## INTERNATIONAL CYANIDE MANAGEMENT CODE

### ALMACENERA EL PACIFICO S.A.C.

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En colaboración con:
INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Operations Summary Audit Report

For The
International Cyanide Management Code and ALMACENERA EL PACIFICO S.A.C. – Lurin – Lima – Peru

Verification Protocol

www.cyanidecode.org
December 2017
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INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: ALMACENERA EL PACIFICO S.A.C.
Name of Facility Owner: ALMACENERA EL PACIFICO S.A.C.
Name of Facility Operator: ALMACENERA EL PACIFICO S.A.C.
Name of Responsible Manager: Ronald Escajadillo
Address: Carretera Antigua Panamericana Sur 29.5, Lurin, Lima, Perú
State/Province/Country: Lima/ Peru
Telephone: +51 297-7023 + Fax: ---
E-mail: rescajadillo@alpa.com.pe

Aspects of the location and description of the operation:

Almacenera el Pacifico SAC (hereinafter ALPA) was created in 2006, with the purpose of providing logistic services to mining companies, but due to market needs, services were expanded to other items at the national level for which The warehousing areas and the services that the company has managed to offer, offering logistical solutions for storage, distribution and transportation.

The company has an area of 93,000 m2 where it has a variety of modular warehouses of different areas that fit the needs of its customers, including warehouses destined for the storage of sodium cyanide that has an area of approximately 10,000 m2.

In 2010 they were audited under the International Code for Cyanide Management (hereinafter the Code) for the certification of the company MERCANTIL SA and in 2013 were audited for the recertification of the same company, because ALPA is the operator of MERCANTIL SA.

ALPA has devices for the transfer of sodium cyanide to isotanks, through metal boxes with cutting devices inside for the opening of the bags with sodium cyanide.

ALPA stores sodium cyanide in the presentation of Wooden Boxes per 1TM and Cylinders of 50Kg and 100Kg.

The operation of ALPA includes the control in the management of Customs Transport (Port - Warehouse Lurin), Storage of Distribution (Discharge of the cyanide packages of the containers, storage of the cyanide packages and loading of the cyanide packages to the containers) And control in the management of Distribution Transport (Lurín Warehouse - Customer). These activities were carried out 11 years ago with ZERO (00) accidents.
SUMMARY AUDIT REPORT
FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.

2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.

3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.

4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

   International Cyanide Management Institute (ICMI)
   1400 I Street, NW, Suite 550
   Washington, DC 20005, USA

5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor’s signature on the Auditor Credentials Form must be certified by notarization or equivalent.

6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.

7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.
Auditor’s Finding

This Operation is:

X in full compliance

☐ in substantial compliance

☐ not in compliance

with the International Cyanide Management Code.

Audit Company: ISOSURE SAC | CIANURO INCORPORATED EIRL

Audit Team Leader: Luis Torres Argandoña

E-mail: auditoria@iso-sure.com

Date(s) of Audit: 29 and 30 December 2017

No significant cyanide incidents or exposures and releases were noted as occurring during the audit period.

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.

Name and Signatures of Other Auditors

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<th>Name</th>
<th>Position</th>
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<tr>
<td>Luis Torres Argandoña</td>
<td>Lead Auditor and Technical</td>
<td></td>
<td>30 December 2017</td>
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CERTIFICO: Que la firma que antecede pertenece a don LUIS ALBERTO TORRES ARGANDOÑA identificado con Documento Nacional de Identidad DNI 09993105, la misma que es auténtica, de lo que doy fe.

El Notario no asume responsabilidad sobre el contenido del documento Art.108 D.Leg.1049.

Lima, 20 de Junio del 2018

ALFONSO BENAVIDES DE LA PUENTE

Notario de Lima

NOTARIA

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Verification Protocol

TRANSPORT

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

1.1 TRANSPORT PRACTICE 1.1

SELECT CYANIDE TRANSPORT ROUTES TO MINIMIZE THE POTENTIAL FOR ACCIDENTS AND RELEASES.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 1.1
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.1 requiring an operation Select cyanide transport routes to minimize the potential for accidents and releases.

