# INTERNATIONAL CYANIDE MANAGEMENT CODE

## CUSA S.A.C.

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In collaboration with:

![CN Inc. Logo]

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**ISOSURE S.A.C.**
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INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: CUSA S.A.C.
Name of Facility Owner: CUSA S.A.C.
Name of Facility Operator: CUSA S.A.C.
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Aspects of the location and description of the operation:

CUSA S.A.C, with more than 52 years in Peru, as a chemical distributor is present in mining market throughout, since 2002.

On July 31, 20123 signed the Code as a road transport from th port of entry to CUSA’s warehouse and to mines using trucking companies individually certified under the International Cyanide Management Institute.

At the time of the audit, CUA had a building exclusively for the storage of cyanide which is in charge of the logistics department supervisor. The Warehouse facility is in Callao, Republic of Perú.

CUSA has a process for selecting suppliers PRO-TRA-001, in which are indicate the guidelines to be met, such as a signatory to the ICMI.

According to the process map, when the purchase order is generated by the client, CUSA have a close communication with the transporter, which must be certified under the Code.
SUMMARY AUDIT REPORT
FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Production 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.
This Operation is:

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

with the International Cyanide Management Code.

Audit Company: ISOSURE SAC | CIANURO INCORPORATED EIRL
Audit Team Leader: Luis Torres Argandoña
E-mail: auditoria@isosure.com

Date(s) of Audit: 26 and 27 July 2017

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

I attest that this Summary Audit Report accurately describes the findings of the verification audit.

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

Name and Signatures of Other Auditors

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<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Signature</th>
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<tbody>
<tr>
<td>Luis Torres Argandoña</td>
<td>Lead Auditor and Transportation, Production, and Mining Technical</td>
<td>Signature</td>
<td>27 July 2017</td>
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<tr>
<td>Carlo Vargas</td>
<td>Transportation and Mining Technical</td>
<td>Signature</td>
<td>31 October 2017</td>
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Verification Protocol

OPERATIONS

Design, construct and operate cyanide production facilities to prevent release of cyanide.

1.1 PRODUCTION PRACTICE 1.1

DESIGN AND CONSTRUCT CYANIDE PRODUCTION FACILITIES CONSISTENT WITH SOUND, ACCEPTED ENGINEERING PRACTICES AND QUALITY CONTROL/QUALITY ASSURANCE PROCEDURES.

X in full compliance with

The operation is ☐ in substantial compliance with Production Practice 1.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The construction of storage facility was approved by the District Municipality of Callao, Callao, Peru, and subjected to quality control of municipal inspectors and customers of CUSA. The designs and drawings submitted were approved under the structural considerations of seismic, electrical, fire, health, in accordance with the Rules of the Peruvian Structural Standards risks, and these are signed by a professional engineer qualified referee, enabling to CUSA for the Storage of Cylinders and Boxes with cyanide. These records are available at CUSA and were reviewed during the audit.

The review of building stores CUSA is performed by a multidisciplinary group of professionals made up 01 Structural Engineer 01 Sanitary Engineer, 01 Electrical Engineer 01 and 01 Architect Engineer Safety and Health at Work, which are qualified referees. This is done every two years and is a requirement of the Municipality of Callao, Peru to get the "License to Operate" concluding APTA facilities CUSA for storage cylinders and boxes cyanide.

There are quality control and quality assurance documentation.

The warehouse built with concrete floor, walls and roof of fireproof glass fiber (has a chute end to end to prevent water ingress as secondary containment. It also has natural ventilation, which consists of windows covered with microfiber, which allows air circulation and prevents the rain to pass if this was given.

The failure or power outage does not affect the operation of CUSA nor cause a leak or spill. Warning system for reporting emergency brigade staff and hazardous materials to meet any spills promptly was evident.

Cyanide boxes and cylinders store a rack system up to five levels supported by a concrete floor.

CUSA has Cyanide GAS sensors to show spills. CUSA stores cyanide in boxes of 1 TN or cylinders of 50 or 100 kg

CUSA not involve the use of pipes and tanks for storage of cyanide.

