



ORICA Specialty Mining Chemicals

ICMI Cyanide Code Supply Chain Recertification

Summary Audit Report

**Orica SMC Orica North America Rail & Truck
Supply Chain**

2026 Recertification Audit



Submitted to:

The International Cyanide Management Institute
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Supply Chain General Information

Name of Operations Audited:	1. Orica Supply Chain Management – Management of individually certified operations and Signatory companies 2. Transport Nord-Ouest, Inc. (TNO) Trucking Operations and Interim Storage Operations (Rouyn-Noranda, Quebec, Canada) 3. Solurail Logistique Inc. Interim Storage Operations and Rail Head (Val-d'Or, Quebec) 4. IsoChem Logistics LLC - Interim Storage Operations (Houston, Texas) 5. Rail Partners – Union Pacific Railroad (UP) and Canadian National Railway (CN) (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 Rail and Truck Supply Chain includes all rail and truck movements as well as interim storage throughout Canada and the United States.

In addition to the organizations listed above that were directly audited during this recertification audit, Orica SMC NA maintains a network of transportation partners who are certified to the Cyanide Code.

Rail partners were also included in the scope of this recertification audit. At the time of this audit the rail partners were Union Pacific Railroad (UP) and Canadian National Railway (CN). Due Diligence assessments of these two rail companies were conducted as part of this re-certification audit process.

Additionally, Orica SMC NA maintains separate “Western U.S./Canada” and “Global Ocean” certified supply chains that specifically address movements shipped from the U.S. West Coast to Alaska and ocean movements originating in the U.S., respectively.

This supply chain previously included shipments to Mexico. At the time of the audit, however, there were reportedly no longer truck or rail shipments between the U.S. and Mexico, cargo is shipped by ocean carrier to Mexico. The Mexican trucking companies were therefore removed from the scope of this certification.

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

Orica SMC NA (formerly Cyanco) 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 re-certification audits since. The plant ships solid sodium cyanide in rail sparger cars, ISO tanks, and one metric ton bag/boxes packed into rail box cars and 20-foot intermodal containers.

Product manufactured at the Winnemucca and Alvin (Houston) locations is shipped by truck, rail, barge, and ocean carrier. Rail and truck shipments shipped from the Winnemucca and Alvin production facilities are within the scope of this North American Rail and Truck Supply Chain. The product is shipped in tank trailers (solution), 20-foot intermodal sea containers, or ISO tanks using Cyanide Code-certified trucking companies or by rail. At the time of the audit, TransWood, Quality Carriers, TNO, and Action Resources were transporting sodium cyanide from the production facilities to either the Port of Houston, rail heads, transloading terminals, or customers. Interim storage activities are performed by IsoChem, Solurail, and TNO. All three of these interim storage locations were audited on-site as part of this recertification audit.

Orica SMC NA Rail & Truck Supply Chain
Name of Operation


Signature of Lead Auditor

July 19, 2026
Date

Audit Implementation and Conclusions

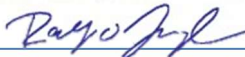
The audit was performed by an independent third-party auditor who is pre-approved by the ICMI as a Lead/Technical Auditor for cyanide transportation operations. Operations were audited on-site in Canada and the United States.

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. Additionally, records regarding carrier selection, incident tracking, equipment maintenance, security measures, shipment tracking, cargo labeling practices, shipping documentation, and community involvement records were sampled for the re-certification period and were found to be acceptable.

Orica SMC NA was found to be in Substantial Compliance with the Cyanide Code.

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Name of Operation


Signature of Lead Auditor

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Date

Auditor's Finding

This operation 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 recertification audit demonstrate that Orica SMC NA cyanide-related distribution and transportation activities are in **FULL COMPLIANCE** with International Cyanide Management Code requirements.

Compliance Statement

This Supply Chain did not experience any Significant Cyanide Incidents during the three-year recertification period.

Auditor Information

Audit Company:	CN Auditing Group, LLC www.cnauditing.com
Lead / Technical Auditor:	Ralf Jurczyk E-mail: rj@cnauditing.com
Dates of Audit:	May 14-15, May 26-28, July 1, 2025 and January 22, 2026



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 recertification 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.

Orica SMC NA Rail & Truck

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July 19, 2026

Name of Operation

Signature of Lead Auditor

Date

Orica SMC NA Rail & Truck Supply Chain

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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.

