

*DINET PERU, S.A.*

*Cyanide Code Principle 2  
Transportation Audit*

*Summary Audit Report*

*PROJECT NO. 0131417*

*JULY 2011*

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# SUMMARY AUDIT REPORT

## 1 GENERAL SUMMARY

### 1.1 INFORMATION ON THE AUDITED OPERATION

Name of Cyanide Transportation Facility: Dinet Peru S. A.  
Name of Facility Owner: Dinet Peru S. A.  
Name of Facility Operator: Dinet Peru S. A.  
Name of Responsible Manager: Claudia Solis  
Address: Av. Alejandro Bertello Nro. 551,  
State/Province: Callao Country: Peru  
Telephone \_\_\_\_\_ Fax: E-Mail: \_\_\_\_\_

Location detail and description of operation:

Dinet Peru S.A. (Dinet) is a company specialized in the transport and storage of hazardous materials (chemical substances and solid waste). Dinet plans to provide sodium cyanide transportation services for the mining industry.

Dinet will collect the cyanide directly at the port facilities or from storage facilities; the cyanide can be transported in iso-tanks or ocean containers.

**This pre-operational audit comprises the ground transportation operations from the moment the port or the storage facility releases the cyanide for its delivery to the client's facility.**

Cyanide will be received from the manufacturer or the storage facility in either of the following packaging presentations:

- Poly-propylene super-sack filled up to 1 ton and placed inside a wooden box.
- Tuff-pack of 48 kg, 20 of this packs are placed inside a wooden box.
- 30-gallon metallic drums; four per pallet and plastic wrapped

No less than 20 boxes or 165 drums are placed in a standard 20-foot shipping container. The exact number of boxes or drums placed in each container serves to prevent lateral movement of the boxes within the container where drums are fastened with belts when transported. The containers will be received locked and tagged. These tags will be only removed at the user's site.

### 1.2 OVERALL AUDITOR'S FINDING

This operation is

- in full compliance
- in substantial compliance \*(see below)
- not in compliance

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with the International Cyanide Management Code.

- \* 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.

Audit Company: ERM Mexico, S. A. de C. V.

Audit Team Leader: Juan Carlos Rangel Lopez E-mail: [juancarlos.rangel@erm.com](mailto:juancarlos.rangel@erm.com)

Names and Signatures of Other Auditors: none

Date(s) of Audit: 12-13 May 2011

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

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

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### 2 DINET'S ROLE AS CONSIGNER

This operation is

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

with the International Cyanide Management Code.

#### **2.1 TRANSPORT:**        *TRANSPORT CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTS AND RELEASES*

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.1
- not in compliance with

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

Dinet has prepared a Transport and Distribution Manual; section 24.8: Policy - Transport and Distribution of Sodium Cyanide, (Dated on 26 January 2011, rev. 1.0), which requires selecting and evaluating the route (the possible one). This evaluation will be registered on a route sheet. Dinet's Safety Chief will participate in the routes evaluations. According to Dinet's procedures, when more than one alternative route is available, the route with the smaller risk will be presented to the client for approval.

The following road characteristics will be considered during the route evaluation: number of lanes, crossed water bodies, transited populated areas, environmentally sensitive areas, wires crossing the road (telephone, electricity, etc.), tolls, service stations, rest and food locations, road conditions, signaling, presence of police stations, speed limits, and weather conditions.

Section 2.8 "Physical Review of the route and risk evaluation" of the Manual, establishes that the routes must be physically evaluated. This evaluation consists of inspecting the route using the route sheet and risk analysis records.

This manual also includes a risk analysis considering the following aspects: traffic density, population, sensitive stage, bridges, water bodies, climate, altitude, condition and design of the road, turnouts, junctions, and socio political conditions. Based on the route inspection, a risk

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assessment is performed. The assessment is documented in the route sheet where the route is divided in sections considering crossings of urban areas, intersections with other roads, and other key points (e.g. bridges, or urban centers). Each section is assessed for each of the route safety criteria mentioned and, based on these, a risk ranking is used (A for areas where there is the possibility for frequent and repeated incidents, to E where there is no possibility for an incident to take place).

Based on the route sheet, incident scenarios are selected and their consequences are assessed in qualitative criteria. Consequences are graded from I (critical consequences, e.g. death) to minimal. And the risk is then given a grade (high moderate, and low). When the grade is high prevention and attenuation measures will be recommended to reduce the risk.

