Cyanide Transportation
Summary Audit Report
For The
International Cyanide Management Code and
CONFINS TRANSPORTES Ltda./Brazil

www.cyanidecode.org

December 2016

The International Cyanide Management Code (hereinafter “the Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.
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
   Tel: +1-202-495-4020

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 signature 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.

Confins Transportes Ltda. / May 2017
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Name of Cyanide Transportation Facility: CONFINS Transportes Ltda.
Name of Facility Owner: CONFINS Transportes Ltda.
Name of Facility Operator: CONFINS Transportes Ltda.
Name of Responsible Manager: Henrique Siqueira Almeida
Address: Rua Palmeiras 101 – Bairro Santo Antonio – Betim – Minas Gerais- Brazil
CEP 32684-170
Country: Brazil
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E-Mail: henrique@confins.com.br

Location detail and description of operation:

The CONFINS Transportes operation is focused on the road transportation of cyanide for gold mining operations, without interim storage. The operation is located at Betim town a city located in Minas Gerais, in southeast Brazil. It is 30 kilometers far from Belo Horizonte the capital of the state of Minas Gerais. The access is by a very good-asphalted road. CONFINS Transportes transports solid cyanide from the Port of Santos (São Paulo State) to Yamana Gold mine located at Pilar de Goias at Goias State). The operation has a SHEQ management system certified in accordance to SASSMAQ protocol, established by ABIQUIM - the Brazilian Chemical Industry Association. Evidenced Conformity Certificate number SAS – 6 n which ABNT (Brazilian Technical Standards) grants the Certificate of Conformity Assessment System of Health Environmental and Safety Quality to CONFINS Transportes implemented for the following activity - Road Transportation of chemical products. Evidenced in the unity located in Rua Palmeiras 101 Santo Antonio 32684 – 170 Betim MG – Brasil meeting the requirements of the Standard Manual SASSMAQ 2014 concession dated on October 21,2015 validity period until October, 21, 2017.

[Signature]

Luiz Eduardo Ferreira
May, 2017
SUMMARY AUDIT REPORT

Auditor's Finding

This operation is:

X in full compliance
☐ in substantial compliance *(see below)
☐ not in compliance

with the International Cyanide Management Code.

During the previous three years certification cycle, CONFIN S Transportes Ltda. did not experience any significant cyanide related incidents nor any compliance problems related to cyanide transportation management.

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

Auditing Company: Ferreira & Cerqueira Ltda.
Audit Team Leader: Luiz Eduardo Ferreira (ICMI qualified lead auditor and transportation qualified TEA (technical expert auditor)).
E-mail: luizeferreira2015@gmail.com
Names and Signatures of Other Auditors: not applicable
Date(s) of Audit: 30/05/2017–01/06/2017 (on-site) and 25/06/2017 (off-site)

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.

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

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

X in full compliance with

☐ in substantial compliance with Transport Practice 1.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CONFINS Transportes defined, documented and implemented internal documented procedure IT – OPPr – 011 rev. 01 - Transporte terrestre de cianeto de sodio which provides methodology to identify and select appropriate and safer routes to transport the cyanide from the port of entrance (Santos port) in Sao Paulo State until the mining operations of Yamana Gold located in Pilar de Goias at Goias State. Evidenced that CONFINS Transportes selected one main route and alternates are established when necessary. Evidenced that all drivers comment the road conditions after the cyanide transportation. Evidenced that the selection of route process considered parameters such as the population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, policy stations, emergency stations, hospitals, communication, shadow areas for communication), the condition of the route (under maintenance, holes, without asphalt), weather conditions (such as fog, fire, rain) and surface waters (rivers, creeks, lakes). Records of selected routes evidence that the selection of routes was performed as required by ICMI Cyanide Code. All above mentioned routes are asphalted and only internal way of property of Yamana Gold is not asphalted). The process of updating of selected transport routes is performed using review of reports of drivers after each cyanide transportation. Observed that CONFINS Transportes identified and evaluated all the hazards and risks risks related to the selected routes mentioned in above-mentioned item 1.1 Sampled examples were: Population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, policy stations, emergency stations, communication, hospitals, shadow areas for communication), the condition of the route (under maintenance, holes, without asphalt), weather conditions (such as fog, fire, rain) and surface waters (rivers, creeks, lakes), fog formation trend, number and length of bridges, saw snippets, amount and scope of dangerous curves, ease or difficulty to meet in an emergency which were clearly identified in the route record. .

