



**ICMI Cyanide Code Consigner Supply Chain
Summary Audit Report**

**DuPont Global Ocean Transportation Supply Chain
Certification Audit**

**Submitted to:
International Cyanide Management Institute
888 16th Street, NW – Suite 303
Washington, DC 20006
USA**

2010 Audit Cycle



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**Management System Solutions, Inc.
P.O. Box 780 999
Orlando, FL 32878
www.mss-team.com**

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Global Ocean Supply Chain Summary

Consignor Name & Contact Information

Name of Operation: E.I. DuPont de Nemours and Company
2571 Fite Road
Memphis, TN 38127 USA

Name and contact information for DuPont Contact: Donald Jeffery
Cyanide Business Global Product Stewardship Manager
Email: Donald.W.Jeffery@USA.dupont.com
Tel. (623) 444-2989

Operational and Audit Information – Global Ocean Supply Chain

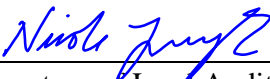
E.I. duPont de Nemours and Company, Inc. (DuPont) is a science-based company operating in more than 70 countries. DuPont offers a wide range of products and services for markets including agriculture, nutrition, electronics, communications, safety and protection, home and construction, transportation and apparel. Solid sodium cyanide for use in the gold mining sector is manufactured at the Memphis, Tennessee plant, which is part of the DuPont Cyanides Business and Chemicals & Fluoroproducts Strategic Business Unit. The plant is located just outside of Memphis in Woodstock, Tennessee.

DuPont was one of the original 14 Cyanide Code signatory companies announced on November 3, 2005. As such, DuPont made the commitment to obtain Cyanide Code certification for its Memphis Solid Cyanide Plant and its packaging operations. DuPont was the first Cyanide Producer to achieve certification in June 2006. The operation was re-certified in 2009.

DuPont transportation supply chains are highly complex due to the global reach of its supply capabilities. After its initial certification in 2006, DuPont contracted ICMI-approved Code Transportation Auditors to perform non-certification audits for its supply chain in the U.S., Mexico, and throughout Central and South America. Audits were conducted of DuPont operations and trucking partners. Due Diligence Reviews were conducted for ocean carriers (including ports) and rail partners (including rail yards). The original audit of DuPont as a Consignor / Transporter and due diligence reviews of the ocean carriers (including ports) and rail

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Name of Operation


Signature of Lead Auditor

August 7, 2010

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partners (including rail yards) was done in February 2007. Now, three years later, similar auditing and due diligence investigation activities were performed again.

The verification audit of DuPont on February 9-10, 2010 was a combined audit of Consignor / Transporter management for global ocean transport and U.S./Canada rail and barge transport. This report contains information regarding the results of the DuPont consignor / transporter verification audit and the results of the ocean carrier and port due diligence investigations. The U.S./Canada rail and barge results are contained within a separate report.

The verification audit and due diligence investigations were conducted according to the 2009-adopted ICMI certification process that calls for consignors to become signatories and undergo transportation supply chain third-party verification audits.

Description of the Global Ocean Supply Chain:

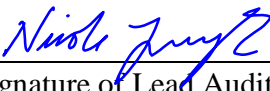
DuPont has been producing and shipping sodium cyanide since 1953. In the United States, the solid sodium cyanide briquettes are packaged at the Memphis Plant, at the LSI Terminal directly adjacent to the plant and at the DuPont packaging terminal in Carlin, Nevada, USA. The Global Ocean Supply Chain is used for shipments from the Memphis Plant that go by rail and then by ocean carrier. The results of the rail and barge audit and due diligence evaluations are contained in a separate report. This evaluation included the following components:

Verification audit of DuPont ocean carrier and port supply chain management practices according to the requirements of the ICMI Transportation Protocol (2009 Revision)

Global Ocean Supply Chain – All global ocean moves of sodium cyanide that originate in the United States are within the scope of this verification audit of DuPont's processes used to manage the ocean transport of its products. The results of the due diligence evaluations of six (6) ocean carriers are also contained within this report. The six ocean carriers for which due diligence investigations were performed are:

1. American President Lines (APL)
2. Hamburg Sued
3. Maersk Line Agency
4. Mediterranean Shipping Co. (MSC)
5. MITSUI O S K Lines LTD (MOL)
6. Seaboard Marine