1.2 PRODUCTION PRACTICE 1.2
DEVELOP AND IMPLEMENT PLANS AND PROCEDURES TO OPERATE CYANIDE PRODUCTION FACILITIES IN A MANNER THAT PREVENTS ACCIDENTAL RELEASES.

X in full compliance with

The operation is □ in substantial compliance with Production Practice 1.2
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.2 requiring an operation develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The standard practices necessary for the safe and environmentally responsible operation are verify and documented as described in PRO-GOP-003 Cyanide Loading.

Interviewed with CUSA staff evidencing that they have the training to identify the deviation in case of checkpoints.

CUSA is aware of the dangers and risks involved in the use of sodium cyanide during storage, therefore, has developed an emergency plan for cyanide management Emergency Plan - Sodium Cyanide Management. The Plan allows them to ensure the safety and health of its employees, customers, contractors, visitors and others; and to fulfill the commitment to prevent or minimize the risk to health in an appropriate, timely and coordinate emergencies response.

Possible cases emergencies:

• Cyanide Spill
• Warehouse Fire
• Cyanide Poisoning
• Natural Disasters (Earthquake, Tsunami)

CUSA has a procedure implemented to identify when it has been operating in the past, and it has changed from those in which the initial design and operating practices were predicated.

CUSA establishes that the changes are necessary in case they are required by the interested parties to the organization (Peruvian State, Customers, Partners, Suppliers, Emergency Support Centers information).

CUSA implemented a program of preventive maintenance of equipment, maintenance, and repair. Maintenance records of equipment used for loading / unloading and storage of cyanide were check.

During the entry or exit from storage, the levels of hydrogen cyanide (HCN) are control with a calibrated instrument.

CUSA has TWO (02) monitoring equipment DRAGÜER. These equipments are mobile equipment.

CUSA not handle cyanide solutions.

The Emergency Plan - Sodium Cyanide Management establishes procedures to dispose of cyanide in contaminated soil, which is describe below.

Decontamination
This activity is decontaminated personnel who had contact with NaCN. The DECON (decontamination corridor) is set in the warm zone and according to:

- Level of risk of contamination of personnel.
- Personal protective level assigned to the decontamination area.
- Grade and number of stations required for installation and riders decontamination personnel.

The basic equipment for decontamination corridors consisting of: plastic marked routes, mechanical cleaning utensils or pressure cleaner containers, thinners, waste recovery containers.

The contaminated clothing and equipment should be removed after use and stored in a controlled area (warm zone) until cleanup procedures can be initiated. In some cases, the protective clothing and equipment cannot be decontaminated and should be properly disposed of as hazardous waste.

The storage facility CUSA is build for ventilation naturally which allows entry of air entering avoiding rain.

The storage area CUSA has roof and walls of fireproof glass fiber, additionally has a system of gutters to catch rainwater and direct it to a sump. It also has a secondary containment system that consists of a trough which avoids water ingress and this is located opposite the entrance doors of the store.

CUSA makes a Risk Assessment Matrix of loading, unloading and storage.

Access to the Warehouse for CUSA is restricted, prohibited the public has a perimeter fence 6 feet tall and security based on two (02) security guards, also has a closed system of security cameras.

The store cyanide has locks on all doors and signals prohibited entry to unauthorized personnel.

The cyanide is packaged as required peruvian political jurisdiction.

1.3  **PRODUCTION PRACTICE 1.3**

**INSPECT CYANIDE PRODUCTION FACILITIES TO ENSURE THEIR INTEGRITY AND PREVENT ACCIDENTAL RELEASES.**

X in full compliance with

The operation is  
☐ in substantial compliance with Production Practice 1.3
☐ not in compliance with

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

The operation is in FULL COMPLIANCE wit Standard of Practice 1.3 requiring an operation inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

No tanks containing cyanide solutions in CUSA facilities. No piping, pumps or valves handle cyanide solutions on site. The inspections of the storage area are performed continuously cyanide. Further inspection records showed, that identify the same incidents, required actions.
WORKER SAFETY

Protect workers’ health and safety from exposure to cyanide.

2.1 PRODUCTION PRACTICE 2.1

DEVELOP AND IMPLEMENT PROCEDURES TO PROTECT PLANT PERSONNEL FROM EXPOSURE TO CYANIDE.