TNO maintains a formal procedure for the planning of transportation routes that takes into account population density, infrastructure, pitch & grade, proximity to water bodies, and the prevalence and likelihood of poor weather and resulting poor driving conditions. TNO personnel determine the safest and best route for transport. Procedures call for driver feedback and routes are re-evaluated when driving conditions change, or when driver feedback suggests that this is necessary. Records were available to demonstrate that all current routes were re-assessed and re-approved during the re-certification period.

Risks such as pitch and grade of roads, traffic congestion, seasonal traffic issues (winter weather and summer tourist congestion), and proximity to water bodies were considered during the development of the routes. Stakeholder input (Orica SMC NA, mine customers, and local authorities) is considered when routes are determined. Appropriate risk mitigation measures include use of lower speeds, avoidance of high congestion time periods or congested roads, and mine road specific risk reduction measures such as check points and two-way communication radios. Risk mitigation measures were discussed with drivers. Awareness was good. Records were available to show that risk assessments for all current routes to Code signatory mine customers were most recently updated in 2025.

Interviews with drivers and management personnel were used to confirm that feedback about driving conditions is communicated daily at each of the companies audited, as needed. Interviews confirmed that special conditions noted by customers are indicated on the shipping paperwork and communicated to drivers assigned to the routes. Discussions are held if there are any concerns, feedback, or questions. Each company demonstrated that routes were re-evaluated and re-approved during the re-certification period.

TNO documents the risk mitigation measures to be taken for each route. Initially, each route was traveled by the owner of the company, a senior driver, or Orica SMC NA. The risks and risk countermeasures were defined at that time.

Appropriate risk mitigation measures are used, and records of risk mitigation decisions are maintained.

Records were available to show that TNO participated in stakeholder engagements with Orica SMC NA, mining customers, regulatory agencies, and local communities, where appropriate. During the route planning process TNO also took into consideration input from governmental

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stakeholders by using route planning software that indicates which roads are either approved or banned for the transportation of hazardous materials. This information was confirmed through interviews and a review of records.

Where routes present special safety or security concerns, TNO uses additional safety or security measures to address concerns. Weather, traffic, and security conditions are constantly monitored, and deliveries are postponed if a route is unsafe. Seasonal concerns in Canada due to the thawing of the roads are considered in the risk assessment. Weight restrictions on the loads are considered when loading trucks. The rail routes are pre-designated routes used for all hazardous material shipments.

Drivers are empowered to stop the transport if the conditions are unsafe. Interviews were used to also confirm that drivers adhere to designated routes and request authorization prior to deviating from the established routes.

Orica SMC NA Supply Chain trucking partner companies do not contract other entities to transport cyanide or to conduct any of the activities required in this Standard of Practice.

Orica SMC NA ensures that its transportation partners are assessed for Code compliance by auditors during re-certification audits (trucking transporters and interim storage) or due diligence assessments (rail carriers).

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.

TNO maintains procedures for the transportation of sodium cyanide. The requirement to only use qualified and commercially licensed drivers with dangerous goods qualifications is stated in the procedures. Confirmation was made during the audit that drivers have received appropriate operational and safety training. Records were available for all current cyanide drivers to demonstrate that qualification and training requirements were met. Orica SMC NA also requires that drivers be properly trained and qualified for cyanide transport as part of its contractual agreements with the carriers.

TNO trains personnel operating cyanide handling and transport equipment to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

Interviews with drivers, dispatchers, management, and maintenance personnel were used to confirm that personnel operating cyanide transportation equipment can perform their jobs safely

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and appropriately. Records from the re-certification period were available for review.

TNO maintains a training management process to ensure that driver training is up-to-date. Trucks are loaded by Orica SMC NA operators and unloaded by drivers. Drivers showed very good awareness of unloading procedures and of emergency shut-off procedures that would help mitigate the risk of having a cyanide release during an emergency.

The auditors verified that training was provided and that it included topics appropriate for the nature of the transport and responsibilities of the operator. Training records and sign-off sheets were also reviewed. The auditors also interviewed truck drivers verifying that they have received the specified training.

Orica SMC NA Supply Chain trucking partner companies do not contract other entities to transport cyanide or to conduct any of the activities required in this Standard of Practice.

Orica SMC NA ensures that its transportation partners are assessed for Code compliance by auditors during either re-certification audits (trucking transporters and interim storage) or due diligence assessments (rail carriers).

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.

