

SUMMARY AUDIT REPORT

Name of Cyanide Transportation Facility: DuPont Panama Supply Chain
Name of Facility Owner: DuPont Panama Supply Chain
Name of Facility Operator: Panama Supply Chain
Name of Responsible Manager: Jean Jacques Covos
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Location detail and description of operation:

DuPont is the seller of sodium cyanide in solid state (briquettes) in Panama. Currently, DuPont uses Brenntag Panama as contractor to coordinate the operative aspects of sodium cyanide transport in Panama.


Cyanide is transported to Panama by ship to the Balboa or Colon. Ship unloading operations are performed by the Port Authority, which releases the container by placing it on a truck's platform. At this point, the cyanide becomes responsibility of DuPont. DuPont's representative in Panama is Brenntag. DuPont has developed the procedures and plans related to the Cyanide Code, their application and the control of the transport operations in Panama is performed by Brenntag. The cyanide is transported directly to the mine, without the intervention of secondary storage facilities.

This audit comprises the ground transportation operations from the moment the Port Authority releases the cyanide to its delivery in the Petaquilla mine. DuPont formally started the implementation of the Cyanide Code in July 2009.

As previously noted, the main transportation route is from Balboa Port to the mine with an approximate length of 216km. As alternative route, in case of contingency in the main route, the cyanide could go from Colon Port to the Petaquilla mine; this route has an approximate length of 372 km.

Cyanide is packaged by the manufacturer in the following way: primary packaging in a poly propylene super-sack filled up to 1 ton. The super-sack is then placed in a wooden box. No less than 20 boxes are placed in standard 20-foot shipping containers (the containers); the exact number of boxes is to prevent lateral movement of the boxes within the container. To further prevent movement a block and brace is applied consisting of placing wood beams between the last box and the container's door. Prior to shipping, the manufacturer (Du Pont USA) seals the container with a tag with serial number at the production facility to prevent material losses. These seals are only removed at the mine.

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

AUDITOR'S FINDING

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

* For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company: ERM Mexico, S. A. de C. V.
Audit Team Leader: Juan Carlos Rangel Lopez E-mail: juancarlos.rangel@erm.com
Names and Signatures of Other Auditors: none

Date(s) of Audit: 12 and 13 January 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 this Summary Audit Report accurately describes 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 Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

1. DUPONT SUPPLY CHAIN IN PANAMA

1.1. **TRANSPORT PRACTICE 1.** **TRANSPORT CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTS AND RELEASES.**

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

DuPont has the procedures:

- o DUP-PA-001 "Cyanide ground transportation from Panama's ports to Petaquilla mine in Panama, Rev 10", dated 21 September 2009.
- o DUP-003 "Assessment of Cyanide Ground Transportation Routes", dated 1 November 2008.


Procedure DUP-003 establishes that the following criteria must be used to assess the route safety:

- o Dangerous turns
- o Steep slopes
- o Main cities and population density
- o Bridges
- o Slides zones
- o Intersection with rail roads
- o Fog, ice, and snow areas
- o Water bodies
- o Environmentally sensitive areas
- o Areas with high robbery risk
- o Areas where driver could rest
- o Any other conditions that may represent a risk.

The initial assessment is performed by DuPont's Technical Services Manager, Mr. Jean Jacques Covos. The procedure also establishes that the route assessment must be updated based on the convoy leader reports as necessary.

Given the ground transportation infrastructure available in Panama, there is only one possible route from Balboa Port to the Petaquilla mine and only one possible route from Colon Port to the mine. The shortest of these alternatives has been selected (from Balboa Port) as main transportation route. Additionally, DuPont-Brenntag has applied the criteria included in Procedure DUP-003 to identify the most sensitive areas through both routes.

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

The two ground transportation routes (Balboa Port – Mine, Colon Port – Mine) were divided in sections considering crossings of urban areas, intersections with other roads, and other key points (e.g. mine check point). Each section was assessed for each of the route safety criteria mentioned and, based on these, a risk ranking was used (A for areas where incident risk is high to D where the risk is low). The assessment was documented in a matrix where the different risks present in each section are marked and the risk ranking is determined. A copy of these matrices is included in procedure DUP-PA-001 and in the Emergency Response Plan. Additionally, a description of the points with a higher risk is included in procedure DUP-PA-001.

DuPont is responsible for the preparation of Procedures and Emergency Response Plan and of maintaining them updated. Brenntag is responsible for the coordination of the transport operations, of providing and maintaining the emergency response equipment, and of providing the Convoy leader. The convoy leader is responsible of preparing his reports.

Based on the mentioned matrix general preventive measures have been established in procedure DUP-PA-001 including: limiting the transportation activities to day-time only, a minimum 8 hr driver-rest period prior to starting a cyanide transportation operation, mandatory driver rest periods every two hours approximately in pre-selected stop points during cyanide transportation operations, all shipments performed in convoys (of up to five trucks) with a safety escort vehicle and a convoy leader. The procedure allows the convoy leader to stop the operations (in a pre-selected point) when the route conditions are unsafe (e.g. due to weather conditions). The evaluation matrices were used to develop emergency scenarios in the different route sections. Each scenario has specific preventive measures (e.g. establishing maximum speed of 20 km controlled by the truck driver leading the convoy in steep slopes).


