specified by their manufacturer, finding it with a current date.

Employees at the facility have access to the Safety Data Sheet (SDS) of the sodium cyanide in Spanish, the language of the workforce. The auditor didn't find first aid procedures in areas where cyanide is used. This document was required to be available to workers in areas where cyanide is handled to be readily available to workers. The facility, after reviewing and detailing its first aid procedures, made available an instructive for the workers, along with the SDS, placing them in a transparent envelope attached to the entrance of each warehouse, finding this requirement in conformance.

Because the operation exclusively handles cyanide in solid form, the labeling requirements apply only to cyanide containers in IBC`s and Eco Bags. The auditor confirmed compliance with this provision by inspecting the cyanide containers stored in the operation, confirming all containers of cyanide are clearly identified as such with the legend of the product in Spanish language, among others.

Proper signage is in place in all areas for the necessary PPE to be used to prevent potential skin exposure to cyanide. In addition, there is also Procedure -D-OPE-001 Cyanide Warehouse Operations Instructions v2, which indicates the decontamination activities that workers must carry out when leaving areas with a possibility of exposure to cyanide. The procedure requires the use of safety shoes, operating gloves, covered extremities and reflective elements. The procedure also requires washing hands after working with cyanide. The company provides its workers with uniforms, one set for winter and another for summer, although there are no specific provisions regarding changing clothes. As a good practice, workers leave their work uniform and change clothes. They have dressing rooms with lockers and facilities for this purpose. The auditor reviewed the procedure and confirmed its implementation through observation of signaling and interviews with employees.

Cyanide antidote will be administered by medical personnel at the local ACHS medical center located at 3 minutes' drive from the facility. Workers at the facility have oxygen and are trained in cyanide first-aid on-site to respond in the event of a cyanide exposure.

The auditor reviewed training records confirming that individuals had received specific training in cyanide first aid. However, through interviews, the auditor identified a need to enhance the program with refresher training, particularly in oxygen therapy using oxygen masks with reservoirs and the operation of AMBU bags. During the site visit, these essential tools were unavailable. Following the audit, the warehouse provided evidence of additional training conducted by ACHS medical personnel. This training covered the use of AMBU (Air-Mask-Bag-Unit) bags for administering oxygen, oxygen usage protocols, symptoms and effects of cyanide exposure, and the action plan for transferring affected individuals to the medical center, with participation from six workers.

The facility`s Cyanide Warehouse Emergency Instructions details specific emergency response procedures to transport exposed workers to locally available qualified off-site medical facilities. The procedures state to quickly transfer to the nearby health center for medical attention along with the Cyanokit antidote to the local ACHS Quilicura medical center near the facility. There is always a pickup truck readily available at the warehouse during a cyanide operation. The auditor reviewed the operation's response procedure determining compliance with this provision.

The facility has alerted the local ACHS Quilicura medical center of the potential to treat patients with cyanide intoxication via cyanide treatment training. They visited the medical center to ensure medical treatment was available as oxygen and trained staff, the operation is confident that medical staff are qualified to treat patients with cyanide intoxication.

The auditor reviewed documentation on coordination with off-site medical staff and confirmed actions to ensure care for exposed personnel. The ACHS agency's April 7, 2025 warehouse visit focused on emergency preparedness and company responsibilities. ACHS provided advice on cyanide first aid, shared procedures for managing cyanide poisoning, and supplied contact information for the Libertadores agency for admissions in poisoning cases. An action plan was

agreed to, outlining a work plan with the company for cyanide poisoning incidents.

During the audit, the facility was developing a written procedure for investigating and evaluating incidents—P-D-INV-001 Cyanide Handling Incident Investigation Plan—to assess if the operation's policies and programs for incident prevention are sufficient or require revision. The procedure must be reviewed for suitability to the facility; once completed, staff training will be conducted, and examples of incident reports and investigations will be provided. The facility was required to complete the development and implementation of procedure P-D-INV-001 Cyanide Handling Incident Investigation Plan to investigate cyanide exposures or related incidents and to implement the procedure reporting incidents although not necessarily related to cyanide. After the audit the facility sent the approved document P-D-INV-001 Cyanide Handling Incident Investigation Plan including examples of completed incident reports and investigations not related to cyanide. No additional actions were required to find this protocol question in compliance.

