INTERNATIONAL CYANIDE MANAGEMENT CODE

MIQ LOGISTIC SRL

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In collaboration with:
INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Operations Summary Audit Report


Verification Protocol

www.cyanidecode.org
December 2017

LIMA, PERU
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INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: MIQ LOGISTIC SRL (MIQ)
Name of Facility Owner: MIQ LOGISTIC SRL (MIQ)
Name of Facility Operator: MIQ LOGISTIC SRL (MIQ)
Name of Responsible Manager: Frank Arbildo
Address: Av. 28 de Julio 150, piso 5
State/Province/Country: Miraflores/Lima/ Peru
Telephone: +51 966931597 Fax: --
E-mail: Flavio.Arbildo@miq.com

Aspects of the location and description of the operation:

MIQ LOGISTICS SRL (MIQ) transports sodium cyanide from the port of Callao to the port of Salaverry via maritime (cabotage), the sodium cyanide is transported within 20-foot containers. The presentation of sodium cyanide in briquettes is in boxes of 1 Ton, 20 boxes per container. These containers are correctly anchored to the boat. When arriving to the port of Salaverry they are unloaded by cranes and transported by the company N & V Transport (company certified by the ICMI) to an intermediate warehouse to later be envoy to the mining unit on behalf of the client.

International Supply Chain is a fully integrated logistics-service offering designed to deliver value by combining services across MIQ Logistics to create a complete end-to-end solution.

It link your origin supply chain with your destination markets’ ever-changing logistics needs, drawing on its service portfolio, in-country professionals, global network, and technologies.

The MIQ Logistics account management teams, along with state-of-the-art technologies, manage the entire solution through its Control-Tower contact structure.

Origin logistics facilities located in all key-sourcing regions provide specialized services ranging from purchase order management and consolidation, to sourcing support and assembly.

Its supply chain experts design, implement, and manage services in partnership with its customers.

In Peru, MIQ Logistics offers comprehensive transportation, distribution and global services for supply chains operating in Latin America. We have expertise in managing air, ocean and land transportation for project materials, heavy and oversize pieces, LCL and FCL containers, and break bulk.

In addition, its technology enhances supply chain management by delivering complete visibility throughout the purchase-order process. Our Web-based system can be integrated with customers’ systems and provide detailed line-item data, proactive shipment status notifications, and customized reports.

It is fully certified in the Business Alliance for Secure Commerce (BASC) program in Peru. This supply chain security initiative reduces the likelihood of smuggling and theft, fines and customs delays for customers and ISO 9001.

It is proven specialists in the mining and energy industries and their project cargo movements. It has earned numerous awards from leading global entities in these industries for its leadership and commitment, just-in-time capabilities, and information technologies.

These activities are carried out 3 years ago with ZERO (0) accidents.
SUMMARY AUDIT REPORT
FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.

2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.

3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.

4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

   **International Cyanide Management Institute (ICMI)**

   **1400 I Street, NW, Suite 550**

   **Washington, DC  20005, USA**

5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor’s signature on the Auditor Credentials Form must be certified by notarization or equivalent.

6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.

7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.
This Operation is:

X 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@iso-sure.com

Date(s) of Audit: 14 and 15 December 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

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Signature</th>
<th>Date</th>
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<tbody>
<tr>
<td>Luis Torres Argandoña</td>
<td>Lead Auditor and Transportation, Production</td>
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<td>31 October 2017</td>
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<td>Carlo Vargas</td>
<td>Transportation and Mining Technical</td>
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TRANSPORT

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

1.1 TRANSPORT PRACTICE 1.1

SELECT CYANIDE TRANSPORT ROUTES TO MINIMIZE THE POTENTIAL FOR ACCIDENTS AND RELEASES.

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.1 requiring an operation Select cyanide transport routes to minimize the potential for accidents and releases.

The MIQ operation for the transport of sodium cyanide was subject to an audit. The Auditor was verifies and all questions related to the transport protocol ICMI were answered. MIQ has the procedure for the Transport of Sodium Cyanide (land and maritime transport), without causing damage or injury to persons and / or the environment and the preservation of substances transported from port of Callao to port of Salaverry in Trujillo and Warehouse of RANSA (15 km of the port of Salaverry).

The evidenced records are as follows

- Roadmap
- Risks of Cyanide Transportation (land an maritime transport)

For the evaluation of the terrestrial route, we have the procedure "Evaluation of route", this makes a tour of the route during which the required criteria are evaluated. This evaluation is documented in a roadmap. The Safety Supervisor of the subcontracted company for transport (N & V Transport, a company certified by the ICMI) and the interested areas participate in the route. The roadmap is updated when relevant changes or conditions that may represent a risk in the transport are recorded in the reports. Additionally, an annual tour is made by the aforementioned participants to update the road map.