Procedure DUP GT-001 establishes that the convoy leader must prepare reports for every trip completed which are used to review and update the route assessment. A sample of three reports (out of seven) were reviewed which marked areas where road maintenance operations were observed and areas where landslides were detected. The convoy leader is always Mr. Edwin González, who was interviewed and mentioned that he uses this information to take additional measures during subsequent trips and to provide feedback to the mine when the dirty road managed by the mine require maintenance.

The convoy leader's report includes: the list of drivers, the list of trucks and trailers used, the containers identification number, the emergency kit checklist, the certification that the alcohol test was performed, the truck and trailer inspection checklist, a summary of the basic emergency response activities and sodium cyanide hazardous characteristics which is signed by each driver the first day of the trip, and a summary of every day activities.

DuPont with the help of Brenntag, organized open forums with relevant stakeholders including the following:

- Government agencies: municipal firefighters, Trade and Industry Ministry (Ministerio de Comercio e Industrias), National Environmental Authority (ANAM, Autoridad Nacional del Ambiente), Labor Ministry (Ministerio del Trabajo), Health Ministry (Ministerio de Salud), Civil

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

Protection Authority (SINAPOC, Sistema Nacional de Protección Civil), municipal police departments.

- Representatives from the hospitals located in the communities along the route.
- The mine union and technical personnel

Cyanide generalities were communicated in these meetings. Specific information was also provided to firefighters emergency response procedures. According to DuPont, no additional feedback has been received to date. Attendance lists for these meetings are kept in files. To date DuPont has organized three open forums on 7 and 9 December 2009, 21 August 2009, and 11 December 2008. A total of 110 persons have participated in these forums. These forums must be performed on a yearly basis.

Furthermore, DuPont and Brenntag held a meeting on 10 December 2008 with Panama's Port Company to provide information regarding sodium cyanide handling and emergency response. A total of 18 Panama's Port Company representatives attended the meeting.

Procedure DUP-PA-001 establishes that all shipments from the ports to the mine are performed in convoys and with a safety escort vehicle (where the convoy leader travels). Additionally, according to the convoy leader reports, a mechanical support vehicle escorts the convoy with basic spare-parts and a mechanics technician.

DuPont contracts Brenntag to coordinate the transport operations in Panama. Brenntag subcontracts Servicios Generales DC S. A. (Servicios Generales) for the cyanide transport. All the activities required by Practice 1.1 are performed directly by DuPont. Brenntag ensures, through the convoy leader that the procedures are followed by Servicios Generales. Additionally, Servicios Generales has signed an adhesion letter, where it states that it will comply with the code; the letter was signed by Mr. Serafin A. Castillo, Servicios Generales Manager, on 30 July 2009. DuPont establishes the route to follow and Servicios Generales must follow it with supervision from Brenntag. The safety escort and convoy leader are provided by Brenntag. The communications with the stakeholders is lead by Petaquilla Mine (the cyanide owner) with DuPont's support. Information regarding training received by Servicios Generales' personnel is provided in the following sections. DuPont audits Brenntag and Servicios Generales on an annual basis.

1.1.2. 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 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Procedure DUP-PA-001 establishes the following requirements for drivers:

- To have the legally required driving license

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

- To be trained in defensive driving
- To be trained by DuPont-Brenntag in sodium cyanide handling and emergency response
- Not to be older than 60 years old.

The procedure also establishes that the driver must have at least one rest day per week, must have rested at least 8 hours prior starting the trip, that a 10 minutes break must be taken approximately every two hours, and that the maximum work journey for the driver is 12 hours.

DuPont has provided training in hazardous materials transportation and cyanide transportation to Brenntag's and Servicios Generales' designated drivers and administrative personnel, and the convoy leader. The initial training sessions was held on 10 December 2008 and refreshments have been provided on 29 July 2009 and 5 January 2010.

According to Servicios Generales training program for 2010, the drivers will attend the following courses:

- Cyanide generalities and emergency response (January and April)
- Motivation (March and June)
- Defensive driving (May)
- Policies(July)

The drivers files were reviewed at Servicios Generales' operations base and these contain the following information:


- Curriculum Vitae
- Copy of their personal official identification
- Copy of their driver license (including expiration date, all of them were type H for hazardous loads as required by the Panama transit regulation).
- Copy of the latest hazardous substances handling training attendance list (provided by DuPont-Brenntag)
- Copy of the defensive driving curse diploma (dated June 2009)
- Copy of the transit tickets history provided by the road traffic authority
- Medical certificate (includes drug tests)

The drivers are the only ones to handle the load, since the container is only removed from the platform in the mine. There are no driver's assistants.

