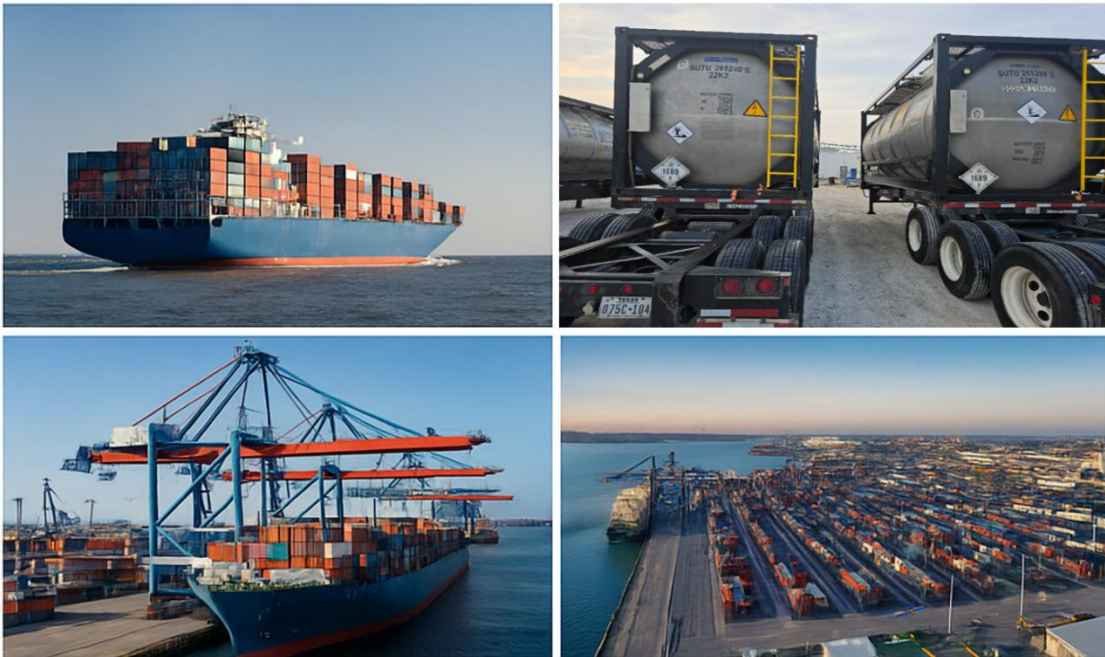




**ICMI Cyanide Code Supply Chain Recertification
Summary Audit Report
Orica SMC NA Global Ocean
Supply Chain
2026 Recertification Audit**



Submitted to:

The International Cyanide Management Institute
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USA

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Operation General Information

Operations Audited:	1. Orica SMC NA Supply Chain Management 2. Ocean Carriers (Due Diligence Assessments) 3. Global Ocean Ports (Due Diligence Assessments)
Contact information for this Supply Chain:	Jacklyn Lands North America Manager, Supply Chain & Logistics Orica Specialty Mining Chemicals Jacklyn.lands@orica.com

Company Background Information

Orica Specialty Mining Chemicals (SMC) is a leading global producer and supplier of sodium cyanide for the gold and silver mining industry, providing both solid and solution sodium cyanide. In February 2024, Cyanco, a leading supplier of sodium cyanide in North America was acquired by Orica Specialty Mining Chemicals North America (herein referred to as Orica SMC NA). The company is now fully integrated into Orica's global manufacturing and distribution network.

Headquartered in Denver, Colorado, United States of America, Orica SMC NA operates manufacturing, packaging, and distribution facilities that support customers across North America, Latin America, Africa, and other international regions. Orica SMC NA emphasizes safe production and transport practices, adherence to the International Cyanide Management Code, and partnerships with mining companies to ensure responsible supply chain management.

Orica SMC NA maintains production and distribution terminals in the United States in Alvin, Texas (outside of Houston), Winnemucca, Nevada, and Cheyenne, Wyoming. In Canada, the company's distribution terminal is in Cadillac, near Rouyn-Noranda, Quebec. Orica SMC NA maintains Cyanide Code certifications for its production operations, distribution terminals, and supply chains.

Supply Chain Description

This Orica SMC NA Global Ocean Supply Chain includes all ocean movements that originate in North America at the Port of Houston and the destination ports, globally.

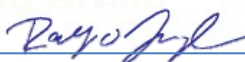
No new ocean carriers were added to this supply chain since the previous re-certification audit.

This Global Ocean Supply Chain includes the following ocean carriers:

- Hamburg Sued
- Maersk
- Hapag Lloyd
- Mediterranean Shipping Co. (MSC)
- CMA CGM

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- Compañía Sud Americana de Vapores (CSAV)
- Zim Lines
- Industrial Maritime Carriers, LLC
- ONE

Ports included in this supply chain are listed below:

- Port of Callao, Peru
- Port of Caucedo, Dominican Republic
- Port of Cortes, Honduras
- Port of Houston, USA
- Port of Izmir, Turkey – new this recertification cycle
- Port of Mersin, Turkey – new this recertification cycle
- Port of Nouakchott, Mauritania
- Port of Tema, Ghana

This Global Ocean Supply Chain is one of three certified supply chains maintained by Orica SMC NA. Orica SMC NA also maintains the North America Rail & Truck and “Western U.S./Canada Supply Chain.” These rail and truck supply chain addresses cargo shipments in the United States, Canada, and Mexico via rail and truck. The Western U.S./Canada Supply Chain includes shipments to Alaska from the U.S. West Coast.

Transportation to and from ports and interim storage at ISOChem in Houston is done using certified Signatory transportation partners and the certified North American Rail & Truck Supply Chain. ISOChem is an interim storage operation that is common to the Orica SMC NA Global Ocean and North American Rail & Truck supply chains. The details regarding the on-site Cyanide Code audit of ISOChem are in the North American Rail & Truck Supply Chain report. The Western U.S./Canada Supply Chain includes the ports and barges used along the route to Alaskan and Western Canadian mines.

The Winnemucca Plant has been in operation since 1990 and originally produced only cyanide solution. The plant was expanded to also produce sodium cyanide solid briquettes in 2019. The operation was one of the world’s first production facilities certified to the Cyanide Code in 2006. The product is delivered to gold mining customers in the western US from Winnemucca in bulk delivery tank wagons and ISO tanks. The operation also ships product by rail to customers in Canada and other U.S. destinations via its Canadian Distribution Center in Cadillac, Quebec (Canada) and the Cheyenne Distribution Center in Wyoming (United States). Both distribution centers are audited to the ICMI Production Protocol separately and maintain individual Cyanide Code certifications.

Orica SMC NA started producing solid sodium cyanide in the industrial park of the Chocolate Bayou Plant of Ascend Performance Materials at Alvin, Texas in September 2012. The plant was acknowledged by the ICMI as being International Cyanide Management Code (Cyanide Code) certified in November 2013 and has been undergoing regular recertification audits since. The plant ships product in rail sparger cars, ISO containers, and one metric ton bag/boxes packed into rail box cars and 20-foot intermodal containers.

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Product manufactured at the Winnemucca and Alvin (Houston) locations is shipped by truck, rail, barge, and ocean carrier. Shipments from the Port of Houston in the United States to international ports are included in the scope of this re-certification audit report. Interim storage activities in the Port of Houston and international receiving ports are also part of this re-certification audit report.

Orica also maintains a global marine supply chain for product that is shipped from Australia. The Orica Ocean Supply Chain was most recently re-certified in 2024.

Audit Implementation and Conclusions

The audit was performed by an independent third-party auditor who is pre-approved by the ICMI as a Lead/Technical Auditor for cyanide transportation and production operations. Shipments that were destined for international global ports were physically observed during the audit of the Orica SMC NA Rail & Truck supply chain.

Orica SMC NA cyanide transportation management practices were evaluated against the Cyanide Code requirements documented in the 2021 revisions of the ICMI Cyanide Code, ICMI Cyanide Code Transportation Protocol, and the ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol. Orica SMC NA internal standards, policies, practices, and procedures regarding the management of the Cyanide Transportation Supply Chain were reviewed.

The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at Orica SMC NA. Records regarding ocean carrier selection and performance, incident tracking, equipment maintenance, security measures, shipment tracking, cargo labeling practices, shipping documentation were sampled for the recertification period and were found to be acceptable.