The ALPA operation for the transport and storage of sodium cyanide was subject to an audit. The Auditor was verifies and all questions related to the transport protocol ICMI were answered. ALPA has the procedure for the Transport of Sodium Cyanide, whose goal is to transport sodium cyanide, without causing damage or injury to persons and / or the environment and the preservation of substances transported from port of Callao to ALPA (Distribution Warehouse) to the point set by the client. All activities associated with Transport Practice 1.1 are performed by EDEWIT, DCR Minería y Construcción, (Transportation Company certified by ICMI).

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ALPA designated by the carrier for the transportation service conducts an annual review of the criteria used for evaluation of the route to: traffic density, cities, bridges, canals, road conditions, route design (curves, berms, number of lanes), altitude, crossroads, detours, weather conditions and the socio-political conditions complying with the provisions of the Code.

In the evaluation report route was identify as a major risk: Urban areas, high traffic, speeding vehicles, winding road (characteristics of the Peruvian geography), and transport of other dangerous goods.

ALPA states that in conjunction with the Transport Company must conduct the evaluation of the route prior to the first transport to a customer base or annual basis by the Chief Safety Officer Safety or the Transportation Company and Chief operations. ALPA states that in conjunction with the transport company must conduce the
evaluation of the route prior to the first transport to a customer base or annual basis by the Safety Officer or Safety Manager of the carrier and a Chief operations ALPA cyanide.

The evaluation route is performed annually by the transport company hired ALPA. During the evaluation of route ALPA staff participates with the staff of the transport company.

The Safety Officer or Safety Manager of the carrier and Chief Operating ALPA cyanide is responsible for the development of the "Road Map” must consider the following points during the evaluation:

- Data Path: Start / End
- Stretches of road: description of the section in km.
- Total kilometers traveled stretch
- Maximum speed limit on the stretch
- Altitude meters above sea level.
- Type and road conditions / speed allowed
- Population

NOTE if check blind spots in the path analysis, they will be assess as a danger the safety and the driver will provide the necessary communications equipment to maintain communications throughout the route.

Technical stops, Fire Stations and Hospitals or Medical Centers in the area, as well as phone and contacts.

As previously noted, the risk assessment of each routes describes the risks identified along them and the specific measures to be taken to address the risks.

The existence of letters sent to the fire companies and medical centers to communicate their roles in case of any emergency and open communication channels between ALPA and emergency support centers were check. Each of the support centers that are consider in the Emergency Plan ALPA sealed these.

Among the letters were consider emergency support centers (fire companies and medical centers) near ALPA and routes used by carriers hired by ALPA.

For the transport of sodium cyanide ALPA asks its carriers have a control room also carriers with GPS system continually provide the positioning of each of the vehicles at all times. As well as continuous speed supervision at each point of the route from the starting point to the end then this information delivered to the Safety Officer ALPA.

ALPA also establishes specifications using trucks escort during the transit of sodium cyanide being due to use ONE (01) escort van for every three (03) or fewer units of traffic load.

The company can only load ONE (01) Container for each platform and can only drag a wagon chassis. The convoy may include one or more escort vehicles at your request. Convoy displacement is dependent on weather conditions; Convoy Leader evaluate the safety of the route in each case, may stop the convoy if satisfied that the conditions do not allow safe travel.

After each trip, the convoy leader must serve the "Trip Report" where findings that compromise safety during transport they are included within the assessment route for modification evidences.

ALPA information given (MSDS, emergency record and record of product information) to support emergency centers (health centers and fire companies) along the above routes, evidenced by a letter signed and received with such information. This activity is carry out for external support centers could be prepare for emergencies. In addition, external support centers comments are ask to manage risk as a way to query and get feedback.
When ALPA carrying sodium cyanide, the control room of Transport, continuously provide the positioning of each of the vehicles at all times, as well as continuous monitoring of the velocity at each point of the route. This control done through geofencing these indicate the maximum and minimum speed of the train each way along the route based on information provided by the roadmap.

ALPA subcontract the cyanide transport operations (EDEWIT, DCR Minería y Construcción).

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.**

- X in full compliance with
- □ in substantial compliance with Transport Practice 1.2
- □ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

The operation is in FULL COMPLIANCE with Standard of Practice 1.2 requiring an operation Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

ALPA, warehouse in Lurin, each year all staff (the warehouse and transport) has to go through different types of training, including new staff from scratch. There is a matrix for training. They are divide into sections for safety and routine work. Special training is carry out by the fire department and external entities specialists.