MIQ has the Salaverry Roadmap, which has selected the transport route that minimizes the possibility of accidents and escapes. This document, with version 01 of 05/12/2017 considers the route from Km 01 to 15; Leaving the Port of Salaverry to the Warehouse of Ransa.

For the evaluation of the maritime route and risk assessment on the vessel, there is a "Safety, health and environment" plan, which carries out a voyage at sea and the evaluation of the vessel (vessel owned by the MULTIMPEX company), that has the necessary security considerations, it is worth mentioning that the port of Callao and Salaverry were also evaluated.
For the evaluation of the terrestrial route, we have the procedure “Evaluation of route”. MIQ implemented the Roadmaps, in the route evaluation report the major risks were identified as the urban areas, population density, road infrastructure, animal crossing, proximity to water bodies, presence of fog, likelihood of free fall.

Risks associated to those characteristics include: vehicle crash, vehicle rollover, vehicle skid, load, loss, pedestrian accidents, product spill in water body, and water contamination, among others.

For each specific route, a risk assessment with a photographic log was developed in 2017. Risk management measures are listed for each portion of the routes based on the characteristics and risk level.

A tour of the route is made during which the required criteria are evaluated. This evaluation is documented in a roadmap. The Safety Supervisor of the subcontracted company for transport (Terrestrial and maritime) and the interested areas participate in the evaluation of the route. The roadmap is updated when relevant changes or conditions that may represent a risk in the transport are recorded in the reports. Additionally, an annual tour is made by the aforementioned participants to update the road map. The “Safety, Health and Environment Plan” includes the evaluation of risks in the operation on land, sea and ports, which is also reviewed annually by MIQ personnel or at the request of the client.

The risk mitigation measures are mainly focused on avoiding social tensions, high transit times of the day and avoiding roads that are dangerous in adverse weather conditions. The high levels of risk are reinforced or controlled through training and monitoring of the activities carried out by MIQ and the subcontracted company for transport. The training program will be given annually.

Among other measures identified for the operation described in the Safety, Health and Environment Plan are:

• Marine transport
  o Failures or deficiencies in the communication systems of the vessel that do not jeopardize navigation
  o Failure to trace a safe route on the navigation chart
  o Failures in emergency response systems in the safety of navigation
  o Collision due to navigation errors of other vessels
  o Loss of vessel stability due to exceeding limits for heel angle
  o Fall from container to sea

• Land Transportation by Road
  o Container fall due to use of cranes
  o Merchandise Spill
  o Injuries during container loading and unloading
  o Contact with cyanide
  o Inhalation of cyanide
  o Vehicle rollover
  o Fires.

MIQ identified the main bridges, tolls, fuel stops and technical stop points.

The existence of letters sent to the fire companies and medical centers to communicate their roles in case of any emergency and open communication channels between MIQ and emergency support centers were check. Each of the support centers that are consider in the Emergency Plan MIQ sealed these.

Among the letters were consider emergency support centers (fire companies and medical centers) near MIQ and routes used by carriers hired by MIQ.
MIQ includes comments from interested parties (communities, other stakeholders, government agencies). These comments if applicable according to its usefulness in the selection of routes and risk management.

The centers are included in the Emergency Response Plan of MIQ.

For the transport of sodium cyanide MIQ asks its carriers have a control room also carriers with GPS system continually provide the positioning of each of the vehicles at all times. As well as continuous speed supervision at each point of the route from the starting point to the end then this information delivered to the Safety Officer MIQ.

MIQ also establishes specifications using trucks escort during the transit of sodium cyanide being due to use ONE (01) escort van for every five (05) or fewer units of traffic load.

The transportation company can upload ONE (01) Container for each platform and can only drag a wagon chassis. The convoy may include one or more escort vehicles at your request. Convoy displacement is dependent on weather conditions; Supervisor of MIQ evaluate the safety of the route in each case, may stop the convoy if satisfied that the conditions do not allow safe travel.

After each trip, the supervisor of MIQ must serve the "Convoy Supervisor Trip Report" where findings that compromise safety during transport they are included within the assessment route for modification evidences.

During the audit process, the above-mentioned transport companies were visited to verify the good functioning of their GPS systems, and SPOT Systems (Global Positioning System), as well as to verify, the actions to be taken in case of signal loss.

MIQ has provided information (MSDS, emergency and product information, Emergency Response Plan) to support emergency centers (health centers, police and fire companies) along the routes mentioned, and a signed and received letter with such information. This activity is carried out so that external support centers could be prepared for emergencies. In addition, comments are asked to external support centers to manage risk as a way to query and obtain feedback. MIQ has contacts with hospitals, police, Fire Company, Crane Service.

MIQ subcontract the cyanide transport operations.