Auditor's Finding

The Orica SMC NA Global Ocean Supply Chain is in **FULL COMPLIANCE** with the International Cyanide Management Code.

The cyanide management practices for Orica SMC NA were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol*. Orica SMC NA internal standards, policies, practices, and procedures regarding the management of the cyanide operations were reviewed.

The results of this re-certification audit demonstrate that the Orica SMC NA Ocean Supply Chain is in **FULL COMPLIANCE** with International Cyanide Management Code requirements.

Compliance Statement

This Ocean Supply Chain has not experienced any compliance issues or significant cyanide incidents during the three-year audit cycle.

Auditor Information

Audit Company:	CN Auditing Group www.cnauditing.com
Lead / Technical Auditor:	Ralf Jurczyk E-mail: rj@cnauditing.com
Dates of Audit:	May 13-15, May 28-30, 2025 with Due Diligence Evaluations performed in June 2025 and a follow-up audit on January 22, 2026

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Auditor Attestation

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification 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.

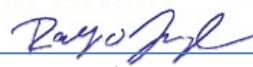
I attest that this Summary Audit Report accurately describes the findings of the re-certification audit. I further attest that the re-certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code *Cyanide Transportation Verification Protocol*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

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Principles and Standards of Practice - Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.

Orica SMC NA has implemented a process for selecting transport routes that minimizes the potential for accidents and releases or the potential impacts of accidents and releases.

Interviews were conducted onsite with supply chain personnel. Shipping records for the entire three-year re-certification period were reviewed during the audit. Orica SMC NA does not control the routing of shipments via ocean; however, they do choose the shipping ports, receiving ports, and ocean carriers. Orica SMC NA personnel ensure that all shipments are made through ports that are authorized for managing hazardous materials and by ocean carriers that are authorized to transport cyanide.

The risk evaluations associated with this supply chain focus primarily on the selection of the international ports to ensure that safety and security standards are acceptable. Infrastructure around the ports is also evaluated for alignment with Cyanide Code criteria. Ocean carriers are selected based on their abilities to deliver cyanide safely into the necessary ports and on their qualifications for transporting dangerous goods according to International Maritime Dangerous Goods (IMDG) requirements.

Risk mitigation measures have been taken in the development and implementation of an improved international shipment tracking process. The parent organization (Orica) also has a certified maritime supply chain and evaluates global risks as part of its certified processes.

Orica SMC NA uses experienced freight forwarding services to ensure compliant shipments. According to interviews, the freight forwarder reports feedback to Orica SMC NA if a route, port, or ocean carrier is deemed to be at increased risk for shipment disruption or other transportation issues.

Each port is in a country that subscribes to the International Maritime Organization (IMO) maritime regulations, including Safety of Life at Sea (SOLAS) and International Ship and Port Facility Security (ISPS) requirements to manage safety and security risks at sea and at ports.

Orica SMC NA does not control the exact routes taken by ocean carriers, but its collaboration with leading international freight forwarders to manage its freight was deemed acceptable by the auditor.

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The primary risks with the ocean transportation supply chain relate to the possibility of losing track of a shipment due to a trans-shipment or other factors, or the risk of having a container opened en-route by a person who has not been trained in cyanide safety. Orica SMC NA tracks its shipments continuously, this capability was assessed during the audit and was found to be suitable.

According to interviews with Orica SMC NA personnel, all containers are sealed to mitigate the risk of having unauthorized personnel access the product during transit. Seal numbers were observed on all shipping papers reviewed. Photos showing the seals were available for review during the audit. The risk mitigation practices were found to be acceptable by the auditor.

Orica SMC NA communicates and engages regularly with its transportation partners to ensure that they are aware of applicable Cyanide Code requirements. Orica SMC NA ensures that its transportation partners are assessed for Cyanide Code compliance during either internal port audits, Cyanide Code re-certification audits, or due diligence assessments.

The operation is:	☒ In full compliance with	Standard of Practice 1.1
	☐ In substantial compliance with	
	☐ Not in compliance with	

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.

Orica SMC NA does not operate transport vehicles in this Ocean Supply Chain.

Orica SMC NA performs due diligence evaluations to ensure that its ocean carriers and ports operate according to recognized EHS standards and are experienced in the handling of hazardous goods.

Orica SMC NA communicates and engages regularly with its transportation partners to ensure that they are aware of applicable Cyanide Code requirements. Orica SMC NA ensures that its transportation partners are assessed for Cyanide Code compliance during either internal port audits, Cyanide Code re-certification audits, or due diligence assessments.

The operation is:	☒ In full compliance with	Standard of Practice 1.2
	☐ In substantial compliance with	

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

Inter-modal containers used for international shipments are owned and controlled by the ocean carriers that carry the containers to international destinations. Orica SMC NA leases and maintains

the ISO tanks used in this supply chain. Inspection and testing records for these tanks were reviewed and found to be complete during the audit.

Orica SMC NA uses only authorized packaging for its solid sodium cyanide shipments. According to interviews, Orica SMC NA personnel inspect the transportation containers prior to loading them.

According to interviews with Orica SMC NA personnel, standard weights are loaded, and standard blocking and bracing configurations are used for intermodal and ISO containers. Shipping paperwork was reviewed during the audit and showed the number of packages shipped and the weight of the cargo. This information is used by transportation partners to ensure that overloading does not occur.

Loads on container ships are inspected and controlled according to the International Convention on Load Lines (ICLL), an International Maritime Organization (IMO) Convention that is applicable for all container vessels engaged in international trade. The ICLL defines the maximum allowed draught of the vessel, and how this is to be marked on the side of the vessel. Container ships are required to go through an International Load Line Certification process that verifies that the vessel strength and stability have been approved for the specific loading capacities. Lines are drawn on the sides of ships to mark the height of the freeboard mark that must be maintained. The use of this mark ensures that the vessel has a reserve buoyancy and bow height in compliance with the requirements of the ICLL. The use and monitoring of this ship characteristic ensures that the container ship is not overloaded.

Additional details regarding transportation equipment is included in the due diligence sections of this report.

The operation is:	☒ In full compliance with	Standard of Practice 1.3
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

Orica SMC NA ensures that cyanide is transported in a manner that maintains the integrity of its packaging. Transportation of cyanide by sea is done in compliance with the International Maritime Organization Dangerous Goods Code. Cyanide shipments are packaged in accordance with Part 4 of the International Maritime Organization Dangerous Goods (IMO DG) Code and according to the packaging instructions and packaging provisions indicated on the DG List. Cyanide packages are marked as required by Section 5.2.1 of the IMO DG Code and according to the labeling requirements indicated on the DG List. Cyanide packages are labeled as required by Section 5.2.2 of the IMO DG Code and according to the labeling requirements indicated on the DG List. Cyanide packaged in transport units are placarded and marked as required by Chapter 5.3 of the IMO DG Code.

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Orica SMC NA uses placards and other signage to identify the shipment as cyanide, as required by local regulations or international standards. The UN packaging number UN 1689 is displayed on all intermodal containers and ISO tanks. Observations made during the audit confirmed this practice.

Orica SMC NA does not manage the ocean transport directly, but it does perform due diligence evaluations to ensure that its ocean carriers and ports operate according to recognized EHS standards, safety program expectations, and that they are experienced in the handling of hazardous goods. Trucking and rail companies within the certified Rail and Truck Supply Chain deliver the cyanide in secured vessels and containers to the Port of Houston which is secured with fencing and 24/7 access controls. Containers are placed on vessels by stevedoring companies that work at the ports. Stowage plans for the containers are developed in accordance with international maritime laws. Blocking and bracing requirements are detailed in the International Maritime Dangerous Goods Code (IMDG regulations) to ensure that the loads do not shift.

The operation is:	☒ In full compliance with	Standard of Practice 1.4
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

Orica SMC NA transports shipments of cyanide by sea in compliance with the Dangerous Goods Code of the International Maritime Organization. Orica SMC NA ships its sodium cyanide on ocean carriers that have demonstrated safety programs and safe performance. Ocean carriers are subject to all International Maritime Organization (IMO) requirements, including those relevant to cyanide shipment safety. The following information was evaluated during the audit:

- a) Orica SMC NA packaging specifications were found to be conformant to the packaging requirements of the IMDG Code.
- b) Shipping containers were reviewed during the associated North American Rail & Truck Supply Chain audit. Photos of packaging were also reviewed. Packages and shipping containers were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
- c) Shipping containers were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
- d) Loaded intermodal and ISO tank shipping containers were evaluated and were found to be marked and placarded in accordance with the IMDG Code.
- e) Shipping documents were reviewed for a sample of cyanide shipments from 2023 through 2025 for each ocean carrier used in this supply chain. All information required by the IMDG Code is required as standard practice on Orica SMC NA shipping paperwork.