X in full compliance with

The operation is

☐ in substantial compliance with Production Practice 2.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 2.1 requiring an operation develop and implement procedures to protect plant personnel from exposure to cyanide.

CUSA receive cyanide cylinders and boxes (finished product). CUSA has develop a proceeding for the entry, storage and disposal of the product “Loading, Unloading and Storage of Sodium Cyanide”. Additionally this procedure is part of the general induction of staff working in the cyanide storage area.

After interview was evident that the staff has been training in “Loading, Unloading and Storage of Sodium Cyanide” procedure.

Loading, Unloading and Storage Sodium Cyanide and performs the practices describe in this, there are also reports that demonstrate the fact.

For non-routine and emergency operation activities CUSA has implemented the Risk Assessment Matrix for operations is valid for ONE (01) year. Additionally, it has the Emergency Plan Emergency Plan. Sodium Cyanide Management, which establishes the necessary measures to prevent exposure of personnel during an emergency, which considers the following emergency scenarios:

- Cyanide Spill
- Warehouse Fire
- Cyanide Poisoning
- Natural Disasters (Earthquake and Tsunami)

Maintenance relates only to forklifts, held outside the company premises by the supplier of the equipment, for which CUSA has a Maintenance Plan for each of the equipment.

The organization carries out annual reviews of the documents, this obligation is recorded in all the procedures, and there are continuous changes in the procedures in the versions of the same.

Workers participate in relevant meetings of review of issues of safety and health at work which takes at least once a month or whenever an emergency occurs topics related to health and safety at work are discussed, review or creating procedures.

Additionally, there is an Occupational Health and Safety Committee where the company's leading staff and workers meet monthly to resolve safety and health concerns.
CUSA uses TWO (2) monitoring devices confirmation of proper control of exposure to hydrogen cyanide (HCN) to the limits of 4.7 ppm (5 mg/m³) or less, during the visit was evidenced both teams were calibrated and a calibration certificate is issued by them.

CUSA has TWO (02) monitoring teams hydrogen cyanide which have their respective calibration certificate valid at all times CUSA account with at least ONE (01) while the other equipment is calibrated by the supplier.

Reportedly, they have not identified areas or activities with such concentrations. Despite this, the A class of personal protective equipment (encapsulated suit) is required on the installation and use of cyanide when a container is damaged and repairs are made to it.

Through interviews with staff and storage forklift driver confirmed using “buddy system” that otherwise may notify or communicate with other staff assistance, support or help where it is determined that it is necessary. CUSA also establishes that all work with sodium cyanide realizer must be at least TWO (02) workers and must be supervise. (Loading, Unloading and Storage of Sodium Cyanide).

Radios and telephones are use to communicate between the relevant personnel related to the operations of cyanide. Forklift operators have radios with them at all times.

CUSA occupational medical exams performed all workers at the start of labor relationship. Also occupational medical exams are performed annually to monitor the health of workers and finally at the end of laboral contract an additional medical examination is performed to certify the good health of the worker at the time of being separated from the organization.

This information is evidence during the audit.

The protocol is developing occupational medical examination by a medical surgeon with specialty in health and safety at work according to the hazards and level of risk to which the worker is exposed.

CUSA has a change clothing policy, personnel performing work of loading and unloading cyanide level C uses costumes, which are disposable once they has been used.

It was evident that during the loading, storage and unloading has signs indicating the presence of cyanide between them this:

Signals USE OF HELMETS, USE OF SAFETY MASK, USE OF SAFETY SHOES, USE OF UNIFORM GLOVES.

- UN 1689
- Rombo IMO (class 6.1)
- NFPA Diamond
- Sodium Cyanide Shop
- MSDS

It was evident that during the loading, storage and unloading has signs indicating the presence of cyanide between them this:

- No unauthorized personnel
- Prohibited Food and Drinking
- Prohibited use of water
- No Smoking
- Prohibited ignite

2.2 **PRODUCTION PRACTICE 2.2**
DEVELOP AND IMPLEMENT PLANS AND PROCEDURES FOR RAPID AND EFFECTIVE RESPONSE TO CYANIDE EXPOSURE.