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During the audit process, the transportation companies were visited to verify compliance with the standards of the "Code"

For the third companies contracting MIQ establishes the following guidelines:
• The service must be complied with under the International Code for the Management of Sodium Cyanide and ICMI Protocol for the Transport of Sodium Cyanide.
• Comply with MIQ's reasonable directions and directions, as well as standard client procedures. All standards and procedures of MIQ.

1.2 **TRANSPORT PRACTICE 1.2**

**ENSURE THAT PERSONNEL OPERATING CYANIDE HANDLING AND TRANSPORT EQUIPMENT CAN PERFORM THEIR JOBS WITH MINIMUM RISK TO COMMUNITIES AND THE ENVIRONMENT.**

X in full compliance with

The operation is

☐ in substantial compliance with Transport Practice 1.2

☐ not in compliance with

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

The operation is in FULL COMPLIANCE with Standard of Practice 1.2 requiring an operation Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

MIQ in the Transportation procedure and Safety, Health and Environment Plan establishes minimum requirements for drivers “Job profile”: health, defensive driving training, and response training on sodium cyanide emergencies (spills and poisoning prevention).

Drivers are legally required to hold an A3C and A4 license. In order to obtain this license, have completed high school, undergo a psychological evaluation and a psycho-technical assessment, and hold a certificate from Professional Driver School.

In the case of boat operators, they request courses in hazardous materials and comply with the PBIP course.

As a result of the audit it was proven that MIQ only uses trained, qualified and licensed operators to operate their vehicles.

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

MIQ, has been working on a Program Management System Safety and Health at Work and Trainning Program. This program has been implemented as evidenced during the audit.

This program provides training related to leadership activities and management commitment, and Training, Hazard Analysis Working Procedures, Use of Personal Protective Equipment, Incident Investigation, Safety Inspections, Emergency Response, Drills, Environment Protection, Security, and Health Program.

MIQ selects the most specialized drivers or operators to transport sodium cyanide.
MIQ includes a training program that must be complemented by all drivers, supervisor and operador of the warehouse, consisting of the following:

- Introduction to the Company
- Basic Ricks Prevention and Use of Personal Protection Equipment (PPE)
- Hazardous Materials Handling and Transportation Nivel 1, 2 and 3
- Emergency Response
- Defensive Driving

In addition, the following training courses are specific to drivers transporting cyanide shipments:

- Cyanide First Emergency Response
- General Information of Cyanide Product

According to Plan cyanide related training is refreshed once a year. During the audit, files of three drivers were reviewed, and all relevant training certificates were available.

A simulated spill of Sodium Cyanide was carried out on December 2, 2017 at the Multimpex facilities; the first hour was training the personnel involved in the development of the simulation and the second hour in the development of the simulation itself.

The simulation was developed in the Multimpex maneuver yard, simulating drop of boxes with sodium cyanide and spill 5Kg during the loading process. Normal climatological conditions, without presence of precipitations; no generation of hydrocyanic gas nor were there injured.

According to the list of assistance to the Theoretical Class of Safe Handling of Cyanide "Spill and Intoxication" and delivery of informative material of security in handling of cyanide to the personnel: Leandro Vásquez, Genaro Torres, Walter Alva, Antonio Llanos, Jorge Herbozo, Luis E. Chero, Roger Cumada, Nicolás Baca; of the Operations, Projects and Logistics areas, respectively.

MIQ subcontract the cyanide transport operations.

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During the audit process, the transportation companies were visited to verify compliance with the standards of the “Code”

For the third companies contracting MIQ establishes the following guidelines:

- The service must be complied with under the International Code for the Management of Sodium Cyanide and ICMI Protocol for the Transport of Sodium Cyanide.
- Comply with MIQ's reasonable directions and directions, as well as standard client procedures.
• All standards and procedures of MIQ.
• National laws.

1.3 TRANSPORT PRACTICE 1.3

ENSURE THAT TRANSPORT EQUIPMENT IS SUITABLE FOR THE CYANIDE SHIPMENT.

X in full compliance with

The operation is  □ in substantial compliance with Transport Practice 1.3
  □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.3 requiring an operation Ensure that transport equipment is suitable for the cyanide shipment.

MIQ has determined the transportation methodology according to the following definition, contained in its Contingency Plan and Safety, Health and Environment Plan:

Marine transport

• Name: AHTS TIDE
• Length: 54.86 m
• Beam: 12.19 m
• Maximum draft: 3.50 m
• Cargo Cover
• Capacity: 450.00 ton
• Length: 34.50 m
• Width: 9.30 m
• Free cover: 320.85 m²

MIQ maintains a copy of the Maintenance Plan for the vessels to be used and has scheduled annual audits to MULTIMPEX to validate compliance with the Maintenance Plan.