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- f) The container packing certificates from 2023-2025 shipments were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMDG Code requirements.
- g) Confirmation was made through the due diligence process that ocean carriers involved in this supply chain use detailed stowage plans for the placement and safe transportation of all hazardous materials, including sodium cyanide shipments.
- h) Confirmation was made through the due diligence process that ocean carriers involved in this supply chain have cyanide emergency response information available on board each vessel, as required by Section 5.4.3.2 of the IMDG Code.
- i) Confirmation was made through the due diligence process that ocean carriers involved in this supply chain complies with stowage and separation requirements of Part 7 of the IMDG Code. This includes the requirement that sodium cyanide be stored separately from acids, strong oxidizers, and explosives.

The operation is: ☒ In full compliance with Standard of Practice 1.5
☐ In substantial compliance with
☐ Not in compliance with

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

Orica SMC NA has access to systems to track the progress of cyanide shipments. Interviews with Orica SMC NA personnel were conducted during the audit. Orica SMC NA online tracking capabilities through ocean carrier information portals were confirmed through computer demonstration and interview. Orica SMC NA has real-time tracking capabilities for its shipments through its freight forwarder, the ocean carrier websites, and the GPS tracking equipment that is attached to ISO tanks.

Shipping paperwork was reviewed during the audit from multiple shipments made during the re-certification period. Records were found to be conformant to Cyanide Code requirements, including chain of custody requirements.

The following documentation is used to track inventory and movement of cyanide: bills of lading and shipping papers indicating the number of packages and amount of material. Information was found to be complete.

The operation is: ☒ In full compliance with Standard of Practice 1.6
☐ In substantial compliance with
☐ Not in compliance with

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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.

See Ocean Carrier and Port Sections of this report for information regarding interim storage.

Interim storage activities in this supply chain, as defined by ICMI, are limited to those that take place at the ocean ports. Port operations ensure that the storage locations and security access to the ports is in alignment with Cyanide Code requirements. The interim storage location in Houston, Texas (ISOChem) underwent a full Cyanide Code audit and is included in the Orica SMC NA Rail & Truck Supply Chain certification.

Orica SMC NA evaluated the suitability of interim storage at ports through its due diligence evaluation process. The ports were each evaluated on-site initially when they were included in the certified supply chain to confirm fulfillment of Cyanide Code requirements and then remotely to confirm continued suitability during this re-certification audit cycle. The due diligence assessment results are included later in this report under the Due Diligence sections.

The operation is:	☒ In full compliance with	Standard of Practice 2.1
	☐ In substantial compliance with	
	☐ Not in compliance with	

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.

Orica SMC NA maintains four emergency response planning documents that address Cyanide Code emergency response requirements.

1) The North America Crisis Management Plan (NACMP) describes the roles, responsibilities, and actions the NA Leadership Team (NALT) would take in the event of an emergency. This document was last updated in 2026.

2) The Emergency Response Guide – Sodium Cyanide (ERG), Version 14, last updated in 2026, contains cyanide-specific details for cyanide event response. The purpose of the ERG is also to

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provide partners along the supply chain with direct emergency response information and guidance.

3) The Emergency Response Assistance Plan (ERAP) is maintained in compliance with Transport Canada transportation regulatory requirements and includes emergency planning information specifically for emergencies that may occur within Canada. This document was last updated in 2025.

4) The Transport Incident Notification Checklist (TINC) contains the primary emergency contacts, including instructions for ICMI notifications. This document was last updated in 2026.

The emergency planning documents noted above were found to be appropriate for the locations, transportation routes, for both solid and liquid cyanide, the methods of transportation as well as interim storage, and transport infrastructure (ocean transport and port interim storage).

Both the ERG and ERAP documents include very detailed descriptions of different emergencies and the actions to take in these emergencies. This includes emergencies inside and outside of facilities, spills on roadways, shipping containers and spills to waterways. Orica SMC NA also contracts with professional emergency response and remediation firms throughout the supply chain.

The ERG clearly outlines the roles and responsibilities of internal and external responders.

The ERG was communicated with external emergency response contractors and Orica personnel who have responsibilities named in the plan. Records for the 2026 ERG, Version 14 showing acknowledgement and acceptance of the ERG were available for the external service providers and internal personnel.

The operation is:	☒ In full compliance with ☐ In substantial compliance with ☐ Not in compliance with	Standard of Practice 3.1
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Transport Practice 3.2

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

The ERG in conjunction with the NACMP clearly outline the duties and responsibilities of Orica personnel, and its internal and external emergency response partners.

Orica has trained its personnel in cyanide safety and its emergency planning documents. Orica provided the 2026 ERG to emergency response partners. Records acknowledging the ERG and confirming that training was done were available for all relevant stakeholders and personnel.

For emergencies during transport or along the transportation route, contracts exist with external

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emergency contract providers. The list of emergency response information that is available and the process for maintaining this equipment were provided for review by the auditor. The list and process for maintaining equipment were found to be acceptable.

Orica SMC NA contracts with Premium Environmental Services (PES) as its emergency response partner for this supply chain. The ERG clearly outlines the roles and responsibilities of Orica personnel, PES, and transporters within the supply chain. Records were available from all entities named in the plan to demonstrate that communications were completed in 2026 and that the service provider and Orica personnel accept the emergency response roles defined in the ERG.

The operation is:	☒ In full compliance with	Standard of Practice 3.2
	☐ In substantial compliance with	
	☐ Not in compliance with	

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The telephone numbers and contact information are maintained in the Event Notification List document. The NA Crisis Plan, the ERG, and the ERAP also have procedures for making internal and external emergency notifications. Contact information in each of the planning documents was found to be complete and current.

The procedure in Section 4 of the ERG calls for review on an annual basis or whenever changes are known to have taken place. The ERG is to be communicated to internal and external stakeholders as outlined in section 3.3.1.

The ERG calls for notification of the ICMI for any significant cyanide incidents and details the significant cyanide events as detailed in ICMI's Definition and Acronyms.

Any significant cyanide incident in the supply chain would be reported to Orica SMC NA and its emergency response partners. Orica SMC NA procedures detail that Orica SMC NA would notify ICMI in the event of a significant cyanide incident involving its product.

The operation is:	☒ In full compliance with	Standard of Practice 3.3
	☐ In substantial compliance with	
	☐ Not in compliance with	

Transport Practice 3.4

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

The ERG contains detailed information remediation for multiple scenarios. This includes remediation of a spill of solid or liquid cyanide to soil or water. Scenarios such as fire and human exposure are also included. Remediation and testing regimes, especially for spills to soil and water are highly detailed.

The ERG specifically makes note that sodium hypochlorite and ferrous sulphate must never be used to treat cyanide that has been released into natural surface water bodies. Extensive supporting technical information is included in the document.

The operation is:	☒ In full compliance with	Standard of Practice 3.4
	☐ In substantial compliance with	
	☐ Not in compliance with	

Transport Practice 3.5

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

The ERG and NACMP are planned to be reviewed on at least an annual basis. All emergency planning documents were most recently updated in 2025 and 2026. The procedure also calls for reviews after any actual incident, as well as after drills.

Orica has started holding tabletop drills for its cyanide operations in North America. One Orica SMC NA tabletop drill was held in January 2026 with the Cadillac production facility. Orica SMC NA personnel also participated in a transporter drill in 2025. The Orica North America Leadership Team (NALT), with responsibilities for SMC (cyanide-related) and other Orica operations in North America, held a tabletop drill in November 2025 to test the NA Crisis Plan as it pertains to cyanide emergencies.

The ERG and NACMP are planned to be reviewed on at least an annual basis. The procedure also calls for reviews after any actual incident, as well as after drills.

The Emergency Response Guide (ERG) was completely updated in 2026 and all identified deficiencies from previous drills and reviews were addressed.

The operation is:	☒ In full compliance with	Standard of Practice 3.5
	☐ In substantial compliance with	
	☐ Not in compliance with	

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Ocean Carrier Due Diligence Investigation Results

Orica SMC NA ships its solid sodium cyanide on ocean carriers that meet recognized Environmental, Health, and Safety (EHS) standards and that are experienced in the handling of dangerous goods. The ocean routes are chosen by the ocean carriers. Each ocean carrier used for cyanide shipments undergoes an initial Due Diligence review of their ability to fulfill ICMI Code requirements. Carrier performance is then monitored continuously and if there are transportation or safety issues, Orica SMC NA discontinues using the carrier.