Principle 3 | MONITORING

Ensure that process controls are protective of the environment.

Production Practice 3.1

Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

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

Summarize the basis for this Finding/Deficiencies Identified:

The facility does not discharge directly or indirectly to surface water. No contaminated water is discharged into the facility; only unopened dry products are handled. They have a contaminated water receiver. Spilled liquids (such as wash water) drain into an underground concrete chamber containing a PVC tank with a capacity of 1.1 cubic meters which is inspected monthly according to the emergency instructions. A contractor is in charge of removing it by suction for final disposal. The nearest stream is about ten kilometers away called Estero Colina, north of the deposit. The groundwater is about 40 meters deep.

The facility does not have direct discharges to surface water. There are no compliance points or points near the facility and no government agencies have issued permits to Draslovka related to groundwater. The site is not engaged in groundwater remediation. The facility manages only solid cyanide without opening cyanide boxes, there is no atmospheric process emissions.

At the facility the medium is not monitored due to the nature of its operations. The operation has no environmental commitment with the authority to monitor atmospheric emissions. The fixed cyanide monitors installed keep data on the levels of HCN gas emissions, which are insignificant according to the data reviewed, thus allowing the monitoring. The industrial sweeping car used to collect dust vacuum cleaner which performs frequent dry cleanings in the warehouse is used weekly to clean the warehouses floors. During the visit, no dust was perceived in the environment.

Principle 4 | TRAINING

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Production Practice 4.1

Train employees to operate the facility in a manner that minimizes the potential for cyanide exposures and releases.

The operation is	✓ in full *compliance* with	Production Practice 4.1
	☐ in substantial compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The facility was required to enhance training related to the recognition of the United Nations symbol for sodium cyanide UN 1689, as this signage identifies the presence of cyanide in the warehouse, and interviews indicated that workers were not sufficiently informed about it. Additional requirements included updating the cyanide training presentation to note that cyanide appears reddish in solution, instructing workers to leave the area in case of a spill, clarifying the slide referring to United Nations Code 1689, and specifying actions to take when hydrogen cyanide (HCN) gas concentrations trigger monitor alarms—withdraw from the workplace at 4.7 ppm and evacuate at 10 ppm. After the audit, the warehouse sent training records on the UN 1689 Code and also on training on the new cyanide training presentation where they included all the requirements mentioned above. Therefore, no additional information was requested to find this protocol question in full compliance.

Sudamerica trains its workers according to the D-CAP-001 Training Plan for Cyanide Handling, Storage, and Transportation dated November 11, 2024, and the M-D-CAP-002 Role-Based Training Matrix Cyanide Warehouse. As indicated in the Training Plan, the objective is to provide cyanide warehouse workers with the knowledge and skills necessary to safely handle this substance, prevent accidents, and respond appropriately in emergencies. Training focus on risk prevention, proper handling of the substance, the use of personal protective equipment (PPE), and proper response in emergency situations. The plan includes initial training lasting 16 hours, ongoing training 8 hours of annual refresher training, and emergency drills and training: 4 hours every 6 months.

The Role-Based Training Matrix Cyanide Warehouse defines raining needed for each work position

specifying the training content, frequency, training manager, and the required indicators / evidence.

The auditor reviewed the annual training matrix 2024, the training materials, examples of training participation lists, understanding test and interviewed employees to verify that cyanide hazards are adequately addressed and potentially exposed personnel receive both initial and periodic refresher training.