The Due Diligence Investigations were also conducted for U.S. and international ports in use at the time of the audit. Records were sampled to confirm that DuPont had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by DuPont for hazardous material shipments. The following ports were in use for sodium cyanide shipments to gold mine customers as of February 2010:

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Ports of Export	Ports of Import	Destination Countries
Jacksonville, FL Long Beach, CA Los Angeles, CA Miami, FL New Orleans, LA Seattle, WA San Pedro, CA Savannah, GA	Antofagasta Arica Balboa Belem Buenos Aires Callao Cartegena Caucedo Corinto Guayaquil Guatamala Montevideo Puerto Angamos (Mejillones) Puerto Cabello Puerto Chacabuco Colon Corinto Puerto Cortes Puerto Deseado Puerto Quetzal Rio De Janeiro Salvador San Antonio Santos Takoradi Valparaiso Vitoria	Argentina Brazil Chile Colombia Dominican Republic Ecuador Ghana Guatemala Honduras Nicaragua Panama Peru Uruguay Venezuela

Global Ocean Supply Chain - Auditor's finding and attestation

The verification audit was performed at the DuPont Sourcing and Logistics building in Wilmington, Delaware – USA. The audit was performed by an independent third-party auditor who was pre-approved by the ICMI as a Lead Auditor for all types of Code audits and as a technical expert for Code audits of cyanide transportation and production operations.

The verification audit of DuPont US/Canada Ocean supply chain management operations was conducted on-site on February 9-10, 2010 with additional reviews of due diligence information following the on-site audit activity. The supply chain management processes and the due

DuPont Global Ocean Supply Chain

Nicole Jung

August 7, 2010

Name of Operation

Signature of Lead Auditor

Date

diligence investigations of ocean carriers and ports were conducted in accordance with the agreed upon audit plan and due diligence documentation requirements.

The DuPont cyanide transportation management practices using ocean carriers (including ports) were evaluated against the Cyanide Code requirements documented in the *ICMI Cyanide Code* (2009), *ICMI Cyanide Code Transportation Protocol* (2009), and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol* (2009). DuPont 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 DuPont. Additionally, records regarding carrier selection, ongoing carrier performance evaluations, incident tracking, equipment maintenance, security measures, port evaluations, shipment tracking, cargo labeling practices, shipping documentation, community involvement, and emergency response records were randomly sampled and found to be acceptable.

DuPont and its transportation partners were evaluated previously during a non-certification Cyanide Code verification audit using the 2005 revision of the Cyanide Code transportation Protocol. Although the 2007 audit and due diligence reviews were non-certification activities, these 2010 audit and due diligence review activities were conducted in accordance with Re-Certification Guidelines, namely the confirmation that DuPont and its transportation partners have continued to be in conformance since the original audit in 2007.

The results of this verification audit and the related due diligence investigations indicate that DuPont and all portions of its Global Ocean Supply Chain are in FULL COMPLIANCE with Cyanide Code requirements.

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Global Ocean Supply Chain - Auditor's Finding

This Global Ocean Supply Chain is

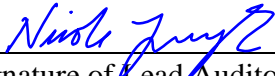
- in full compliance**
- in substantial compliance
- not in compliance

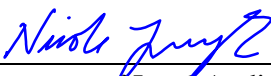
with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010

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

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

DuPont Global Ocean Supply Chain		August 7, 2010
Name of Facility	Signature of Lead Auditor	Date

DuPont Global Ocean Supply Chain		August 7, 2010
Name of Operation	Signature of Lead Auditor	Date

Consignor Summary

Operational & Audit Information for Consignor

The DuPont Corporate Sourcing & Logistics group located in Wilmington, Delaware manages the domestic and international transportation of sodium cyanide. The Ocean Transport Procurement Group has overall responsibility and authority for coordinating ocean carrier selection, safety, security, and quality performance tracking, ocean carrier contracts, route selection, booking of shipments, shipment tracking, and incident investigation. The DuPont Procurement Group works together with a professional freight forwarding service provider to coordinate shipments and ensure that the appropriate level of shipment tracking and controls are in place.