Initial Due Diligence assessments were conducted for the ocean carriers and ports included in the scope of the Global Ocean Supply Chain. No new ocean carriers were added to this supply chain since the previous re-certification audit.

This Global Ocean Supply Chain includes the following ocean carriers:

- Hamburg Sued
- Maersk
- Hapag Lloyd
- Mediterranean Shipping Co. (MSC)
- CMA CGM
- Compañía Sud Americana de Vapores (CSAV)
- Zim Lines
- Industrial Maritime Carriers, LLC
- ONE

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.

Ocean carriers transporting hazardous substances such as sodium cyanide are subject to stringent international regulations that require careful route planning to minimize risks to crew, cargo, the public, and the environment. The International Maritime Organization (IMO) sets the overarching framework through instruments such as the International Maritime Dangerous Goods (IMDG) Code and the International Convention for the Safety of Life at Sea (SOLAS). Both establish mandatory provisions that oblige carriers to assess navigation routes not only in terms of efficiency but also in relation to safety and environmental protection.

The IMDG Code, mandatory under SOLAS since 2004, sets out the classification, packaging, marking, stowage, and segregation rules for dangerous goods. While the Code primarily focuses on cargo handling, it also reinforces that carriers must ensure safe transport conditions, including selecting ports and trans-shipment terminals capable of handling Class 6.1 toxic substances. In

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practice, this extends to planning routes through facilities with adequate emergency response capability and security controls, minimizing the potential for accidents or releases in inadequately equipped locations.

SOLAS Chapter V explicitly requires that all vessels maintain a voyage plan approved by the ship's master. The voyage plan must take into account IMO guidelines on routing systems, marine environmental protection areas, and potential hazards along the passage. For dangerous cargo, this means carriers must avoid routes with elevated navigational risks (such as areas of heavy traffic, narrow straits, or regions with adverse weather conditions) and give preference to safer passages and ports with established dangerous goods protocols.

The IMO has also adopted recommendations such as the Revised Guidelines for the Safe Transport of Dangerous Cargos and Related Activities in Port Areas (2007), which emphasize that berth operators, port authorities, and carriers share responsibility for route and terminal selection. These guidelines encourage carriers to coordinate closely with ports and flag states when planning routes, ensuring that facilities enroute have both the infrastructure and the regulatory oversight to manage hazardous cargo safely.

Together, the IMDG Code, SOLAS, and IMO guidance form a coherent regulatory system requiring carriers not only to comply with packaging and stowage rules, but also to carefully design their transport routes. By doing so, they minimize accident potential, ensure emergency preparedness along the route, and align with broader international safety and environmental protection goals.

When Orica SMC NA plans a specific shipping route to an ICMI Signatory Mine, it evaluates the route that will be taken from production to mine site. This route evaluation includes the selection of the most appropriate destination port and then the selection of an ocean carrier with hazardous material handling capabilities.

According to interviews, Orica SMC NA gives strong preference to ocean carriers that have already been found to be compliant with Cyanide Code requirements through a Cyanide Code Due Diligence assessment. Ports that have been found to be acceptable are chosen based on proximity to end customer, experience handling hazardous materials safely, security of the port, emergency response capabilities, and road infrastructure to the port. Only in cases where a closer port has unacceptable infrastructure or security is the shipment routed using a longer over-the-road segment.

The operation is:	☒ In full compliance with	Standard of Practice 1.1
	☐ In substantial compliance with	
	☐ Not in compliance with	

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.

International maritime regulations require that all personnel responsible for the handling and transport of dangerous goods, including sodium cyanide, are properly trained and certified to minimize risks to workers, nearby communities, and the marine environment. The International Maritime Dangerous Goods (IMDG) Code specifies in Part 1, Chapter 1.3 that shore-based staff and shipboard crew must receive function-specific training related to classification, packaging, marking, handling, stowage, segregation, and emergency response for dangerous goods. This ensures that every operator involved in cyanide transport understands both the hazards of the cargo and the procedures necessary to prevent accidental releases or exposures.

The International Maritime Organization (IMO) has further codified these obligations through conventions such as SOLAS and the Standards of Training, Certification and Watchkeeping for Seafarers (STCW Convention). These instruments require that crew members and officers handling hazardous materials possess appropriate licenses and complete refresher training on a recurring basis. Training must cover not only cargo handling procedures, but also shipboard safety management, fire prevention, first aid, and spill response, thereby integrating cyanide-specific risks into a broader safety management framework.

In port areas, the IMO's Revised Recommendations on the Safe Transport of Dangerous Cargos and Related Activities in Port Areas (2007) emphasize that terminal operators are responsible for ensuring their staff are competent in handling hazardous cargos. This includes verifying that operators of cranes, forklifts, and container handling equipment are licensed and trained in accordance with national requirements, as well as in the special provisions of the IMDG Code. These recommendations underscore that inadequate training of port staff poses risks not only to workers, but also to surrounding communities that could be affected by a release or spill.

Together, the IMDG Code, SOLAS, STCW, and IMO port guidelines create a regulatory framework that requires continuous training, licensing, and verification of competency for all personnel engaged in cyanide handling. This layered system of oversight ensures that operators are equipped with both the knowledge and practical skills to prevent accidents, thereby minimizing risks to human health, community safety, and the marine environment.

According to the responses to a Cyanide Code questionnaire that was used when the ocean carriers were first brought into the certified supply chain, the ocean carriers comply with International Maritime Organization (IMO) requirements and are in compliance with International Maritime Dangerous Goods (IMDG) and U.S. 49 Code of Federal Regulations (CFR) requirements concerning the transportation of the hazardous materials, including the training of employees.

Intermodal moves once the shipment reaches the port are controlled by the ocean carrier. When the ocean carriers were initially added to this certified supply chain, they each self-reported to Orica SMC NA that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel. One of the ocean carriers in this

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supply chain, Industrial Maritime Carriers, LLC is a Cyanide Code Signatory company. As such, this carrier underwent a full Cyanide Code audit and was found to be in full compliance with the Code.

The operation is:	☒ In full compliance with	Standard of Practice 1.2
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

The safe transport of sodium cyanide requires that all equipment used in its handling and carriage is designed, tested, and maintained to accommodate the weight and hazardous properties of the cargo. Under the International Maritime Dangerous Goods (IMDG) Code, Part 4 specifies the requirements for packaging and intermediate bulk containers (IBCs), while Part 7 sets out rules for stowage and segregation. Containers and transport units must be UN-certified, marked with the appropriate hazard labels, and designed to withstand the rigors of international shipping. This ensures that cyanide shipments are not exposed to mechanical stress, leaks, or chemical incompatibility during transport.

At sea, the International Convention for the Safety of Life at Sea (SOLAS) requires vessels to operate only with equipment capable of safely handling dangerous goods. Ship-to-shore gantry cranes, reach stackers, and transport trailers must all be rated for the loads they carry, and shipboard equipment must be certified under a Safety Management System (SMS) aligned with the International Safety Management (ISM) Code. SOLAS also obliges carriers to implement regular inspection and maintenance programs to verify that equipment remains within safe working limits, with records available for audit by flag state and port state authorities.

The IMO's Code of Practice for the Packing of Cargo Transport Units (CTU Code) further reinforces that containerized cargo must be loaded and secured using appropriate equipment and procedures to prevent shifting during transit. For sodium cyanide, this means containers must be inspected for structural integrity, fitted with placards, and secured against movement, while mechanical handling equipment is checked daily to prevent overloading or mechanical failure. Port operators are also expected to maintain preventive maintenance programs to keep cranes, forklifts, and other handling gear in safe working condition.

By combining IMDG packaging and stowage requirements, SOLAS equipment safety standards, and CTU Code handling provisions, the international regulatory framework ensures that all equipment used in cyanide transport is fit for purpose. These measures reduce the risk of spills, accidents, or equipment failure, thereby safeguarding workers, vessels, and surrounding communities throughout the transport chain.

Each ship is registered in a country and under international maritime laws, that country is held accountable for ensuring compliance of the registered ships. This is accomplished by auditing and fulfillment of reporting requirements to maritime authorities, such as the United States Coast

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Guard. Memorandum of Understanding exist between countries to enable the authorities in one jurisdiction to govern ships sailing into that jurisdiction and ensure compliance.