Procedure DUP-PA-01 establishes that the convoy leader must confirm that the drivers are included in the list of trained drivers; this is documented in a checklist and in the convoy leader report. The convoy leader has a list of trained drivers and includes in its report the vehicles and drivers that participated in the shipment.

The convoy leader makes sure that only these drivers participate in cyanide transportation and documents this in the vehicle inspection checklist included in his report.

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Procedure DUP-PA-001 establishes the characteristics required for vehicles to be used for cyanide transportation including:

- o Certification for vehicles older than 5 years by a third party mechanical service
- o Maintenance program
- o Permits required by the local authorities
- o The procedure includes a list of eight trucks and five platforms/chassis that have been approved for use in cyanide transportation operations

The certification required by procedure DUP-PA-001 is to ensure that the trucks have the capacity to haul the load and the platform trailers to carry it (one container with approximately 20 metric tons of cyanide; the total weight including the cyanide, the packaging material, and the container is approximately 23.8 tons).


The procedure includes instructions to replace or assign new trucks to the cyanide fleet, including the instruction of obtaining a certificate from a third part to establish initial conditions and to integrate the truck or platform to the preventive maintenance program.

Servicios Generales' vehicles certification was performed in September 2009. According to the certification reports only minor details were identified and corrected.

Servicios Generales has a preventive and corrective maintenance procedure (dated September 2009, without code). It establishes that each unit is send to an external workshop on a semiannual basis. Additionally, they require the workshop to provide a maintenance routine for each unit to be performed between the semiannual events. This procedure also establishes that when a failure or potential failure is identified, a report is prepared and the operations leader determines the deadline for the repair and designates the required resources for the repair. According to the procedure the maintenance activities must be recorded in Maintenance forms, which are kept in the truck or trailer file.

The trailers/platforms were inspected by the Structure Laboratory of Panama's Technologic University in November 2009. According to the report provided by this laboratory, the units are in conditions to carry 24.95 tons (approximate total weight of a container loaded with cyanide is 23.8 tons). The laboratory recommended corrective maintenance actions which according to the maintenance records were implemented.

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

The truck file includes copies of the license to transport hazardous materials, truck inspection by the national commission for the fires prevention, including the initial certification, and preventive and corrective maintenance records.

Procedure DUP-PA-001 establishes that Brenntag, through the convoy leader, is responsible for the inspection of every truck and platform prior to the shipment. A checklist, which includes questions about the truck conditions, the driver, the required documents, and truck accessories, is used to document the inspection. A checklist form is filled for each truck in the convoy. According to the reports and checklists, this inspection is performed the day before the shipment. When deficiencies are identified these are fixed prior the vehicle leaving Servicios Generales' base to the Port facilities (e.g. lug nuts installation in platform 527197 on 13 August 2009 and confirmed with the maintenance report).

Full audits to the subcontractors were performed by Mr. Juan Carlos Rangel in consecutive days as part of this audit.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:


Procedure DUP-PA-001 establishes that the load cannot be altered during the transportation process. To ensure this, tags are placed in the ocean container's locks at the manufacturing facility. These tags can only be removed at the mine. The procedure establishes that the transporter cannot divide the shipment or otherwise remove it from the container. The containers received in the port are placed on platform trailers hauled by trucks without the need of changing the packaging.

Procedure DUP-PA-001 establishes that placards with cyanide's UN number and poison signs need to be placed in the container, this is verified with the previously mentioned checklist. The convoy leader has additional placards incase the container is missing one or more. According to the reviewed convoy leader reports, the presence of the placards was verified through the checklist.

Procedure DUP-PA-001 establishes that:

- Inspections are performed prior the vehicle departs to the port facility for loading (documented by checklist included in convoy leader report)
- Inspections are performed prior to the departure from the port facility (special focus on twist lock) (no records established).
- Once approved for use, the truck and the platform must be included in a preventive maintenance program (controlled by Servicios Generales, and reviewed as mentioned in Section 2.13)

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

- Operators rest at least 8 hrs prior to trip, should not drive for over 12 consecutive hours, and take a 10 min break approximately every two hours at pre-selected stops points where the risk has been assessed and ranked as low; the convoy leader ensures that these are the only programmed stops. The fulfillment of these requirements was confirmed by the drivers interviewed.
- Prior to departure, the convoy leader assesses the weather conditions and gets information about political issues on the road; if he deems it necessary he can postpone the trip and this decision is informed to the mine, to Brenntag and to DuPont.
- Prior to departure of every shipment, the drivers are tested for alcohol levels (blow tests documented in the convoy leader report; the tester was available for inspection during the audit and it was observed to be in operating conditions).
- Load shifting within the container is not considered possible as all containers are filled with 20 boxes and block and brace is applied to prevent load movement.
- Container rollovers in different conditions (during the rainy season, crossing a river, in a curve, or crash) are considered and preventive measures are included in the Emergency Response Plan.

