



INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Operations Summary Audit Report

**For The
International Cyanide Management Code
and GRUPO ARIZONA Transporte e
Logística – Minas Gerais - Brasil**



Verification Protocol

**www.cyanidecode.org
September 2019**

TABLE OF CONTENTS

INTRODUCTION

.....ERROR!
BOOKMARK NOT DEFINED.

1 TRANSPORT 6

1.1	TRANSPORT PRACTICE 1.1	6
1.2	TRANSPORT PRACTICE 1.2	7
1.3	TRANSPORT PRACTICE 1.3	8
1.4	TRANSPORT PRACTICE 1.4	9
1.5	TRANSPORT PRACTICE 1.5:	11
1.6	TRANSPORT PRACTICE 1.6:	11

2 INTERIM STORAGE 13

2.1	TRANSPORT PRACTICE 2.1	13
-----	------------------------------	----

3 EMERGENCY RESPONSE: 13

3.1	TRANSPORT PRACTICE 3.1:	13
3.2	TRANSPORT PRACTICE 3.2:	15
3.3	TRANSPORT PRACTICE 3.3:	16
3.4	TRANSPORT PRACTICE 3.4:	16
3.5	TRANSPORT PRACTICE 3.5:	17



INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: GRUPO ARIZONA

Name of Facility Owner: ARIZONA LOGÍSTICA Ltda.

Name of Facility Operator: GRUPO ARIZONA

Name of Responsible Manager: Maria Aline Gonçalves Vieira Carreiro

Address: Av. Coronel Jove Soares Nogueira, No. 707, Sala 3, Bairro Inconfidentes, Contagem

State/Province/Country: Minas Gerais, Brasil

Telephone: 55. 31 3311-2808 / Mobile: 55. 31 98846-0147

E-mail: aline.vieira@arizonagrupo.com.br

Aspects of the location and description of the operation:

Arizona Logistica Ltda The Head Office is situated in Contagem, Minas Gerais - Brasil however, the site certificate refers to the operations that will be held out in Bahia, Fazenda Caroba, s/n, Candeias/Bahia - Brasil. Arizona Logistica is a Company dedicated to the transport of hazardous materials with operations in Brasil. It provides integral logistics services and it is focused in the mining industry and long-term contracts. Arizona Logística intends to transport solid state sodium cyanide (briquettes). This on behalf of the national manufacturer Unigel Unidade Candeias / BA, Brasil, recertified by ICMI, for Mining Company - Beadell Brasil Ltda. located in the State of Amapá. and other mining companies located in Brazil. Adding to that it can also transport to other Mining Operations in different ways under either container. The product is weighed and sealed the day before the actual departure of the vehicle or the same day. This is done by the producer (Unigel). Drivers should check daily for personal protective equipment (PPE), vehicle protective equipment (EPV) and their unit. The Driver follows a pre-established route and must follow it. The discharge is made by the mining operation in Beadell - Brasil, which checks that the seals are not violated; therefore, Drivers cannot stay in the cab. The Arizona Logistica has implemented an integrated management system for quality and safety based on ISO 9001:2015 and SASSMAQ (Health, Safety, Environment and Quality Assessment System). This system considers the safety requirements during the preparation of the bidding documents, service design, and requires developing client/project specific safety procedures and emergency response plans. Its focus on long-term contracts has allowed them acquiring transportation units especially for the project. Other products transported by Arizona Logistica in Brasil include Sodium Metabisulfite, Virgin Lime, Lead Nitrate, Scaled Caustic Soda, Copper Sulphate. This Audit comprises land transportation operations in Brazil based on Integrated Management System (SIG) documents and the current transportation operation performed at Unigel's plant in Bahia to Mining Company - Beadell Brasil. Arizona Logistica Ltda formally began implementing the Cyanide Code in January 2019, when it became a Signatory to the Code and incorporated it into its Integrated Management System. This is Arizona Logistica's first certification with the Cyanide Code.



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.

LEAD AUDITOR SIGNATURE

SEP. 2019 ARIZONA



Auditor's Finding

This Operation is:

- X in full compliance
- in substantial compliance
- not in compliance

**The International
Cyanide
Management Code**

with the International Cyanide Management Code.