The operation is: ☒ In full compliance with Standard of Practice 1.3
☐ In substantial compliance with
☐ Not in compliance with

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

As part of the due diligence questionnaire process, ocean carriers initially self-reported that they train their personnel on hazardous materials handling. Industrial Maritime Carriers underwent a full Cyanide Code audit and demonstrated full compliance with all Code requirements, including the Code safety program requirements.

International regulations require carriers and port operators to implement structured safety programs that address the unique risks associated with transporting hazardous materials such as sodium cyanide. The International Maritime Dangerous Goods (IMDG) Code establishes that dangerous goods must be handled, stowed, and transported according to documented procedures that protect both personnel and the environment. These procedures include container inspections, segregation from incompatible substances, maintenance of packaging integrity, and adherence to stowage plans that minimize the likelihood of accidental release.

Under the International Convention for the Safety of Life at Sea (SOLAS), Chapter IX requires shipping companies to maintain a certified Safety Management System (SMS) in compliance with the International Safety Management (ISM) Code. An SMS includes policies, procedures, and emergency drills designed to identify and mitigate risks in ship operations. For carriers transporting cyanide, this means developing safety protocols that cover container inspections prior to loading, verification of proper labeling and placarding, monitoring of weather and sea conditions, and suspending operations during unsafe circumstances such as high winds or civil unrest.

The IMO's Revised Recommendations on the Safe Transport of Dangerous Cargo and Related Activities in Port Areas (2007) extend these requirements to port facilities. They emphasize that berth operators and port authorities must adopt operational safety programs covering traffic management, cargo inspections, fire prevention, and spill preparedness. These recommendations require ports to integrate cyanide handling into their broader health, safety, and environmental management systems, ensuring that procedures are in place for hazard identification, risk assessment, and continuous improvement.

Collectively, these instruments require carriers and ports to move beyond ad hoc handling practices and adopt comprehensive safety programs rooted in international standards. By mandating documented procedures, preventive maintenance, operational controls, and emergency readiness, the IMDG Code, SOLAS, ISM Code, and IMO guidance ensure that cyanide shipments are transported under conditions that minimize the risk of accidents and

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releases throughout the maritime supply chain.

Upon initial inclusion of the ocean carriers into the certified supply chain, they each reported that they have robust safety programs which are mandated by international laws. Formal safety, environmental, emergency response, and auditing programs apply to all employees aboard ocean vessels.

The operation is:	☒ In full compliance with	Standard of Practice 1.4
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

International standards for the transportation of cyanide by sea are followed. The following information was evaluated during the audit:

- j) Orica SMC NA packaging specifications were found to be conformant to the packaging requirements of the IMDG Code.
- k) Shipping containers were reviewed during the associated North American Rail & Truck Supply Chain audit. Photos of packaging were also reviewed. Packages and shipping containers were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
- l) Shipping containers were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
- m) Loaded intermodal and ISO tank shipping containers were evaluated and were found to be marked and placarded in accordance with the IMDG Code.
- n) Shipping documents were reviewed for a sample of cyanide shipments from 2023-2025 for each ocean carrier used in this supply chain. All information required by the IMDG Code is required as standard practice on Orica SMC NA shipping paperwork.
- o) The container packing certificates from 2023-2025 shipments were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMDG Code requirements.
- p) Confirmation was made through the due diligence process that ocean carriers involved in this supply chain use detailed stowage plans for the placement and safe transportation of all hazardous materials, including sodium cyanide shipments.
- q) Confirmation was made through the due diligence process that ocean carriers involved in this supply chain have cyanide emergency response information available on board each vessel, as required by Section 5.4.3.2 of the IMDG Code.
- r) Confirmation was made through the due diligence process that carriers involved in this supply chain complies with stowage and separation requirements of Part 7 of the IMDG Code. This includes the requirement that sodium cyanide be stored separately from acids, strong oxidizers, and explosives.

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The maritime shipment of sodium cyanide is governed by a comprehensive set of international standards designed to ensure consistency, safety, and environmental protection across all jurisdictions. The cornerstone of this framework is the International Maritime Dangerous Goods (IMDG) Code, which has mandatory status under the International Convention for the Safety of Life at Sea (SOLAS). The IMDG Code specifies the classification of sodium cyanide as UN 1689, Toxic, Packing Group I, and sets out requirements for packaging, marking, labeling, and placarding. Containers must also display the Marine Pollutant mark alongside the UN 1689 placard to reflect the cargo's environmental hazard, ensuring that carriers, ports, and emergency responders recognize the dual risks associated with cyanide.

The IMDG Code also prescribes the preparation of a Multimodal Dangerous Goods Form, which functions as the central shipping document. This form includes the container/vehicle packing certificate required by IMDG 5.4.2 and is aligned with SOLAS Chapter VII and MARPOL Annex III. Together, these provisions ensure that documentation, packaging, and containerization follow consistent international standards, minimizing the chance of errors when shipments move between jurisdictions or transport modes.

In addition, the International Ship and Port Facility Security (ISPS) Code supplements SOLAS by requiring port facilities and vessels to implement security assessments and plans for high-risk cargo, including cyanide. Carriers must also comply with the International Safety Management (ISM) Code, which obliges them to integrate dangerous goods handling into their certified Safety Management Systems. These requirements ensure that cyanide shipments are not only documented and packaged correctly but also transported under vessels and port conditions that meet internationally recognized safety and security standards.

Through the combined application of the IMDG Code, SOLAS, MARPOL, ISPS, and ISM frameworks, the maritime transport of sodium cyanide is standardized at a global level. Compliance with these instruments guarantees that shipments are packaged, documented, stowed, and handled consistently, regardless of the carrier or port of call. This harmonization minimizes regulatory gaps, strengthens risk management, and fulfills the obligations of the International Cyanide Management Code for sea transport.

The operation is:	☒ In full compliance with	Standard of Practice 1.5
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

International regulations emphasize the importance of tracking and monitoring hazardous cargo throughout the maritime supply chain to prevent losses, diversions, or unaccounted exposures. The International Maritime Dangerous Goods (IMDG) Code, Part 5, requires that dangerous goods transport documents and manifests be maintained at all times, providing a chain of custody from consignor to consignee. These documents must identify the cargo, packaging reference numbers, hazard class, and stowage location onboard the vessel, ensuring that carriers and authorities can account for each container at every stage of its journey.

Under SOLAS Chapter V, vessels are required to maintain continuous navigational records and voyage plans, which, when combined with electronic cargo tracking systems, provide real-time visibility of cyanide shipments. Modern carriers typically integrate GPS, electronic data interchange (EDI), and terminal operating systems to allow consignors and consignees to monitor container status during transit. This technology-driven tracking supplements regulatory obligations by ensuring that any delays, diversions, or incidents are immediately communicated to relevant stakeholders.

Port authorities and berth operators are also guided by the IMO Revised Recommendations on the Safe Transport of Dangerous Cargo and Related Activities in Port Areas (2007), which stress the need for cargo monitoring, restricted access to hazardous goods storage areas, and secure transfer of custody between carriers. Tracking procedures extend to interim storage at port facilities, where records of arrivals, departures, and container placements must be maintained to ensure that no hazardous cargo is misplaced or left unattended.

Together, these requirements ensure a continuous chain of accountability for cyanide shipments. By integrating IMDG documentation requirements, SOLAS navigational rules, and IMO port safety guidance with modern electronic tracking systems, the international regulatory framework minimizes the potential for losses, theft, or diversion. This regulatory structure not only enhances security but also aligns with the International Cyanide Management Code's goal of preventing releases and ensuring transparency across the entire transport chain.

Upon initial inclusion of the ocean carriers into the certified supply chain, they each confirmed that they have computer systems that are used for the tracking and management of all freight containers within their system. The management systems provide among other items the date, time, location, and carrier involved in the last interchange, transport action, or gate move. Orica SMC NA and its freight forwarder have access to this information via internet websites. This was confirmed through a sampling approach during the audit.

The sodium cyanide shipments for this segment are containerized loads of bag-in-box packages and ISO tank shipping containers. All shipping containers are sealed. Shipping papers were reviewed. The auditor confirmed that seal numbers are recorded on the bills of lading. This enables personnel along any portion of the segment to confirm that the containers have not been opened.