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Several controls such as all vehicles are equipped with tachograph (speed limit), driver qualification and training, truck monitoring, maintenance, pre-traveling brief with the driver, planned transport observations, full time monitoring of the truck from a remote station related to cyanide risks analysis limited traveling time in accordance with Brazilian Law 13.103 dated on March 02, 2015, were implemented by CONFINS Transportes in order to mitigate the risks related to the selected routes. Besides, CONFINS Transportes uses a tool named Analise Preliminar de Riscos (Previous Risks Analysis) before each transportation of dangerous products. The Integrated Management System Manager provides all necessary informations for the drivers. CONFINS Transportes constantly evaluates the conditions of the selected routes. In the end of each travel, the driver records on Formulario de Rotograma his perceptions about the route conditions. This travel report is reviewed by the operations officer Jefferson and by the EMS manager Kenia Natalia. When necessary, the route plan is updated and the risks re-evaluated. Track traffic conditions, points allowed to stop and overnight, authorized supply points, places with sharp curves, places with winding track uphill and steep slopes, bridges and rivers, risk of accidents, checkpoints, locations requiring special permits for transit, allowed speed for trucks, pedestrian crossing sites, local animal risk on track, emergency telephones of the places, population data are considered to select pertinent routes. The travel plan identifies all existing risks at the routes. Evidenced that CONFINS Transportes defined and documented internal documented procedure IT - OPR - 011 "transporte terrestre de cianeto". It addresses risks along the selected routes for driver training and as a reference. Evidenced through reviewing pertinent records of training, that drivers are trained in that procedure IT – OPR – 011 and consequently in solid sodium cyanide transport routes risks. Evidenced record of training of drivers duly established and maintained... Evidenced during the audit field that drivers have in their vehicles copies of updated versions of transport routes. Noted that before each travel, the drivers have to prepare the record identified as Inspecao de veiculo de transporte de produtos quimicos in accordance with Brazilian regulations - Decreto Federal 96044, and Portaria 204. Check lists used identify PPE - Personnel Protective Equipment, and Fire Extinguer conditions, documentation, of drivers, documented procedures such as Emergency Attendance Plan, identification and number of truck, safety placards, capacity truck, UNO number, emergency kits, safety equipment, driver data, product vendor data, observations and signature of the responsible. CONFINS Transportes when necessary, contacts the Brazilian Federal Road Policy, the tracking contractor (SAS CAR Telemetria), the road administration contact (Concessionaria das Rodovias Centrais do Brasil, Auto Pista Fernao Dias, Concessionarias PMARS, Ecovias dos Imigrantes) in order to define the route and avoid potential problems along the selected route.

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and overnight, authorized supply points, places with sharp curves, places with winding track uphill and steep slopes, bridges and rivers risk of accidents, checkpoints, locations requiring special permits for transit, allowed speed for trucks, pedestrian crossing sites, local animal risk on track, emergency telephones of the places, population data are considered to select pertinent routes. CONFINS Transportes defined and documented internal documented procedure PO-09—"Planejamento de rota". Evidenced by the respective records of training, that drivers are trained in that procedure PO-092 and consequently in solid sodium cyanide transport. CONFINS Transportes, when necessary, contacts the Brazilian Federal Road Policy, the tracking contractor (Auto Track), the road administration contact (Via Dutra, Auto Pista Fernao Dias, Ecovias Anchieta – Imigrantes and Concessionaria BR 040) in order to define the route and avoid potential problems along the selected route. CONFINS Transportes has a 24 hours monitoring of trucks by Auto Track Systems. Due to good road transportation conditions it is not used convoys since the risk analysis indicates that is not necessary this type of control. All the cyanide transport activity is performed by the operation own drivers and trucks.

Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

X in full compliance with

☐ in substantial compliance with Transport Practice 1.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that CONFINS Transportes established, implemented and maintained internal documented procedure IT-OPR-011 item 5.5 identified as Programa de Instrucao e Desenvolvimento Continua which defines how to identify training needs, planning, providing and recording training, activities. Internal documented procedure PO-REH-002 – Training and development which establishes that all new employee has to do an induction training being instructors the Work Safety technical and The Integrated manager.

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all cyanide involved personnel has to be trained about risks related to cyanide before perform activities with this chemical product. CONFINS Transportes only uses trained and licensed drivers as required by the applicable legislation for the transport of dangerous products including solid sodium cyanide. Evidenced the material used for training cyanide-involved personnel, which was issued by Yamana Gold. It includes – safety handling of cyanide, chemical and physical properties, first aids related to cyanide, Protective Personnel Equipment – PPE, packaging conditions of solid cyanide, international labeling of cyanide, marine pollutant from cyanide, production of cyanide, stability of cyanide, types of cyanides, toxicology related to the cyanide, exposition levels to HCN and consequences, first aids, how to treat areas cyanide-contaminated., protective masks and internal documented procedures of Confins Transportes related to handling and transportation of solid cyanide. cyanide trucks drivers have a specific driving license type " AE".Evidenced " Carteira Nacional de Habilitação " – CNH providing evidence that all drivers have this license type AE. Brazilian Resolução CONTRAN 168 dated on December 14, 2004 establishes that truck drivers of dangerous products shall have training in "MOPP – Movimentação Operacional de Produtos Perigosos". Reviewing pertinent training records evidenced that all drivers of CONFINS Transportes that conduct NaCN have this training. Beyond this legal requirement,CONFINS Transportes established health requirements to the drivers, psychological evaluation, education requirements and experience, defensive driving and provides annual refresh training, including first aid and emergency procedures related to cyanide and driver's operation manual. Evidenced that CONFINS Transportes uses an electronic tool in order to manage the validity licences of all drivers, The annual refresh trainings performed were implemented as stated.. Sampled examples were – Training about Risks evaluations related to cyanide transportation for the drivers. Also evidenced that the drivers received a specific training on the route that is used to transport cyanide (route training).CONFINS uses its own employees and trucks perform all cyanide transportation.
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:

Evidenced that CONFINS Transportes uses twenty and six trucks for transportation of solid sodium cyanide. The maximum load capacities are: clearly identified. Evidenced that CONFINS transportes has an efficient management of maximum load for each truck. Evidenced that trucks have lockers, with wall and specific to transport containers. Truck licenses are updated as required. According to the Brazilian legislation all trucks used to transport chemical products shall be inspected by a public authority in order to be approved to transport such kind of products. Evidenced that all trucks are licensed as required. Records of periodic inspections were reviewed and provided evidence that CONFINS Transportes only uses equipment designed and maintained to operate within the loads defined, in accordance with Brazilian regulations laws. E evidenced that CONFINS Transportes established internal documented procedure PO = MAN - 001 Gerenciamento da manutencao da Frota It is defined how it is planned and managed maintenance activities in Confins.Transportes. There are two types of maintenance such as preventive and Corrective Maintenance. For this pour pose it is defined Maintenance Plans which are controlled by the Electronic Agenda named Autumn and pertinent check lists and Service Orders for maintenance. Responsibilities and authorities are duly defined and documented. For external maintenance it is used only pre qualified services suppliers. CONFINS Transportes defined criteria for evaluation, selection and re evaluation of maintenance services. It is used only approved suppliers which are included in Approved Vendors List. It is defined that monthly all vehicles are inspected in order to detect eventual problems. An complete verification items are defined such as electrical components, mechanical components, oil and water, safety items conditions, general aspects, documentation and eventual others items.
As results of such inspections it is defined the needs of opening or not OS – Service Orders for maintenance. This check list is named Check list de inspecção do veículo de frota; Agregado and is is signed by both driver and maintenance people. Evidenced duly implemented as stated, it defines the methodology for preventive maintenance. It is required that preventive maintenance are performed by mileage in accordance with the required by the truck manufacturer.

