



July 2011

ICMI CERTIFICATION SUMMARY REPORT

Anglo Gold Ashanti Cerro Vanguardia Mine, Santa Cruz, Argentina

Submitted to:

International Cyanide Management Institute
(ICMI)
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UNITED STATES OF AMERICA

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Santa Cruz
Argentina

REPORT

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Distribution:

Cerro Vanguardia S.A. - 2 copies
Golder Associates S.A. - 1 copy





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1.0 SUMMARY AUDIT REPORT FOR GOLD MINING OPERATIONS

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2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

The Cerro Vanguardia project is located in Santa Cruz Province in the far south of Argentina, at an elevation of 200 masl.



Figure 1: Regional Location Map



The Cerro Vanguardia deposit is a series of veins, and mined using open pit techniques. There are around 15 open pits with variable contents of gold, silver and base metals. Ore is mined at a rate of 1 million tonnes per year with an average gold grade of 9.5 g/t and of silver 111 g/t. The mine life is forecast at 15 years. The Cerro Vanguardia mineral processing plant has a capacity of 3129 tonnes per day. The process involves the following steps:

- Three stages of crushing;
- Stockpiling and blending;
- Grinding in a ball mill, with cyanide addition;
- Cyanide leaching;
- Washing and thickening;
- Leach solution clarification and precipitation of gold and silver using zinc powder (Merill Crowe process);
- Smelting to form metal doré;
- Carbon in leach (CIL);
- Elution using the Anglo American system;
- Cyanide recovery using volatilization;
- SO₂ cyanide destruction to around 30 ppm CN (WAD);
- Deposition of tailings in a tailings dam.



SUMMARY AUDIT REPORT

Auditors Findings

This operation is:

- in full compliance with
- in substantial compliance with **the International Cyanide Management Code**
- not in compliance with

Audit Company: Golder Associates
Audit Team Leader: Alistair Cadden, Lead Auditor and Technical Specialist
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Name and Signatures of Other Auditors

Name	Position	Signature
Bruno Pizzorni	Auditor	
Adriana Lopes Cuevas	Auditor	
Mark Montoya	Gold Mining Technical Specialist	

Dates of Audit

The Certification Gold Mining Operations Verification Audit was undertaken within four days (eight person-days) between January 10 and January 14, 2011.

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 Gold Mining Operations and using standard and accepted practices for health, safety and environmental audits.



PRINCIPLE 1 – PRODUCTION

Encourage Responsible Cyanide Manufacturing by Purchasing from Manufacturers that Operate in a Safe and Environmentally Protective Manner

Production Practice 1.1: Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment

in full compliance with

The operation is

in substantial compliance with

Production Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 1.1, which requires that the site encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

Cerro Vanguardia buys its cyanide from Cyplus GmbH. Cyplus GmbH manufactures cyanide at its Wesseling Plant, originally certified as code compliant on July 14, 2006, and re-certified as code compliant on December 7, 2009.



PRINCIPLE 2 – TRANSPORTATION

Protect Communities and the Environment during Cyanide Transport

Transport Practice 2.1: Establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 2.1 which requires that the site establish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters.

Responsibility designation is clearly defined and standard procedures are clearly demanded in the cyanide supply contract, covering all the topics necessary to ensure the protection of the communities and the environment during cyanide transportation. For example:

Clause 4 (Quality and Supply Conditions) imposes the standards for packaging, labeling and some transportation issues.

Clause 5 (Transportation and Delivery) presents in detail transportation conditions.

Clause 9 (Support and Training) specifies the conditions for training of the BUYER's employees and third parties involved in this process, and the emergency response.

Clause 10 defines the SELLER's responsibilities

Transport Practice 2.2: Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management

in full compliance with

The operation is

in substantial compliance with

Transport Practice 2.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in substantial compliance with the Standard of Practice 2.2 which requires the mine protect communities and the environment during cyanide transport.

Cyanide supply contract between Cerro Vanguardia S.A. and Cyplus GMBH demands full "compliance of the Cyanide Code Principles and Standards of Practice as published and amended from time to time by ICMI in performing its obligations hereunder" as stated in Clause 11.1 of the cyanide supply contract between Cerro Vanguardia S.A. and Cyplus GMBH.

CyPlus's Cyanide supply chain from the Wesseling manufacturing plant in Germany to Puerto Deseado in Argentina was certified as fully compliant with the code on June 2nd 2011. The supply chain within Argentina from Puerto Deseado to the mine site was certified as fully compliant with the code 1st July 2011.

Cerro Vanguardia keeps full chain of custody records for the cyanide shipments.



PRINCIPLE 3 – HANDLING AND STORAGE

Protect Workers and the Environment during Cyanide Handling and Storage

Handling and Storage

Practice 3.1:

Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

in full compliance with

The operation is

in substantial compliance with

Handling and Storage Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Handling and Storage Practice 3.1, requiring that cyanide handling and storage facilities are designed and constructed consistent with sound, accepted engineering practices, quality assurance/quality control (QA/QC) procedures, spill prevention and spill containment measures.