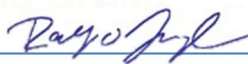
Orica SMC NA uses only supply chain partners with equipment designed and maintained to operate within the loads it is handling. Shipment records were reviewed to confirm that standard weights within the capacity of the intermodal containers, tractors, trailers, ISO tanks, rail tank cars and chassis were being shipped. ISO weight capacities and the fulfillment of ISO tank inspection requirements were reviewed during the audit and were found to be compliant. Orica SMC NA uses only authorized packaging for its sodium cyanide shipments.

Orica SMC NA is using a modified bulk rail tank car for rail shipments. According to interviews with Orica SMC NA personnel, Orica SMC NA works closely with the rail car manufacturers to develop appropriate specifications for the modified rail cars used for cyanide transport. The modifications of the rail cars to eliminate the bottom load-out valve are done to prevent accidental loss of the material in case of derailment. The modifications also reduce the risk of unauthorized unloading of the material.

Each modified rail tank car goes through a verification and acceptance process when it is ready to be put into service. The rail cars must also go through what is known as an OT-5 approval process before they can be accepted into service by the rail partners. Interviews confirmed that

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rail car specifications are appropriate for the load and the material being shipped.

The auditor found transportation equipment to be in very good condition and suitable for delivering cyanide. The tractors and trailers used to deliver to mines are enhanced with upgraded equipment and heavy-duty frames to ensure safe travel over rough terrain to the mine sites. Tires are replaced on a frequent basis and regular maintenance activities and inspections are conducted. Safety and emergency shut-off systems are designed into the delivery equipment and were found to be appropriate for mitigating the risk of chemical spills. Loading of the trucks is done by Orica SMC NA personnel. ISO inspection records and shipping records were available for the recertification period to demonstrate that equipment is suitable and is not being overloaded.

According to interviews with Orica SMC NA personnel, standard weights are loaded and standard blocking and bracing configurations are used for van trailers and intermodal 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.

TNO transportation equipment was found to be in very good condition and was deemed suitable for the loads being shipped. Tractors and trailers used for mine deliveries are enhanced with upgraded equipment and heavy-duty frames to ensure safe travel over rough terrain.

Shipping paperwork was reviewed during the audit and showed the number of packages shipped and the weight of the cargo. Specifications for trucks and trailers clearly show that equipment is appropriate for the loads that must be transported.

Loads are driven over scales to confirm that trucks are not being overloaded. Records were available to demonstrate that equipment is not being overloaded.

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

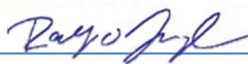
Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

According to interviews with Orica SMC NA personnel, formal procedures are used by all loading operations at the Orica SMC NA facilities. These activities are audited during the production audits of each facility. Details are contained in the respective audit reports posted on the ICMI website. Blocking and bracing of solid cyanide in intermodal containers is done by Orica SMC NA using formal procedures and pre-shipment inspections. ISO tanks and solution tankers are also inspected by Orica SMC NA prior to shipment.

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TNO confirmed that it has formal safety programs that clearly address all Cyanide Code safety program requirements. Formal procedures and training programs are used to ensure that cyanide is transported in a manner that is safe and protective of the transportation packaging. TNO personnel were interviewed to confirm that written procedures continue to be used in daily operations.

Orica SMC NA uses placards and other signage to identify the shipment as cyanide, as required by local regulations or international standards. The number UN 3414 for liquid sodium cyanide or UN 1689 for solid sodium cyanide is displayed on all packaging, ISO tanks, tank wagons, intermodal containers, and rail cars. Observations made during the audit confirmed this practice.

Cyanide solution in Canada is transported in bulk tanker trailers using UN 3414 shipping placards for sodium cyanide solution on all sides of the truck, in accordance with Canada transportation regulations. All vehicles and trailers were found to be properly placarded during the audit.

Orica SMC NA:

According to interviews with Orica SMC NA personnel, rail cars, trucks, and trailers are inspected prior to shipment.

Orica SMC NA tracks when rail car and ISO tank maintenance and inspections are due and ensures that required maintenance and inspections are performed. Records for the recertification period were checked and were found to be acceptable.

Orica SMC NA and carrier personnel were interviewed to confirm that intermodal containers are blocked and braced as part of the Orica SMC NA loading process. Rail hopper cars, ISO tanks, and tank trailers are properly sealed and inspected by Orica SMC NA prior to shipment. The auditor confirmed through observations that loads were appropriately secured.