ALPA has a special department within Human Resources to develop, implement and verify these workouts.

ALPA has staff trained in safe handling and storage of sodium cyanide, the Annual Training Program 2016 and 2017, in which training for warehouse staff and people of Transportation Companies evidenced, was evident. In addition, he proceeded to interview two (02) equipment operators in operations management and storage of sodium cyanide. The ALPA does subcontract handling Storage Operation, and subcontract the Transport Operation Practice 1.1 are performed by ICMI.

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1.3 **Transport Practice 1.3**

**Ensure that transport equipment is suitable for the cyanide shipment.**

- X in full compliance with
The operation is

☐ in substantial compliance with Transport Practice 1.3
☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

The operation is in FULL COMPLIANCE with Standard of Practice 1.3 requiring an operation Ensure that transport equipment is suitable for the cyanide shipment.

ALPA states that Transport Companies hired must have a maintenance procedure and planning of it, this requirement is audit by the Safety Officer ALPA annually according to the program without warning. ALPA also states that hire companies must meet the requirements of ICMI and the Ministry of Transport and Communications (MTC) of Peru.

ALPA states that vehicles will be hired lowboy trailers with a maximum load capacity of 22 tons, which are certify to transport sodium cyanide by the Peruvian government.

In addition, before each trip ALPA staff verifies that vehicles are fit to travel and meet the requirements described above.

For service storage of sodium cyanide (cylinders and boxes), ALPA has evidence of procedures for these operations. It was evident he was about a maintenance plan that contains the equipment for handling cyanide, which states: manufacturer, make, model and serial numbers and kinds of maintenance that must be maintain in accordance with the guidelines of manufacturer.

Evidences of dates and hours of service for maintenance - the equipment was verify.

Prior to their loading and use trucks are inspected by staff ALPA to demonstrate any deviation that jeopardize the operation, based inspection in the format "Checklist Previous -Trip" if find any deviation is made the communication with the company carries for prior to the start of the operation solution.

After the load is, fixed ALPA makes a record of the weights and measures to record the weight of the load and verify that this does not exceed the maximum set of 20 TM as established in Peruvian Law by type of vehicle configuration.

In addition, there are in all the routes used, controls weight and size of the Ministry of Transport and Communications (MTC) of Peru.

Before giving the output of unit personnel ALPA check that the carrier has the following duly completed documents:

- Referral Guide Submitter
- Carrier Referral Guide
- Tract Property Cards and Semi-Trailer
- Proof of registration of the vehicle in the National Register of Road Transport Hazardous Materials and Waste issued by the Ministry of Transport and Communications MTC (tractor and semi-trailer).
- Circulation Card MTC
- Driver's License driver
- Course Freight ERM
- National Identity
• Data Sheet Material Safety Data Sheet (MSDS) Sodium Cyanide
• Primer Product Safety Contingency Plan for the Transport of Sodium Cyanide
• Certificate of Technical Inspection for transporting hazardous materials
• Liability Policy
• Cash or Risk

In addition, ALPA staff inspects the forklift, considering the following points: Suitable for a transporter tonnage, lower antiquity to 5 years. Exterior and interior of the unit in good condition (no damage), forklift mast in good condition (no cracks or breaks), cleaning the unit as mirrors in good condition and complete, safety belts and operating clean, no signs of leaking oil, coolant or fuel, parking brake operative, operative wheels, alarm, back in good state.

There are documented procedures that set the conditions in place to prevent overloading of the transport vehicle used for cyanide management; these include issues of safety and environment, as quoted below:

• Inspection of packaging
• Sobriety
• Control of HCN Levels
• Check List loading and unloading
• Check List container reception
• Procedure for Cargo and Storage Discharge
• Risk Assessment Matrices
• Contingency Plan - Cyanide Management

The operation of loading and unloading of sodium cyanide is carry out in the switchyard outside the store, in front of the storage area Sodium Cyanide. During loading and unloading, has surveillance by a Supervisor ALPA.

The ALPA does subcontract Operation Transport Practice 1.3

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1.4 TRANSPORT PRACTICE 1.4

DEVELOP AND IMPLEMENT A SAFETY PROGRAM FOR TRANSPORT OF CYANIDE.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 1.4 □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.4 requiring an operation Develop and implement a safety program for transport of cyanide.
ALPA established a transportation method avoiding disturbances during motion describing the administrative, operational and safety measures for the smooth operation of the transport of sodium cyanide.