X in full compliance with

The operation is not in substantial compliance with Production Practice 2.2

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 2.2 requiring an operation develop and implement plans and procedures for rapid and effective response to cyanide exposure.

CUSA has developed an emergency plan for quick and effective management of sodium cyanide Emergency Plan - Sodium Cyanide Management.

Response to cyanide exposure several detailed procedures are given, among which are:

- Cyanide Spill
- Warehouse Fire
- Cyanide Poisoning
- Natural Disasters (Earthquake and Tsunami)

This program includes drills two times per year of which was evidence that conducted in January 2017 during the visit.

It is worth mentioning that after reviewing the training plan and training records was evident that the staff is training in the Emergency Plan and Safe Management of Cyanide (Spill and poisoning) were interviewed personnel involved in the operation, which claimed to have received training and drill, and have demonstrated knowledge in the application of the guidelines Emergency Plan.

The site has showers and portable wash stations eyes low pressure dry chemical extinguishers of 50 Kg, these last every 50 meters.

CUSA features water distribution system, oxygen resuscitator.

CUSA also deliver a copy of the MSDS and Emergency Plan evidencing the charge of receipt of the document.

Workers are provide with telephone for internal communication within the facility and has telephone services for external communication.

CUSA sets the “Loading, Unloading and Storage of sodium cyanide” in the elements detailing first aid that must be present during operation with cyanide (receipt, storage and dispatch) provides a checklist to check the existence of these, if one was use be set to be replace immediately.

CUSA in the checklist provides a review of first aid kit this should be reviewed prior to performing any operation related to cyanide Checklists from January 2014 to July 2017 were reviewed; availability of equipment was confirmed during the audit.

The MSDS in Spanish was available next to the storage of cyanide. Also, the area has safety signage in Spanish language.

No tanks, pipes or containers. Cyanide is stored in warehouses, which are clearly marked with the following pictures:
Signals USE OF HELMETS, USE OF SAFETY MASK, USE OF SAFETY SHOES, and USE OF UNIFORM GLOVES.

- UN 1689
- Rombo IMO (class 6.1)
- NFPA Diamond
- MSDS
- No unauthorized personnel
- Prohibited Food and Drinking
- Prohibited use of water
- No Smoking
- Prohibited ingite

It only allows authorized to enter the work area with cyanide staff.

The personnel, contractors and visitors have no contact with cyanide since CUSA only manipulates boxes and cylinders, in case of product spillage is established in the Emergency Response Plan, the decontamination of all personnel affected by the spill or participat in the action of lifting the cyanide spill.

CUSA not have medical services on site because it only handles cases and cylinder cyanide, however CUSA informed the nearest health center (10 minutes by car) and the company of firefighters (10 minutes) on the application first aid in case of poisoning with cyanide and the application of Oxygen if required. They found in the Emergency Plan and are evidenced deliver a copy thereof to be send by the document.

The Emergency Plan includes a guideline for transporting workers exposed to the nearest medical facility (10 minutes). This guideline indicates in which case the exposed worker should be evacuate, ambulance phones and medical centers, transportation if necessary is done with ambulances (these are not owned by the organization).

CUSA has established an emergency communication centers, alerting doctors about the risk of cyanide exposure. Letters been sent with the information necessary and maintain ongoing communication, letters are detailed email, direct phone and contact person.

CUSA has an annual simulation plan, the 2016 and 2017 plans are evidenced. The simulation report of 2017 "Cyanide spill in storage" is shown, where the planning and steps followed and lessons learned are recorded.

CUSA has implemented a couple to care and accident investigation methodology, which aims to ensure that all accidents and near misses are report and investigated immediately in order to make the respective corrections. This procedure is the responsibility of the Head of Safety. The procedure is divide into the accident / incident care, Accident Investigation / Treatment Failure and the accident / incident.

As part of this research, this method indicates that the investigation of the incident / accident must be support by a report.

CUSA reports no accidents occurred with cyanide or whatever is involved, information validated by interviews with company personnel operative.
MONITORING:

Ensure that process controls are protective of the environment.