Cerro Vanguardia has a new cyanide storage facility built in 2010 and approved by the Argentine authorities

The cyanide storage area comprises a steel framed building with a roof and cladding on three sides. The floor of the building and the area adjacent to it is a reinforced concrete slab with reinforced concrete walls around the edge, which comprise secondary containment. A mass concrete ramp over the secondary containment walls enables access by a fork lift truck for cyanide unloading and manoeuvring activities. The reinforced concrete floor and perimeter walls are considered to be competent barriers to leakage. No liquid cyanide is delivered to site. Solid cyanide is delivered in 1 tonne bulk bags within plywood boxes. The purpose built cyanide delivery and unloading area has full secondary containment. The site is in an arid region of Patagonia. There are no perennial water courses near the site.

The cyanide mixing and distribution tanks are located on reinforced concrete plinths within the plant building

Cerro Vanguardia has ultrasonic level detection monitors fitted to the cyanide mixing and cyanide distribution tanks. These are connected to the SCADA system in the plant control room which is monitored full time by the plant control room operator. The SCADA system activates visual and audible alarms at preset intervention levels. In the event of overfilling the SCADA system automatically shuts off the mix water pump.

The cyanide storage areas are well ventilated, both in the cyanide storage compound and within the plant site (i.e. the cyanide distribution tank). Measurements from the site's fixed HCN monitors and the auditors' own portable monitor showed HCN levels to be below detection limits. The cyanide boxes in the cyanide storage compound are stored under a roof and off the ground. No solid cyanide is stored within the plant building. The potential for solid sodium cyanide to come into contact with water is minimal. Cyanide storage is in a secure compound with a fence and locked gates within the secure site perimeter boundary. Public access is prohibited. The only materials stored within the cyanide storage compound are boxes of sodium cyanide. No incompatible materials are present within the compound.

The cyanide mixing and distribution tanks are located within the process plant. The tanks are positioned on concrete plinths within an area of secondary containment. The secondary containment is provided by concrete floors and walls that have been treated with epoxy paint to prevent infiltration. These are considered to be a competent barrier to leakage.



Handling and Storage

Practice 3.2:

Operate unloading storage and mixing facilities using inspections, preventative maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

in full compliance with

The operation is

in substantial compliance with

Handling and Storage Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Handling and Storage Practice 3.2 requiring that cyanide handling and storage facilities are operated using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

The written procedure on handling of sodium cyanide (PETS-GOP-PTA-020-Rev8) includes a detailed procedure for mixing cyanide. Boxes of NaCN are stored stacked 3 boxes high. PETS-GOP-PTA-020-Rev8 describes the requirements for treating spills of solid NaCN and spills of cyanide bearing solutions and requires the unloading and mixing of NaCN to be undertaken by two operators in the mix area, with remote observation by the operator in the control room.

Cerro Vanguardia is required to comply with Law 24.051 Hazardous Waste; Annex 1 Y7 Waste Containing Cyanides. The site is registered as a producer of hazardous waste under Law 2.567. Cerro Vanguardia is certified by the Province of Santa Cruz No 167 dated 27/04/10. The empty cyanide containers are taken to a licensed hazardous waste landfill site off-site. Bags are washed with 5% sodium hydroxide solution for 48 hours to dissolve any residual cyanide. The bags are then washed 3 times with fresh water by plant operators within the cyanide preparation bunded area. This wash water is then sampled and analysed to verify that there is no residual cyanide. The Environmental Department takes the bags and boxes to the waste storage area, which is a reinforced concrete paved area with reinforced concrete bund walls. Sent on hazardous waste landfill by licensed hazardous waste transporters SERPEI SRL; Marbec. Hazardous waste landfill TAYM SA Cordoba. No cyanide containers are returned to the vendors.



PRINCIPLE 4 – OPERATIONS

Manage Cyanide Process Solutions and Waste Streams to Protect Human Health and the Environment

Operations Practice 4.1: Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventative maintenance procedures.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.1, requiring that the operation implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

Cerro Vanguardia has a number of written procedures developed for its cyanide facilities which are graded depending on the outcome of a risk assessment. These are stored on the Soft Expert Excellence Suite document management system, which is available on the site's computer network, e.g.: PETS-GOP-PTA-007 Start up of Cyanisorb plant

- PO-GOP-MET-001 rev0 Sampling from leach tanks, CIL tanks and thickeners
- PO-GOP-001 rev0 Decontamination of Equipment and Materials in the Plant
- Plan-GOP003 rev1 Containment of spills of hazardous chemicals

Cerro Vanguardia has operating parameters and procedures for all its cyanide facilities. For the tailings dam the stability and freeboard requirements are calculated each year by personnel from Anglo American Technical Services in Brazil and South Africa. This includes allowable piezometric levels and freeboard (3 m to allow for storage of a Probable Maximum Precipitation (PMP) flood). Freeboard requirements are indicated on the dam wall with a colour coded marker board (red, yellow, green). In the process the pH is required to be over 10.5. This is set out in the training materials, plant operating manual and on the automatic control systems within the plant SCADA. The allowable cyanide concentration in the tailings dam is 50 ppm, which is 100 ppm less than the allowable level according to Argentine law. The operational target for the cyanide destruction system is 3 ppm.