Additionally, Servicios Generales has its own Drugs and Alcohol policy which is signed by the drivers. Servicios Generales performs annual health test to the drivers including laboratory analysis for the detection of drugs and alcohol. They perform this test twice a year to all drivers.

As previously mentioned, the convoy leader, a Brenntag representative, inspects Servicios Generales' vehicles prior to every shipment on the day before the shipment as required by DuPont's procedures.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:


The scope of this audit was only for the ground transportation operations performed by DuPont from Panama's Ports to Petaquilla Mine; therefore, this practice does not apply.

1.1.6. 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 1.1

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All drivers are provided by Servicios Generales with a cellular phone and radios. The convoy leader has also a cellular phone and a radio and he is responsible to communicate with Brenntag and DuPont and the emergency responders as established in the Emergency Response Plan.

Communication equipment is tested prior to the departure of the convoy. According to the Servicios Generales representatives, cellular phones are under a lease contract and the phone company replaces any cellular the same day it is reported to fail.

The route assessment matrix highlights the area where cellular service is deficient. It consists of the final 40 km dirty road section of the route. The radios used by the drivers have a radio distance of approximately 2 km. To ensure the convoy can contact emergency responders at any point, the convoy leader obtains a mine-owned radio which has coverage in this portion of the route when reaching the mine's check point located prior t this dirty road. The convoy leader returns the radio to the mine personnel once the convoy has been received at the mine.

Procedure DUP-PA-001 establishes that the convoy leader must report the progress of the convoy at the pre-selected stop points. The progress report is provided by phone to Brenntag's the Integrated Management System Assistant, who informs DuPont and other interested parties of the convoy progress. A tabular report is generated with the estimated and actual time of arrival to the selected stop points. Also, all incidents (e.g. mechanical failure) are reported immediately to DuPont-Brenntag operations manager.

The following documents are used to track the amount of cyanide transported:


- Bill of lading issued by the ocean cargo company, this includes the number of containers and their identification number, the number of super-sacs contained (referred in the format as intermediate bulk containers IBC), and net weight.
- DuPont's Invoice the ocean container number and the amount of cyanide per container.

Additionally, the mine generates a receipt stating the amount of cyanide received, including the truck and trailer plates and the date of the reception.

Additionally, as previously mentioned, the containers are locked are tagged at then manufacturer's facilities and these tags are only removed at the mine.

The bill of lading, the invoice, and the MSDS are carried by each driver. The first one is provided by the Port Authority at the moment of releasing the containers, the MSDS is provided by the convoy leader, along with first aid indications, prior departure.

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

1.2. INTERIM STORAGE: *DESIGN, CONSTRUCT, AND OPERATE CYANIDE TRANS-SHIPPING DEPOTS AND INTERIM STORAGE SITES TO PREVENT RELEASES AND EXPOSURES.*

1.2.1. 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 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ground transport operations performed by DuPont-Brenntag from Panama's Ports to Petaquilla Mine do not involve the use of interim storage facilities. Therefore, this practice does not apply. The shipment takes two days to ensure that it is performed only in day time. The places where the vehicles stay overnight have been previously selected and consist of properties completely fenced with safety guards. As previously mentioned, the containers are only open at the mine and have placards indicating that they contain cyanide.

1.3. EMERGENCY RESPONSE: *PROTECT COMMUNITIES AND THE ENVIRONMENT THROUGH THE DEVELOPMENT OF EMERGENCY RESPONSE STRATEGIES AND CAPABILITIES.*

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

DuPont has implemented an Emergency Response Plan (DUP-PA-02, dated November 2009). This plan has been agreed with Brenntag and the Petaquilla mine, which provides emergency response team and is responsible for the communication with the media. This is a detailed document (76 pages) that includes, among other information, the emergency response team organization chart, emergency phone directory, communication channels guidelines, emergency scenarios, and instructions to attend specific and general emergency scenarios.

SUMMARY AUDIT REPORT

The Emergency Response Plan includes the route assessment matrices which were used to develop emergency scenarios (Plan Section 2 E), the respective preventive and mitigation measures (also included in Section 2 E), and emergency response actions (Section 5).

The plan has a detailed (four pages) explanation of the sodium cyanide characteristics and toxicity based on the MSDS. The emergency scenarios, the general emergency response instruction, and the scenario-specific instructions consider the solid state of the cyanide.

Section 2 C of the Emergency Response Plan provides information regarding the packaging and transportation characteristics of the product, the container, and the transportation unit. All emergency scenarios developed are related to ground transportation: crash with another vehicle, vehicle rollover in steep slope or curve, rollover with spill, rollover with hurt persons, and rollover with the product reaching a water body, among other.