3.1 PRODUCTION PRACTICE 3.1:

CONDUCT ENVIRONMENTAL MONITORING TO CONFIRM THAT PLANNED OR UNPLANNED RELEASES OF CYANIDE DO NOT RESULT IN ADVERSE IMPACTS.

X in full compliance with

☐ in substantial compliance with Production 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 conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

CUSA makes the finished product storage, cyanide is not removed from its package; operations do not generate air emissions or wastewater containing cyanide in normal conditions. The waste generated by an emergency would be handle as hazardous waste. This section does not apply to facilities.

CUSA makes no discharges to surface waters, stored CUSA presentation end briquettes packed in boxes and cylinders product. The waste generated by an emergency would be handle as hazardous waste.

CUSA not perform any type of discharge, terminated CUSA stores briquettes packed in presentation boxes and cylinders product. The waste generated by an emergency would be handle as hazardous waste.

CUSA not perform any type of indirect discharge to surface water, stored CUSA finished briquettes packed in presentation boxes and cylinders product.
TRAINING:

Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner

4.1 PRODUCTION PRACTICE 4.1:

TRAIN EMPLOYEES TO OPERATE THE PLANT IN A MANNER THAT MINIMIZES THE POTENTIAL FOR CYANIDE EXPOSURES AND RELEASES.

X in full compliance with

The operation is □ in substantial compliance with Production Practice 4.1

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 4.1 requiring an operation train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.

CUSA provides training programs for workers, customers and annual form, the training program of 2016 and 2017 were evident.

CUSA provides training programs for workers in annual form, the training program of 2016 and 2017 on the entire course "Personal Protective Equipment" included was evident.

CUSA has a training program based on the risks to which the workers are exposed, it should be mentioned that CUSA only stores boxes and cylinders with cyanide, the opening of which is not allowed. These records were evidence during the audit.

CUSA performs risk assessment which is made by process and job after evaluation it was determined that the people involved with the management of cyanide should bring the following trainings.

The training elements are necessary for each job identified in training materials.

CUSA sets and performs an initial induction to all staff and regular training on safety and health, in order to prevent accidents and spills this induction include: operating procedures, safe handling of cyanide (spill and intoxication), firefighting, first aid and use of personal protective equipment. These records were evidence during the audit. "Loading, Unloading and Storage of Sodium Cyanide Sodium" also states that the staff in the transaction related to cyanide must be previously entailed the performance of its duties. In addition, 5-minute briefings prior to commencing activities with sodium cyanide (loading and unloading) whose records were evidence during the audit are given.

The efficiency of formation of cyanide is test during exposure to cyanide or cyanide spill drill according to CUSA training program. An independent report after each year and depending on the results of the need for this training is prepared and communicated. In addition courses offered by outside entities, are evaluated and are certificated and whose minimum note is 13 to approve, otherwise it should return to take the course. Exams and certified staff in the Training Courses were note.

During the visit, he met staff of CUSA demonstrating their knowledge in these courses.
4.2 **Production Practice 4.2:**

**Train employees to respond to cyanide exposures and releases.**

- X in full compliance with
- □ in substantial compliance with Production Practice 4.2
- □ not in compliance with

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

The operation is in FULL COMPLIANCE with Standard Practice 4.2 requiring an operation train employees to respond to cyanide exposures and releases.

CUSA has Emergency Plan - Management sodium cyanide in which all employees are training in the different scenarios that could result in an emergency such as the release of cyanide. This training is delivered by the Chief Safety CUSA once a year.

The Training Program CUSA indicated that two drills per year are performed during the visit evidence ONE (01) made by CUSA. The simulation evidenced was based on the safe handling of cyanide during the spill involving CUSA personnel.

Simulations performed are evaluate in terms of effectiveness, to determine the level of knowledge, skills, and identifying weaknesses of staff and the organization. This assessment was evident in the reports of the drills conducted in 2016 and 2017.

CUSA keeps records of them performed trainings where indicated in the: names, function, work center, signatures of trainer, firms of workers, name of the topic, copies of the materials imparted during training and assessment also the credentials of the instructor. These were evidenced During the audit records also were interviewed three worker.