Cerro Vanguardia has developed a number of inspection and preventative maintenance systems that are embedded within the normal operations of the site. Inspections are carried out both formally, as part of a prescribed inspection regime, and informally as part of day to day operations. Each day there is a meeting between shift bosses/coordinators and head of plant at 7:30 am and 9.00 pm to plan work for the day arising from inspections. Requests for non-urgent corrective maintenance are sent by operations staff to maintenance staff by email. This email is used to generate a work order. Urgent requests are transmitted directly by radio, and the documentation is completed afterwards. A computerised planned maintenance system called Elipse is used to control planned maintenance. This system generates instructions for planned inspections and preventative maintenance works. Elipse is also used to generate work orders due to observations made in inspections.

Cerro Vanguardia operates a change management procedure based on a system of prefeasibility, feasibility and detailed engineering studies. The approval process involves people from operations, maintenance, safety, environmental department, medical team.

Alvaro Caldera





Cerro Vanguardia has a number of contingency procedures to deal with process upsets such as:

- Emergency shut down procedures for Cyanisorb plant,
- Provision of emergency power supply;
- Measures for shutting down and starting up the carbon regeneration kiln;
- Measures for managing compressed air systems;
- Operation of gas extraction fans

Cerro Vanguardia has a number of inspection schedules to ensure that the plant is operating within its design parameters. including:

- Daily plant operators inspections and shift reports
- Planned Maintenance inspections weekly and monthly

There is a system for tank inspections for all tanks in the process plant. Inspections are performed according to API 653. Ultrasonic NDT is used to measure thickness of tank walls and is carried out annually. This is undertaken by the mine's staff. Formal visual inspections of tank conditions are carried out by maintenance staff every 6 months: check for condition of painting, leaks, rusting, visible deformation. If tanks are drained down, e.g. for repairs to agitators, an internal visual inspection is undertaken to check of evidence of loss of thickness, corrosion etc.

Cerro Vanguardia has two 110 kW generators to maintain critical systems in the event of a power cut. They carry out a check every week to ensure that the equipment will start up if the general power supply should fail. Once a month a 'live' test is held whereby the Cyanisorb plant is run on the emergency back-up generator for 1 hour. Maintenance of the generator motors and mechanical equipment is undertaken by the maintenance department monthly.

Operations Practice 4.2: Introduce management and operating systems to minimise cyanide use, thereby limiting concentrations of cyanide in mill tailings.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.2, requiring that the operation limit the use of cyanide to that optimal for economic recovery of gold so that the waste tailings material has as low a cyanide concentration as practical.

The ore at Cerro Vanguardia comes for a number of open pit mines and an underground mine. The grades of gold and silver at the mine vary significantly, in particular silver can range between 5 g/t and 500 g/t. To take account of this Cerro Vanguardia has a comprehensive programme of ore grade evaluation, bottle roll testing and cyanide.

Cerro Vanguardia uses a combination of manual titration and online titration to control cyanide addition to the process. The site has a Cyanisorb cyanide reclamation plant to maximize the amount of cyanide reused, minimize the amount sent to the cyanide destruction circuit and reduce the overall amount of new cyanide added to the circuit.



Operations Practice 4.3: Implement a comprehensive water management programme to protect against unintentional releases.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.3, requiring the operation to implement a comprehensive water management programme to protect against unintentional releases. Cerro Vanguardia has a comprehensive probabilistic water balance. The water balance considers a number of climatic conditions. Catastrophic precipitation events have been modeled (>40mm of precipitation and return intervals as 100 years or more). This information is presented in the Final Report "Modelacion Hidrodinamica de la Rotura de Colas del proyecto Cerro Vanguardia", 2008. Precipitation and evaporation rates have been measured at site. Monthly precipitation data is available since 1997, whereas monthly evaporation data is available since 2001. This information is presented in the weekly and quarterly reports, and in the final report "Modelacion Hidrodinamica de la Rotura de Colas del proyecto Cerro Vanguardia". The catchment area of the dam has been taken into account in the calculations. Impacts of freezing and thawing are not considered in the water balance as there is no build up of snow and ice over prolonged periods of time in the region, and there is no large catchment for the dam. Therefore the impact of these freezing and thawing is considered to be minimal. Tailings discharge flow heading towards the tailing dam is measured every week. This flow is differentiated between pulp (including solid material percentage) and water. Discharge points are also identified. In addition, recovered water flow which is sent back from the tailing dam to the plant is also measured and recorded on the weekly reports. Seepage from the dam is monitored weekly through a system of linked collection manholes. These channel the water towards pumps which are used to send the collected seepage water back to the tailings dam. In case of power outages, fixed and portable generators are available to keep all the equipment working properly.

Cerro Vanguardia operates a comprehensive monitoring system for the water balance, including measurement of freeboard, inflows and outflows, seepage flows and piezometers. The site collects meteorological data and uses it to update the water balance each week.

Operations Practice 4.4: Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.4, requiring the operation implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

Cerro Vanguardia has a cyanide recovery and cyanide detoxification system to ensure discharges to the tailings dam do not exceed a cyanide concentration of 50 ppm CN WAD. The site also has fencing and bird scares to ensure wildlife does not come into contact with cyanide solutions. There have been no reported cyanide related wildlife or livestock mortalities. There is no heap leach facility at Cerro Vanguardia.