The operation is:	☒ In full compliance with	Standard of Practice 1.6
	☐ In substantial compliance with	
	☐ Not in compliance with	

Principle 2 | INTERIM STORAGE

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

Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

The safe storage of sodium cyanide during maritime transport is governed by the International Maritime Dangerous Goods (IMDG) Code, which sets out mandatory provisions for stowage, segregation, and containment of dangerous cargo while at sea. For cyanide, classified as UN 1689, Toxic, Packing Group I, Marine Pollutant, the Code requires storage in sealed containers that remain intact throughout the voyage. Containers must display both the toxic hazard placard and the marine pollutant mark on all sides, ensuring that vessel crews and emergency responders can readily identify the cargo.

Onboard vessels, IMDG Part 7 establishes strict segregation requirements, obliging carriers to store cyanide containers away from incompatible substances such as acids, oxidizers, explosives, and foodstuffs. These segregation rules are designed to prevent chemical reactions that could cause toxic releases. Carriers implement detailed stowage plans during loading, mapping out container locations to ensure proper separation and secure placement. The plans must be included in the vessel's dangerous goods manifest and be accessible to the ship's master at all times.

The Safety of Life at Sea (SOLAS) Convention, in conjunction with the International Safety Management (ISM) Code, requires vessels to maintain a certified Safety Management System (SMS) that covers the safe handling and storage of hazardous cargo. This system obliges ship operators to conduct container integrity checks, monitor stowage conditions during the voyage, and suspend cargo operations during unsafe circumstances such as extreme weather. Ships must also maintain firefighting systems, spill response equipment, and secure containment areas capable of managing a release, in line with the IMO's safety and environmental protection standards.

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Complementing these requirements, the IMO's Revised Recommendations on the Safe Transport of Dangerous Cargo and Related Activities in Port Areas (2007) highlight the shared responsibility of carriers and berth operators to ensure that containers remain secure during interim storage at trans-shipment points. For maritime operations, this translates into regular inspection of cargo lashings, monitoring container stacks for shifting or damage, and maintaining emergency preparedness throughout the voyage.

Together, these measures ensure that sodium cyanide remains securely contained during sea transport. By requiring sealed packaging, clear hazard placards, segregation from incompatible substances, and continuous oversight under SOLAS and IMDG provisions, international regulations minimize the risk of releases and exposures while cyanide is stored on board ships.

Upon initial inclusion of the ocean carriers in the certified supply chain, they each reported that during transport, the storage of cyanide both on land and on vessels is in accordance with the applicable stowage and segregation requirements in the IMDG and the Coast Guard 33 CFR regulations when in the United States. The terminal must segregate containers like the segregation onboard vessels.

Safety checklists and seals are used by Orica SMC NA personnel when the shipping containers are loaded at the production facility. The seals enable verification that the containers were not opened during transit.

The ports within the scope of this certification audit were initially assessed for their ability to handle hazardous materials safely. The ports were confirmed to be secure with appropriate roadway or rail infrastructure into the port. See the port due diligence section of this report for additional information.

The operation is:	☒ In full compliance with	Standard of Practice 2.1
	☐ In substantial compliance with	
	☐ Not in compliance with	

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Principle 3 | EMERGENCY RESPONSE

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

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

The International Maritime Dangerous Goods (IMDG) Code requires that carriers and port facilities maintain detailed emergency response documentation to address potential incidents involving hazardous cargo such as sodium cyanide. Section 5.4.3 mandates that emergency response information always be accessible, including Safety Data Sheets (SDS) and procedures for responding to spills, leaks, or exposure. Ships must carry the Emergency Schedules (EmS) Guide, issued by the IMO, which provides response protocols for incidents involving toxic substances and marine pollutants.

Under the Safety of Life at Sea (SOLAS) Convention and the International Safety Management (ISM) Code, ship operators are required to maintain a certified Safety Management System (SMS) that incorporates emergency preparedness procedures. This includes crew training in first aid for cyanide exposure, spill containment drills, and procedures for notifying authorities and coordinating with external responders. Vessel masters must ensure that these plans are specific to the ship's cargo and voyage route.

In port operations, the IMO's Revised Recommendations on the Safe Transport of Dangerous Cargoes and Related Activities in Port Areas (2007) emphasize that terminal operators must have documented emergency response plans for dangerous goods incidents. These plans must cover both land- and water-based spill scenarios, integrate with local fire and medical services, and provide for secure communication with regulatory authorities.

Together, these instruments ensure that emergency response planning is detailed, documented, and tested in advance. By requiring carriers and port operators to prepare for incidents specific to cyanide's toxicity and environmental hazard, international regulations minimize the risk of uncontrolled releases and ensure effective coordination in the event of an emergency.

Upon initial inclusion in the certified supply chain, ocean carriers each reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties.

Emergency response planning and the performance of frequent emergency drills are required by international laws. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

The operation is:	☒ In full compliance with	Standard of Practice 3.1
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

International requirements stipulate that emergency response plans must identify trained personnel responsible for carrying out specific actions during a hazardous incident. The IMDG Code and the IMO's Revised Recommendations require that carriers and terminal operators designate staff with clear roles in handling dangerous goods emergencies. This includes trained crane operators, deck officers, and health, safety, and environmental staff who can act immediately in the event of a cyanide-related incident.

The ISM Code, mandatory under SOLAS, further requires that vessels have a designated safety officer and a clear chain of command for emergency response. This ensures that resources such as spill kits and personal protective equipment (PPE) are available and that personnel know how to deploy them. Regular refresher training is mandated by the Standards of Training, Certification and Watchkeeping for Seafarers (STCW) Convention, which provides consistency in crew preparedness across international fleets.

By clearly designating personnel and ensuring they are equipped with the necessary resources, international maritime regulations guarantee that ships and ports handling cyanide can respond rapidly and effectively to mitigate the consequences of an incident.

The operation is:	☒ In full compliance with	Standard of Practice 3.2
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

The IMDG Code requires that carriers prepare dangerous goods manifests and stowage plans that can be provided immediately to authorities in the event of an emergency. Section 5.4 also requires that emergency contact information be included in transport documents, ensuring rapid communication with consignors, consignees, and local responders.

SOLAS regulations mandate that shipmasters notify coastal states and port authorities of any incident involving dangerous goods. Port facilities, under the IMO's Revised Recommendations, must similarly maintain updated contact lists for emergency responders, regulatory agencies, and medical facilities. This ensures that in the event of a cyanide release, notifications can be made without delay, and appropriate external resources can be mobilized.

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Upon initial inclusion of the ocean carriers in the certified supply chain, they each confirmed that they have emergency response plans in place which include the prompt notification of all involved parties.

The operation is:	☒ In full compliance with	Standard of Practice 3.3
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

Remediation procedures must not only address the recovery of spilled cyanide but also consider the risks posed by chemicals used in neutralization. The IMDG Code and IMO guidance emphasize containment, recovery, and secure disposal as the primary means of remediation at sea or in port. Carriers and port operators are cautioned against using reactive agents such as sodium hypochlorite, hydrogen peroxide, or ferrous sulfate in surface water, as these can create harmful by-products.

The ISM Code requires emergency response planning to incorporate safe remediation methods, including containment booms for waterborne releases, absorbents for dry spills, and controlled transfer to secure storage or treatment facilities. These provisions ensure that remediation efforts do not inadvertently cause greater harm to personnel, communities, or the marine environment.

The operation is:	☒ In full compliance with	Standard of Practice 3.4
	☐ In substantial compliance with	
	☐ Not in compliance with	

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

Continual improvement is a core element of international maritime regulation. The ISM Code obliges carriers to conduct periodic audits of their Safety Management Systems, including emergency response procedures. Similarly, the IMO's Revised Recommendations call for port facilities to hold mock drills and exercises at least annually, testing scenarios such as toxic spills, container breaches, or fire incidents involving dangerous goods.

These drills are evaluated to identify gaps in equipment, training, or coordination, and findings must be incorporated into revised procedures. The IMDG Code also requires that training programs be updated regularly to reflect changes in international standards, ensuring that personnel remain current on best practices.

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By requiring periodic evaluation and revision, international regulations ensure that cyanide emergency response capabilities remain robust and adaptive to changing risks. This feedback loop strengthens preparedness and aligns with the International Cyanide Management Code's principles of transparency and ongoing performance improvement.