Trailer:

• Category / Class: N3 / Trailer.
• Bodywork: Trailer.
• Fuel: Oil.
• Age: not more than 5 years.
• Shafts, as seen in the DS 058-2003-MTC, Standard Vehicle Weights and Measures (legal International Standard) for cyanide transport units are designated configuration, T3S3, T3S2.

Semitrailer:

• 04 fastening systems (twistlock, plus pins), which may be fixed.

Excessive load
MIQ provides that the charge should not exceed the carrying capacity, and this control is performed by using the format “Check List Cyanide Unit”.

The maintenance of the units is done by the supplier, the parts are original and technicians are specialized for the type of vehicle.

**Loading Equipment in Port of Salaverry**

- Crane brand: Grove
- Model: GMK5220-E
- Crane Capacity: 220TN
- Main feather: 31.6 m
- Counterweight: 51.0 TN

According to through the “Transportation Procedure”, MIQ supervisor together with a driver of the transportation company have to check the trucks and trailers completing a checklist per vehicle prior to the departure of the convoy. The checklist requires reviewing:

- Origin and destination of the load
- Names of the driver and supervisor
- Shipment documentation (insurance, current technical inspection, circulation permit, among others)
- Driver’s documentation (license and ID card, and appropriate training certificates)
- PPE (safety hat, goggles, safety boots, vest, gloves, harness, and thermal wear)
- Vehicle safety equipment (cell phone and radio, safety belts, first aid kit, reflective triangles, cones, flash light, horn, fire extinguishers, Jack, snow chains, mirrors, alarms, Wheel wrench, wedges, windshield, among others)
- Lights (blinking, turns, large, stops, among others)
- Placards
- Tires (trucks and spare tires)
- Load verification (braces and twists lock of the semitrailer. Reportedly, this is verified again after loading the container, although it is not registered)

During the audit, three (03) bundles of travel records, is evidenced.

In addition, inspections of the vessels are carried out prior to the loading of the containers and cranes before their use for the unloading of the containers in the port of Salaverry.

According to the Transportation Procedure, MIQ has procedures in place to prevent overloading of the transport vehicles, one CONTAINER of cyanide can be loaded on the vehicle. As seen in the “DS 058-2003-MTC, Standard Weights and Measures Vehicular” (Law of Peru).

In addition, in the Safety, Health and Environment Plan, the maximum container load per vessel is established, and the maximum loading load of the cranes in the port of Salaverry is determined.

MIQ subcontract the cyanide transport operations.

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During the audit process, the transportation companies were visited to verify compliance with the standards of the "Code".

For the third companies contracting MIQ establishes the following guidelines:

- The service must be complied with under the International Code for the Management of Sodium Cyanide and ICMI Protocol for the Transport of Sodium Cyanide.
- Comply with MIQ's reasonable directions and directions, as well as standard client procedures.
- All standards and procedures of MIQ.
- National laws.

1.4 TRANSPORT PRACTICE 1.4

**DEVELOP AND IMPLEMENT A SAFETY PROGRAM FOR TRANSPORT OF CYANIDE.**

X in full compliance with

The operation is  

☐ in substantial compliance with Transport Practice 1.4

☐ not in compliance with

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

The operation is in FULL COMPLIANCE with Standard of Practice 1.4 requiring an operation Develop and implement a safety program for transport of cyanide.

MIQ established a transportation method avoiding disturbances during motion.

For the transport of sodium cyanide, MIQ verify that the transportation company count with a control room, with the Spot and GPS system continuously provide the positioning of each of the vehicles at all times. Also, MIQ follows the units by means of the system installed by the transport companies.

The GPS Satellite Messenger SPOT provides a vital line of communication when required, as well as assistance in case of emergency when needed. Thanks to its 100% satellite technology, SPOT works virtually anywhere in the world, even where mobile coverage does not reach.

The transportation companies have a control room at:

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<td>Transportation Shipping Company</td>
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During the audit process, the above-mentioned transport companies were visited to verify the good functioning of their SPOT and GPS systems, as well as to verify, the actions to be taken in case of signal loss.

MIQ will only transport solid cyanide in sealed containers. Normal safe driving procedures and unloading procedures ensure that the truck and trailer are not damaged during transit. Its procedures and plans establish that the cargo can not be altered during the transportation process.

MIQ requires inspection of plate load information (DOT, UN and NFPA) verification of the truck “Check List Cyanide Unit”. Signage is provided in order to comply with local regulations, which are based on the UN Recommendations on the Transport of Dangerous Goods. Copies of the placards are included in the Emergency Response Plan.

MIQ indicates the need for conformity of the client, to ensure that the escort vehicles, transport vehicles, boats are in optimal conditions.

MIQ conducts vehicle and boat operator ship inspections prior to each departure/shipment.

During the audit process, records of inspections prior to each departure shipment are evidence.

MIQ, during its continuous visits, evaluates the compliance of the maintenance plan of the units of the transporters and boats, during the audit, it was visited and evidenced the registration of the inspection reports of MIQ, also, it was visited to the transportation company and evidenced the Maintenance Plan for each one of them.