As part of the initial training, the facility provides the training Personal Protective Equipment (PPE) (2 hours) where the first part is about knowledge on the types of PPE for handling cyanide as chemical-resistant gloves; appropriate masks and respirators; chemical protective clothing (coveralls, boots); eye protection or face shields; emergency equipment: First aid kits with cyanide antidotes (such as the Cyanokit). Second part of the training is related to instructions on the proper use of PPE: how to select the appropriate PPE based on the type of work to be performed; PPE inspection and maintenance procedures; Use of PPE in emergency situations.

The auditor reviewed examples of training participation lists in 2024 in the use of personal protective equipment, observed the use of personal protective equipment at the facility and interviewed the employees regarding their training, finding this in conformance.

All personnel involved in the management of cyanide at the facility have been trained to perform their assigned tasks in a safe and environmentally sound manner. Task-specific training is aimed to instruct employees on how to accomplish their assigned tasks safely; the required procedures are designed such that the tasks are accomplished in a manner that prevents exposures and releases.

The auditor reviewed examples of training assistance records and test of understanding and through interviews, employees showed awareness of procedural requirements. Training Standard Operating Procedures (SOPs) and Good Practices (2 hours) covers the following topics. Operating procedures in the cyanide warehouse: safe reception and storage of cyanide, cyanide warehouse emergency instructions; cyanide Loading and Unloading Procedure; Emergency Plan; Use of appropriate protective equipment when handling cyanide; Labeling, internal transportation, and waste management processes and inventory control and operational records. Good work practices training cover the following topics. Personal hygiene: hand washing and changing clothes; no eating, drinking, or smoking inside the cyanide warehouse, and procedures to prevent cross-contamination.

Task training is provided to employees before they are allowed to work with cyanide in an unsupervised manner. Training effectiveness is evaluated through testing and through observation of on-the-job performance by the Operations Supervisor. The Training Plan for Cyanide Handling, Storage, and Transportation requires that new staff be inducted with the work procedures before they can work with cyanide. This Plan is aligned with current regulations in Chile and is periodically updated. The auditor verified compliance by reviewing training records and interviewing operational and supervisory personnel.

The facility provides refresher training annually to its employees, on normal tasks involving handling cyanide to ensure that employees continue to perform their jobs in a safe and environmentally protective manner, as scheduled in the Training Plan which includes ongoing training 8 hours of annual refresher training. This program, among others, includes specific training to their assigned tasks and address cyanide safety. Formal evaluations were verified by review of the evaluation records and interviews with employees.

The operation´s Training Plan identify the specific cyanide management elements that the employees must be trained in to properly perform the required tasks. Training based on cyanide working procedures identifies the important items that must be conveyed to a new employee regarding how the cyanide-related tasks must be performed. The auditor reviewed the training material and interviewed workers and trainers to find compliance with this provision.

The training is provided by the operation H&S Coordinator who trains in topics of regulations and safety. Has technical training in risk prevention with 20 years of experience. Training is also provided by the company`s Key Account Manager who has more than 15 years of experience handling cyanide and 10 years training on cyanide to members of the ACHS and firefighters. He is a chemical engineer and holds a master's degree in environmental engineering. Training is also provided by the Warehouse Operations Supervisor in issues of warehouse operations. He has 10 years of experience in the company, is an accountant by training. Verification included interviews, confirming their level of expertise in operating the facilities and in training is adequate.

The facility evaluates the training effectiveness through testing and observation of on-the-job performance by the Operations Supervisor. According to sated in the Training Plan , assessment of acquired knowledge is through written exams, job observation, and emergency drills. The auditor reviewed records for formally documented evaluations, finding it in compliance.

Production Practice 4.2

Train employees to respond to cyanide exposures and releases.

The operation is	✓ in full *compliance* with	Production Practice 4.2
	☐ in *substantial* compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The operation trains all its employees working in the facility in what to do in the event they observe a cyanide release and/or exposure, to call for assistance and to provide cyanide first aid themselves. Personnel are trained in the different procedures that the site has to respond to a situation of exposure or release of cyanide. According to the Training Plan, employees are trained

to provide first response in case of cyanide spills and first aids; also, they are trained in the Emergency Plan to call for the assistance of medicals from the local ACHS medical center located in the surroundings of the facility. Workers are trained annually in in the Emergency Response Plan, among others.