The operation is:	☒ In full compliance with	Standard of Practice 3.5
	☐ In substantial compliance with	
	☐ Not in compliance with	

Ocean Port Due Diligence Investigation Results

Ports used in this supply chain are listed below:

- Port of Callao, Peru
- Port of Caucedo, Dominican Republic
- Port of Cortes, Honduras
- Port of Houston, USA
- Port of Izmir, Turkey – new this recertification cycle
- Port of Mersin, Turkey – new this recertification cycle
- Port of Nouakchott, Mauritania
- Port of Tema, Ghana

Solid sodium cyanide packed into intermodal or ISO tank shipping containers is shipped from the Port of Houston in Texas USA using the ocean carriers detailed in this supply chain audit report. The cyanide is received at the international ports and stored for a short time (normally no more than three days) and is picked up by transportation companies that have either contracted to Orica SMC NA or to the mine site to which they are delivering. The road transportation in the destination country is outside the scope of this certification audit activity.

When a port is first added to the supply chain, the port evaluation process involves an on-site review of environmental, health, safety, and security practices. Fulfillment of Cyanide Code requirements is confirmed at that time. Road infrastructure to and from the ports, as well as port experience with handling dangerous goods is also evaluated.

On-site evaluations were performed for each port within the scope of this audit as part of previous Cyanide Code certification and re-certification audits. Remote due diligence evaluations are conducted after the initial assessment on a three-year frequency. If there are no spills, security or other incidents during the re-certification period, no on-site re-visit is deemed necessary. No negative issues, spills, or cyanide exposures were reported during the re-certification period from any of the ports in this supply chain.

In addition to Orica's efforts to ensure that Cyanide Code requirements are fulfilled, there are many agencies chartered with the task of confirming that shipping is conducted in a safe and secure manner. One such organization is the International Maritime Organization (IMO). The IMO was established in Geneva in 1948, and it currently headquartered in London, United Kingdom. The IMO

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is a specialized agency of the United Nations. The IMO's primary purpose is to develop and maintain a comprehensive regulatory framework for shipping. The IMO regulates practices associated with safety, environmental concerns, legal matters, technical co-operation, maritime security and the efficiency of shipping. One initiative of the IMO is the International Convention for the Safety of Life at Sea (SOLAS), which was enacted in 1974. Ocean carriers are required to have periodic audits of their safety programs. The provisions of SOLAS include fire protection, lifesaving equipment, radio communications, safety of navigation, transportation of dangerous goods, management of safe operations of ships, and maritime security.

Regarding port safety and security, amendments to the SOLAS Convention were enacted in 2002. These amendments gave rise to the International Ship and Port Facility Security (ISPS) Code, which went into effect on 1 July 2004. The concept of the code is to provide layered and redundant defenses against smuggling, terrorism, piracy, stowaways, etc. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans. Container ships and ports that service them are required to have multiple third-party audits of safety and security. Each ship and each port involved in international trade undergoes external security, safety, and management system audits at least annually. In the United States the Port Facility Security Plans are filed with, and monitored by the United States Coast Guard, the U.S. authority with jurisdiction over U.S. Ports.

Port of Callao – Peru

The Port of Callao is located just 12 kilometers from downtown Lima and is Peru's primary commercial port. The Port of Callao is fully fenced and has strict access controls. Orica SMC NA contracted a third-party Cyanide Code auditor who is external to CN Auditing Group to evaluate the Port of Callao during a previous re-certification cycle. The auditor assessed the port and concluded that port operations including storage and handling operations were in conformance with Cyanide Code requirements.

Orica SMC NA has been shipping its cargo through the Port of Callao in Peru as part of its certified ocean supply chain since the first Cyanide Code certification in 2013. During the initial on-site assessment, interviews were held with port personnel, procedures were assessed, storage and handling practices were observed, and records were reviewed. The remote evaluation confirmed that the information shown here is current, that Orica SMC NA has not had any negative experiences with the port. Orica SMC NA has concluded that the port is still suitable for cyanide storage and shipments.

Port of Caucedo – Dominican Republic

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The Port of Caucedo is located on the southern half of the Dominican Republic. It is located approximately 30 minutes / 25 km from Santo Domingo, the capital of the Dominican Republic. It is also located about 5 km from the International airport in a Free Trade Zone.

The port was built in 2003. It has three deep water berths, 17 m deep, with a length of 922 m.

DP World Limited, which operates the port and logistics center, is incorporated in Dubai. It operates 70 terminals on 6 continents. DP World has more than 36,000 employees, and, according to its website, is the 4th largest Marine Terminal Operator.

The port has multiple accreditations, including ISO 28000-2007, C-TPAT, US Homeland Security, US Coast Guard, ISPS, CSI.

The Port of Caucedo is fully fenced and has strict access controls. Orica SMC NA contracted a third-party Cyanide Code auditor who is external to CN Auditing Group to evaluate the Port of Caucedo during a previous re-certification cycle. The auditor audited the port and concluded that port operations including storage and handling operations were in conformance with Cyanide Code requirements.

Orica SMC NA has been shipping its cargo through the Port of Caucedo in the Dominican Republic as part of its certified ocean supply chain since the 2018 Cyanide Code re-certification audit in 2018. During the initial on-site assessment, interviews were held with port personnel, procedures were assessed, storage and handling practices were observed, and records were reviewed. The remote evaluation confirmed that the information shown here is current, that Orica SMC NA has not had any negative experiences with the port. Orica SMC NA has concluded that the port is still suitable for cyanide storage and shipments.

Port of Cortes, Honduras

Puerto Cortes is in the north and along the Atlantic coast of Honduras. It is the main port of the country and is the one of greater traffic between the Honduran and is one of Central America's most important ports. The port handles 85% of shipment to Honduras, 10 % to El Salvador and 5% to Nicaragua.

It has the advantage of being in a well-protected natural bay of deep waters where the variation of the tides is insignificant, with a maximum fluctuation of 0.3 m. Northeast winds and shifting currents.

Puerto Cortes is located 40 minutes from the highway to the industrial city *San Pedro Sula* and 2 hours with the border of Guatemala, towards Puerto Barrios and Santo Tomas de Castilla. It has one of the most complete terminals of containers in the region.

It has six dock berths, of which docks 4, 5 and 6 have been concessioned to the Philippine ICTSI (International Container Terminal Services Inc.), which formed a partnership with *Operadora*

Portuaria Centroamericana S.A. de C.V.

The facility is completely fenced. Access to the port is only possible via a security gate. Security cameras are used throughout the facility and the port is manned 24 hours per day. The port maintains a management system that conforms to ISO 14001 and maintains an International Ship and Port Security (ISPS) certification.

Orica SMC NA has been shipping its cargo through the Port of Cortes in Honduras as part of its certified ocean supply chain since the 2018 Cyanide Code re-certification audit in 2018. During the on-site assessment during the 2018 re-certification cycle, interviews were held with port personnel, procedures were assessed, storage and handling practices were observed, and records were reviewed. Confirmation was also made that Orica SMC NA has not had any negative experiences with the port. Orica SMC NA has concluded that the port is suitable for cyanide storage and shipments.

Port of Houston, USA

The Texas production facility is in close proximity to the Port of Houston. This is the primary ocean shipping port used by Orica SMC NA. The port of Houston is one of the world's largest ports, it is in Texas in the United States along the southern coast. The port is a 50-mile-long complex of diverse public and private facilities. Orica SMC NA audited the port during a previous re-certification cycle and confirmed that it meets Cyanide Code requirements.

The facility is completely fenced. Access to the port is only possible via a security gate. Security cameras are used throughout the facility, and the port is manned 24 hours per day. The port is under the jurisdiction of the United States Coast Guard. The Coast Guard monitors the Houston port and the shipping channel closely and performs multiple audits of port facilities each year.

Orica SMC NA has been shipping its cargo through the Port of Houston in the United States as part of its certified ocean supply chain since the first Cyanide Code certification in 2013. During the initial on-site assessment, interviews were held with port personnel, procedures were assessed, storage and handling practices were observed, and records were reviewed. Confirmation was also made that Orica SMC NA has not had any negative experiences with the port. Orica SMC NA has concluded that the port is suitable for cyanide storage and shipments.

In addition to the Orica SMC NA Due Diligence investigation, the Industrial Maritime Carriers (IMC) Cyanide Code certification (April 2024) included an onsite audit of Watco Greens Port, which is one part of the Port of Houston. IMC is a Signatory to the Code and performs stevedoring and transportation services at the Port of Houston. IMC is part of the Orica SMC NA certified supply chain.