For the transport of sodium cyanide, ALPA requests that the carrier count with a control room, with the GPS system continuously provide the positioning of each of the vehicles at all times.

Before the trip, ALPA verifies that the three visible sides of the vehicles are equipped with UN Number, NFPA diamond and diamond DOT. Peruvian law fulfilled Supreme Decree 021-2008-MTC Regulation for the transport of hazardous materials / waste.

ALPA check out by prior agreement of inspection units by ALPA Staff to ensure that vehicles and escort vehicles are in good condition.

ALPA audited annually and unexpectedly the maintenance plan of the transport companies and the maintenance records of the units are revised, ALPA has a plan keeping of the forklift and was were reviewed maintenance records and practice was confirmed during the observation and and was evident in the interview with ALPA Safety Supervisor, and Drivers.

ALPA states that Drivers Transportation Companies should rest at least 8 hours before a trip and do not drive more than 12 hours a day and daylight driving only during the day. It is noteworthy that the Peruvian rules provide the same hours for the transport of hazardous materials “DS 009-2004-MTC Regulation of Transport Management Act”.

ALPA places the burden of cyanide must travel in containers of 10, 20 feet or 40 feet, developing mechanisms to prevent movement.

ALPA set your procedure, ALPA supervisor in the warehouse must verify that the load must be properly secured in the container, during the visit by staff indicated that if necessary elements are used to secure the load so that the load does not move inside the container.

ALPA states that the trip will take place in the way of convoy; the Convoy Leader is responsible for the assessment of weather conditions and is empowered to suspend the transport convoy.

At the end of the trip, the leader of the operation and drivers must submit a report detailing the same route incidents, advance information, and find relevant and sensitive areas to ensure the safety and Safety information on future trips.

ALPA has a Policy of ZERO consumption of alcohol and drugs or any other substance that may impair or reduce the function of the transport driver, a member of convoy or forklift in stock. Prior to the commencement of activities necessary to perform a test alcohol test and periodically discard evidence of drug use, the violation of this policy has resulted in the separation of the worker from the organization.

Plans and procedures for compliance with the Code are review annually and annual follow-up audits will be develop to verify compliance with standards ALPA.

ALPA establishes guidelines to ensure that their subcontractors comply with items 1, 2 and 3 of this must be respected according to the Transport Practice 1.4.

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1.5 **TRANSPORT PRACTICE 1.5:**

**FOLLOW INTERNATIONAL STANDARDS FOR TRANSPORTATION OF CYANIDE BY SEA AND AIR.**

X in full compliance with

The operation is  □ in substantial compliance with Transport Practice 1.5
 □ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

The operation is in NOT APPLICABLE with Standard of Practice 1.5 requiring an operation Follow international standards for transportation of cyanide by sea and air.

ALPA not transported by sea transport and air transport within the territory of Peru.

1.6 **TRANSPORT PRACTICE 1.6:**

**TRACK CYANIDE SHIPMENTS TO PREVENT LOSSES DURING TRANSPORT.**

X in full compliance with

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

**Summarize the basis for this Finding/Deficiencies Identified:**

The operation is in FULL COMPLIANCE with Standard of Practice 1.6 requiring an operation Track cyanide shipments to prevent losses during transport.

ALPA states that contract carriers must use a GPS system. They must also have a telephone service, radio and cellular pathway that ensures full coverage during movement and be fully connected to the control room where his base and ALPA. In addition to providing, a system that continuously indicates the position of each vehicle at all times.

ALPA inspects the telephone lines are in operation prior to departure, further checks are done to verify the operation of mobile equipment, GPS and radio by List Pre-Trip Inspection Authority.

ALPA has identified areas without cell coverage and radio, for it asks ALPA contract carriers using satellite equipment.

ALPA verifies that the GPS system have transport companies that hire has location updates in real time also continually sought (periods not to exceed one hour) the location of the transport units.
Before each trip ALPA check the bill of lading and waybill, transported amounts of cyanide, Data Sheet Material Safety also this documentation must be available throughout the trip as ALPA guidelines, this same data is review by Customer (final destination). Note that this information must be show to the inspectors if MTC is request otherwise the carrier be fine.