The Plan's Section 4 establishes the responsibilities for the members of the response team (Brenntag and Servicios Generales personnel with assistance from DuPont); it also establishes that the external emergency response teams (police department, firefighters, etc) will be used to secure the area, to communicate with the population and evacuate it if required, and to coordinate vehicular traffic in the area. It also includes responsibilities for the mine's emergency response team. See the detailed report for DuPont for further details

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with


Summarize the basis for this Finding/Deficiencies Identified:

As mentioned in practice 1.2 the drivers and the convoy leader, as well as administrative personnel from both subcontractors, have received training from DuPont in the emergency response procedures. Additionally, the plan has been agreed with the Petaquilla mine that will participate and lead the emergency response. The convoy leader, Mr. Edwin Gonzalez has received additional training from DuPont's specialized personnel.

The Plan's Section 4 establishes the responsibilities for the members of the initial response team (convoy leader and drivers), including the roles of the DuPont and Brenntag personnel. It also includes responsibilities for the on-site commander (from the mine), the communications leader (responsible for contact with the authorities and the media, also from the mine), field containment and recovery supervisor, Brenntag emergency brigades leader, and the mine emergency brigades leader.

Section 4.3 has a list of the required emergency response equipment (which is also included as a checklist of section 7.5 of procedure DUP-PA-001).

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

Procedure DUP-PA-001 establishes that the emergency equipment must be carried by the convoy leader in the safety escort vehicle. A checklist is used to verify that it is available and it is documented in the convoy report.

The Plan's Section 8 establishes that all the training in relation with emergency response is to be provided on an annual basis.

Procedure DUP-PA-001 establishes that the emergency response equipment must be carried by the convoy leader in the safety escort vehicle. A checklist is used to verify that it is available prior the convoy's departure and it is documented in the convoy leader report.

The Emergency Response Plan establishes that the drivers must help to control the emergency while the mine emergency response team arrives. The convoy leader (Brenntag) is responsible for the initial emergency control and communications until the mine's emergency response team arrives, if necessary.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:


The Plan's Section 3.A includes a communications flow diagram which can be summarized as follows: the convoy leader must first inform Brenntag's Operations Manager, and then the Police. Brenntag's Operations Manager informs external emergency response teams, the mine, and DuPont. Section 3.B includes a list of the members of the internal response team members (including DuPont's, Brenntag's, and the mine personnel) and that of external emergency responders (police, firefighters, hospitals, authorities, etc.).

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

Section 5.6 of the Emergency Response Plan establishes the procedure to clean a spill and the decontamination of the area which consist of:

- isolate the area,
- sweep the cyanide (it is handled only in dry state),
- collect the debris in plastic bags or drums,
- treat the area with calcium carbonate and then with a 5% sodium hypochlorite solution,
- wait at least 15 min,
- rinse the area with water, and

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

- wait for the area to dry and then remove the barricades.

Section 5.8 establishes that chemicals should not be added in water bodies, and the use of sodium hypochlorite, oxygen peroxide and iron sulfate is limited only to puddles, and artificial water reservoirs. Additionally, it includes instructions for assessing the impact on surface water bodies and to prevent the population to be poisoned by contaminated water. These instructions are part of the emergency response instructions to cyanide spills with contact to water and water bodies.

1.3.5. 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 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:


The Plan's Section 9 establishes that it must be reviewed whenever modifications are required or, at least, once a year. Procedure DUP-PA-001 establishes that the convoy leader report must be used to update the assessment of the route. Both the Emergency Response Plan and the Procedure were last updated on November 2009.

The Plan's Section 8.5 establishes that at least two emergency drills must be performed every year one theoretical and one practical. The drills were performed on 4 and 5 January 2010. Scenario consisted in a spill of 50 kg of cyanide from a wood box due to a driver losing control of the truck when driving and using the cellular phone. The scenario also considered that the driver loses conscience due to exposure to HCN.

This drill was performed in Servicios Generales' patio and a report was prepared by a specialist hired by DuPont. The date for the second drill is yet to be confirmed as, reportedly, DuPont is looking for it to have the mine personnel to be involved.

The Plan's Section 9 establishes that it must be reviewed whenever modifications are required or, at least, once a year including the name and numbers of the emergency contacts and phone numbers of external responders. According to DuPont and Brenntag representatives, no accidents have taken place.

DuPont Panama Supply Chain
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

2. BRENNTAG PANAMA

2.1. TRANSPORT PRACTICE 1: PRACTICE 1. TRANSPORT CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTS AND RELEASES.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Brenntag does not select cyanide transport routes, but ensures that selected and assessed by DuPont is used by the transport subcontractor.


Brenntag does not have procedures to evaluate the risk of select transport routes, but follows those imposed by DuPont, and supervises their application by the transport subcontractor.

Brenntag does not contact the authorities or other stakeholders; that is a responsibility of DuPont. As requested by DuPont's procedures all cyanide shipments are performed in convoys and with a safety escort vehicle where the convoy leader travels, both the safety escort and the convoy leaders are provided by Brenntag.