Evidenced that CONFINS Transportes implemented preventive maintenance as required. CONFINS Transportes uses an efficient electronic control in order to prevent overloading of the transport vehicle being used for transportation of cyanide. Besides this control internal documented procedure PO - OPR 002 Controle Operacional establishes that the drivers shall review the transportation documentation in order to verify the cargo weight and confirm that the truck is capable to transport. According to Brazilian transport legislation, there is a maximum load capacity allowed per truck to transit in the roads. There are control points along the route to verify the cargo weight (weight stations) and to review the cargo documentation. Control points along the roads issue an weight record that is brought to the company with the transport documentation. Pertinent records provide evidence that CONFINS Transportes has been duly implemented controls in order to prevent overloading.

The operation uses its own drivers and equipments and does not subcontract any transportation service.

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

- X in full compliance with
- [ ] in substantial compliance with Transport Practice 1.4
- [ ] not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that CONFINS Transportes have handling and inspection procedures as necessary to ensure that the cyanide is handled and transported in a manner that maintains the integrity of the producer’s packaging. It is defined the use of check list in order to verify that cyanide is transported in such way that ensures the integrity od the producers packaging. Evidenced duly implemented. During the audit procedures were reviewed and it was found the proper implementation thereof. Inspection records were checked and provided evidence that such inspections were carried out as required. Equipment operators were interviewed and provided evidence of compliance with this provision.

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Reported that The Chemours Company FC LLC cyanide boxes are transported in certified containers that are sealed after the loading activity at Brasil Santos terminal (Port of Santos). The container is unsealed when arrives at the mine operation. According to the Brazilian legislation, the truck shall have, in four sides, standard placards indicating the nature of the chemical product being transported. The presence of such placards are verified before each travel and the results are recorded in a specific checklist. Evidenced during the field audit that the trucks have the required placards (signage). CONFINS Transportes defined and documented PO – OPR- 002 Controle Operacional - A vehicle inspection program of the truck before each journey, including the inspection of the truck, the inspection of the emergency resources, the inspection of the communication and tracking system, the inspection of the tachograph, the inspections of the PPE- personnel protective equipment, the verification of the driver and cargo documentation. Evidenced inspection records as stated. Verified that CONFINS Transportes implemented an effective preventive maintenance program for its trucks in accordance with truck producers requirements. The preventive maintenance are performed by a qualified Company. The operation defined a maximum driving time of 10 hours, including one hour for lunch and a 30' rest every 4.5 hours of driving. In accordance Brazilian regulation laws. The driver is not allowed to drive at night. The working hours is controlled through the remote tracking station named SAS CAR. Evidenced during the field audit that this procedure is duly implemented. The truck is specifically designed to transport containers and it has pin lockers, that are inspected by the driver before each journey, and prevent the containers from shifting. Evidenced during the field audit duly implemented. In accordance to the operation safety policies and the driver's operation manual, in the event of stormy or hard rain, wind conditions, ice rain, the transport activity shall be stopped or even not allowed to begin. Evidenced that all this matters are defined and documented in the internal documented procedure IT – OPR – 11. Interviewed drivers should to be aware of the above mentioned. CONFINS Transportes designed and implement a drug & alcohol policy, accepted by all drivers, in which all the drivers before the beginning of a journey pass through an alcohol detection test and each three months the drivers pass through a drug detection test. Besides before each cyanide transportation the drivers are submitted to alcohol and drug tests. Evidenced records of alcohol and drugs tests duly implemented as required.