ALPA is secure before each trip that the sender reference guide to indicate the product name, number of the United Nations (UN), and weight of packages transported cargo quantity, and likewise that product safety considerations indicated.

Prior to the start of the trip, the MSDS (Material Safety Data Sheet) is delivered to the carrier.. The lack of guidance sender reference and Data Sheet Material Safety during transport is fine by the confiscation of the cargo by the Peruvian government that makes mandatory controls on all tolls departure City Lima. It is worth mentioning that the sender reference guide should be preserve and stored by the carrier for not less than five (05) years’ time.

ALPA establishes guidelines to ensure that their subcontractors comply with the elements 1 to 6 of this, should be respected according to the Transport Practice 1.6.

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INTERIM STORAGE

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

2.1 TRANSPORT PRACTICE 2.1

STORE CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTAL RELEASES.

X in full compliance with

The operation is

☐ in substantial compliance with Transport Practice 2.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

ALPA within the Supply Chain, account has a distribution warehouse.
EMERGENCY RESPONSE:

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

3.1 TRANSPORT PRACTICE 3.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is  ☐ in substantial compliance with Transport Practice 3.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.1 requiring an operation Prepare detailed emergency response plans for potential cyanide releases.

ALPA has an emergency response plan (EMERGENCY RESPONSE PLAN FOR CYANIDE TRANSPORTATION). Information on road conditions is defined in the Roadmap document. The Emergency Plan describes the response actions for anticipated emergency situations. These were verified during the audit.

The Emergency Response Plans for transportation is suitable for the selected transport route, based on the hazards and risk assessment after the completion of the ROADMAP.

The Emergency Response Plan is suitable for the selected transport route, taking into account the physical and chemical form of cyanide clearly based on the Safety Data Sheet of the Product "Sodium Cyanide". ALPA is a transporter of sodium cyanide supply in solid state (briquettes).

ALPA indicates the use of trucks to transport sodium cyanide taking into account the characteristics of the equipment and assesses the structural condition of the road where the transportation sodium cyanide is done.

Information on road conditions is defined in the Roadmap document. The Emergency Response Plan describes the response actions for anticipated emergency situations. These were verified during the audit.

It also establishes the logical line of action to be taken by the convoy leader and drivers in case irregularities arise during transportation of sodium cyanide.

ALPA has defined three levels of emergency response:

- 1st Response – Product Spill of less than 1 tons.
- 2nd Response – Product Spill of more than 1 tons or Product Spill in contact water.

For 2nd Response, ALPA subcontracts External Emergency Responder (IFSEC PERU) and also contacts the Fire Department, Police, and Emergency Medical Services.

During 2nd Response emergencies, the External Emergency Responder is in charge of the emergency response actions when they arrive (delimitation of the area, communication, and access and traffic control are
performed by the drivers and the safety specialist while the External Emergency Responder arrives). However, when the National Fire Department arrives to the scene, they take control of the emergency, as established by local regulations. This is established in the Emergency Response Plan. Finally, specific roles of each outside responder are outlined in the Emergency Response Plan.

3.2 **Transport Practice 3.2:**

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

X in full compliance with

- The operation is ☐ in substantial compliance with Transport Practice 3.2
- ☐ not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

The operation is in FULL COMPLIANCE with Standard of Practice 3.2 requiring an operation Designate appropriate response personnel and commit necessary resources for emergency response.

ALPA, evidenced during the audit, which asks companies transport drivers and supervisors receive training in emergency response on safe cyanide management (spill and intoxication), and other courses must be trained in handling the defense, firefighting, first aid, hazardous materials level I and Level 2. knowledge in these areas further issuance of licenses by the transport companies is evidenced by staff ALPA after interviews with the drivers where asks questions of the above issues and thus verify understanding of them, this was evident after reviewing records Checklist Pre-Trip; this is evidence by reviewing training plans 2016 and 2017 verifying compliance with specific skills.

Drivers, Supervisors are responsible to respond in an emergency; they pass through medical tests to verify their good physical condition to perform these activities and have received the necessary training for efficient emergency response.

Each truck has the necessary amount of emergency response equipment and the safety escort also has a Response Kit for spills and poisoning (oxygen), and personal protective equipment which must be verified before the trip, as well as the verification of courses prior to starting the travels and the periodic emergency response training.