Operations Practice 4.5: Implement measures to protect fish and wildlife from direct or indirect discharges of cyanide process solutions to surface water.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.5, requiring the operation implement measures to protect fish and wildlife from direct or indirect discharges of cyanide process solutions to surface water.

Cerro Vanguardia discharges water from time to time from the open pit mines. Cyanide has not been detected in this water. Cyanide has not been detected in groundwater monitoring downstream of the operation. The mine has not impacted surface water with cyanide.

Operations Practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.6, requiring the operation implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

Cerro Vanguardia has implemented a number of measures to protect the beneficial use of groundwater including low permeability lines in the tailings dam, operation procedures to minimize seepage from the tailings dam, groundwater monitoring systems around the dam and plant and secondary containment systems.

Cerro Vanguardia does not use mill tailings as backfill.

CN WAD has not been detected in groundwater samples taken to date (<0.022mg/L) in all groundwater samples taken to date.



Operations Practice 4.7: Provide spill prevention or containment measures for process tanks and pipelines.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.7

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.7 requiring that the operation provide spill prevention or containment measures for process tanks and pipelines.

All cyanide facilities have secondary containment except the leach tanks, which have an array of 4 monitoring wells nearby and remediation procedures should the need arise. Leach tanks are on ring beams, and CVSA has a risk based inspection procedure in place to ensure adequate environmental protection. This comprises inspections of the tanks every two months in accordance with API 650, ad hoc inspections of the inside of the tanks when they are drained for maintenance purposes, an array of leak detection wells, and a remediation procedure should leakage be detected. The receptors for any leakage from the leach tanks are groundwater and the 'flamingo pond' approximately 3km down gradient. An array of 4 monitoring wells, CVMP1 – 4, are in place around the mineral processing plant, in vicinity of the leach tanks. The wells are monitored quarterly by Hidroar as part of the site groundwater monitoring programme. To date levels of cyanide are below detection limits.

The secondary containments are sized to be at least 10% bigger than the largest tank within them. Secondary containments have sumps which are pumped back into the original process tank. Cyanide pipeline have secondary containment in the form of HDPE wraps or pipe in pipe construction. The tailings delivery pipeline and return water pipeline run a long a pipe corridor that ensures that any spill will report towards the tailings dam or back to the plant. Secondary containments are built from HDPE, concrete, mild and stainless steel which are all considered to be compatible with high pH conditions.

Operations Practice 4.8: Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.8

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.8 requiring that operations implement quality assurance/quality control (QA/QC) procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

The plant site was constructed between 1997 and 1998. Fluor Daniel was the EPCM contractor. A full QA/QC programme was implemented during construction. The QA/QC programme has addressed the suitability of the materials being used for the works, which comprise of compacted earth and rock fill, reinforced concrete, mild steel, stainless steel and HDPE. Cerro Vanguardia has a comprehensive archive containing all original drawings, specifications, QA/QC documentation. The QA/QC documentation has been signed off by a number of institutions including Instituto Técnico de Hormigón (The Concrete Technical Institute).



Operations Practice 4.9: Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

in full compliance with

The operation is

in substantial compliance with

Operations Practice 4.9

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 4.9 requiring that operations implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and groundwater quality.

Cerro Vanguardia has a written monitoring plan and detailed procedures of sampling and analysis, developed by Fernando Salomone the head of the mine's environmental department, who is appropriately qualified and experienced to undertake such a role. The procedures detail when, where and how samples should be taken and specify chain of custody requirements. Sampling conditions are recorded. Surface water and groundwater samples are monitored downstream of the operation by the mine's staff, third parties appointed by the authorities and community stakeholder. Animal mortality is recorded by the mine, but no mortalities related to cyanide have been reported to date. Monitoring is carried out a various intervals, e.g., daily inspections around the tailings dam, weekly, monthly and quarterly monitoring.



PRINCIPLE 5 – DECOMMISSIONING

Protect Communities and the Environment from Cyanide through Development and Implementation of Decommissioning Plans for Cyanide Facilities.

Decommissioning

Practice 5.1: Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

[X] in full compliance with

The operation is [] in substantial compliance with Decommissioning Practice 5.1 [] not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 5.1, which requires that the site plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

The 2010 Closure Plan provides the written procedures for decommissioning all of the Cerro Vanguardia cyanide facilities at the cessation of operations. Additionally, the Closure Plan includes an implementation schedule for the decommissioning activities. In accordance with regulatory commitments, CVSA updates its Closure Plan every two years, at minimum, and follows AngloGold Ashanti corporate standards for updating the Closure Plan if operational changes occur or key additional project information is obtained.