Audit Company: Julio Monteiro Auditores da Qualidade Ltda.

Audit Team Leader: Julio C. M. Monteiro - Lead Assessor in Cyanide Operations, Expertise in Mining, Cyanide Transportation and Productions.

Auditor: None

E-mail: monteirojulio790@gmail.com; jmaq@ig.com.br

Date(s) of Audit: September 18, 19 and 20, 2019

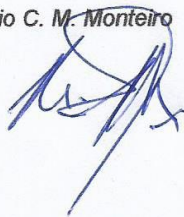
I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management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

Signatures of Audit Team Leader

Julio C. M. Monteiro



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.

ARIZONA implemented the route evaluation process identified as "POP SSMA 22 – Rotogram to Cyanide Transport which describes the items to be assessed during the route analysis in accordance with the ones pointed in the International Cyanide Management Code.

Arizona is in full compliance with good practice standards 1.1 where it is mandatory to review and select a cyanide transport route to minimize risks and prevent accidents. The POP SSMA 22 - Routing procedure determines that all routes for cyanide transport should be evaluated and selected. The model of the rotogram used is descriptive, and to be able to raise the risk of accidents the data are raised Critical Route Points.

It is clear in the procedure that it is prohibited for the Driver to deviate from the route or stop in a place not allowed. The same document states that the Driver's location communication must be via Sascar, a Specialist Monitoring Company, which can monitor all route via satellite inclusive in shaded area. Arizona guides Drivers and Staff on safety measures to be used when transporting with satellite tracking through the POP GCO 07 - Tracking Satellite procedure. Driver's Manual Buony Sascar illustrates the step-by-step use of all keyboard usage and macro sending throughout the trip, as well as informing the types of lock in the vehicle. Sascar Equipment Statement Document taken from the Sascar website confirming the installation of "Sascarga Full Sat 200" trackers.

During the preparation of the Rotogram, the risks of the operation were evaluated, considering their impact and their criticality, which are set out in the "Hazard and Risk Table".

Drivers take exams on admission and periodicals: Clinical Examination, Occupational Audiometry, Blood Count with Platelet or Fraction Count (Ethogram, Leukogram, Platelets), Glucose - Research and / or Dosage, Conventional ECG up to 12 leads, EEG-EEG , Ophthalmological Assessment, Psychological Assessment, Romberg and Toxicological Test. Drivers receive training based on the specific Physical Driver's Manual Buony and Sascar System for the transport of sodium cyanide, which addresses various operating hazards and guidelines to minimize them.

Arizona undertakes under the POP SSMA 22 - Schedule procedure to maintain a periodic review process of the routes used to deliver cyanide. This process ensures a lively routing, as each time the Driver travels the



route it provides feedback on the stretch conditions to the Integrated Management System (GIS) assistant, with the most critical elements being highlighted and communicated to the managers involved. directly in the context of cyanide transport. Arizona documents the measures taken to address the risks identified from the Rotogram Primary Matrix, then evaluates the most critical elements (high damage potential) through FOR 01 POP SSMA 04 - Hazard and Risk Assessment and as appropriate. The necessary actions and subsequently reevaluates this risk in order to reduce its classification making remote the possibility of materializing the accidental hypothesis described.

Arizona Logistica communicates with communities, other stakeholders, and Government Agencies by posting material indicating Route Cities on the Company's web site, Presented the protocol for sending maps that is forwarded monthly to the Official Organs in accordance with Normative Instruction No. 11 of April 13, 2018 and Conama Resolution (National Environmental Council) No. 10 of June 13 / 1988, which are instruments of the National Environmental Policy.

Arizona does not hire convoy services. Drivers are trained in the Emergency Response Plan and simulated how to act in the event of an accident. The critical point, identified on the route along the Santana x Serra do Navio stretch in Amapá State, will be accompanied by two trained Employees who accompany the wagons in another vehicle to arrange and support in case of need or risk identification. In Serra do Navio, a mining site, there is another Employee who also follows the vehicle to the entrance of the mine, besides performing the checklist, both were trained in simulated cyanide accidents and PAE.