The auditor reviewed the operation's training matrix, records of emergency response training, and through interviews with facility personnel confirmed that appropriate training is provided to site personnel.

The auditor required the operation to reinforce first aid training for cyanide exposure, especially emphasizing oxygen therapy. This was after interviewing several workers. After the audit, the warehouse sent attendance records to the first aid course, including oxygen administration practices. The training was carried out by an external contractor who is the service provider of the Chilean mutual association. No information was required to find this protocol question in compliance.

Personnel at the facility are trained in all the necessary actions to carry out against cyanide exposures and in release response actions as is assigned in the operation's emergency response plan. The operation's requirements for employee training, including records of the training that these employees receive, as included in the annual training matrices. The auditor reviewed examples of training participation lists from throughout the recertification period and interviewed workers verifying compliance.

The facility retains the training records through the electronic BUK platform documenting the training the workers have received including the names of the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training material. The auditor reviewed these records through the BUK system where he confirmed face-to-face training provided to the staff on April 24, 2025, on safe handling of cyanide. He reviewed the training minutes with the electronic signatures. Also, through this database it was reviewed the understanding tests, determining compliance with this provision.

Principle 5 | EMERGENCY RESPONSE

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

Production Practice 5.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is	✓ in full *compliance* with	Production Practice 5.1
	☐ in substantial compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The facility has developed the written emergency response plan I-D-EME-001 Cyanide Warehouse Emergency Instructions v2 (the ERP or the Plan), detailing the specific emergency response procedures to respond to cyanide exposures and the processes to be followed in the event that cyanide is ingested, skin or eye contact made, and/or inhaled. The Plan describes specific emergency response procedures to respond to cyanide releases and exposures. The Plan deals with initial actions and emergency evaluation at the scene, personal protective equipment (PPE) required, solid cyanide spill in enclosed/ open spaces, fire hazard, symptoms of cyanide poisoning, environmental hazards, cleaning and decontamination.

The Plan considers the potential failure scenarios appropriate for its site-specific environmental and operating circumstances as a release during handling cyanide of solid cyanide. In the event of a cyanide spill, the amount spilled would be less than a ton over a concrete pavement due to the nature of its operation as they handle one ton cyanide boxes one at a time. Cyanide manipulation is carried out on an impermeable surface and no water courses are in the vicinities. The procedure prohibits the transfer of cyanide in the presence of rain or bad weather. The ERP does not consider a catastrophic release of hydrogen cyanide gas (HCN) as a scenario due to the nature of its operation.

Releases during fires are covered under the ERP. In all cases, the Plan indicates that, if possible, to fight the fire with dry chemical powder extinguishers that are not acidic or that contain water. If the fire cannot be controlled, it is preferable to let the product burn. For larger fires, the Plan considers calling the local firefighter's company. Explosion scenarios are not considered possible in the Plan as the facility does not store substances or materials that could result in explosions.

The Plan does not consider emergency scenarios due cyanide piping, valves or tanks rupture as

the facility only manages solid cyanide. Also, the facility considers power outages and equipment failures inapplicable because of the manual approach to transloading wherein the workers would simply stop work. The scenarios of failure due to overtopping of ponds, tanks, and waste treatment facilities are inapplicable to the operation because there is no cyanide solution at the facility.

The auditor verified that the Plan address those release scenarios that may reasonably be expected to occur and result in significant impacts to its workers, community and environment, as applicable to the site-specific features of the operation and its environmental setting.

The Plan address the types of releases and responses that may be expected to occur at the site and include sufficient details so that personnel know the specific actions they are expected to take in response to the emergency. The degree of detail and specificity in the Plan is adequate to the environmental setting of the operation, the nature of the potential receptors, and the controls in place at the facility. The warehouse is located in an industrial area.