DuPont subcontracts Brenntag for the coordination and supervision of cyanide transport. All the activities required by Practice 1.1 are performed directly by DuPont. The safety escort and convoy leader are provided by Brenntag. DuPont has trained the convoy leader. The communications with the stakeholders is lead by Petaquilla Mine (the cyanide owner) with DuPont's support. Information regarding training received by Brenntag's personnel is provided in the following sections. DuPont supervises Brenntag's activities by reviewing the convoy leader reports and performing an audit on an annual basis.

Except in the event of an emergency, Brenntag does not contact external responders; that is a responsibility of DuPont.

Brenntag Panama
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

2.1.2. 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/Deficiencies Identified:

Brenntag does not have truck drivers; however, Brenntag's convoy leader, who has been trained by DuPont, makes sure that drivers are qualified and have the proper driver's license to operate vehicles with sodium cyanide loads. Brenntag's convoy leader confirms that the drivers are included in the list of trained drivers.

DuPont supervises Brenntag's activities by reviewing the convoy leader reports and performing an audit on an annual basis.

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

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/Deficiencies Identified:

Brenntag does not provide the transport units; however, Brenntag's convoy leader is responsible on the day to day basis to ensure that only the trucks and trailers that have been approved under DuPont requirements are used in cyanide transport operations.

Furthermore, Brenntag's convoy leader is responsible for the inspection of every truck and platform prior to every shipment; he uses a checklist derived from DuPont's procedure.

DuPont supervises Brenntag's activities by reviewing the convoy leader reports and performing an audit on an annual basis.

Brenntag Panama
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

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

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/Deficiencies Identified:

Brenntag's convoy leader ensures that the transport contractor follows the safety measures implemented by DuPont.

Brenntag's convoy leader ensures that the transport company places placards with cyanide's UN number and poison signs need in the containers.

Brenntag's ensures that DuPont procedures are followed by the transportation company. DuPont procedures are compliant with this element.

DuPont supervises Brenntag's activities by reviewing the convoy leader reports and performing an audit on an annual basis.

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

This practice does not apply.

2.1.6. 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 1.2
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

DuPont has identified the blackout areas and has agreed with the mine that the convoy leader receives a mine-owned radio which has coverage in the blackout areas. The convoy leader returns the radio to the mine personnel once the convoy has been received at the mine. Brenntag provides the convoy leader with a cell phone and radio.

Communication equipment is tested prior to the departure of the convoy.

Brenntag Panama
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

Progress of the cyanide shipment is tracked by Brenntag's personnel. The convoy leader calls the base and the responsible person transmits the information to DuPont and other interested parties. The convoy leader ensures that the drivers carry with them the cargo documents.

The bill of lading, the invoice, and the MSDS are carried by each driver. The first one is provided by the Port Authority at the moment of releasing the containers, the MSDS is provided by the convoy leader, along with first aid indications, prior departure.

DuPont supervises Brenntag's activities by reviewing the convoy leader reports and performing an audit on an annual basis.

2.2. INTERIM STORAGE: *DESIGN, CONSTRUCT, AND OPERATE CYANIDE TRANS-SHIPPING DEPOTS AND INTERIM STORAGE SITES TO PREVENT RELEASES AND EXPOSURES.*

2.2.1. 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 1.2
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Brenntag does not store cyanide for DuPont. This practice does not apply to the transporter.

2.3. EMERGENCY RESPONSE: *PROTECT COMMUNITIES AND THE ENVIRONMENT THROUGH THE DEVELOPMENT OF EMERGENCY RESPONSE STRATEGIES AND CAPABILITIES.*

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


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/Deficiencies Identified:

Brenntag follows the Emergency Response Plan prepared by DuPont; which is in compliance with the seven elements of this practice.

Brenntag Panama
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

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

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/Deficiencies Identified:

Brenntag follows the Emergency Response Plan prepared by DuPont; which establishes the responsibilities for the members of the initial response team including the roles of Brenntag's personnel. The Emergency Response Plan prepared by DuPont establishes that the convoy leader is responsible for the initial emergency control and communications until the mine's emergency response team arrives, if necessary.

The emergency response equipment is carried by the convoy leader who is also responsible for its inspection and make sure that it is available in every shipment. A list of all emergency response equipment is established the Emergency Response Plan prepared by DuPont.

DuPont provides all the training in relation with emergency response on an annual basis. As previously noted, the initial training sessions were held between on December 2008 and refreshment was provided in July 2009 and January 2010.

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


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/Deficiencies Identified:

As previously noted, Brenntag follows the emergency plan prepared by DuPont, which complies with the two elements of this practice.

Brenntag Panama
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

2.3.4. 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 1.2
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

As previously noted, Brenntag follows the emergency plan prepared by DuPont, which complies with the two elements of this practice.

2.3.5. 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 1.2
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

As previously noted, Brenntag follows the emergency plan prepared by DuPont, which complies with the three elements of this practice. Brenntag's personnel have participated in the emergency drills organized by DuPont.