ARIZONA has provided information (MSDS, emergency and product information, Emergency Response Plan to support emergency centers (health centers, police and fire companies) on the mentioned routes. Responsibilities and duties are described in the PAE - Emergency Response Plan. Arizona has the Emergency Response Plan prepared by the WGRA Company (Ambipar Group Company) and the Cyanide Specific PAE, which outlines the responsibilities and actions to be taken in case of an emergency beyond the accidental assumptions that make clear the actions to be taken. Arizona has three pre-plans, which describe three cyanide accident scenarios, this document is easy to understand and is with the Driver, which outlines the actions of what to do and who to report in the event of a cyanide transport accident. WGRA -Environmental Risk Management Company - Contract No. C05022014497 and Insurance Policy.

ARIZONA does not subcontract any of this cyanide transport operations.

All the documented information's, during this audit, made are in their latest version and records are maintained according to ARIZONA Integrated Management System implemented and Certify.

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

The operation is in substantial compliance with Transport Practice 1.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ARIZONA is in full compliance with Transport Practice 1.2. ARIZONA complies with the all elements of the Transport Practice 1.2 and ensure that Transport Equipment is Suitable for the Cyanide Shipment and

LEAD AUDITOR SIGNATURE

SEP. 2019 ARIZONA



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

Arizona Logistica establishes in documented procedures driver-specific training that must be trained and qualified to transport cyanide with as little risk as possible.

Competencies and requirements are described in the trailer driver's job description and for FOR 01 - POP SIG 05 Competency Description, and the Training in accordance with the POP SIG 05 - Competency procedure. Evidence of training provided is programmed in the Annual Training Plan, and recorded in attendance list, photo book, as well as evaluation of the effectiveness of such training. Drivers are legally required to hold a Special License, according the Brazilian Laws for the Professional Drivers, undergo a psychological evaluation and a psycho-technical assessment.

Records were verified and all staff operating the transport equipment was set to perform their work in a manner that minimizes the possibility of cyanide releases and exposures, these trainings include safe handling of cyanide both as emergency and poisoning, firefighting, first aid, defensive driving.

The ARIZONA procedures establish minimum requirements for Drivers: health, defensive driving training, response training on sodium cyanide emergencies (spills and poisoning prevention).

According to the Training Plan the recycling is carried out once a year. During the audit, files of four Drivers and one Supervisor were reviewed, and all relevant training certificates were available Plan.

ARIZONA does not subcontract any of this cyanide transport operations.

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.

Arizona uses only suitable and maintained maintenance vehicles for the transportation of cyanide, to ensure this requirement adopted, specific checklists that cover all the demands required by Unigel (Cyanide Producer) related to the context of safe operation with sodium cyanide. In POP OP 10 - Check List in item 2.2.1, the criteria for ensuring high standards of compliance and safety of operation are determined. The precedence has a checklist form that determines how the Driver should fill in at the beginning of the trip and at each stop.

ARIZONA establishes through documented information procedure POP SSMA 21 - Handling Cyanide Movement and Transportation, which defines the suitability rules of the vehicle that will be exclusive for the transport of sodium cyanide.

According to the Procedure for transportation of sodium cyanide, a Driver must check the trucks and trailers completing a checklist per vehicle prior to the departure.



Arizona establishes through documented information the procedure POP EXP 05 - Vehicle Weight Control (item 2.1), the maximum axle weight, by vehicle type and dimensions, also defines the rules that apply to cyanide transport, strictly following the Current Brazilian Legislation, and the technical standard for the manufacture of equipment used to transport cyanide.

The parameters included in the procedure POP EXP 05 - Vehicle Weight Control, which from Jan.01,2007, are effective: Resolution 210/06 and Resolution 211/06 of CONTRAN (National Traffic Council).

ARIZONA does not subcontract any of this cyanide transport operations.

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.

ARIZONA establishes through documented information POP SSMA 21- Cyanide Handling and Movement procedure that the loading operation is carried out exclusively by producer Unigel, where security measures are adopted to ensure total sealing and actions that prevent the movement of cargo during transport. . Drivers are advised to check the seal, before every departure, daily and every trip restart, the check list includes all these steps. These actions maintain the integrity of the producer's packaging.