TNO:

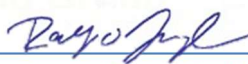
Vehicle inspections are done prior to every shipment and maintenance is performed approximately every 30-90 days, depending on equipment type. Maintenance records for the recertification period were found to be complete.

Driver hours are limited by U.S. and Canadian transportation regulations. Confirmation was made by the auditor that TNO monitors driver hours to ensure compliance. Dispatch and delivery records for the recertification period were reviewed during the audit and were found to be acceptable.

Weather conditions are constantly monitored, and deliveries are postponed if a route is unsafe. Drivers are empowered to stop transport if the conditions are unsafe. Interviews were conducted with drivers and procedures were reviewed during the audit to confirm that drivers are empowered to modify or suspend a shipment if unsafe conditions exist. Such a change in delivery plans would be made in close coordination with the carrier dispatcher, Orica SMC NA personnel, and with the mining customer. Drivers showed good awareness of the need to adhere to designated routes and request authorization prior to deviating from the established routes or transportation plans.

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Random drug and alcohol testing is done in accordance with Canadian regulations. Records for the recertification period were available to show that all parts of the safety program, including drug testing are effectively implemented.

TNO has implemented a safety program for cyanide transport that include all Code required considerations. Safety Program records were available to show that all parts of the safety programs are effectively implemented.

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.

No shipments are made via sea on this transportation segment. Ocean shipments are addressed in the Orica SMC NA Global Ocean Supply Chain recertification audit report.

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.

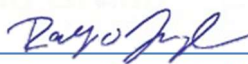
All TNO drivers have communication equipment consisting of at least cell or satellite phones, and most drivers have multiple communication systems available to them at all times. This practice was confirmed through interview and observation during the audit.

All communication equipment (GPS, cell phone, satellite phone, etc.) is confirmed to be operational at the start of each trip. Cell phone blackout areas are identified by the trucking company during the route planning process. Satellite phones are issued to any drivers who are being dispatched on a route with a known cell phone blackout area that would otherwise leave a driver out of contact for more than a few minutes. A review of procedures and driver interviews were used to confirm this practice.

The dispatcher ensures that the driver has a working satellite phone when driving these routes. Interviews were conducted to confirm that these practices have been in place for the entire recertification period. Communication equipment was found to be in good working order.

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Orica SMC NA personnel at each point of loading (production plants and distribution terminals) maintain close communications with truck drivers and trucking companies making cyanide deliveries. Depending on the location, this communication is either direct through a communication system with the driver or indirect through the dispatcher of the trucking partner.

Trucks are always in contact with dispatch by cell phone, satellite phone, or an onboard communication system in addition to being tracked by a Global Positioning System (GPS).

The GPS tracking system provides the vehicle position in real time, indicating at what time it passes through the geofences, the vehicle and driver data, among other useful information. The GPS tracking capability was confirmed during the audit.

Shipping paperwork maintained by TNO for each shipment includes chain of custody information such as container numbers, waybill numbers, customs declarations (as appropriate), proof of delivery, and producer invoice, etc.

A bill of lading (waybill) accompanies the transportation which details the amount and type of cyanide in transit. The appropriate Safety Data Sheet (SDS) is also maintained in the truck during transport. SDSs were up-to-date and available during the audit.

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

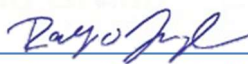
Store cyanide in a manner that minimizes the potential for accidental releases.

Interim storage activities in this supply chain, as defined by ICMI, take place at IsoChem Logistics, LLC in Houston Texas, and at the TNO interim storage facility in Rouyn-Noranda, and at the Solurail Logistique Inc. Interim Storage Operations and Rail Head in Val-d'Or, Quebec, Canada. Each of the interim storage areas is a fenced truck and/or rail yard that is designated for in-transit management of cyanide transportation containers. Solurail is primarily used for changing transportation mode from rail to truck and for shipping empty ISO tanks back to the United States via rail.

IsoChem/TNO/Solurail: All three interim storage operations were audited on-site and were observed to have appropriate signage. Visible signs at all three locations indicated that cyanide in either the UN 1689 (solid) or 3414 (solution) form were present. Signs at all three interim storage

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facilities stated in the appropriate language (either French in Quebec or English in Houston) that smoking, open flames, eating and drinking are not permitted in the immediate area where cyanide is stored. Personal protective equipment requirements for the material storage and handling activities are posted outside the cyanide storage area.