Decommissioning

Practice 5.2: Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

[X] in full compliance with

The operation is [] in substantial compliance with Decommissioning Practice 5.2 [] not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with the Standard of Practice 5.2 which requires that the site establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

Section 12 of the Closure Plan provides an estimation of costs associated with final closure. Decommissioning and closure costs for the cyanide facilities (including costs for maintenance and monitoring activities) make up approximately 45% of the total closure cost. These facilities include the mill, process plants (for concentration and leaching areas), heap leach facilities, process ponds, and the tailings impoundment. CVSA updates projected mine closure costs (which include reclamation and decommissioning costs) each year for use in its annual budget. In the past, a qualified, independent financial auditor (Ernst and Young) has audited those budgets.

Argentine Mining Legislation does not require specific financial guarantees for mine closure activities. As CVSA has established self-insurance as the financial assurance mechanism to cover estimated costs for the mine closure activities including cyanide-related decommissioning activities as identified in its Closure Plan. A professional financial auditor registered with the CPCE (Professional Council of Economics of the Province of Santa Cruz), provided a certified statement (Certification of Financial Ratios, dated March 14, 2011)

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demonstrating that, based on its assessment using an accepted method of financial evaluation, that CVSA has sufficient financial strength to fulfill the decommissioning obligations. In its certified statement, the financial auditor indicated that financial evaluation methodologies described in the U.S. Code of Federal Regulations (CFR) at 40 CFR 264.143(f), 30 CFR 800.23, 10 CFR 30, Appendix A were used as guidance to determine the financial tests used in its determination.



PRINCIPLE 6 – WORKER SAFETY

Protect Workers’ Health and Safety from Exposure to Cyanide

Worker Safety

Practice 6.1: Identify potential cyanide exposure scenarios and take measures as necessary to eliminated, reduce and control them.

in full compliance with

The operation is in substantial compliance with **Worker Safety Practice 6.1**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.1 which requires that the site has developed procedures describing how cyanide-related tasks such as unloading, mixing plant operations, entry into confined spaces, and equipment decontamination prior to maintenance should be conducted to minimise worker exposure.

CVSA has many procedures describing how cyanide-related tasks prior to maintenance should be conducted to minimize worker exposure.

They require the use of personal protective equipment, implement procedures to review process and operational changes affecting the health and safety of the workers and incorporate the necessary protection measures. CVSA has implemented a change management procedure that addresses the health and safety impacts of purposed process modifications, such as the implementation of an INCO/SO₂ cyanide destruction system. There is worker input to the managers on health and safety issues through the safety committee.

Worker Safety

Practice 6.2: Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

in full compliance with

The operation is in substantial compliance with **Worker Safety Practice 6.2**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Standard of Practice 6.2 which requires that the site operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

CVSA protects worker health and safety operating and monitoring pH>11, with an automated system to monitor and adjust pH as required. The operation has identified areas where there is potential for exposure to elevated levels of HCN and has developed work procedures to avoid this occurrence, with specified PPE and HCN gas monitoring equipment. The HCN monitoring equipment is maintained and calibrated every 2 months by SIAFA, a specialist company based in Buenos Aires. The operation is correctly signed with adequate warnings, has showers and eye wash stations, tanks and pipes with cyanide identified and pipes with signaled with the flow direction, MSDS and first aid informational materials in place. The operation implements a procedure for reporting and investigating cyanide related incidents



Worker Safety

Practice 6.3:

Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

in full compliance with

The operation is

in substantial compliance with

Worker Safety Practice 6.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 6.3 that requires that the site develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

CVSA has water, oxygen, a resuscitator, antidote kits and a radio, telephone, alarm system or other means of communications or emergency notification readily available for use at cyanide unloading, storage and mixing locations. CVSA regularly inspects the first aid medical cabinet ensuring equipment is available and operative. They replace materials and antidote according to the manufacturer indications. CVSA has specific written emergency response procedures to address potential cyanide spill accidents: *Actuación de Emergencia con Intoxicación de Ácido Cianhídrico (HCN)*. This procedure deals with ensuring the victim, giving first aid, recognizing intoxication symptoms, antidote administration, medical intravenous treatment and victim recuperation.

CVSA has its own on-site equipped medical post with two ambulances to assist workers exposed to cyanide and other emergencies. CVSA will give first aid to cyanide intoxicated victims, administer antidotes and once stabilized the patient will be transported to Puerto San Julián hospital. CVSA has agreements with the hospitals of Puerto Deseado and Puerto San Julián to treat patients exposed to cyanide. CVSA has ensured the hospitals have the relevant medical training and has informed them about the potential to treat patients for cyanide exposure.

CVSA undertakes mock drills and uses them to generate feedback and critical assessment to improve the performance of their emergency response.



PRINCIPLE 7 – EMERGENCY RESPONSE

Protect Communities and the Environment through the Development of Emergency Response Strategies and Capabilities

Emergency Response

Practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 7.1**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in substantial compliance with Standard of Practice 7.1 which requires that the site prepare detailed emergency response plans for potential cyanide releases.

The Plan has specific response actions anticipating eventual emergency situations, developed an Emergency Response Plan to address potential accidental releases of cyanide. CVSA has emergency response plans to address potential cyanide spill accidents. These specify the necessary actions in case of exhaust gas of sodium cyanide, cyanide spills solid cyanide solution. The plan addresses the scenarios a – j of section 7.1.2. The cyanide supply chain, including transportation related emergencies, was fully certified under the code 01/07/11.