Before each trip according to the POP OP 10 - Checklist procedure, the inspection is carried out by the Driver through a form that analyzes all vehicle items (tires calibration, fittings, lights, Epp's, emergency kit, documents, among others). In the same form, there are items to be inspected at the restart of each trip (after overnight), the Driver conducts a survey on all items of the vehicle such as (signs, seal status, documentation, emergency kit, Epp's, calibration and condition of tires, fittings, lights, among others) always according to checklist. The Driver conducts two inspections on the vehicle, one before the release of loading and one after loading, sealing the container.

Vehicles are marked with a Risk Panel and Safety Label in accordance with the guidelines of the resolution of the National Land Transport Agency - ANTT 5232 of 2016. These guidelines are included in procedures directed to the Operation, in order to ensure the correct identification of the vehicle. type of product carried its risks, as well as precautions with Operation communities and surrounding areas.

Identifications used:

UN Sodium Cyanide Number: 1689.

Proper Shipping Name: SOLID Sodium CYANIDE

Primary Hazard Class or Subclass: 6.1

Hazard Number: 66

ARIZONA requires inspection of cartels load information (DOT, UN and NFPA) verification of the truck. Signage is provided in order to comply with local regulations, which are based on the UN Recommendations



on the Transport of Dangerous Goods. Copies of the placards are included in the Emergency Response Plan and Rotogram.

Vehicle maintenance is performed by qualified third-party companies. Maintenance control is performed through the procedure POP OP 07 - Fleet Maintenance, where the responsible for the fleet analyzes the spreadsheet FOR 02 where all maintenance performed, identified by plate is released. It is also inserted the Invoice, mileage, value, description of the services, and date of the service.

The responsible for the fleet analyzes the spreadsheet and requests to the Purchasing sector the appropriate quotes in the qualified suppliers.

ARIZONA requires inspection of cartels load information (DOT, UN and NFPA) verification of the truck. Signage is provided in order to comply with local regulations, which are based on the UN Recommendations on the Transport of Dangerous Goods. Copies of the placards are included in the Emergency Response Plan and Rotogram.

Documented procedure determines fleet maintenance rules, plus Maintenance Worksheet and Evidence Sheet. ARIZONA has a preventive maintenance plan. The maintenance records were reviewed.

Documented procedure POP OP 03 - Disc Tachograph and Driver's Manual determine the time and validity allowed for cyanide transport. drivers are advised to drive only from 6:00 am to 7:00 pm with 3-hour breaks and a minimum of 11 hours rest.

Documented procedure POP SSMA 21 describes the precautions Unigel takes to prevent cargo movement. Sodium cyanide loading is performed exclusively by Unigel and Unigel adopts procedures to prevent the product from moving in the vehicle while traveling, supporting the normal efforts of the operation.

POP SSMA 21 - Sodium Cyanide Handling, Movement and Transportation, documented procedure, describes the rules of when loading can be modified or suspended. Arizona hereby defines that cyanide transport may be modified or suspended if conditions are impeding and / or affecting the safety of the operation such as: bad weather, strikes, civil unrest, cataclysms or other force majeure situations that may be found at source, route or destination. For all these situations a contingency plan will be drawn up in agreement with the customer, shipper and carrier. This contingency plan is defined in summary as set out below.

At the end of the trip, the Driver must submit a report detailing the same road incidents, anticipated information, sensitive areas, and find relevant information to ensure the safety on future trips.

Arizona has an Alcohol and Drug Policy, where all employees have access, are aware, trained in specific courses, and the Breathalyzer Test is performed on the Drivers and Professionals involved. Training Certificate of the National Transport Service Sest Senat of Driver Mr. Jorge de Souza Costa held on Sep. 08,2019. In addition, all Drivers take the toxicological examination. Objective evidence presented toxicological examination report No. 06UMHCHI006379601 conducted on Apr. 04, 2019 conducted by the Laboratory Labet Toxicological Exams, which concludes that the presence of psychoactive substances above the cutoff limits determined by the current legalization were not identified.