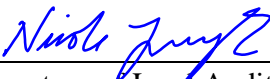
Cyanide Product Stewards within the DuPont Cyanides Business coordinate activities associated with route risk evaluation when customers are originally established and again at established frequencies. The Product Stewards also coordinate community communications, training sessions, port evaluations, customer evaluations, and package & label reviews. Corporate Emergency Response Specialists work together with the DuPont Cyanides Business to coordinate emergency response planning procedures, preparation and maintenance of emergency equipment, training of DuPont emergency response personnel, and evaluation of plans and procedures through periodic emergency response drills.

DuPont maintains formal standards, policies, guidelines, and procedures for ensuring Distribution Safety. DuPont Corporate standards exist for Incident Prevention, Emergency Response, Transportation Risk Assessment, Distribution Regulatory Compliance, and Training, and Distribution Handling & Storage. In addition, the Sourcing & Logistics Groups maintain desk manuals with specific procedures for the procurement of transportation services and the management of carriers.

Personnel interviewed during the February 9-10, 2010 DuPont Verification Audit / Global Ocean Transport Due Diligence Investigations:

DuPont Global Ocean Supply Chain

Name of Operation


Signature of Lead Auditor

August 7, 2010

Date

Transport Practice Discussed →	1.1 Route selection Risk Assessment	1.2 Driver / Operator Training & Qualifications	1.3 Equipment Suitability	1.4 Safety Program & Preventive Maintenance	1.5 Ocean Transport	1.6 Tracking of shipments	2.1 Interim Storage	3.1-3.5 Emergency Response	Supply Chain Management - General Discussions
Audit Participants									
International Transportation Procurement Manager (Ocean Transport)	X				X	X		X	X
Marine Procurement (Ocean Transport)	X				X	X		X	X
Product Stewardship Manager, North America Cyanides	X						X	X	
Cyanide Business Global Product Stewardship Manager	X	X	X	X		X	X	X	X
Logistics Leader, Cyanides Business			X	X		X		X	X
Emergency Response Specialist/Site Fire Chief DuPont Memphis Plant								X	
Safety, Health & Environmental Manager – Sourcing & Logistics								X	X
Regulatory Affairs – Cyanides Business (packaging requirements and certifications)		X							
Internal DuPont Hazmat Consultant		X			X				

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DuPont Consignor / Transporter – Auditor’s finding and attestation

The DuPont cyanide transportation management practices using ocean carriers (including ports) were evaluated against the Cyanide Code requirements documented in the *ICMI Cyanide Code* (2009), *ICMI Cyanide Code Transportation Protocol* (2009), and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol* (2009). DuPont 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 DuPont. Additionally, records regarding carrier selection, ongoing carrier performance evaluations, incident tracking, security measures, port evaluations, shipment tracking, cargo labeling practices, shipping documentation, community involvement, and emergency response records were randomly sampled and found to be acceptable.

DuPont Consignor / Transporter - Auditor’s Finding

DuPont Consignor / Transporter operations are

- in full compliance**
- in substantial compliance
- not in compliance

with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010

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

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

DuPont Consignor/Transporter Operations *Nicole Jurczyk* August 7, 2010
Name of Facility Signature of Lead Auditor Date

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Name of Operation Signature of Lead Auditor Date

process in which all aspects of cyanide product stewardship (labeling, product trail, use or transportation incidents, MSDS, etc.) are reviewed at least every three years.

DuPont trains community responders and hospitals in Memphis, Tennessee, at international ports, and at customer sites. Records of community interactions / training sessions were reviewed and found to be acceptable. According to a U.S. Port analysis compiled by DuPont in February 2010, ports in use at the time of the audit had all been contacted, but access to U.S. Ports in this post 9/11 era is very difficult. DuPont has concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist ports with regard to security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

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. DuPont's overall selection of the routing for shipments gives very strong preference to routing that does not involve a trans-shipment step (transferring the shipment from one carrier to another en-route). In addition to the care taken to avoid trans-shipment situations in the routing process, DuPont contracts with a freight forwarding company to arrange and then track shipments closely. Information regarding DuPont's ability to track ocean shipments was sampled during the audit and was found to be suitable for mitigating the risk of losing track of a specific shipment. In order to reduce the chance that an unauthorized or untrained person may open an inter-modal container, the containers are sealed. Records that included the information on container seals were reviewed for each of the ocean carriers for the time period 2007 through 2010. Information on the shipping records was appropriate and no problems were evident.