The Manual establishes that the convoy leader must prepare a report for every transport operation. Furthermore, as previously mentioned, the Manual establishes that the route sheet will be updated when relevant changes or conditions that could represent a risk to the transport are registered on the operation report prepared by the convoy leader or at least on an annual basis.

As previously mentioned, the risk assessment includes mitigation measures for the selected scenarios to reduce the risk. Furthermore, preventive measures have been established in the Emergency Plan including procedures to prevent accidents when driving through bridges, dangerous turns, narrow roads, steep slopes, as well as instructions to face mechanical failure in one of the convoy units, or social unrest or weather conditions.

As part of the physical review of routes the transporter identifies nearby communities and governmental agencies for example: policemen and firemen stations, medical centers, etc. Additionally, Dinet will send a letter to these agencies prior to the first shipment notifying the transport activity, providing the cyanide's MSDS and an email address to receive feedback. This letter will be subsequently re-sent on an annual basis.

According to the routes specific Emergency Response Plan, when Dinet transports hazardous materials (including sodium cyanide); the transport is conducted in convoys with an escort vehicle. The convoy will be conformed to a maximum of five units, one escort vehicle for every three units, and two safety supervisors for each escort vehicle.

As previously noted, Dinet will send a letter to the policemen and firemen stations and medical centers identified during the route assessments, a copy of the Emergency Plan will be also provided with the previously mentioned letter.

According to its subcontractor selection procedure, Dinet will only subcontract other transporter when their client's service demand would overcome their capacity. The procedure also establishes that the subcontracted transporter must be certified under the Cyanide Code by ICMI, and that the transporter must follow the route selected by Dinet and that the transporter has performed a redundant assessment of the route.

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### 2.1.2 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.

The operation is

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

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

The Manual establishes the following requirements for the drivers:

- Have compatible health for the work to be performed.
- Appropriate driver's license that enables them for the type of truck to be used.
- Drivers must be trained in defensive driving, first Aid, firefighting, HAZMAT level II, and sodium cyanide handling and emergencies response (cyanide spillage and poisoning).

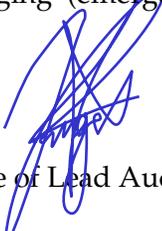
Dinet has prepared a training program which includes the following courses to be lectured on an annual basis:

- For drivers
  - First aid,
  - Defensive driving,
  - Fire fighting,
  - HAZMAT level II (basic operations)
  - Sodium cyanide handling (emergency and poisoning)
  - Training in Emergency Response Plan for the Transport of Cyanide of Sodium.

For convoy leaders:

- First aid,
- Defensive driving
- Fire fighting,
- HAZMAT level II (basic operations) and HAZMAT level III (for supervisors).
- Sodium cyanide safety managing (emergency and poisoning)

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- Training in Emergency Response Plan for the Transport of Cyanide of Sodium

Furthermore, in order to ensure the success of the training program and the emergency response, Dinet and the user companies have approved an annual drills program, which will include programmed and unexpected drills.

According to its subcontractor selection procedure, Dinet will only subcontract other transporter when their client's service demand would overcome their capacity. The procedure also establishes that the subcontracted transporter must be certified under the Cyanide Code by ICMI.

### **2.1.3 Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.**

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.3
- not in compliance with

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

Dinet will lease the transport units (Trucks: International 7600 6x4 and trailers RMB Sateci). The lease contract establishes that the preventive and corrective maintenances of the units will be performed by the owner according to the manufacturer recommendations. The owner provides copies of the maintenance orders to Dinet which are kept in the unit file.

Dinet keeps a preventive maintenance plan based on the current worked hours for trailers and mileage for trailers and the hours/kilometers to the next service.

Additionally, Dinet personnel performs an inspection of the trucks prior to authorize their use in the next service, the inspection includes electrical elements (basically lights), mechanical system (oil and coolant levels, breaks, air bags, and tires among others). The trailer is also reviewed including lights and mechanical system (breaks, suspension system, tires, among others). Another inspection is performed prior and after the transport operation including the following items:

- Breaks
- Oil level
- Air conditioning system
- Alternator
- Battery
- Horn
- Compressor
- Steering system
- Clutch, mirrors

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- Wind shield cleaner,
- Tools
- And other 69 elements of both the truck and the trailer.

The checklist is used to identify elements that need attention from the maintenance department.

Moreover, in order to comply with the Peruvian legislation regarding hazardous materials and waste transportation, all the units (truck and trailer) are inspected on an annual basis by mechanical workshops authorized by the "*Ministerio de Transporte y Comunicaciones*" (MTC - Transport and Communications Ministry).