The plans and procedures for compliance with the Code are reviewed annually and annual surveillance audits are developed to verify compliance with the ARIZONA standards.

All the documents made are in their latest version and records are maintained according to ARIZONA Integrated Management System implemented and Certify.

ARIZONA does not subcontract any of this cyanide transport operations.

LEAD AUDITOR SIGNATURE

SEP. 2019 ARIZONA



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.

ARIZONA 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 shipment to prevent losses during transport.

ARIZONA implementations POP SSMA Documented Procedure - Stakeholder Communication, establishes a system for internal and external communication on SSMAQ issues including:

- a) what to communicate;
- b) when to communicate;
- c) with whom to communicate;
- d) how to communicate;
- e) who to communicate.

POP SSMA takes into legal consideration and other scope requirements and also communicates with all relevant Arizona-identified stakeholders, such as: mining operation the cyanide producer or distributor and / or emergency responders, communities, shareholders (partners), and other interested parties. Ensures that the reported information is consistent with information generated through the Integrated Management System and is reliable. It also provides a way to respond to relevant communications.

The POP SSMA 08 Emergency Preparedness and Response procedure defines what to report and how to communicate in an emergency.

The Environmental Emergency Nucleus - NEA has a team of professionals who work on duty 24 hours and can be called by telephone: (31) 99822-3947 and (31) 99825-3947 / Prevention and Emergency Board (31) 3915-1237 (Business Hours It is a very serious violation, subject to a simple fine "Failure to report to the NEA or the Minas Gerais Military Police - PMMG the occurrence of an accident with environmental damage" (Decree Law 47.383 / 2018 - Annex I, code 117)



The pre-plans are determined for each action to whom to communicate, what to communicate and the key stakeholders: Carrier and Unigel.

Fleet vehicles are equipped with a Sascar Satellite Tracker - Satellital Technology, as evidenced by the Sascar Company statement demonstrating the Class of Tracker used by ARIZONA called "SASCARGA FULL SAT 200" satellite technology equipment.

Through the vehicle checklist it is evident that there is control and checking before the whole trip the communication equipment verification: cell phone, charger, battery, and in the case of the tracker the verification is made through Buonny Company, before the loading release.

The Buonny Risk Management Plan, prepared by Buony Company based on information from ARIZONA Cargo Insurance, Allianz Security, due on 04/22/2020. Buony Checklist Manual and POP GCO 07 - Satellite Tracking, stipulates that before all loading the vehicle sensors checklist should be performed, this procedure is performed by the Buony Team who only releases the Driver for loading, after checklist application and approval

Additional, ARIZONA periodically test communication equipment to ensure it functions properly.

Where black-out areas, if any, should be identified in the Rotogram, the POP SSMA 22 - Rotogram procedure establishes and regulates that in these areas, where there is shade, the Driver should maintain contact through data registered in the Satellital / Sascar System.

Even in black-out areas, Drivers have access to communication via the vehicle's installed keypad, as it is equipment with satellite traceability, which guarantees the continuity of operation throughout the program. It has been found that the system covers every perimeter except in places with a metal cover or other type of physical obstruction which in these cases is compensated by GPRS Technology.

The GPS System has location actualizations in real time, in areas without GPS coverage it saves the information transmitted after the passing of vehicles.

POP Procedure SSMA 21 - Cyanide Handling, Moving and Transportation establishes the transportation control requirements with the mandatory management documents that integrate the transportation service provision establishing the Producer, Consignee and Carrier requirements.

All Operation is monitored, and this ensures the integrity of the load content. Through scales duly installed at the Producer and Consignee, the Unigel output values and the Mining input values are checked. The Road Scale checks to see if the vehicle weight is compatible with what is stated in the invoice - NF of the product, as well as if the integrity of the seal was maintained throughout the trip. The seal is installed on the Producer and the Driver is responsible for its integrity to its destination.

The Cyanide Transportation Driver's Manual defines the required documents by relevant legislation and the requirements for seal tampering, as well as the Checklist.