DuPont uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

Transport Practice 1.2 Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

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

Summarize the basis for this Finding:

This requirement does not apply to DuPont for this supply chain.

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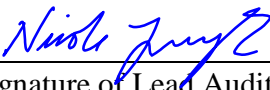
Security and U.S. Coast Guard infrastructure that is available to assist ports with regard to security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

DuPont performs audits of international ports and provides cyanide safety training at ports, when authorized to do so by the individual ports. Records were sampled during the 2007 audit and during this 2010 audit. A sample of First Order evaluation information showed that DuPont has been consistently reviewing international ports for safety and security between 2007 and 2010. The auditor concluded that DuPont has effective processes for ensuring that international ports have demonstrated appropriate safety, security, and road infrastructure prior to being approved for hazardous material shipments.

As recommended by the ICMI Auditor Guidance for the Use of the Cyanide Transportation Verification Protocol, dated October 2009, specific information regarding this practice is addressed below:

- a) The DuPont packaging specifications were reviewed as part of the verification audit and were found to be conformant to the packaging requirements of the IMDG Code.
- b) Photos of packaging for drums and IBCs presented at the audit were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
- c) Photos of packaging for drums and IBCs presented at the audit were appropriately labeled and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
- d) Photos of loaded inter-modal containers were reviewed and were found to be marked and placarded in accordance with the IMDG Code. This aspect of compliance was also evaluated in 2009 at the on-site verification audit of the LSI operation in Memphis, TN.
- e) Shipping documents were reviewed for a sample of cyanide shipments. All information required by the IMDG Code is required as standard practice on DuPont shipping paperwork.
- f) The container packing certificates 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) DuPont maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements (records including valid SOLAS certificates). The ocean carriers confirmed to DuPont that they have cyanide emergency response information available on board each vessel.
- h) DuPont maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements.

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

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

Summarize the basis for this Finding:

DuPont works together with its freight forwarder to track shipments using a secure web-based shipment tracking system. Appropriate action is taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that location can always be confirmed. Email communications containing database tracking information was reviewed during the audit and confirmation was made that shipments are being tracked continuously and that DuPont normally has access to “real-time” information regarding the location and status of its shipments of cyanide. Shipping paperwork was reviewed and was found to be conformant to 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. The abovementioned documents were reviewed during the audit. Ocean carriers reported that they maintain databases with MSDS information for the products they carry.

2. INTERIM STORAGE: *Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.*

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

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

Summarize the basis for this Finding:

This requirement does not apply to the DuPont supply chain management activities.

3. EMERGENCY RESPONSE: *Protect communities and the environment through the development of emergency response strategies and capabilities*

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plan had last been updated in 2010 and the U.S. Integrated Emergency Response plan was last updated in 2009. The Emergency Response Procedures were last updated in 2010.

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

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

Summarize the basis for this Finding:

Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the document. Interviews with DuPont personnel during this and previous Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. Page 7 of the Emergency Response Procedures specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water.

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

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

Summarize the basis for this Finding:

According to Section 4 of the Cyanides Global Response Plan for Off-Site Incidents, emergency plans including notification numbers are checked at least annually. The Cyanides plan had last been updated in 2010 and the U.S. Integrated Emergency Response plan was last updated in 2009. The Emergency Response Procedures were last updated in 2010.

Many emergency drills are conducted at DuPont on an on-going basis. Emergency response drills at the Memphis Plant, for example are conducted quarterly. This was evaluated during the 2009 re-certification audit. According to the Cyanides Global Response Plan for Off-Site Incidents, the plan is to be tested by conducting drills at least annually.

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Records were available to show that the Global Cyanides Business has conducted emergency response drills each year for the past three years. Drills typically involve at least one transportation partner and often one or more customers. Drill critiques were sampled and were found to be appropriate.