The Plan describes step-by-step response actions for solid cyanide spills, fire, cyanide exposed workers and site evacuation. There is also a community telephone directory for contacting the neighboring industrial facilities should a broader evacuation be needed. The use of cyanide antidotes and first aid measures for cyanide exposure are addressed in procedure Control of releases at their source, containment, assessment, mitigation and future prevention of releases are addressed in the ERP. The auditor evaluated the Plan confirming its level of detail is appropriate.

Production Practice 5.2

Involve site personnel and stakeholders in the planning process.

	✓	in *full* compliance with	
The operation is	☐	in *substantial* compliance with	Production Practice 5.2
	☐	not *in* compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The operation has involved its own site personnel in the emergency planning process via regular training in the Plan and review and revision of the emergency procedures. The site is located in an industrial zone; the operation has communicated its ERP with the local Municipality of Quilicura. There are no residential communities in the vicinity of the facility. The auditor reviewed meeting records with the municipality, also interviewed site personnel confirming compliance with this

provision. Nevertheless, the site was required to involve the surrounding warehouses in the emergency planning process. After the audit the facility sent visit records to the warehouses and industrial facilities in the vicinity coordinating emergency response actions for mutual and to involve them in emergency planning. No additional actions were required to find this in compliance.

The facility has informed of the nature of their risks associated with accidental cyanide release to the community representatives through the Municipality of Quilicura regarding what communications and response actions are appropriate. The warehouse has a resolution from the authority authorizing them to operate as a warehouse for hazardous substances. This authorization requires showing that, in addition to having adequate facilities to store this type of substances, they also have emergency response plans which have been approved by the authority and by the fire department.

The operation engaged local firefighters from Quilicura and are in coordination to perform a cyanide emergency mock drill together. On the other hand, staff from ACHS medical center visited the warehouse at the operator's invitation to participate in reviewing the activities relevant to their designated roles in the event of a cyanide emergency. The auditor reviewed the meetings minutes and also interviewed site personnel confirming compliance with this provision.

The auditor required the warehouse to identify which contractor provides final disposal services for cyanide-contaminated waste and to present its procedures for transportation and final destination. After the audit the facility provided email correspondence confirmation the collaboration and availability of external contractor Ambipar for specialized emergency response. This was also confirmed in the emergency response plan stating in addition Ambipar is the contractor responsible for transporting cyanide-contaminated waste from the warehouse to the authorized hazardous material landfill for final adequate disposition. Ambipar provided its response procedure. No additional information was required to find this protocol question in compliance.

Given that the warehouse has recently started sodium cyanide storage operations commissioned by Draslovka, the auditor verified through discussions with warehouse managers that regular consultations and communications with stakeholders are planned to ensure the emergency response plan addresses relevant conditions and risks. This is supported by meeting minutes indicating an agreement for ACHS medical staff to provide first aid training related to cyanide exposure and coordination with Quilicura firefighters to conduct a joint drill.

Production Practice 5.3

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

The operation is	✓ in full compliance with	Production Practice 5.3
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The ERP addresses the primary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Plan. The Plan also identifies lead coordinators and their alternates and authorizes them to commit resources, as necessary, and identifies the brigade members by name. The Training Plan and the Role-Based Training Matrix requires training in the emergency response procedures, among others. The Plan includes call-out procedures, a communications flowchart, and 24-hour contact information for the coordinators and response team members. The duties and responsibilities of the brigade are clearly specified in the Plan, lists all emergency response equipment that should be available and include procedures to inspect emergency response equipment and assure its availability when required. The Plan describes the role for ACHS medical center and firefighters from Quilicura, the entities having designated roles in emergency response procedure.

The auditor required for emergency response plan, in the emergency response equipment available, to indicate the quantity of each piece of equipment. Also requested that the inspection list be broken down individually for each piece of equipment to ensure its availability and proper functioning. At the time of the audit, the inspection form only included one field, as a general compliance check for emergency response equipment. After the audit, the operation sent the emergency response plan including a complete list of emergency response equipment indicating the quantities. It also sent an inspection form for this equipment where each one of them was mentioned to control its proper functioning. No additional information was required to declare this question of the protocol in full compliance.