Drivers must rest at least 08 hours before a trip and must not drive more than TEN (10) hours per day, drivers drive up to FIVE (05) hours continuously, with breaks every TWO (2) hours. It is noteworthy that Regulations of Peru set the same schedule for the transportation of hazardous. And according to the Procedure for transportation of sodium cyanide, drivers can drive up TEN (10) hours, and stops are designated prior to the departure of the convoy. Facilities where the convoys stop are fenced and have 24 hours security guards.

MIQ states that the load of cyanide must travel in 20-foot CONTAINER, developing mechanisms to prevent its movement.

According to the Transportation Procedure, MIQ has anchoring mechanisms for the container and lashing system for cyanide in the container.

The procedure specifies:

- **Internal**
  - The load must be uniformly distributed on the floor of the container
  - Avoid empty spaces
  - Avoid slips

- **External**
  - Insured by 04 anchorages
  - Sometimes with 02 cross-links

- Inspections of Cargo Securing Materials
The condition of the load securing elements is inspected using Check List Cyanide Unit.

- On the boat
  - Security guardrails
  - Chains
  - It is evidenced a safety study carried out by a specialist engineer to avoid falling containers from the boat

The trip will take place in convoy mode; the supervisor of MIQ is responsible for the assessment of climatic conditions and is empowered to suspend the transport convoy.

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

“Alcohol and Drug Policy” It is prohibited the consumption of alcohol, drugs or any other substance that may impair or reduce the function of the driver or a member of the convoy in which prior to the start of each trip everyone must go through an alcotest and periodical drug tests; the violation of this policy results in the separation of the worker from the operation.

Periodic controls of toxicological tests were evidenced for the auditor.

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

MIQ keeps the records of the transport activity and inspection of the cargo units, evidenced the reports of the 2017.

MIQ subcontract the cyanide transport operations.

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During the audit process, the transportation companies were visited to verify compliance with the standards of the “Code”

For the third companies contracting MIQ establishes the following guidelines:

- The service must be complied with under the International Code for the Management of Sodium Cyanide and ICHM Protocol for the Transport of Sodium Cyanide.
- Comply with MIQ's reasonable directions and directions, as well as standard client procedures.
- All standards and procedures of MIQ.
1.5 **Transport Practice 1.5:**

**Follow International Standards for Transportation of Cyanide by Sea and Air.**

X in full compliance with

The operation is

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

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

The operation is in FULL COMPLIANCE with Standard of Practice 1.5 requiring an operation Follow international standards for transportation of cyanide by sea and air.

MIQ ships its sodium cyanide on MULTIMPEX ocean carrier that have demonstrated safety programs and safe performance. The ocean carrier sign standard contractual agreements that require that the carrier adhere to applicable regulations and have "organized safety programs."

Contract was reviewed during the audit and this standard clause appears in the ocean carrier contract. Each carrier was asked for information regarding fulfillment of ICMI Cyanide Code requirements using a customized ICMI transportation protocol. Responses and information provided by ocean carrier was deemed to be appropriate by the auditor.

The MIQ and Ocean Carrier contract require that all transportation is conducted in accordance with all regulatory requirements.

The ocean route is chosen by the ocean carrier (Port of Callao - Port of Salaverry). However, it must be consulted beforehand with MIQ.

Destination ports are evaluated by the MIQ (Port of Callao - Port of Salaverry). This is done prior to the first shipment of product to a new location. Records were available to show that port evaluations had been conducted at each of the international ports used in this Supply Chain. MIQ has also concluded that the Homeland Security infrastructure that is available to assist ports with regard to security and emergency response is sufficient to conclude that ICMI Cyanide Code requirements are fulfilled.

The auditor concluded that MIQ has effective processes for ensuring that international ports have demonstrated appropriate safety, security, and road infrastructure prior to being approved for hazardous material shipments.

As recommended by the ICMI Auditor Guidance for the Use of the Cyanide Transportation Verification Protocol, specific information regarding this practice is addressed below:

a) The MIQ packaging specifications were reviewed as part of the verification audit and were found to be conformant to the packaging requirements of the IMDG Code.

b) Packaging for drums and IBCs reviewed as part of the due diligence evaluation were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
c) Packaging for drums and IBCs reviewed as part of the due diligence evaluation were appropriately labeled and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.

d) Loaded inter-modal containers were evaluated and were found to be marked and placarded in accordance with the IMDG Code.

e) Shipping documents were reviewed for a sample of cyanide shipments from January 2017 through December 2017 for each ocean carrier used in this supply chain. All information required by the IMDG Code is required as standard practice on MIQ shipping paperwork.

f) The container packing certificates from 2017 shipments were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMDG Code requirements.

h) MIQ maintains records which show that the ocean transport is conducted in compliance with all international and DOT (U.S. Department of Transportation). The ocean carriers confirmed to MIQ that they have cyanide emergency response information available on board each vessel.

i) MIQ maintains records which show that the ocean transport is conducted in compliance with all international and DOT requirements.