The interim storage yards are open truck or rail yards. The personal protective equipment requirements pertain primarily to visibility vests, hard hats, and steel-toed shoes. Containers are not opened, and workers do not physically touch the containers, they are moved with heavy equipment such as reach stacker container handlers.

All three interim storage facilities were found to have appropriate fencing and locking practices in place to prevent unauthorized access to cyanide.

All three interim storage facilities separate the cyanide physically from incompatible materials such as acids, strong oxidizers and explosives. Cyanide is physically separated from incompatible materials to prevent mixing in the event of a container leak or breach. Storage practices were found to be acceptable.

In this supply chain, cyanide is stored in solution tank wagons or solution ISO tanks that are specially designed transportation equipment that minimizes the potential for contact with water and/or spill. The valves on the tank wagons are internal and the valves on the ISO tanks are on top of the containers.

Solid sodium cyanide is also stored at these facilities. Solid briquettes are packaged in water-proof 1-ton bag-in-box configurations packed into intermodal containers. The containers are not opened, and they are stored off the ground on rail ties or truck chassis to ensure that the containers do not sit in water.

No ISO tanks or intermodal containers are opened in this supply chain nor are they stored indoors where cyanide gas could build up. Transportation containers are not opened.

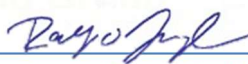
At the IsoChem facility, the intermodal containers are stored at the highest elevation in the outdoor container yard. Containers are maintained on a series of railroad ties to provide further protection from the risk of being exposed to standing water. Sodium Cyanide packages within the intermodal shipping containers are comprised of a bag-in-box construction that offers additional protection against water intrusion. ISO tanks are sealed and are constructed to be watertight.

The tank trailers are not opened at the TNO facility and are only parked for hours or overnight. ISO tanks and intermodal containers transferred from rail to truck at Solurail are also in storage for only short periods of time. Spill equipment is available in each of the operations audited. Storage practices were found to be acceptable at all three locations.

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

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Name of Operation


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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.

Orica SMC NA:

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 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, transport infrastructure (rail and truck) and the interim storage facilities at TNO, Solurail and ISOChem.

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 Orica SMC NA transportation partners, 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, supply chain partners, and internal personnel.

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TNO/Solurail/ISOChem: TNO, Solurail, ISOChem, Energex and TSM operations also each maintain emergency response plans and procedures that were reviewed and found to accurate and up-to-date. Emergency Response Plans (ERPs) and information reviewed for each of the operations were last updated in 2025.

The ERPs were found to be suitable and appropriate for the operations, routes traveled, physical form of the cyanide (solid vs. solution), method of transportation and/or interim storage, transportation infrastructure, and design of the transport vehicles/containers and design of the interim storage facility (Solurail and ISOChem).

Both liquid and solid sodium cyanide are shipped using this supply chain. Emergency response procedures address actions to be taken in response to both types of sodium cyanide spills. All emergency response plans reviewed consider the method of transport (rail or truck) to the final destination. All plans were found to be appropriate for the mode of transportation involved.

The actions that are to take by the carriers or the interim storage facilities (primarily secure the scene, notify Orica SMC NA, and contact authorities) are listed in the plans. Additional actions are listed in the Orica SMC NA emergency documentation. The documentation was found to be acceptable for the operations and the supply chain.

The plans and emergency response information outline the roles and responsibilities of internal and external responders.

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.

Orica SMC NA:

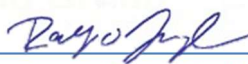
The ERG in conjunction with the NACMP clearly outline the duties and responsibilities of Orica personnel, and its internal and external emergency response partners.

Orica has trained its personnel in cyanide safety and its emergency planning documents. Orica provided the 2026 ERG to transportation partners and 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 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

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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, transportation partners, and Orica personnel accept the emergency response roles defined in the ERG.

TNO/Solurail/ISOChem: Each company provides emergency response training to their personnel. The effectiveness of the training is confirmed through on-site auditing and emergency response drills.

Drivers, managers, and maintenance shop personnel at each organization receive an appropriate level of training to enable them to fulfill their role in emergency response. Formal emergency response training is refreshed annually. Training records were available for the recertification period and were complete.

The roles and responsibilities of relevant internal and external personnel are described in the emergency plans maintained by each part of the supply chain. Interviews with personnel at each company confirmed that there was good awareness of the roles and responsibilities in the event of an emergency.