The section 24.8 of the Manual, states the responsibilities of the convoy leader that includes, conduct an inspection of the truck before being loaded, together with the driver. During this inspection also couplings and labeling are reviewed to ensure that the unit is suitable for the trip.

Dinet does not have trucks with the capacity to haul two trailers together and its trailers can only carry one 20 feet container. To prevent over loading, Dinet has established in their Manual that the convoy leader will review the bill of lading issued by the supplier and confirm that the total weight does not exceeds the truck and trailer capacity.

As previously mentioned, Dinet will only subcontract other transporter when their client's service demand would overcome their capacity. The procedure also establishes that the subcontracted transporter must be certified under the Cyanide Code by ICMI. Dinet will request the subcontractor an operation report which will contain the truck and trailer inspection checklists implemented by the subcontractor.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.4
- not in compliance with

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

The solid sodium cyanide will be received in the packaging modalities described in Section 1 of this report; which includes locks and numbered tags. According to Dinet's procedures; the drivers are not authorized to open the container and, therefore, they cannot alter the integrity of the packaging.

The Transport and Distribution Manual establishes that prior to the operation, the unit will be inspected. The inspection will include confirmation of the presence of placards with the UN number and the hazardous materials division.

The Manual establishes that the convoy supervisor must perform an inspection of each unit prior to each transport operation. This revision will be documented in a checklist.

Dinet has a maintenance procedure in the Manual of Transport and Distribution (Section: 15.6, dated on 01 October 2008), that establishes the different actions on preventive maintenance that must be performed to each truck and trailer based on the mileage traveled by the unit. This is described in further detail in Section 2.1.3 of this report.

Section 4 of the Manual establishes that the drivers must have at least a resting time of eight (08) hours before starting a new transport operation, and that they have two rest for two hours after driving four hours, and that after the twelve working hours the driver must rest eight hours. Additionally, the Manual also establishes that cyanide transport is only allowed in day time, which further limits the driving hours.

As previously noted, the number of drums or boxes in a container was established to prevent load movements within the containers. Dinet will not have the opportunity to confirm this for every container; however, they have prepared procedures to prevent incidents during the transport including driving through dangerous curves/turns, steep slopes, etc.

According to the Manual, the convoy leader has the authority to stop the convoy when weather conditions or civil unrest are faced. Additionally, the Manual establishes the criteria to select the non-planned stop locations to prevent accidents while the trucks are parked and procedures to follow when these conditions are faced.

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The Manual of Transport and Distribution comprise an Alcohol and Drugs Policy that establishes that the consumption of alcohol and drugs is totally prohibited before, during, and after the transport. It also requires the employees to notify the use of any medication to confirm that it would not affect the driver performance. Additionally, at the beginning of each journey, the convoy leader will perform an alcohol breath test to each driver and supervisor and this will be recorded in the operation report.

The Manual has a section with the records that must be kept as a result of the cyanide transport operations. The section also establishes the format (electronic or paper) in which the record must be kept.

As previously mentioned, Dinet will only subcontract other transporter when their client's service demand would overcome their capacity. The procedure also establishes that the subcontracted transporter must be certified under the Cyanide Code by ICMI. Dinet will request the subcontractor an operation report which will contain the truck and trailer inspection checklists, the alcohol-test results, and the hours drove per day.

**2.1.5 Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.**

The operation is

**THIS PRACTICE DOES NOT APPLY TO THE OPERATION**

- in full compliance with
- in substantial compliance with Transport Practice 1.5
- not in compliance with

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

As described in Section 1, the scope of this audit was only for the ground transportation operations performed by Dinet, therefore this practices is not applicable.

**2.1.6 Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.**

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 1.6
- not in compliance with

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

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According to the Emergency Response Plan, as part of the emergency equipment for sodium cyanide transport, all the drivers will be equipped with cell phone and radio. The convoy leader will also have a satellite telephone.

Communication equipment will be reviewed prior to the departure of the convoy; this inspection will be registered in the vehicle checklist.

The cell phone coverage service provided by different companies is assessed during the route selection and the trip updating. In order to ensure communication availability in blackout areas, the convoy leader is provided with a satellite phone.

As established in the Manual, during the transport operations the convoy leader will inform via telephone to the Control Office Head of the convoy progress and will report any event that may cause the convoy to stop. If necessary, the information obtained will be sent to the client via email, as soon as possible.

As required by local regulations, a bill of lading will be issued by Dinet which will include the number of the container and the net content. Additionally, the cyanide supplier issues its own bill of lading including the same information and the tag number. Both bills of lading will be carried by the driver at the unit.