ALPA verifies that the carrier has the necessary equipment for emergency response in case of a larger second activation ALPA spill response activates the second answer.

Inspection records of the response teams prior to each trip through the emergency Checklist before Trip were check. The presences of these teams in the convoy were verify. The Emergency Plan indicates staff functions in an emergency, also the emergency equipment to be use in both the first and second response. The Emergency Plan describes specific emergency response roles and responsibilities of staff.

ALPA trains staff and staff of transport company. The transport vehicle operators receive initial and periodic refresher training in emergency cyanide (Spill and poisoning) annually and emergency response procedures including implementation of the Emergency Responce Plan. Additionally organizes lectures before the trip.
indicating safety procedures and a summary of actions in an emergency. Delivering drivers summary information emergency response plan.

During the audit process were interviewed to transport personnel and reported having received training.

ALPA specified the verification criteria of the units before each journey.

During the audit, inspection records were evident.

ALPA does subcontract this cyanide transport operations.

<table>
<thead>
<tr>
<th>Company</th>
<th>Operation</th>
<th>Date</th>
<th>Website</th>
</tr>
</thead>
<tbody>
<tr>
<td>DCR MINERIA Y CONSTRUACION</td>
<td>TRANSPORTATION</td>
<td>June 05, 2017</td>
<td><a href="https://www.cyanidecode.org/signatory-company/dcr-mineria-y-construccion">https://www.cyanidecode.org/signatory-company/dcr-mineria-y-construccion</a></td>
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</table>

3.3 **TRANSPORT PRACTICE 3.3:**

**DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.**

X in full compliance with

The operation is

- [ ] in substantial compliance with Transport Practice 3.3
- [ ] not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

The operation is in FULL COMPLIANCE with Standard of Practice 3.3 requiring an operation Develop procedures for internal and external emergency notification and reporting.

It was evident that the contact information in case of emergency is update in case of emergencies and update the Emergency Plan in this case warrants. The Emergency Plan indicates the current list of contact, which is review, and updated through calls in each revision of Emergency Planning. By performing 02 calls to the numbers given in the contact list updating is evidenced contact numbers in case of emergency.

The Emergency Response Plan includes an internal communication and external schema that specifies the call flow by the safety personnel, the receptors, the regulatory agencies, external response providers, medical centers, fire departments, and communities potentially affected by an emergency.

3.4 **TRANSPORT PRACTICE 3.4:**

**DEVELOP PROCEDURES FOR REMEDIATION OF RELEASES THAT RECOGNIZE THE ADDITIONAL HAZARDS OF CYANIDE TREATMENT CHEMICALS.**

X in full compliance with

The operation is

- [ ] in substantial compliance with Transport Practice 3.4
Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.4 requiring an operation develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

It was noticed in the Emergency Response Plan, the description of how to recover or neutralize the solids, the procedure of decontamination of soils or other contaminated medium and how to manage these wastes.

The Emergency Response Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released to surface waters.

3.5 Transport Practice 3.5:

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

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.5

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.5 requiring an operation Periodically evaluate response procedures and capabilities and revise them as needed.

The period of review and evaluation of this Emergency Response Plan is at least once a year.

The ALPA’s Management is responsible for requesting immediate changes to this Plan, in the event of serious incidents, by simulation results, results of audits or inspections by process improvement etc.

During the audit, records spill drill evidenced, in 2016 and 2017.

The Emergency Response Plan and the Training Plan define the frequency of emergency drills. The document presents the schedule of emergency simulations.

The simulations are made by the Chief of Safety who has an ANNUAL DRILL PROGRAM indicating the completion of ONE (01) practical simulation, for the purpose of evaluating the effectiveness of the Emergency Plan and correct what is indicated on it.

The purpose is to measure the efficiency of the response procedure to ensure that the staff involved in an emergency act according to the Emergency Response Plan.

The Chief of Safety takes into account the rapid preliminary compilation of the situation, gathering basic facts as they are known such as time the who, what, where, when, how and why of the situation, contacts the responsible person and broadcasts the obtained information, and continuously communicates with the Convoy Leader and will meet the requirements of authorities.
Alcance de certificación:
PROVISIÓN DE SERVICIOS DE CONSULTORÍA,
CAPACITACIÓN Y GESTIÓN DE RECURSOS HUMANOS.
MONITOREO OCUPACIONAL.

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