CVSA has identified the possible scenarios for an incident involving sodium cyanide. Outside the property considers the discharge of sodium cyanide in Puerto Deseado and transportation to CVSA, which could arise breaking or opening the container to spill into the sea or the concrete floor, emission of fumes, fire, collision, civil commotion, assault and robbery. The CVSA Crisis Plan sets out the actions to be taken to protect the communities near the affected areas. The operating procedure emergency response due to HCN intoxication specifies first aid treatment and antidotes that should be administrated to victims contaminated with cyanide. In the operating procedure Spill Monitoring cyanide solutions indicate the actions necessary to control, contain and monitor cyanide spills. The soil detoxification procedure using calcium hypochlorite in a possible spill of sodium cyanide is set to be applied primarily in the plant area and roads.

Emergency Response

Practice 7.2: Involve site personnel and stakeholders in the planning process.

in full compliance with

The operation is in substantial compliance with **Emergency Response Practice 7.2**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 7.2 which requires that the site involve site personnel and stakeholders in the planning process.

CVSA involve site personnel as managers, emergency teams, supervisors between others. Also involves the stakeholders as communities of Puerto Deseado and Puerto San Julián in the planning process.

CVSA communicates with the communities and authorities regarding the emergency response plans. The Community Relations program involves informing risks associated with current mining activity and how they are prevented. These risks include transport and usage of sodium cyanide.



CVSA has a community emergency working plan to respond against cyanide emergencies. As part of this plan they train Puerto Deseado and Puerto San Julian authorities for emergency response. The training includes response planning and communication, to hospitals, police, gendarmerie, prefecture and the civil defense of Puerto Deseado and Puerto San Julián. CVSA provided details of communication informing the community about the cyanide transfer, security measures and training medical personnel to treat intoxicated. CVSA showed briefings with local authorities in Puerto Deseado and Puerto San Julián. CVSA provided information to local ports regarding cyanide transfer and security measures required. Local medical staff have been trained to treat cyanide intoxicated patients. CVSA in coordination with Hazmat has scheduled new training for Puerto Deseado and Puerto San Julián authorities, to be held during in March 2011.

Emergency Response

Practice 7.3:

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

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 7.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 7.3 which requires that the site designate appropriate personnel and commit necessary equipment and resources for emergency response.

CVSA has designated the general manager and managers of the operation as the personnel and commit necessary equipment and resources for emergency response. The CVSA emergency response plan designates and gives details of the training required by emergency responders. The plan includes emergency call out numbers and contact information the emergency response teams.

The emergency response plan defines the duties and responsibilities of the co-coordinators and team members. It includes a list of emergency response equipment, including personal protection equipment, available on-site and inspection requirements

The plan details the role of outside responders, medical facilities and communities in the emergency response procedures, for which CVSA has given training. CVSA has agreements with outside responders such as the police and the local hospitals regarding their roles in emergencies.

Emergency Response

Practice 7.4:

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 7.4

not in compliance with



Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 7.4 which requires that the site develop procedures for internal and external emergency notification and reporting.

CVSA has developed procedures for internal and external emergency notification and reporting. The information is organized, clear and easy to access.

The Cyanide Management Plan states in section 3.5 Transport Emergency Response Plan that Hazmat, the convoy escort, must communicate with the public agencies involved in the situation such as Civil Defence, Fire Station, Police, Secretariat of Environment, Traffic, relaying all information obtained in the emergency room. In Appendix 3.6 indicates the communications procedure, Appendices 3.4 and 3.5 shows emergency telephone numbers, an list government agencies respectively.

Appendix 7.1 Emergency Response Plan, item 2, contains a contact list with internal telephone numbers and public institutions. Item 4.1 shows the communications procedure to follow. The Plan includes response procedures and contact information for reporting on accidents involving cyanide that can affect surrounding communities

Emergency Response

Practice 7.5:

Incorporate in response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 7.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 7.5 which requires that the site incorporate in response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

The plan and its supporting documents describe the measures required for remediation and monitoring of cyanide spills, taking into consideration the additional environmental risks associated with using cyanide detoxification chemicals.

Chapter 7 of the Plan describes the measures for a solid cyanide spill during transport from the warehouse to the processing plant and the case for cyanide solution spill, indicating the procedure to retrieve it and neutralize the contaminated soil, which complemented detoxification procedures for monitoring soil and spills of cyanide solutions.

Soil detoxification procedures using calcium hypochlorite in a possible spill of sodium cyanide and also in the monitoring procedure spills cyanide solutions, describes the actions to be taken and remedial measures.

Bottled drinking water is provided at the site

Item 4.2.10 specifies that "sodium hypochlorite, hydrogen peroxide and ferrous sulphate should never be used to treat cyanide released into natural bodies of surface water. These chemicals are toxic to aquatic life".

Monitoring requirements are specified in the site's environmental procedures.



Emergency Response

Practice 7.6:

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

in full compliance with

The operation is

in substantial compliance with

Emergency Response Practice 7.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 7.6 which requires that the site periodically evaluate response procedures and capabilities and revise them as needed.