Brenntag Panama
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

3. SERVICIOS GENERALES

3.1. TRANSPORT PRACTICE 1 **TRANSPORT CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTS AND RELEASES.**

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales does not select cyanide transport routes, but follows that selected and assessed by DuPont.

As requested by DuPont’s procedures all cyanide shipments are performed in convoys and with a safety escort vehicle where the convoy leader travels, both the safety escort and the convoy leaders are provided by Brenntag. Additionally, Servicios Generales provides a mechanical support vehicle escorts the convoy with basic spare-parts and a mechanics technician as requested by DuPont.

DuPont subcontracts Servicios Generales DC S. A. for the cyanide transportation. All the activities required by Practice 1.1 are performed directly by DuPont. Servicios Generales has signed an adhesion letter, where it states that it will comply with the code; the letter was signed by Mr. Serafin A. Castillo, Servicios Generales Manager, on 30 July 2009. DuPont establishes the route to follow and Servicios Generales must follow it. The safety escort and convoy leader are provided by Brenntag. The communications with the stakeholders is lead by Petaquilla Mine (the cyanide owner) with DuPont’s support.

3.1.2. 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

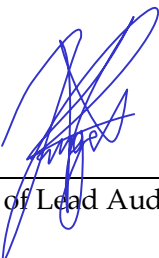
- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales has a selected group of drivers that comply with the requirements established by DuPont:

- o To have the legally required driving license

Servicios Generales
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

- To be trained in defensive driving
- To be trained by DuPont in sodium cyanide handling and emergency response
- Not to be older than 60 years old.

DuPont has provided training in hazardous materials transportation and cyanide transportation to Servicios Generales' designated drivers and administrative personnel. The initial training sessions was held on 10 December 2008 and refreshments have been provided on 29 July 2009 and 5 January 2010.

Servicios Generales Training program for 2010, the drivers will attend the following courses:

- Cyanide generalities and emergency response (January and April to be provided by DuPont Brenntag)
- Motivation (March and June)
- Defensive driving (May)
- Policies(July)

The drivers files were reviewed at Servicios Generales' operations base and these contain the following information:

- Curriculum Vitae
- Copy of their personal official identification
- Copy of their driver license (including expiration date, all of them were type H for hazardous loads as required by the Panama transit regulation).
- Copy of the latest hazardous substances handling training attendance list (provided by DuPont)
- Copy of the defensive driving curse diploma (dated June 2009)
- Copy of the transit tickets history provided by the road traffic authority
- Medical certificate (includes drug tests)

The drivers are the only ones to handle the load, since the container is only removed from the platform in the mine. There are no driver's assistants.

The convoy leader ensures only these drivers participate in cyanide transportation and documents this in the vehicle inspection checklist included in his report.

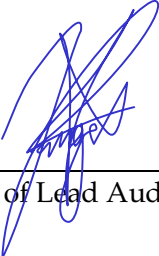
3.1.3. Transport Practice 1.3: *Ensure that transport equipment is suitable for the cyanide shipment.*

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

Servicios Generales' vehicles were certified by a third party workshop, Partes Diesel S. A., in September 2009. According to the certification reports only minor details were identified and corrected, these units have been included in a preventive maintenance program. Servicios Generales has a preventive and corrective maintenance procedure (dated September 2009, without code). It establishes that each unit is sent to an external workshop on a semiannual basis. Additionally, they require the workshop to provide a maintenance routine for each unit to be performed between the semiannual events. This procedure also establishes that when a failure or potential failure is identified, a report is prepared and the operations leader determines the deadline for the repair and designates the required resources for the repair. According to the procedure the maintenance activities must be recorded in Maintenance forms, which are kept in the truck or trailer file.

The trailers/chasis were inspected by the Structure Laboratory of Panama's Technologic University in November 2009. According to the report provided by this laboratory, the units are in conditions to carry 24.95 tons. The laboratory recommended corrective maintenance actions which according to the maintenance records were implemented. The maximum weight of the transported container is 23.8 tons (20 ton of net cyanide load, 1.5 tons of packaging material, and 2.3 tons of the empty container).

The truck file includes copies of the license to transport hazardous materials, truck inspection by the national commission for the fires prevention, including the initial certification, and preventive and corrective maintenance records.

The convoy leader is responsible for the inspection of every truck and platform prior to every shipment he uses a checklist derived from DuPont's procedure.

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

The operation is

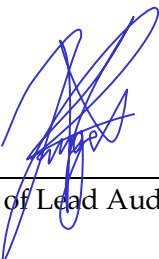
- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales follows DuPont procedures, which establish that:

- Inspections are performed prior the vehicle departs to the port facility for loading (performed by DuPont's convoy leader)
- Inspections are performed prior to the departure from the port facility (performed by DuPont's convoy leader).
- Once approved for use, the truck and the platform must be included in a preventive maintenance program
- Operators rest at least 8 hrs prior to trip, should not drive for over 12 consecutive hours, and take a 10 min break approximately every two hours at pre-selected stops points where the risk has been assessed and ranked as low. The fulfillment of these requirements was confirmed by the drivers interviewed.