The facility confirmed that outside entities such as ACHS and local firefighters are aware of their involvement and are planning to perform together a cyanide emergency mock drill. The outside entities with a role in the ERP are hospitals and firefighters. The necessary information as meeting minutes were available for the auditor's review.

Production Practice 5.4

Develop procedures for internal and external emergency notification and reporting.

The operation is	✓ in full compliance with	Production Practice 5.4
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The Plan includes the procedure and contact information for notifying management, regulatory agencies, outside response providers and medical facilities of the emergency. The Plan states in a scenario where an emergency is identified, whether Level II, or III, first communication is internal to Management and the Management follows up with Dependencies and Authorities. The Plan contains contact information for internal communications to South American Commercial, Draslovka as the cyanide consignor, Quilicura fire department, ACHS Quilicura Medical Center, Quilicura Municipality and the police.

The Plan includes procedures and contact information for notifying potentially the Quilicura Municipality as a representative of the local community, although it is not in the vicinity of the warehouse. The situation is communicated to Sudamerica management team, who takes the lead in media management.

The auditor required that contact information about the local environmental authority to be included. After the audit, the operation sent records by means of reception letters, where the firefighters and the local police (*carabineros*) are established as the contact in case of environmental emergencies. No additional information was required to find this question of the protocol in full compliance.

The ERP includes a requirement and details to notify Draslovka so that they in turn inform the ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such communications have been made as there was no significant incident in the operation.

Production Practice 5.5

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

The operation is	✓ in full *compliance* with	Production Practice 5.5
	☐ in *substantial* compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The Plan describes specific measures to recovery of solids remediation measures to the limited extent that such procedures are needed for this facility and setting. The facility does not manage cyanide solutions. Nonetheless, the Plan describes methods to wash surfaces and materials with a dilute (5%) sodium hypochlorite (commercial leach) solution to destroy cyanide, and that the neutralization materials are to be treated as hazardous wastes. Provision of an alternate drinking water supply is inapplicable because the facility already provides bottled water for their staff, and there are no discharges to surface water or groundwater that might affect intakes or wells, respectively.

The emergency response plan lacks details on who will oversee remediation, hazardous waste disposal, and where responsibility for defining this information lies.

The ERP prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water or that could be expected to enter surface water, although all activities are performed inside the facility cyanide yard properly confined and waterproofed and away from bodies of water. There are no surface water bodies near the site.

The Plan address the potential for environmental monitoring to the limited extent that such procedures are needed for this facility and setting. Draslovka does not manage cyanide solutions at the facility; most surfaces are roofed, and pavements with concrete.

Production Practice 5.6

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

The operation is	✓ in full *compliance* with	Production Practice 5.6
	☐ in substantial compliance with	
	☐ not in *compliance* with	

Summarize the basis for this Finding/Deficiencies Identified:

The Plan includes provisions for reviewing and revising its emergency response planning procedures on a yearly basis. The header of each procedure lists dates for the original, current, and next revisions. The auditor observed that the plan was starting from November 2024 stating the header next revision to be made in November 25. After the audit the facility reviewed the Plan to version 2 , dated June 2025.

The auditor instructed Sudamerica to conduct a mock emergency drill focused on cyanide management and requested a detailed report on the results. Additionally, the auditor emphasized the importance of documenting the frequency of future emergency drills within the Emergency Response Plan or another relevant record.

Following this directive, on July 7, the warehouse carried out a simulated cyanide spill drill involving eight workers. The drill was thoroughly documented with photographic evidence showcasing its execution. A comprehensive report was submitted, which included key findings, identified areas for improvement, proposed corrective actions, assigned responsibilities, and established an annual schedule for such drills as part of the emergency response planning.

Given that workers had recently completed both theoretical and practical first aid training, no further information was deemed necessary. However, it was recommended that the next exercise focus on simulating an emergency scenario involving cyanide exposure to enhance preparedness for different situations.