The Bill of Landing and the shipment reference are part of the shipping records of the amount transported; the Material Safety Data Sheet is checked before each trip and is available throughout the transportation.

In the sender shipment reference is indicated the name of the product, the United Nations (UN) number, the transported number of packages and weight of the load, and it is also necessary to indicate the product safety considerations. Upon the delivery of the sender shipment reference, the provider delivers the Material Safety Data Sheet to the carrier. The absence of the sender reference guide and of the Material Safety Data Sheet during transportation is fine by the confiscation of the cargo.

The other documents that show the amount of cyanide shipped are: MDFE (Electronic Manifest), CT-e (Electronic Bill of Lading) and Invoice of the product.

Unigel loading guidelines are provided in procedure EXP.P.01 - Sodium Cyanide Shipment

ARIZONA does not subcontract any of this cyanide transport operations.



INTERIM STORAGE

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

Does not apply

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 NOT APPLICABLE with Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

ARIZONA has no stores or warehouses in territory of Brasil.

3. 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

LEAD AUDITOR SIGNATURE

SEP. 2019 ARIZONA



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.

ARIZONA has a contract number C05022014497 with WGRA Environmental Risk Management, CNPJ: 05.316.350 / 0001-85 - (Ambipar Group Company), which prepares and implements the Emergency Response Plan to establish emergency response strategies with hazardous products. Highlighted the PAE WGRA review 01 - 12/09/2019 This document sets forth: ARIZONA Characterization, List of Goods Transported, including Sodium Cyanide, Hazard Class 6.1, Transport Route, Type of Transport Vehicles, Triggering Emergency Control Actions, Triggering Flowchart, Human Resources. Emergency Response, WGRA Material Resources, Post-Emergency Actions, Accidental Assumptions, Accidental Refusals, Updates and Training, in addition to the responsibilities of the Plan Coordinator and Support Team. 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 Rotogram.

The Emergency Response Plan, specific for the transportation of sodium cyanide, was developed considering the elements of choice of the selected route.

The Cyanide Transport Route states that the plan was developed considering the elements of the route selected for the transportation of sodium cyanide, observing areas of lower population concentration (lower demographic index), avoiding areas of environmental preservation, poorly conserved bridges and accesses. critics close to water resources.

ARIZONA meets national criteria and environmental guidelines through registration with the IBAMA Database (Brazilian Institute of Environment and Renewable Natural Resources) through registration No. 5553649 issued on AUG.15, 2016, whose proof of registration is verifiable. through the authentication key: 4vc6.hbqi.3pa9.79r7. The validity of the document is confirmed by the IBAMA (Brazilian Institute of Environment and Renewable Natural Resources) Certificate (Regularity Certificate) No. 5553649, issued on July 18, 2019 and valid until Oct.18 2019.

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

ARIZONA indicates the use of trucks to transport sodium cyanide considering 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.

To circumvent the known risks, the Rotogram is kept up to date, which guarantees the accurate and adequate information for the operations. Arizona invests in training. Whenever there is a restriction at a point where the risk is high, mapping to another alternative route is performed until normal conditions are restored, or even with definitive changes of the route.

Arizona Establishes the Transport Vehicle Design: This document presents all the characteristics of vehicles that will be intended exclusively for the transportation of sodium cyanide, these characteristics are: Number of Axles, Suspension System, Chassis, Dimensions and Container Capacity, and other features.



The Cyanide Transport Specific PAE establishes the design of the transport vehicle, which determines the specifications and requirements that will be used for the transportation of cyanide. ARIZONA uses trucks; in addition, all shipment is dispatched within low platform trailers purchased with a maximum load capacity of 30 tons.

The characteristics of temporary storage facilities are not applicable as the transportation will be done business to business.

In Item 3 of the Emergency Flowchart, contained in FOR 01-POP SSMA 08-PAE and the Specific Sodium Cyanide Transport PAE, the actions to be taken to take preventive actions in case of emergency are presented.