Servicios Generales
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

- Prior to departure of every shipment, the drivers are tested for alcohol levels (blow tests performed by DuPont's convoy leader).

Servicios Generales has its employees to follow Brenntag Driving Policy which includes the prohibition of driving under the effects of alcohol or drugs.

Servicios Generales follows maintains the integrity of the packaging by not removing the locks and tags placed in the in the ocean container and places placards with cyanide's UN number and poison signs need in the containers; which is supervised by Brenntag's convoy leader.

The convoy leader inspects Servicios Generales' vehicles prior to every shipment on the day before the shipment. The vehicles are not used after the inspection and, since these have designated drivers, this ensures that the driver takes the required rest time prior to the shipment. The convoy leader controls the programmed stops in the pre-selected stop points. Additionally, The Cyanide Transport Procedure establishes that they will audit Servicios Generales at least once per year.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales is a ground transport company, this practice does not apply.

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

The operation is

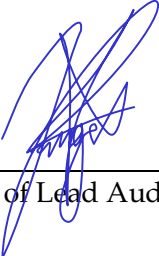
- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All drivers are provided by Servicios Generales with a cellular phone and radios.

Communication equipment is tested prior to the departure of the convoy. According to the Servicios Generales representatives, cellular phones are under a lease contract and the phone company replaces any cellular the same day it is reported to fail.

Servicios Generales
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

DuPont has identified the blackout areas and has agreed with the mine that the convoy leader receives a mine-owned radio which has coverage in the blackout areas. The convoy leader returns the radio to the mine personnel once the convoy has been received at the mine.

Each driver is provided with the following documents:

- Bill of lading issued by the ocean cargo company, this includes the number of containers and their identification number, the number of super-sacs contained (referred in the format as intermediate bulk containers IBC), and net weight.
- DuPont's Invoice the ocean container number and the amount of cyanide per container.

Additionally, as previously mentioned, the containers are locked are tagged at then manufacturer's facilities and these tags are only removed at the mine.

The bill of lading, the invoice, and the MSDS are carried by each driver. The first one is provided by the Port Authority at the moment of releasing the containers, the MSDS is provided by the convoy leader, along with first aid indications, prior departure. Progress of the cyanide shipment is tracked by Brenntag's personnel.

As previously mentioned, the convoy leader inspects Servicios Generales' vehicles prior to every trip, including the inspection of cellular phones and shipment records. The convoy leader controls the programmed stops in the pre-selected points and reports the progress to Brenntag, which informs DuPont.

3.2. INTERIM STORAGE: *DESIGN, CONSTRUCT, AND OPERATE CYANIDE TRANS-SHIPPING DEPOTS AND INTERIM STORAGE SITES TO PREVENT RELEASES AND EXPOSURES.*

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

The operation is

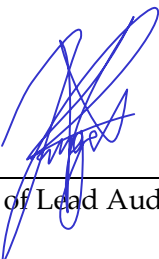
- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales is a transport company and does not have storage facilities. This practice does not apply to the transporter.

3.3. EMERGENCY RESPONSE: *PROTECT COMMUNITIES AND THE ENVIRONMENT THROUGH THE DEVELOPMENT OF EMERGENCY RESPONSE STRATEGIES AND CAPABILITIES.*

Servicios Generales
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales follows the Emergency Response Plan prepared by DuPont; which is in compliance with the seven elements of this practice.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

DuPont has trained Servicios Generales personnel in the emergency response procedures.

Servicios Generales follows the Emergency Response Plan prepared by DuPont; which establishes the responsibilities for the members of the initial response team including the roles of Servicios Generales' personnel.

The emergency response equipment is carried by the convoy leader who is also responsible for its inspection and make sure that it is available in every shipment. Servicios Generales has provided the drivers with personal protective equipment which is reviewed by the convoy leader.

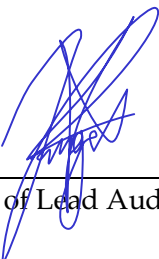
DuPont provides all the training in relation with emergency response on an annual basis. As previously noted, the initial training sessions were held between on December 2008 and refreshment was provided in July 2009 and January 2010.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Servicios Generales
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date

SUMMARY AUDIT REPORT

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales follows the emergency plan prepared by DuPont, which complies with the two elements of this practice.

3.3.4. 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 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales follows the emergency plan prepared by DuPont, which complies with the two elements of this practice.

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

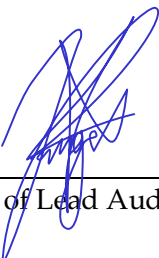
The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Servicios Generales follows the emergency plan prepared by DuPont, which complies with the three elements of this practice. Servicios Generales' personnel has participated in the emergency drills organized by DuPont.

Servicios Generales
Name of Facility



Signature of Lead Auditor

12 to 13 January 2010
Date