Ocean Carriers and Ports – Summary of Due Diligence Investigations

Operational and Audit Information for Ocean Carriers and Ports

All global ocean moves of sodium cyanide that originate in the United States are within the scope of this verification audit of DuPont’s processes used to manage the ocean transport of its products. The results of the due diligence evaluations of six (6) ocean carriers are also contained within this report. The six ocean carriers for which due diligence investigations were performed are:

1. American President Lines (APL)
2. Hamburg Sued
3. Maersk Line Agency
4. Mediterranean Shipping Co. (MSC)
5. MITSUI O S K Lines LTD (MOL)
6. Seaboard Marine

The Due Diligence Investigations were also conducted for U.S. and international ports in use at the time of the audit. Records were sampled to confirm that DuPont had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by DuPont for hazardous material shipments. The following ports were in use for sodium cyanide shipments to gold mine customers as of February 2010:

Ports of Export	Ports of Import	Destination Countries
Jacksonville, FL	Antofagasta	Argentina
Long Beach, CA	Arica	Brazil
Los Angeles, CA	Balboa	Chile
Miami, FL	Belem	Colombia
New Orleans, LA	Buenos Aires	Dominican Republic
Seattle, WA	Callao	Ecuador
San Pedro, CA	Cartegena	Ghana
Savannah, GA	Caucedo	Guatemala
	Corinto	Honduras

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	Guayaquil Guatamala Montevideo Puerto Angamos (Mejillones) Puerto Cabello Puerto Chacabuco Colon Corinto Puerto Cortes Puerto Deseado Puerto Quetzal Rio De Janeiro Salvador San Antonio Santos Takoradi Valparaiso Vitoria	Nicaragua Panama Peru Uruguay Venezuela
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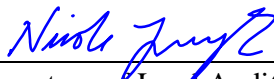
Ocean Carriers and Ports - Auditor's finding and attestation

DuPont ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance. The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable regulations and have "organized safety programs." Contracts were reviewed during the audit and this standard clause appears in Article 21 of the ocean carrier contract.

As part of DuPont's due diligence effort, each of the six ocean carriers was asked to perform a self-evaluation against the Cyanide Code Transportation Protocol requirements using a customized ICMI transportation protocol. The results from these evaluations were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that each carrier is authorized for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid.

In addition to DuPont'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 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

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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. Records were available for each of the six ocean carriers noted in this report to show that they had successfully passed a SOLAS audit and that they each maintained valid SOLAS certificates. According to information reviewed during the due diligence investigation, the provisions of SOLAS include: fire protection, life saving equipment, radio communications, safety of navigation, transportation of dangerous goods, management of safe operations of ships, and maritime security.

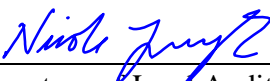
Additionally, Maersk participates in the voluntary Chemical Distribution Institute – Marine Packed Cargo program (CDI-mpc). Carriers in this program undergo a management systems safety audit using the CDI-mpc protocols that were created in cooperation with the United States American Chemical Council under its Responsible Care® initiatives. The CDI-mpc certificates are issued to individual ships. Maersk provided a number of these certificates as examples. All certificates showed that ships had been reviewed in 2009 for safe operations and adherence to best chemical management practices.

With regard to port safety and security, new 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. 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).

The ocean routes are chosen by the ocean carriers. The destination ports are evaluated by the DuPont Regional Product Steward for Cyanides. Part of the evaluation prior to the first shipment of product is an evaluation of the port. The DuPont Cyanides Business Regional and Global Product Stewards were interviewed as part of this audit. The U.S. Regional Product Steward reported that U.S. ports in use at the time of the audit had all been contacted to inquire about emergency response capabilities, environmental policies, security practices, and adherence to Maritime Transportation Security Act requirements. A report written in February 2010 summarizing the information gathered through this due diligence activity was provided to the auditor as evidence that appropriate due diligence evaluations had been done on all U.S. ports noted in the introduction section of this report. DuPont has also concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist ports with regard to security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

DuPont Global Ocean Supply Chain

Name of Operation


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DuPont performs audits of international ports and provides cyanide safety training at ports, when authorized to do so by the individual ports. Records were sampled during the 2007 and 2010 audits to confirm that DuPont had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by DuPont for hazardous material shipments. A sample of First Order evaluation information showed that DuPont has been regularly reviewing international ports for safety and security between 2007 and 2010. The auditor concluded that DuPont has effective processes to ensure that international ports have appropriate safety, security, and road infrastructure prior to being approved for hazardous material shipments.