In item 7 "Roles and Responsibilities" of documents FOR 01-POP SSMA 08-PAE and the Sodium Cyanide Transport Specific PAE describe the responsibilities of the PAE Coordinator, Support Team, Emergency Response Team (WGRA), Producer (Unigel) and identifies external stakeholders, Medical Facilities, and Air Support for emergency procedures, cites Name and Telephone Number of all medical facilities identified in the Rotogram and the Name and Telephone Support Air Available in the State of Amapá.

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.

According Emergency Response Plan, Drivers and Support Staff 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.

The Emergency Response Plan indicates that each truck has the necessary amount of emergency response equipment and the also has a Response Kit for spills and poisoning, 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.

ARIZONA has the necessary equipment for emergency response in the event of a major spill.

The transport vehicle Operators receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan. In the Emergency Plan indicates the functions of the staff in case of an emergency, and the emergency equipment to be used in both the first and the second response. The Emergency Plan describes the specific functions of the emergency response and the staff responsibilities. There were verified the records of the emergency response refresher training.

In the FOR 01-POP SSMA 08-PAE and the Specific Sodium Cyanide Transport PAE the items to be inspected are listed in the Emergency Kit box:



Tyvek disposable costumes, Level A suits, SCBA, safety goggles, safety visual protectors, water suits, boots, gloves, masks, flashlights, hazard tape rolls, bags, brooms, scissors, full face masks with gas filters cyanuric, lime, buckets and lamps.

ARIZONA does not subcontract any of this cyanide transport operations.

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.

Effectively, the Communication Diagram is established to respond to an emergency on the road, previously designed with the Yanacocha client; and another flow to serve other clients.

It was noticed that the contact information, in case of emergency it will be set and updated the Emergency Response Plan. The Emergency Response Plan indicates the current contact list which is reviewed and updated through every review of the Emergency Response Plan.

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.

ARIZONA from documented procedures, FOR 01 POP SSMA 08- PAE - Cyanide Specific and POP SSMA 08 - Emergency Preparedness and Response, defines the means for properly communicating with those involved in the transport operation.

Complementarily, the Pre-Plans also establish emergency communication channels that are fixed to the vehicles through adhesive panels.

Documented Procedure FOR 01 POP SSMA 08- PAE - Sodium Cyanide Transport Specific Establishes Primary Flowchart for Emergency Response, and Contact Information for Notifying Producer, Mine, Regulatory Agencies, Suppliers, Medical Facilities, and Potentially Affected Communities in 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
 not in compliance with

LEAD AUDITOR SIGNATURE

SEP. 2019 ARIZONA



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.

The procedure FOR 01 POP SSMA 08- PAE - Cyanide Transport Specific Plan , item 14 states that: when a toxic product (such as cyanide) causes environmental contamination, no other chemicals should be used to remedy the damage, as this action may lead to new contamination and generate complicated scenarios to act. Spilled material should always be collected in conjunction with WGRA teams using PPE required for safe operation. All collected waste and products will be sent and sent to Unigel.

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 (suggested) or in case it changes to the legislation, the processes of the client or business, according the Certificated ARIZONA Integrated Management System in the procedure "Control of Documented Information".

ARIZONA undertakes to undertake training and retraining actions when it comes to training related to cyanide transportation, as well as relevant simulations.

ARIZONA conducts training and recycling actions when it comes to training related to cyanide transportation, as well as relevant simulations. An example of objective evidence is the Cyanide Spill Simulation and the use of Personal Protective Equipment, held on Aug,30, 2019, with a workload of 03 hours, by the Occupational Safety Technical Instructor, Fernando Horta. The simulation was recorded in photos and film.

The basic Driver Position trainings are set out in the Driver Position Description. Training needs and their fulfillment are recorded in the Annual Training Program - FOR 05 - POP SIG 05.



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 training system is defined in POP SIG 05 - Competences. Effectiveness is assessed in the types of training events; whose themes relate to aspects that impact management system processes. The effectiveness evaluation in simulation situations is performed when the simulation is performed, being evaluated by the instructor or facilitator responsible. Emergency Simulation Efficacy Report - Sodium Cyanide. Version 1.0 -Date: 09/09/2019.

This assessment may influence a change in the Emergency Care Plan, depending on the results obtained.

LEAD AUDITOR SIGNATURE



SEP. 2019 ARIZONA