MIQ not transported by air transport within the territory of Peru.

1.6 TRANSPORT PRACTICE 1.6:

TRACK CYANIDE SHIPMENTS TO PREVENT LOSSES DURING TRANSPORT.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 1.6

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.6 requiring an operation Track cyanide shipments to prevent losses during transport.

MIQ states that contract carriers must use a SPOT and GPS system. They must also have a telephone service, radio and cellular pathway that ensures full coverage during movement to connect with the control center of the transport company and of MIQ. In addition to providing, a system that continuously indicates the position of each vehicle at all times.

MIQ inspects the telephone lines are in operation prior to departure, further checks are done to verify the operation of mobile equipment, Spot, GPS and radio by Check List Cyanide Unit.

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

The phone lines were operating at the time of the audit; and also an inspection was done to verify the operation of mobile equipment and it was found the payment of the phone, the GPS, satellite phone and the radio UHF services.

Additionally, the SPOT system is also used in the vessels of the company MULTIMPEX

Evidence photographic records of the SPOT device are evidenced in boat operators and drivers.
MIQ have identified areas without cell coverage and radio, for it asks MIQ contract carriers using satellite equipment.

MIQ requests transportation companies to have a SPOT and GPS system, the transporters grant the access code and contact telephones so that MIQ staff can verify the progress of the units in real time. During the audit, the monitoring carried out by the MIQ staff was verified.

Before each trip MIQ check the bill of lading and waybill, transported amounts of cyanide, Data Sheet Material Safety also this documentation must be available throughout the trip as MIQ guidelines, this same data is review by Customer (final destination). Note that this information must be show to the inspectors if MTC is request otherwise the carrier be fine.

MIQ, for each trip issue a reference guide indicating the name of the product, the United Nations (UN) number, and the weight of the packages transported quantity of cargo, as well as the safety considerations of the indicated product. A copy of the safety sheet is also issued. These documents are in the ownership of the driver and are available throughout the transfer.

MIQ verifies the availability of documentation through a pre-trip check list.

The records were evidenced during the audit.

MIQ subcontract the cyanide transport operations.

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During the audit process, the transportation companies were visited to verify compliance with the standards of the "Code"

For the third companies contracting MIQ establishes the following guidelines:

- The service must be complied with under the International Code for the Management of Sodium Cyanide and ICMI Protocol for the Transport of Sodium Cyanide.
- Comply with MIQ's reasonable directions and directions, as well as standard client procedures.
- All standards and procedures of MIQ.
- National laws.
INTERIM STORAGE

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

2.1 TRANSPORT PRACTICE 2.1

STORE CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTAL RELEASES.

X in full compliance with

The operation is ☐ in substantial compliance with Transport Practice 2.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

This Practice is not applicable; MIQ, does not store cyanide in Peruvian territory.
EMERGENCY RESPONSE:

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

3.1 TRANSPORT PRACTICE 3.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is

☐ in substantial compliance with Transport Practice 3.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.1 requiring an operation Prepare detailed emergency response plans for potential cyanide releases.

MIQ has an Emergency Response Plan for the maritime transport of sodium cyanide (includes the operation of land transport by road and operation of maritime transport "cabotage"). In the detail that emergencies will be classified based on the analysis of the following aspects: Risk for life and human health, Risk of environmental damage, Resources used to control the emergency. The Emergency Plan describes the response actions for emergencies previews. These were verify during the audit.

The companies subcontracted for transport (land and sea) also have an Emergency Plan. This plan provides a set of guidelines that will be used to direct and coordinate all aspects of preparing a response to an accident during transport and an emergency response. In addition to providing equipment inventories, lists of people teams and contacts, the Plan has several broader features to maximize its effectiveness.

It contains strategic information on responses that provide guidance on the protection of sensitive areas, response procedures and cleaning and disposal techniques. It is flexible to allow adjustments and modifications in field conditions, rather than being limited to specific solutions for fixed scenarios of cyanide accidents. It also considers coordinated response efforts.

This Contingency Plan is maintained so that it remains an effective tool in the successful response to an accident with sodium cyanide. The information in the Plan is updated and current, therefore, whenever any modification occurs, the Plan is updated.

The Emergency Response Plans for transportation is suitable for the selected transport route, based on the hazards and risk assessment after the completion of the ROADMAP.

In its Emergency Response plan, it is indicated that it applies to all the activities carried out by MIQ and Subcontractors as part of the Maritime Transport service of Sodium Cyanide for the Yanacocha Mining Company S.R.L. The content of this document may change or be reviewed for information received in the future, or for changes in the scope of the service.