CVSA has undertaken two emergency drills for cyanide accidents in the last 6 months. The tailings dam rupture drill involved 13 employees from different areas: environmental, safety, plant, metallurgical processes and medical staff.

The need to update the Emergency Response Plan was recognized as outcome of the simulation of a dam break. The communication plan as indicated in the emergency response plan was not followed. The emergency brigade leader reported that there was too much radio communication at the dam site, which generated confusion for the emergency response brigades. At the time of the audit the communication plan the document data base system had the status "under review".



PRINCIPLE 8 – TRAINING

Train Workers and Emergency Response Personnel to Manage Cyanide in a Safe and Environmentally Protective Manner

Training Practice 8.1: Train workers to understand the hazards associated with cyanide use.

in full compliance with

The operation is

in substantial compliance with

Training Practice 8.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 8.1. which requires that the site train workers to understand the hazards associated with cyanide use.

CVSA trains all employees in cyanide hazards. Staff and contractors working in the mill have to undergo more specific cyanide hazard awareness training. Refresher training is undertaken annually. The Human Resources department keeps files with training records and a schedule of refresher training. In addition each department also keeps training records.

Training Practice 8.2: Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

in full compliance with

The operation is

in substantial compliance with

Training Practice 8.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 8.2 which requires that the site train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment. CVSA trains employees in the normal production tasks, including unloading, mixing, production and maintenance, with minimum risk to worker health and safety in a manner that prevents unplanned cyanide releases. This is done by

Training elements necessary for each job involving cyanide management is adequately identified in training materials. By means of the matrix of risk identification and hazard assessment, CVSA identifies the elements that must be present in cyanide hazards training. The RNA – learning needs survey - is also used to identify training elements. CVSA personnel receive training by appropriately qualified professional, who provide task training related to cyanide management activities. The cyanide toxicology training was given by experienced physicians. Plant induction is given by an employee with 10 years' experience. Hazmat is a recognized training service company.

CVSA gives refresher training in cyanide hazards annually to employees. Last cyanide training was given by Hazmat through November – December 2010. Individual training records are kept in the Training Center data base. Each area of the operation has individual employee files with the specific cyanide hazards training records. The records include the names of the employee and the trainer, the date of training, the topics covered, and evaluation records.



Training Practice 8.3: Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

in full compliance with

The operation is

in substantial compliance with

Training Practice 8.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 8.3 which requires that the site train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

CVSA demonstrated that employees working in the unloading, mixing, production and maintenance facilities receive training on cyanide emergency response. Considering that time is very important when giving first aid to potential victims of cyanide poisoning, CVSA has members of the emergency squad (BOER) working in the different areas where cyanide is present. There are personnel in the cyanide unloading, mixing, production and maintenance areas, trained in the procedures to be followed if cyanide is to be released. These personnel take part in routine drills to test and improve their response skills. The emergency squad BOER and response coordinators are trained in the procedures included in the emergency response plan and using the response equipment, such as the use of SCBA, amyl nitrite and supplied oxygen kit.

CVSA has a community emergency working plan to respond to cyanide emergencies. As part of this plan they provided training to Puerto Deseado and Puerto San Julian authorities for emergencies response. The training includes response planning, communication, to hospitals, police, gendarmerie, prefecture and civil defense of Puerto Deseado and Puerto San Julián. The auditor reviewed communications informing the community about the cyanide transfer, security measures and training medical personnel to treat intoxicated.

CVSA conducted a survey of the authorities of the communities on both ports evaluating their ability to respond to an emergency, see Appendix 3-2 Audience Response System, and Appendix 3-5 Mobile Organizations. Emails between CVSA and the relevant authorities demonstrated coordination with Hazmat, company that provides consultancy and security escort to cyanide transport cyanide. CVSA showed results with local authorities in Puerto Deseado and Puerto San Julián.

CVSA gives refresher training in cyanide hazards to their employees annually; response to cyanide exposures and releases is included. Last cyanide training was given by Hazmat through November - December; who delivered 10 sessions over four weeks to employees and contractors about cyanide hazards and emergency planning. Hazmat issued a training results report. The Training Center data base helps tracking refresher training. As there are employees with growing experience, the refreshing training varies to provide them with additional knowledge and maintaining in this way the interest in learning.

On December 17, 2010 CVSA undertook a mock emergency drill simulating cyanide intoxication in the acid wash columns.

For 2011 they have the following schedule for mock emergency drills:

February: Spillage of cyanide solution

- March: Emergency in cyanide transportation;
- July: Fire in the cyanide storage; and
- September: HCN gas generation in one area of the plant.



ICMI CERTIFICATION SUMMARY REPORT

The Human Resources and Health and Safety departments keep records documenting the cyanide training, including the names of the employee and the trainer, the date of training, the topics covered, and how the employee demonstrated an understanding of the training materials.



PRINCIPLE 9 – DIALOGUE

Engage in Public Consultation and Disclosure

Dialogue Practice 9.1: Provide stakeholders the opportunity to communicate issues of concern.

[X] in full compliance with

The operation is

[] in substantial compliance with

Dialogue Practice 9.1

[] not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 9.1 which requires that the operation provide stakeholders the opportunity to communicate issues of concern.