The emergency plans for each operation define what equipment must be available at the facility. TNO defines what equipment needs to be in each truck and the extra personal protective equipment in each emergency bag. Equipment is checked as part of the pre-trip inspection process. Emergency equipment was confirmed to be in place and consistent with that listed in the ERPs for each operation during the audit.

TNO defines what equipment needs to be in each truck and the extra personal protective equipment in each emergency bag. Equipment is checked as part of the pre-trip inspection process. Emergency equipment was confirmed to be in place and was consistent with that listed in the ERP.

TNO checks its emergency response equipment as part of the pre-trip inspection process. This practice was confirmed through interview and observation. For the interim storage facilities, emergency equipment is defined in the ERPs and is checked monthly to ensure that it is available if needed. Emergency equipment was physically observed during the audit and was found to be appropriate.

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

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Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

Orica SMC NA:

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.

TNO/Solurail/ISOChem: The notification procedures, including telephone numbers, are described in the ERPs maintained by each organization within the supply chain.

The trucking company ERPs list current emergency numbers for local hospitals, and for ambulance, fire, and environmental responders. The phone lists also included up-to-date contact information for Orica SMC NA personnel, regulatory agencies, and potentially affected communities.

The emergency information in the ERPs was reviewed during the audit and was found to be up to date.

Each ERP defines a frequency of not more than one year for the checking of emergency notification information and reporting procedures to confirm that the information is kept up to date. The emergency information in the ERPs was reviewed during the audit and was found to be current.

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	

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Transport Practice 3.4

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

Orica SMC NA:

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.

TNO/Solurail/ISOChem:

Interviews confirmed that trucking and interim storage operations would contact Orica SMC NA for guidance regarding the need to perform any significant clean-up or neutralization operations in response to a cyanide spill or release.

The trucking and interim storage facility ERPs include text that addresses the remediation and neutralization of cyanide solutions. General information is given, and the hazards associated with using cyanide treatment chemicals are recognized. Neutralization chemicals are not allowed to be used in or near surface water bodies. There are no water bodies near the interim storage facilities.

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.

Orica SMC NA: 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

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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.

TNO/Solurail/ISOChem:

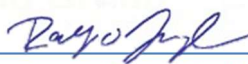
The companies periodically review their emergency response plans for adequacy. Reviews are generally performed on at least an annual basis and after incidents, drills, and tabletop exercises. Each of the ERPs reviewed during the audit had most recently been reviewed and updated in 2025.

Companies performed tabletop simulations at least annually and emergency response drills within the recertification period. Emergency response records were available for review for each year from 2023-2025.

According to the emergency procedures maintained by the trucking and interim storage facilities, emergency plans are updated as necessary after drills and actual emergencies. Evidence was available to demonstrate that a full drill critique was done after the emergency drills reviewed during the audit. An "After Action" report was developed, and formal corrective actions were opened and tracked to closure after the one Significant Cyanide Incident. Records were reviewed and were accepted by the auditor.

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

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Rail Carrier and Rail Yard Due Diligence Investigation Results

Principle 1 | TRANSPORT

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

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

The Orica SMC NA rail cars are shipped from Winnemucca and Houston on the Union Pacific Railroad (UP). Those cars that are headed for Cadillac are switched to the Canadian National Railway (CN) in the Proviso, Illinois yard in Chicago. Security and safety risks are minimized through the use of the shortest possible transit time for the shipments. There are no other choices of rail partners for this rail move as the railroad companies own the track that is used.

The Orica SMC NA Cheyenne Transload Terminal located in Cheyenne, Wyoming is a sodium cyanide transloading facility operated by TransWood Inc. Cyanide solution is transported by rail car via the Union Pacific railroad from Winnemucca to Cheyenne, moved on-site into a fenced area, and then loaded into ISO container trailers for truck transport to mines. This operation has been Cyanide Code certified since 2017.

The railroads maintain control over routing and employ specific safety measures to ensure the safest transit of hazardous materials possible. The railroads have been certified Responsible Care® Partner companies for more than ten years. As such, their rail management system, including rail yards and interchange point safety and security, has been audited by a 3rd-party auditing firm and has been found to be suitable and effective on a tri-annual basis. According to information that is publicly available, the rail yard where the rail cars cross the U.S./Canada border has undergone 3rd-party environmental, health, safety, and security evaluations through the CN Responsible Care® certified management system certification program.