- Safe Cyanide Handling
- Cyanide poisoning
- Use of EPPS
- Fight against fire
EMERGENCY RESPONSE:

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

5.1 PRODUCTION PRACTICE 5.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is □ in substantial compliance with Production Practice 5.1

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 5.1 requiring an operation prepare detailed emergency response plans for potential cyanide releases.

CUSA developed the Emergency Plan - Sodium Cyanide Management (hereinafter referred to as the Plan). The Plan is a document that covers all operations during the operations in the warehouse. A section that describes the characteristics of sodium cyanide, emergency organization, communication protocol, and emergency evaluation levels are included.

The scenarios are related to releases of wooden boxes and action plan includes specific response to these scenarios.

• Cyanide Spill
• Warehouse Fire
• Cyanide Poisoning
• Natural Disasters (Earthquake and Tsunami)

CUSA stores ended briquettes packed in presentation boxes and cylinders product. These packages are not OPEN during storage so no catastrophic atmospheric emissions are generated. In case of any release will be detect by HCN monitoring equipment.

The Plan considers releases during loading, CUSA does not perform dissolution operations.

CUSA Consider the following activities in the event of fire, which are, describe in the Plan Workers assigned to this work should have appropriate physical and psychological conditions to address the risk and effort to their duties require. Must also maintain and follow a training program and training in firefighting, the use of portable fire extinguishers PQS and systems firefighting foams.

CUSA stores ended briquettes packed in presentation boxes and cylinders product. The Plan has indications in case of rupture of boxes and cylinders

CUSA activities are not affect by power cuts and equipment failure, CUSA stores ended briquettes packed in presentation boxes and cylinders product.

CUSA not have activities where ponds, tanks and sewage treatment facilities are included. CUSA stores ended briquettes packed in presentation boxes and cylinders product.
The Plan establishes general and specific considerations for emergency scenarios cyanide operations, including the following general considerations are described below:

These instructions should be considered in any type of accident, either clash with vehicles, people, stationary items, fall and/or breakage of containers (container/packaging) of sodium cyanide.

The tasks of each brigade of emergency response are identified in the Plan. Additionally, cyanide store is just over 1 km from the nearest population center and has a peripheral wall 6 feet tall avoiding any contact with the inhabitants.

The Plan describes the use of sodium cyanide and first aid, additional staff is trained annually in the use thereof. The procedure is described first aid.

In the Plan actions in the case a spill occurs has specified actions to control of releases at their source.

In the plan the actions to be performed during a spill, CUSA set to Plan procedures and corrective actions will be reviewed after an emergency to prevent future releases.

### 5.2 PRODUCTION PRACTICE 5.2:

**INVOLVE SITE PERSONNEL AND STAKEHOLDERS IN THE PLANNING PROCESS.**

X in full compliance with

The operation is

☐ in substantial compliance with Production Practice 5.2

☐ not in compliance with

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

The operation is in FULL COMPLIANCE with Standard of Practice 5.2 requiring an operation involve site personnel and stakeholders in the planning process.

The Plan was developed by the Chief Safety - CUSA, the closest area is more than 1 km of the facility. According to the procedure for emergency response emergency in the worst case scenario will not affect more than one area within 100 meters radius and the evacuation of all personnel will be 500-meter radius.

CUSA does not have any nearby communities, the closest community is approximately 3 km away, however, CUSA sending letters indicating the cyanide storage activities, contact numbers and shipping Plan to be reviewed by the emergency support agencies and provide their comments and know the role of operations in case of an emergency. This activity was evident on charges of receiving letters and Plan that is save in CUSA.

CUSA informed the municipality of Callao, hospitals and firefighters, informing them of their operations and of their Emergency Plan, so that they can issue their comments.

The Plan includes a communications protocol in writing stating the emergency communication should be with all stakeholders; include Employees, the Client, Regulatory Agencies and other Institutions (Hospitals, Firefighters).

### 5.3 PRODUCTION PRACTICE 5.3
DESIGNATE APPROPRIATE PERSONNEL AND COMMIT NECESSARY EQUIPMENT AND RESOURCES FOR EMERGENCY RESPONSE.

X in full compliance with

The operation is □ in substantial compliance with Production Practice 5.3

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 5.3 requiring an operation designate appropriate personnel and commit necessary equipment and resources for emergency response.