“Veta” Newsletter presents at the end of the publication an advertising slot with German Stoker’s e-mail address; this space is directed to questions related to cyanide use. German Stoker is in charge of the communication area, and all the cyanide-related questions he receives will be steered to the person/area with the capacity of answering them. This publication is given to the operators who take it to their homes promoting an indirect communication channel with the community at Puerto San Julian, Caleta Olivia, Comodoro Rivadavia and Rio Gallegos.

This newsletter is also available through the intranet site available for the people inside the mine.

There is also a company webpage under construction. This webpage is going to have information directed to the public in general, including publications related to cyanide use.

Dialogue Practice 9.2: Initiate dialogue describing cyanide management procedures and responsively address identified concerns.

[X] in full compliance with

The operation is

[] in substantial compliance with

Dialogue Practice 9.2

[] not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 9.2 which requires that the site initiate dialogue describing cyanide management procedures and responsively address identified concerns.

Training programs have been carried out at Puerto San Julian and Puerto Deseado with the emergency response groups (police, fire department, hospital, etc) on November 8 and 9, 2009. These talks were presented by Cerro Vanguardia personnel (Mercedes Batalla – Medical Service Chief – and Leonardo Pierrard – Former CVSA employee).

A brief explanation about cyanide transportation process from the port at Puerto Deseado to the Mine was published in August 2009 in “Oro del Sur” Newsletter. This publication is distributed among the mine operators and some institutions in the town (e.g. hotels) disseminating the information inside the community.

Cerro Vanguardia has run emergency response plan training related to cyanide accidents for the media visits (Panorama Minero and AIMSA) on December 9, 2010.

Classifieds in the Rio Gallegos newspaper (Tiempo Sur) and the Piedrabuena newspaper (El Independiente del Sur, July 2010) promote the participation of the community in the environmental monitoring program on the tailing dam water. There is also a link on the newspaper “El Independiente del Sur” website

Alexander Calderon





(www.elindependientedelosur.com) with an invitation to participate of the environmental monitoring program at the tailing dam.

The environmental monitoring program on the tailing dam had been videotaped and broadcasted on the TV program "TVO", from Channel 9, Rio Gallegos.

An article about cyanide management at Cerro Vanguardia was published on "Nucleo" Magazine in December 2010. This magazine is published every 2 months and distributed in Santa Cruz, Chubut and Buenos Aires Provinces.

Dialogue Practice 9.3: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

in full compliance with

The operation is

in substantial compliance with

Dialogue Practice 9.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

CVSA is in full compliance with Standard of Practice 9.3 which requires that the site make appropriate operational and environmental information regarding cyanide available to stakeholders.

The transportation procedure is explained in the publication "Oro del Sur", August 2009. A general description of the process carried out in the plant is described in the publication "Vetas", December 2010. Both publications are distributed to the entire personnel who usually take the publication to their homes where their families can have access to this information.

Institutional brochures (both in Spanish and English versions) have been implemented. These brochures contains information related to the cyanide process inside the plant and at the tailings dam; it also mentions the existence of the Cyanisorb plant which recovers most of the cyanide used in the gold recovery process, and the existence of a "closed circuit" between the plant and the tailings dam highlighting the proper cyanide management and the highly reduced environmental impact. This brochure is going to be distributed not only to the mine personnel but also to external institutions such as South African Embassy at Buenos Aires.

"Panorama Minero" is a monthly publication which is distributed nation-wide and by subscription to countries such as Chile, Peru, Bolivia, Canada, USA, and Finland. This magazine published on August 2009 an extended article which contained a detailed explanation of the plant process and the cyanide use.

The environmental monitoring program on the tailing dam had been videotaped and broadcasted on the TV program "TVO", from Channel 9, Rio Gallegos.

Although there is not an official number available regarding illiteracy levels, based on interviews and surveys carried out by Cerro Vanguardia in Puerto San Julian (February 19 – 21 , 2010) it was determined that illiteracy levels are very low. From 392 persons interviewed, 100% have at least elementary education level completed.

All type of incidents which can impact the environment, including cyanide leaks, are reported to the Provincial Mining Department. The report reviewed corresponds to an incident which was reported on March 8, 2010. An excavator working on the main road accidentally broke the pipe which transports the tail material from the plant to the tailing dam. This rupture generated a spillage of 10 m³ of pulp on unprotected soil with a concentration of 100/140 ppm free cyanide. This incident was reported on March 12, 2010 to the Provincial Mining Department. More recently on March 14 ,2011, a tailings pipe line ruptured releasing 200 m³ of slurry with a CN WAD concentration of 63 ppm into its secondary containment. This spill was dealt with in accordance with the mines emergency response procedures and reported to the authorities. Information about the spill was made available through the company website and a local newspaper.



ICMI CERTIFICATION SUMMARY REPORT

<http://www.tiemposur.com.ar/nota/22560-cerro-vanguardia-dijo-que-no-hay-nada-que-esconder.html>

http://www.cerrovanguardiasa.com.ar/uploads/Articulo/pdf/47_Vertido%20de%20pulpa.pdf

In addition, those incidents are also reported to the Corporation in a quarterly basis.



Report Signature Page

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