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Nicole Jung
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August 7, 2010
Date

DuPont Ocean Carrier & Ports - Auditor's Finding

Due diligence investigations have been performed so that it can reasonably be concluded that ocean carriers & ports used by DuPont for sodium cyanide shipments are

- in full compliance**
- in substantial compliance
- not in compliance

with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010

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

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

DuPont Consigner/Transporter Operations *Nicole Jurczyk* August 7, 2010
 Name of Facility Signature of Lead Auditor Date

DuPont Global Ocean Supply Chain *Nicole Jurczyk* August 7, 2010
 Name of Operation Signature of Lead Auditor Date

Description of Due Diligence Information Reviewed for Ocean Carriers and Ports

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 management of Global Ocean Transport is: consistent with Transport Practice 1.1
substantially consistent
not consistent

Summary of the basis for this finding:

Ocean routes are chosen by the ocean carriers and are regulated by a number of international organizations. When DuPont plans a specific shipping route and chooses an ocean carrier, it evaluates safety performance, availability of direct shipping lanes, and authorizations for the transport of hazardous materials. All carriers undergo regular safety performance reviews. Information was reviewed in the DuPont incident tracking database and was found to be acceptable.

According to interviews, DuPont gives strong preference to ocean carriers that have been evaluated as part of a Cyanide Code due diligence investigation. Strong preference is also given to direct shipping lanes that do not involve a transfer of the cargo to a different ship. Ports that have been found to be acceptable are chosen based on proximity to end customer. Only in cases where a closer port has unacceptable infrastructure or security is the shipment routed using a longer over-the-road segment.

Transport Practice 1.2: *Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.*

The management of Global Ocean Transport is: consistent with Transport Practice 1.2
substantially consistent
not consistent

Summary of the basis for this finding:

All Ocean Carriers

According to the responses to a questionnaire modeled after the Cyanide Code Transportation Protocol, all ocean carriers reported that they comply with IMO requirements and are in

Summary of the basis for this finding:

All Ocean Carriers

Ocean carriers reported 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. DuPont's freight forwarder has access to this information via the internet web sites. DuPont can request this information at any time.

The sodium cyanide shipments for this segment are containerized loads of IBCs and drums. All shipping containers are sealed. Shipping papers were reviewed. Auditors 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.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

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

The management of consistent with Transport Practice 2.1
Global Ocean Transport is: substantially consistent
not consistent

Summary of the basis for this finding:

All Ocean Carriers

Ocean carriers 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. The terminal must segregate containers similar to the segregation onboard vessels.

The packaging used for solid cyanide conforms to IMO and US DOT requirements. Certifications and approvals were reviewed during the 2007 audit and confirmation was made through interviews that no packaging changes have occurred since then. As part of the ocean carrier due diligence audit, documentation was reviewed that confirmed that ocean carriers must contractually adhere to regulatory requirements and maintain formal safety programs. Additionally, safety checklists and seals are used by the DuPont packaging facility after the containers are packed. This process was reviewed during the on-site audits of DuPont, its carriers, and its packaging facilities in 2006, 2007, and 2009. The seal enables verification that the container was not opened during transit.

DuPont Global Ocean Supply Chain

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If a destination port is not already approved and showing acceptable performance for the handling of hazardous materials for DuPont shipments, it is evaluated by the DuPont Regional Product Steward for Cyanides. Part of the evaluation prior to the first shipment of product is an evaluation of the port. Product Stewards either visit the port and observe that personnel are handling materials safely, that the port is secure and the roadway infrastructure into the port is suitable or they confirm that DuPont has already approved the port for hazardous material shipments. Completed checklists showing port evaluations were sampled during the audit and were found to be acceptable. Interviews confirmed that all ports in use at the time of the audit had been either confirmed to have acceptable safety and security performance or had been specifically evaluated for cyanide shipments.

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 management of Global Ocean Transport is: consistent with Transport Practice 3.1
substantially consistent
not consistent

Summary of the basis for this finding:

All Ocean Carriers

Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. DuPont provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of the DuPont emergency protocols and the involvement of CHEMTREC. Interviews during this audit and the 2007 audit confirmed that personnel within DuPont and at the freight forwarder had appropriate awareness of the emergency response plans. The same emergency systems are used for any type of transportation emergency.

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

The management of Global Ocean Transport is: consistent with Transport Practice 3.2
substantially consistent
not consistent

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