The Plan includes the name of the individual members of those responsible for coordinating emergence and their roles and responsibilities.

The Plan identifies the emergency response teams that are the prominent cyanide operation staff.

All operational staff (8 people) are training in cyanide emergency response as if spilled cyanide may provide staff to assist with the emergency. The training is appropriate for emergency responders.

The Plan shows the contact information of all the Coordinators and Response Team Members (Committee of Crisis). This plan states that these members have been give phones must respond at all times (24 hours).

The responsibilities and duties of the Emergency Response Team describes the Plan.

Plan of emergency detailed the list of equipments detailing to be used and which were evidenced after field inspection.

Also specified in the Plan which is very important during storage operations have a set of equipment and materials that will allow them immediate emergency response.

The Plan and the “Loading, Unloading and Storage of Sodium Cyanide” Kit to provide that emergency response should be check before each operation with sodium cyanide (download / Storage space / load) and identified the absence of a team it must be replaced prior to the start of activities.

The Plan describes the activities of external support centers also in emergency appointment with the address and telephone numbers for quick contact in case of medical care can quickly evacuate those involved.

Reports of drills conducted, evidenced the presence of firefighters during the practices and private entities of second response of the carriers. Hospitals and firefighters, as well as interested parties, are invited regularly to provide comments during the simulation exercises.

5.4 PRODUCTION PRACTICE 5.4

DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with

The operation is □ in substantial compliance with Production Practice 5.4

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The operation is in FULL COMPLIANCE whit Standard of Practice 5.4 requiring an operation develop procedures for internal and external emergency notification and reporting.

The plan includes a communication protocol that includes internal communication functions, as well as notification to the authorities and external response personnel. The Plan includes a directory of internal and external contacts. It also displays the contact information of the entire team of internal and external response to emergencies; members of that team have telephones and are available 24 hours a day so it was verify after calls to these numbers during the visit.

There are no communities near the site less than 3 km away, however the Emergency Response Plan has been communicated to the municipality of Callao, firemen and hospitals so that they can provide the necessary support if requested.

5.5 PRODUCTION PRACTICE 5.5

INCORPORATE INTO RESPONSE PLANS AND REMEDIATION MEASURES MONITORING ELEMENTS THAT ACCOUNT FOR THE ADDITIONAL HAZARDS OF USING CYANIDE TREATMENT CHEMICALS.

X in full compliance with

The operation is

☐ in substantial compliance with

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 5.5 requiring an operation incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

The plan describes the methodology to decontaminate, remediate soil or other contaminated materials and dispose of all spill cleanup debris and bodies of water test for the presence of cyanide, the methodology described below. The methodology is appropriate.

In the Plan prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

Based on the Risk Assessment Matrix, there isnt potential to affect water bodies. None of specific scenarios rather think that a spill would reach the floor (warehouse and concrete patios are paved) or water. The monitoring is limited to the air and is carried out with detector gas cyanide (HCN) portable.

5.6 PRODUCTION PRACTICE 5.6

PERIODICALLY EVALUATE RESPONSE PROCEDURES AND CAPABILITIES AND REVISE THEM AS NEEDED.

X in full compliance with

The operation is

☐ in substantial compliance with

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The operation is in FULL COMPLIANCE with Standard of Practice 5.6 requiring an operation periodically evaluate response procedures and capabilities and revise them as needed.

The Plan needs to be updated at every opportunity there are changes in form and content, in terms of procedures, people, phone numbers, equipment, methods, or any other consideration to allow us to more effectively and efficiently. It should also be amended following comments during drills, emergencies, request any interested parties or at least one (01) once a year.

The site has an annual program of emergency drills including cyanide spill. A ONE (01) exercise held and consisted of cyanide spill in stock during the unloading of containers.

In The Plan specifies that should be review following comments during drills, emergency or at least ONE (01) once a year, we can fit the pages of signatures.
Alcance de certificación:
PROVISIÓN DE SERVICIOS DE CONSULTORÍA.
CAPACITACIÓN Y GESTIÓN DE RECURSOS HUMANOS.
MONITOREO OCUPACIONAL.

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