According to the Manual, the bill of lading and the MSDS will be carried by each driver. This will be confirmed by the convoy leader through the vehicle inspection checklist.

As previously mentioned, Dinet will only subcontract other transporter when their client's service demand would overcome their capacity. The procedure also establishes that the subcontracted transporter must be certified under the Cyanide Code by ICMI. Dinet will request the subcontractor an operation report which will contain the truck inspection checklists (documenting the review of the communication equipment and availability of a satellite phone) implemented by the subcontractor. Dinet will also ask the subcontractor to inform of the progress of the convoy by telephone or email on a frequent basis.

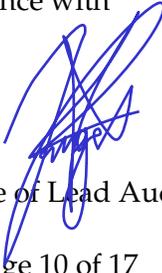
### **2.2 2. INTERIM STORAGE: DESIGN, CONSTRUCT AND OPERATE CYANIDE TRANSSHIPPING DEPOTS AND INTERIM STORAGE SITES TO PREVENT RELEASES AND EXPOSURES.**

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

The operation is:

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

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

The scope of this audit did not include interim storage.

### **2.3 EMERGENCY RESPONSE: PROTECT COMMUNITIES AND THE ENVIRONMENT THROUGH THE DEVELOPMENT OF EMERGENCY RESPONSE STRATEGIES AND CAPABILITIES**

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 3.1
- not in compliance with

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

Dinet has prepared an Emergency Response Plan for sodium cyanide transport. This is a detailed document of approximately 51 pages (excluding annexes) that includes: general information on the company; the organizational chart; responsibilities for the cyanide supplier, for the mine, for the transporter, and external responders; the route risk assessment, and instructions for the specific scenarios identified.

According to the reviewed Emergency Response Plan, Dinet only performs first response consisting of isolating the area, chemical containment, and initial communications. Second response (spill clean up) responsibilities are for the suppliers or the mine (depending on the arrangements for each route); however, Dinet personnel can participate and provide support on clean up activities.

The Emergency Response Plan includes the route assessments (for active routes in Annex B) and instructions to respond to the different scenarios identified, including actions to be taken and material requirements.

The plan includes in section 8 a two pages summary of the sodium cyanide. The spill response procedure are for sodium cyanide in briquettes, which is the only modality transported by Dinet.

The reviewed plan includes emergency scenarios related to ground transportation of sodium cyanide in briquettes transported within ocean containers.

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As previously noted, the plan includes in Annex B the route sheet and the route risk assessment which includes the identification of the road conditions and characteristics (steep slopes, curves, bridges, traffic intensity) in different sections of the route. The route risk assessment matrix includes the most likely scenarios in each route and the worst case scenarios as well as mitigation and prevention measures when possible.

Dinet transports cyanide only in trucks with containers, the emergency scenarios and response procedures are consistent with this transport modality.

As previously noted the Plan includes the emergency scenarios developed from the route assessment. It also includes prevention and mitigation measures and procedures as previously described, as well as specific response instructions.

The plans have a section named Responsibilities Identification, which establishes the responsibilities for the members of the response team. It establishes that the police department will provide information regarding the road conditions, and will control the traffic in case of accident. Also, the firefighters may take control of the emergency (as established in Peru's hazardous materials regulations). It also includes responsibilities for the mine's and suppliers' emergency response teams.

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### 2.3.2 Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

- in full compliance with
- in substantial compliance with Transport Practice 3.1
- not in compliance with

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

The Emergency Response Plan establish the annual training requirements including: a four hour training in hazardous materials operations level I (identification and operation of transport vehicles) that is attended by drivers, and four hour training in hazardous materials operations level II and III (basic operations) attended by the convoy leaders and other personnel with emergency response responsibilities. Additionally, the drivers and convoy leader receive training in defensive driving, first aid, basic firefighting, handling of sodium cyanide and related emergency response procedures established in the Plan.

The Section 7 of the Plan establishes the responsibilities for the members of the response team. The plan establishes the following positions within the Plan and their respective duties (including the name of the position outside the Plan):

- Crisis Manager (Transport and Distribution Manager)
- Safety Coordinator (Transport Supervisor)
- Operations Coordinator (Fleet Chief)
- Planning Coordinator (Safety Chief)
- Logistics Coordinator (Transport Chief)
- First Responders (Drivers)

Section 9 of the Emergency Response Plan includes a list of emergency equipment and personal protective equipment to be used during emergencies, and comprises the following:

Personal Protective Equipment:

- 1 hard hat
- 2 safety glasses
- 1 reflective vest
- 1 uniform
- 1 shoes of top of steel