The scope for its land transport includes the following:
Geographical location: Peru
Physical location: From the customer's warehouses or ports to the location indicated by the Client.

Facts of maximum probability are included: Catastrophic failure of the container resulting in the fall of the cyanide while the truck is running; traffic accident that involves the fall of the container of the platform of the transporter truck, and fall of a container inside a watercourse.

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

MIQ indicates the use of trucks to transport sodium cyanide taking into account the characteristics of the equipment and assesses the structural condition of the road where the transportation sodium cyanide is done.

Information on road conditions is defined in the Roadmap document. The Emergency Response Plan describes the response actions for anticipated emergency situations. These were verified during the audit.

It also establishes the logical line of action to be taken by the convoy leader and drivers in case irregularities arise during transportation of sodium cyanide.

In addition, it includes the characteristics and risk assessment of the ports of Callao and Salaverry, in the latter includes the operation of unloading the containers by cranes and the risks when carrying out the operation of maritime transport.

MIQ requests and verifies that the transport companies use trucks also all ships in trailers low or high platform acquired with a maximum load capacity of 22 tons, which are certify to transport sodium cyanide by the Government Peruvian.

The procedures included in the Emergency Response Plan are:

- SO.PY.YC.PR.001 - GENERAL PROCEDURE FOR THE CARE OF EMERGENCIES WITH HAZARDOUS MATERIALS
- SO.PY.YC.PR.002 - PROCEDURE FOR THE INSPECTION OF CONTAINER LOAD WITH SODIUM CYANIDE IN SUPPLIER INSTALLATIONS
- SO.PY.YC.PR.003 PROCEDURE FOR THE MONITORING OF GAS CIANHIDRICO
- SO.PY.YC.PR.004 RESPONSE PROCEDURE IN CASE OF SPILL OF SODIUM CYANIDE ON EARTH
- SO.PY.YC.PR.005 RESPONSE PROCEDURE IN CASE OF SPILL OF SODIUM CYANIDE ON BOARD DECK
- SO.PY.YC.PR.006 PROCEDURE FOR RESPONSE IN CASE OF FALL OF CONTAINERS WITH SODIUM CYANIDE TO THE SEA
- SO.PY.YC.PR.007 RESPONSE PROCEDURE IN CASE OF INTOXICATION BY SODIUM CYANIDE.
- SO.PY.YC.PR.008 RESPONSE PROCEDURE IN CASE OF FIRST AID AND EVACUATION
- SO.PY.YC.PR.009 RESPONSE PROCEDURE IN CASE OF FIRE
- SO.PY.YC.PR.010 RESPONSE PROCEDURE IN CASE OF BOAT COLLISION
- SO.PY.YC.PR.011 RESPONSE PROCEDURE IN CASE OF MAN FALL TO WATER
- SO.PY.YC.PR.012 RESPONSE PROCEDURE IN CASE OF ABANDONMENT OF BOATS
- SO.PY.YC.PR.013 RESPONSE PROCEDURE IN CASE OF HYDROCARBON SPILL
- SO.PY.YC.PR.014 PROCEDURE OF ANSWER IN CASE OF EXCESSIVE ESCORA
- SO.PY.YC.PR.015 RESPONSE PROCEDURE IN CASE OF PIRATE ATTACKS DURING MARITIME TRANSPORTATION
• SO.PY.YC.PR.016- EMERGENCY PROCEDURE IN THE EVENT OF A TRAFFIC ACCIDENT DURING THE TERRESTRIAL TRANSPORT OF SODIUM CYANIDE
• MEDICAL EVACUATION PLAN (MED-EVAC).

MIQ subcontracts External Emergency Responder (IFSEC PERU, ECOCENTURY and FULLSAFETY) and also contacts the Fire Department, Police, Emergency Medical Services, Center of Chemical Information - CINQUI (Technical advice in handling of HAZMAT), OUTSOURCING GREEN SAC (Hazardous waste management / Cleaning and remediation Environmental)

During 2nd Response emergencies, the External Emergency Responder is in charge of the emergency response actions when they arrive (delimitation of the area, communication, and access and traffic control are performed by the drivers and the safety specialist while the External Emergency Responder arrives). However, when the National Fire Department arrives to the scene, they take control of the emergency, as established by local regulations. This is established in the Emergency Response Plan. Finally, specific roles of each outside responder are outlined in the Emergency Response Plan.

3.2 TRANSPORT PRACTICE 3.2:

DELEGATE APPROPRIATE RESPONSE PERSONNEL AND COMMIT NECESSARY RESOURCES FOR EMERGENCY RESPONSE.

X in full compliance with

The operation is

☐ in substantial compliance with Transport Practice 3.2

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.2 requiring an operation Designate appropriate response personnel and commit necessary resources for emergency response.