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Evidenced that CONFINS Transportes defined and implemented a process to manage all records related to its activities. All requested records were promptly retrievable and are adequately maintained by the operation, as previously mentioned. The operation does not subcontract any handling or transport activities.

_Transport Practice 1.5:_ Follow international standards for transportation of cyanide by sea and air.

The operation is

- [x] in full compliance with
- [ ] in substantial compliance with Transport Practice 1.5
- [ ] not in compliance with

_Summarize the basis for this Finding/Deficiencies Identified:_

This transport practice is not applicable to the operation scope. This TP 1.5 is not applicable to the operation scope, due to the fact that it transports cyanide only by truck (road transportation).

_Transport Practice 1.6:_ Track cyanide shipments to prevent losses during transport.

The operation is

- [x] in full compliance with
- [ ] in substantial compliance with Transport Practice 1.6
- [ ] not in compliance with

_Summarize the basis for this Finding/Deficiencies Identified: (Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided)._
The transport vehicle is provided with tracking systems (on board computer), using GPS signal (supplied and managed by SAS CAR). The driver is also equipped with a fast dialing mobile phone. Evidenced during the field audit duly implemented. The communication system (GPS, mobile phone, radio, pager) is periodically tested to ensure it functions properly. The tracking system has no blackout areas. Evidenced during the field audit and through interviews with the drivers. As previously mentioned, the truck is monitored 100% of the time, by a remote control station, by the operation headquarters and the tracker provider. The transport vehicle is provided with tracking systems (on board computer), using GPS signal (supplied by SAS CAR System CONFINS Transportes) defined and implemented a chain of custody records management, according to the Brazilian law. The documentation is verified prior to the transportation and before the unloading at the mine operation. Verified during the field audit duly implemented. The transport documentation clearly identifies the amount of cyanide being transported and the product MSDS is part of this documentation. The operation does not subcontract any handling or transport activities.

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

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

- X in full compliance with
- □ in substantial compliance with Transport Practice 2.1
- □ not in compliance with

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

This principle is not applicable to the operation scope because the cyanide cargo is transported straight from the entrance Port to its final destination, the mining operation. During the transport, the truck is monitored 100% of the time and stops, at night, only allowed at pre-evaluated and approved stations along the route. The tracking system also blocks (remote turn-off) the truck engine if something different from the planned script (travel plan) occurs. Verified the track system records as well as the tachograph records.

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3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities

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

The operation is

X in full compliance with
□ in substantial compliance with Transport Practice 3.1
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that CONFINS Transportes has two Emergency Plans. The first one named PAE – Plano de Atendimento a Emergencial for the transportation of dangerous products issued by Edna Maria Ribeiro Candido and approved by Kenia Natalia de Paulo Ferreira dated on February 15, 2017 and the other one is Emergency Training dated on September 29, 2015 also issued by Edna Maria Ribeiro Candido and approved by Kenia Natalia de Paulo Ferreira. CONFINS Transportes Emergency Response Plans was developed for the specific circumstances and was verified that the emergency plans are appropriate to the specific cyanide transportation routes, and transport practices. The risks associated to the selected routes were identified and evaluated and the emergency response plans are focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes. Evidenced that the plans are specific for the transportation of solid cyanide. Noted that the plans are specific for the road transportation of cyanide, by truck (flat platform truck, with pin lockers, specifically designed to transport metallic sea containers). Evidenced that the Plans consider the specific conditions of the selected routes and the risk analysis performed for the selected routes. As previously mentioned, the risks associated to the selected routes were identified and evaluated. The emergency response plan is focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes.

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The plans are specific for the truck configuration being used to transport the cyanide (flat platform truck, with pin lockers, specifically designed to transport metallic sea containers). The plans describe the specific response actions that shall be applied to each emergency situation, such as accident with fire, fall into a river, cyanide leakage on a rainy day, among other specific emergency scenarios. Evidenced that the emergency plans describe the roles of several stakeholders that should be involved in the emergency response, such as road policy, emergency responders and rescuers, first aid stations along the route, reference hospitals, and environmental authorities.