Per each truck:

- 1 lantern
- 1 dry chemical power extinguisher (4 kg)
- 4 safety cones
- 1 first aid kit
- 1 kit of tools

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Per convoy

- 14 overall tyvek
- 8 gloves for chemists
- 8 leather gloves
- 8 safety PVC boots
- 8 safety industrial goggles
- 2 tape rolls of danger
- 2 lanterns
- 1 tape roll of duck
- 40 masks 3M code 8210
- 12 blisters of amyl nitrite
- 4 spades
- 4 safety cones
- 2 sweep
- 40 chemical products bags 16 x 30
- 10 chemical products bags 33 x 60
- 80 kg of lime
- 2 buckets
- 1 cable
- 25 absorbent cloths
- 2 absorbent sleeves

This section also establishes that the items within the kit that have been used, they will be replaced prior to the subsequent transport operation, that the expiration dates will be verified for the contents of the first aid kits and antidotes. The result of this verification will be registered in the final report of the trip that the convoy leader issues at the end of the trip.

The Emergency Response Plan establishes that the emergency equipment must be carried by the convoy leader, and that each driver must have its own personal protective equipment. A checklist is used to verify that it is available and it is documented in the convoy report.

As previously mentioned, the Plan establishes the training requirements, which include training in the emergency response procedures included in the Plan. The training will be provided on annual basis.

As previously mentioned, Dinet will only subcontract other transporter when their client's service demand would overcome their capacity. The procedure also establishes that the subcontracted transporter must be certified under the Cyanide Code by ICMI. The Plan establishes that the subcontractor drivers and convoy leader will have the same roles as if they were from Dinet and that their emergency response equipment will have at least the same components as the one implemented by Dinet. Dinet will request the subcontractor an operation report which will contain the emergency equipment checklist implemented by the subcontractor.

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### 2.3.3 Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 3.3
- not in compliance with

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

Sections 12 and 15.2 of the Plan establish the communication flow for the plan, which depend on the level of the emergency as follows:

- Low level: controlled locally by Dinet personnel (convoy leader and drivers). The supplier and the end user are notified: the participation of external responders is not deemed necessary.
- Middle level: personnel of Dinet requiring the support from external responders (National Police, Medical Centers, Fire brigade, etc.) to control the situation.
- High level: Dinet Safety Chief who leads the incident control at the scene with the logistic support of the supplier / user, and immediate attention of the institutions (National Police, Medical Center, Fire brigade, etc.)

It is the Crisis Manager responsibility to notify the client and external responders of the emergency and to response questions from the Media.

Additionally, the Plan includes accident investigation requirements and a list of emergency response contacts both internal and external with telephonic numbers.

The emergency notification, reporting procedures, and emergency response contact directory are included in the emergency response plan. Section 16 of the plan establishes that it must be reviewed after an incident takes place, or an emergency drill is performed. Emergency drills will be performed twice a year.

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### 2.3.4 Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 3.4
- not in compliance with

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

Section 12 of the Plan, indicates the initial actions to be conducted if a spillage of sodium cyanide occur, and they are described according to the type of spillage:

a) Spillage in Dry – Cleaning and Decontamination

- isolate the area,
- sweep the cyanide (it is handled only in dry state),
- if there is the potential for rain cover the material with plastic
- collect the waste in plastic bags or drums,
- treat the area with calcium carbonate and then with a 5% sodium hypochlorite solution,
- wait at least 15 min,
- rinse the area with water, and
- wait for the area to dry and then remove the barricades.

Section 12 of the Plan establishes that chemicals should not be added in water bodies, and the use of sodium hypochlorite, oxygen peroxide, and ferrous sulfate is limited only to ponds, and artificial water reservoirs. Additionally, it includes instructions for assessing the impact on surface water bodies and to prevent the population from contaminated water poisoning.

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

The operation is

- in full compliance with
- in substantial compliance with Transport Practice 3.5
- not in compliance with

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

Section 16 of the Plan establishes that Plan will be updated after the review any incident (spillages) and mock drills. There will be two drills per year.

The section 14 of the Training and Drills Plan establishes that to achieve the success of the training program, to ensure an adequate response to incidents, and to review and maintain the Emergency Response Plan, an annual drills program will be prepared.

The drills program will comprise:

- Programmed drills: They will be scheduled with the objective of incorporating administrative and operational staff of the company. A programmed drill will be conducted on an annual basis.
- Un-announced drills: An unexpected drill will include a real mobilization of equipments and resources at least every year with an operation under way in any part of the route.

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