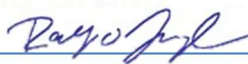
The operation is:	☒ In full compliance with	Standard of Practice 1.1
	☐ In substantial compliance with	
	☐ Not in compliance with	

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.

During this Due Diligence Review it was confirmed that the CN and UP railroads have continued to be certified Responsible Care® Partner companies for more than ten years. As such, their training programs and employee qualification processes have been audited by a 3rd-party auditing firm and have been found to be suitable and effective. The fulfillment of required training is a specific requirement of the Responsible Care Management System (RCMS). Although no

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railroad training files are maintained by Orica SMC NA, information regarding the safety practices of the CN and UP railroads was available and was reviewed during the audit.

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 CN & UP railroads maintain Responsible Care Management System® certifications and undergo a full management system audit at least every three years which includes a review that the preventive maintenance program for transportation equipment is suitable, adequate and effective. The proper maintenance of rail equipment is heavily regulated and inspected by the U.S. Federal government, which also helps to ensure fulfillment of rail equipment preventive maintenance and inspection requirements.

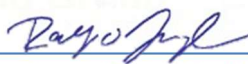
The operation is: ☒ In full compliance with Standard of Practice 1.3
☐ In substantial compliance with
☐ Not in compliance with

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

Both the UP and CN are Responsible Care® certified for their safety, health, environmental and security management programs. Adherence to governmental safety regulations such as limits on operator hours and drug testing are evaluated at least every three years by a 3rd-party auditing firm. Limitations on worker hours and drug testing in the U.S. and Canadian rail industry are also strictly regulated and enforced by governmental agencies. The safety programs, including preventive maintenance programs for both companies have been found to be suitable and effective, year after year.

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

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

This Cyanide Code requirement is not applicable to this supply chain.

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.

Both the UP and CN railroads use Data Electronic Interchange (EDI) tracking technology to manage shipments for their customers. Rail shipping paperwork was reviewed during this audit. Accurate descriptions were available showing the type of material, the weight of the shipment, and the shipping and arrival information.

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 CN & UP railroads maintain Responsible Care Management System® certifications and undergo a full management system audit at least every three years which includes a review of material handling practices, emergency response planning, and security.

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.

Information for both rail carriers was reviewed to confirm that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. Orica SMC NA provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

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

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

Orica SMC NA offers immediate technical assistance through its contracted emergency response service providers for any cyanide spill and offers emergency resources for spills that might occur near a Orica SMC NA site. Orica SMC NA contracts with CHEMTREC to ensure that appropriate notifications and emergency response is initiated if there is an incident.

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

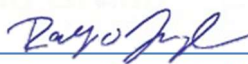
Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

The CN and UP are both part of the TRANSCAER® (Transportation Community Awareness and Emergency Response) organization which helps with notifications requirements. Orica SMC NA contracts with appropriate organizations to ensure that appropriate notifications and emergency response is initiated if there is an incident on any rail or truck movement.

Orica SMC NA experienced a rail incident in 2024 involving a rail tank car of sodium cyanide solution. Due to extreme temperatures in the rail car, the solution started to decompose, and ammonia was emitted from the pressure relief valve of the rail car. Four CN employees were

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exposed and received minimal medical treatment and monitoring following the incident. Orica SMC NA reported the incident to ICMI within 24 hours of the incident but later determined that there was no release of sodium cyanide. The chemical emitted was ammonia that resulted from decomposition processes within the rail car. Following a thorough investigation, Orica SMC NA determined that no sodium cyanide was released, and the incident was therefore not classified as a Cyanide Significant Incident.

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.

Orica SMC NA and its emergency response service providers would lead any remediation efforts involving cyanide. No information regarding this requirement was investigated for CN and UP.

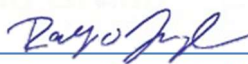
The operation is: ☒ In full compliance with Standard of Practice 3.4
☐ In substantial compliance with
☐ Not in compliance with

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

As part of the rail carrier safety programs such as TRANSCAER® (Transportation Community Awareness and Emergency Response), drills and exercises (not necessarily cyanide specific) are conducted to test response capabilities. Additionally, both railroads have been certified Responsible Care® Partner companies for more than ten years. As such, their emergency response systems have been audited by an independent 3rd-party auditing firm and found to be effective on a tri-annual basis. One requirement of any certified Responsible Care Management System® is that the emergency response plans be up-to-date and that emergency response plans be tested periodically.

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

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