MIQ during the audit has show that drivers, boat operators, and Supervisors receive training in emergency response from appropriate personnel on the safe handling of cyanide (spill and intoxication) and others receive training courses in defensive driving, firefighting, first aid. These trainings are renewed annually complying with the training plan 2017.

Training given to staff

• Hazardous Material - HAZMAT 1 warning level
• Hazardous Material - HAZMAT 2 basic operations
• Hazardous Material - HAZMAT 3 Technical
• Defensive driving
• Safe handling of cyanide
• Emergency Response Plan

The training program is developed annually and can be enhanced according to performance and safety indicators and / or customers' requirement. For staff security awareness, it has adopted implementing further safety talks, which are made by the Security area, Supervisors and the same staff.
The Emergency Response Plan, Drivers, Boat operators, Supervisors, Chief safety, Operations Manager, Central Monitoring Coordinator, and General Manager are responsible to respond in an emergency; They have received the necessary training for efficient emergency response.

The Emergency Response Plan each truck has the necessary amount of emergency response equipment and the Supervisor of MIQ also has a Response Kit for spills and poisoning, and personal protective equipment which must be verified before the trip, as well as the verification of courses prior to starting the travels and the periodic emergency response training.

MIQ has the necessary equipment for emergency response in the event of a major spill. Which is verified by the "Check List Cyanide Unit".

There were verified the records of the emergency response and inspection of equipment. The presence of such equipment in the convoy was verified. In the Emergency Plan indicates the functions of the staff in case of an emergency, and also the emergency equipment to be used in both the first and the second response. The Emergency Plan describes the specific functions of the emergency response and the staff responsibilities.

In the Transportation Procedure and Safety, Health and Environmental Plan are specified the verification criteria of the units before each journey.

During the audit, inspection records were evident.

The Supervisor of MIQ is responsible for ensuring the timely change of those equipment needed for emergency response, and proceeded to inform the Logistics area any requirement on the matter.

MIQ subcontract the cyanide transport operations.

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- Comply with MIQ's reasonable directions and directions, as well as standard client procedures.
- All standards and procedures of MIQ.
- National laws.

3.3 **TRANSPORT PRACTICE 3.3:**
DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with

The operation is

☐ in substantial compliance with Transport Practice 3.3

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.3 requiring an operation Develop procedures for internal and external emergency notification and reporting.

It was evident that the contact information in case of emergency is update in case of emergencies and update the Emergency Plan in this case warrants. The Emergency Plan indicates the current list of contact, which is review, and updated through calls in each revision of Emergency Planning.

The Emergency Response Plan includes an internal communication and external schema that specifies the call flow by the safety personnel, the receptors, the regulatory agencies, external response providers, medical centers, fire departments, and communities potentially affected by an emergency.

3.4 TRANSPORT PRACTICE 3.4:

DEVELOP PROCEDURES FOR REMEDIATION OF RELEASES THAT RECOGNIZE THE ADDITIONAL HAZARDS OF CYANIDE TREATMENT CHEMICALS.

X in full compliance with

The operation is

☐ in substantial compliance with Transport Practice 3.4

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.4 requiring an operation develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

It was noticed in the Emergency Response Plan, the description of how to recover or neutralize the solids, the procedure of decontamination of soils or other contaminated medium and how to manage these wastes.

The Emergency Response Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released to surface waters.
3.5 **Transport Practice 3.5:**

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

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.5

□ not in compliance with

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

The operation is in FULL COMPLIANCE with Standard of Practice 3.5 requiring an operation Periodically evaluate response procedures and capabilities and revise them as needed.

The MIQ’s Management is responsible for requesting immediate changes to this Plan, in the event of serious incidents, by simulation results, results of audits or inspections by process improvement etc.

During the audit, records spill drill evidenced, in 2017.

The Emergency Response Plan and the Training Plan define the frequency of emergency drills. The document presents the schedule of emergency simulations.

The simulations are made by the Chief of Safety who has an ANNUAL DRILL PROGRAM indicating the completion of ONE (01) practical simulation for operation, for the purpose of evaluating the effectiveness of the Emergency Plan and correct what is indicated on it.

The purpose is to measure the efficiency of the response procedure to ensure that the staff involved in an emergency act according to the Emergency Response Plan.

The Supervisor of MIQ takes into account the rapid preliminary compilation of the situation, gathering basic facts as they are known such as time the who, what, where, when, how and why of the situation, contacts the responsible person and broadcasts the obtained information, and continuously communicates with the Supervisor of MIQ and will meet the requirements of authorities.
Alcance de certificación:
PROVISIÓN DE SERVICIOS DE CONSULTORÍA.
CAPACITACIÓN Y GESTIÓN DE RECURSOS HUMANOS.
MONITOREO OCUPACIONAL.

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