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Port of Izmir, Turkey

The Port of Izmir in Turkey was newly added to the Orica SMC NA certified supply chain during this recertification audit cycle (2024).

The Port of Izmir's SOCAR Terminal, located on the Aegean coast, is one of Turkey's largest and most modern container terminals. It serves as a central hub for containerized, bulk, and general cargo, supporting industrial and agricultural trade from the Aegean region. The port benefits from a naturally sheltered bay with deep waters, ensuring year-round access with minimal tidal variation. Built in 2016, the facility supports container, bulk, and project cargo operations and can handle vessels of up to 18,000 TEU. Its infrastructure includes a 700-meter dock with a depth of 16 meters, general cargo docks, and an extensive storage and logistics area.

Izmir is directly connected to the Turkish highway and rail networks, linking it to major production centers and inland markets. The port includes container terminals, bulk cargo berths, and Ro-Ro facilities, with modern handling equipment for high-volume operations.

The port is enclosed with perimeter security, controlled access points, and surveillance systems operating 24/7. It complies with international maritime standards and is certified under the International Ship and Port Facility Security (ISPS) Code.

Orica SMC NA performed an onsite due diligence audit on January 22, 2024. The audit was performed by contracted ICMI-approved auditors. The audit included site inspections, review of transport and storage practices, and interviews with terminal representatives.

The audit evaluated compliance with Cyanide Code transport practices, including:

- Personnel training and qualifications
- Suitability and maintenance of equipment
- Safe interim storage and segregation of dangerous goods
- Documentation and tracking of cyanide shipments
- Security measures and ISPS compliance
- Emergency response planning and external responder coordination

Interim storage practices were found to be following International Maritime Organization (IMO) recommendations for the Safe Transport of Dangerous Cargos in Port Areas. The terminal is ISPS Code certified, maintains ISO 9001, ISO 14001, and ISO 45001 management systems, and uses container tracking software for better container tracking.

According to the Due Diligence report, emergency response services are subcontracted to NRC (National Response Corporation), accredited by Turkish authorities. NRC maintains equipment and personnel on site, with the capability to manage land- and water-based spills in accordance with SOLAS and national requirements.

Based on site observations, interviews, and document review, the auditor concluded that the

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SOCAR Terminal has implemented the necessary measures to safely manage cyanide shipments, including safe handling, interim storage, training, equipment maintenance, and emergency preparedness.

Port of Mersin, Turkey

The Port of Mersin in Turkey was newly added to the Orica SMC NA certified supply chain during this recertification audit cycle (2024). The Port of Mersin is situated on Turkey's Mediterranean coast and is the largest container terminal in Turkey and one of the busiest ports in the Eastern Mediterranean. It is a key trans-shipment and logistics hub for international trade routes connecting Europe, the Middle East, and North Africa. The port handles containers, bulk cargo, and petroleum products, and has become an important entry point for Central Anatolia's industrial and agricultural exports.

The port has an annual handling capacity of approximately 2.6 million twenty-foot equivalent unit (TEU) and provides container, bulk, vehicle traffic (roll-on/roll-off), and general cargo services. The port covers 112 hectares, with 21 berths totaling 3,370 meters in length and an average berth depth of 15.8 meters. It is equipped with advanced infrastructure including ship-to-shore gantry cranes, reach stackers, mobile harbor cranes, and on-site rail connections. The port also has excellent connections to the country's highways.

Mersin is a fenced and secure facility with restricted entry, constant surveillance, and port police presence. It is operated under international quality, safety, and environmental standards, maintaining ISO 9001 and ISO 14001 certifications, and fully complies with the ISPS Code.

Orica SMC NA performed an onsite due diligence audit on January 25, 2024. The audit was performed by contracted ICMI-approved auditors. The audit included site inspections, review of transport and storage practices, and interviews with terminal representatives.

The audit evaluated compliance with Cyanide Code transport practices, including:

- Personnel training and qualifications
- Suitability and maintenance of equipment
- Safe interim storage and segregation of dangerous goods
- Documentation and tracking of cyanide shipments
- Security measures and ISPS compliance
- Emergency response planning and external responder coordination

Interim storage practices were found to be following International Maritime Organization (IMO) recommendations for the Safe Transport of Dangerous Cargos in Port Areas.

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Based on site observations, interviews, and document review, the auditor concluded that the Port of Mersin has implemented the necessary measures to safely manage cyanide shipments, including safe handling, interim storage, training, equipment maintenance, and emergency preparedness.

Port of Nouakchott - Mauritania

Mauritania, officially the Islamic Republic of Mauritania, is a country in the Maghreb region of western North Africa. It is the eleventh largest country in Africa and is bordered by the Atlantic Ocean to the west, Morocco and the remnants of Western Sahara in the north, Algeria in the northeast, Mali in the east and southeast, and Senegal in the southwest.

Solid sodium cyanide is received at the Port of Nouakchott in sea containers, and they are immediately loaded onto trucks to go to mine sites. The Port is situated some distance from the city of Nouakchott with one access road leading the Port entrance. A distance from the Port, one road leads to the city of Noaukchott, while the main road leads past the city, and eventually onto the main road leading north.

The Port, "Port de l'Amitié" (PANPA) is run by the Port Autonome De Nouakchott and is a Governmental Department.

The Port of Nouakchott is fully enclosed in walls and fencing and has strict access controls. Orica SMC NA contracted a third-party Cyanide Code auditor who is external to CN Auditing Group to evaluate the Port of Nouakchott during a previous re-certification cycle. The auditor audited the port and concluded that port operations, including storage and handling operations were in alignment with Cyanide Code requirements. The Port is authorized for the receipt of dangerous goods. Equipment, training programs, handling practices, and emergency response preparedness were all deemed suitable and acceptable for the handling of solid cyanide in sea containers.

Orica SMC NA has been shipping its cargo through the Port of Nouakchott in Mauritania as part of its certified ocean supply chain since the first Cyanide Code certification in 2013. During the initial on-site assessment, interviews were held with port personnel, procedures were assessed, storage and handling practices were observed, and records were reviewed. Orica SMC NA has not had any negative experiences with the port. Orica SMC NA has concluded that the port is still suitable for cyanide storage and shipments.

Port of Tema – Ghana

The Port of Tema is the main Container Port servicing Ghana and some of the land locked countries (Burkina, Mali, Niger & Chad). The port has been in use since 1962. The port operator that was evaluated through Due Diligence is Meridian Port Service (MPS). During the previous

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re-certification cycle, interviews were held with MPS personnel, procedures were assessed, storage and handling practices were observed, and records were reviewed.

The Port of Tema is located in the southeastern part of Ghana and is about 30 kilometers east of Accra. The Tema Port has a security fence around the entire Port. Security measures include electronic access gates for staff, 24-hour manned security staff and the use of surveillance cameras.

Orica SMC NA has been shipping its cargo through the Port of Tema in Ghana as part of its certified ocean supply chain since the first Cyanide Code certification in 2013. During the initial on-site assessment, mine personnel held interviews with port personnel, procedures were assessed, storage and handling practices were observed, and records were reviewed. Orica SMC NA has not had any negative experiences with the port. Orica SMC NA has concluded that the port is still suitable for cyanide storage and shipments.

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Detailed Due Diligence Findings

The results of the initial on-site due diligence assessments that were performed when the ports were originally added to this certification are listed in the following table and are arranged by topic: Port Security, Safety & Training, Material Handling & Storage (including environmental considerations), and Emergency Response.

Topic	Assessment Results
Port Security	- All ports in this supply chain are completely surrounded with walls or fences and access to the ports is strictly controlled. Security at the ports was found to be consistent with Cyanide Code requirements. - Confirmation was made that the following practices are in place: 24/7 manned security; complete fence line; no public access; sealed (locked storage containers); security cameras.
Safety & Training	- The ports all currently handle sodium cyanide. - Port personnel receive Dangerous Goods training. - Confirmation was made during the audits that no eating, smoking, or open flames are allowed in areas where cargo is handled and stored.
Material Handling & Storage	Dangerous Goods cargo is stored using standard chemical compatibility management practices at each port.
Emergency Response	- A written Emergency Response Plan (ERP) was available at each port. - The roles and responsibilities of the Emergency Response Team are defined in the Emergency Response Plan (ERP). The information in the ERP was found to be acceptable. - Appropriate emergency response equipment was available at each of the Ports.

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