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

- X in full compliance with
- □ in substantial compliance with
- □ not in compliance with

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

Evidenced that CONFINS Transportes provided emergency training for drivers, coordinators, emergency response members. Evidenced records of emergency response trainings duly established and maintained. Evidenced that mentioned Emergency plans include and clearly define the specific emergency response duties and responsibilities of involved personnel. All emergency related materials are listed in the Driver’s Manual item 12.1 and are checked before each travel. Evidenced duly implemented. The driver’s manual defines the required emergency equipment that shall be available at the truck, such as face mask, gloves, flashlight, signage, fire extinguishers (ABC type), rubber boots, safety helmet and glasses, overall Tyvec, antidotes, brush, cords, MgO powder and plastic blankets. The emergency kit is inspected before each travel. Evidenced that the required emergency equipments are in accordance with Brazilian Standard NBR 9736. Annually CONFINS Transportes provides initial and refresh training. The emergency kit is inspected before each travel. Evidenced records of emergency kit inspections duly established and maintained as required. The operation does not subcontracts any handling or transport activities.

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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:

Evidenced that "Manual do Motorista – issued by CONFINS Transportes dated on September 27, 2015 defines the methodology for notification of appropriate parties/stakeholders in the event of a cyanide release or exposure during transport. It is available to all entities that may need to use them, and therefore they are included in the Emergency Response Plan – PAE. The entities requiring notification are clearly identified in the Emergency Response Plan – PAE as having designated roles in the response such as road policy, the cyanide producer, the cyanide buyer, hospitals, first aid stations along the route, environmental agencies, emergency responders, Brazilian chemical association. Emergency contact information are also available at the truck doors (stickers) and at the truck chassis (stickers also). This information is kept updated. Sampled examples were: "Corpo de Bombeiros", - 193, Policia Militar – 190 "Road Federal Police – 190, Civilian defense – 199, SSMA Sao paulo – 11 31333000, SSMA Rio de Janeiro – 21 22933293, SSMA Minas Gerais 31 32986200, Espirito Santo – 27 31363444, Yamana Gold 62 33933300 During the field audit was verified for proper implementation and updating of information related to emergency notification. Reviewed PAE – Plano de Atendimento Emergencial para Situações no Transporte de Cianeto de Sódio" issued by CONFINS Transportes.

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

Summarize the basis for this Finding/Deficiencies Identified:

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Evidenced that Emergency Plan and Driver Manual both of them issued by CONFINS transportes clearly define the remediation procedures that shall be applied in the event of cyanide related emergencies. The disposition of contaminated residues is defined in accordance Brazilian Environmental Laws. CONFINS Transportes has contract with SUATRANS a commercial chemical remediation company to provide this service to the transporter which is clearly identified in CONFINS Transportes Emergency Response Plan so SUATRANS can be activated as soon as practical. Evidenced that the mentioned plans clearly define that chemical products, such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide, are prohibited to be used in the event of solid cyanide releases in surface waters along the route.

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

X in full compliance with

☐ in substantial compliance with  Transport Practice 3.5

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that CONFINS Transportes defined and documented that annually reviews and revise (if necessary) their emergency plans as well as also planned, on an yearly basis, several simulation activities related to their emergency plans, including one specific exercise in conjunction with the emergency responder expert, SUATRANS. Evidenced that CONFINS Transportes plans and implement mock emergency drills, related to its emergency plans and in conjunction with the emergency responder expert. Reviewed emergency drill plans for 2016 and 2017 (in conjunction with SUATRANS), including the participation of external stakeholders, such as Brazilian Federal road policy, road administration rescue team, local firefighters). Evidenced that CONFINS Transportes after the emergency drills, review the drill result and, when applicable, the emergency plan is revised and updated. Sampled examples were: Emergency drill reports performed on December 26, 2016 and April 28, 2017

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