Cyanide Transportation
Summary Audit Report
For The
International Cyanide Management Code and
TRANSPORTES NIQUINI 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 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.

Transportes Niquini Ltda.
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Name of Cyanide Transportation Facility: Transportes Niquini Ltda.
Name of Facility Owner: Transportes Niquini Ltda.
Name of Facility Operator: Transportes Niquini Ltda.
Name of Responsible Manager: Dario de Souza Niquini
Address: Rodovia Fernando Dias km 482 s.n (Betim)
State/Province: Minas Gerais
Country: Brazil
Telephone: (55+31) 35399400
Fax: (55+31) 35399503
E-Mail: niquini@niquini.com.br and diretoria@niquini.com.br

Location detail and description of operation:

The Transportes NIQUINI 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. Transportes NIQUINI transports solid cyanide from the Port of Santos (São Paulo State) to Anglo Gold Ashanti mines located at Santa Barbara and Nova Lima both of them at Minas Gerais 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 167.035.15 in which ABNT (Brazilian Technical Standards) grants the Certificate of Conformity Assessment System of Health Environmental and Safety Quality to Transportes Niquini implemented for the following activity - Road Transportation of chemical products evidenced in the unity located in Rodovia Fernao Dias km 482 – Jardim Piemonte Norte ZIP Code 32689-898 – Betim MG meeting the requirements of the Standard Manual SASSMAQ 2014 first concession dated on December 18, 2015 validity period from 18.12.2015 to 18.12.2017.

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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, Transportes NIQUINI 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: 12.12.2016 ~ 14.12.2016 (on-site) and 15.12.2016 (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:

Evidenced that Transportes NIQUINI defined, documented and implemented internal documented procedure PO - 09 - Planejamento de rota 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 Anglo Gold Ashanti located in Santa Barbara (Corrego do Sitio I - CDS I and Corrego do Sitio II - CDS II and in Nova Lima (Fazenda Planta Queiroz mine).all of them at Minas Gerais State. Evidenced that Transportes NIQUINI selected two possible routes (one main and one alternate) between the port and the mines. The process of updating of selected transport routes is performed in maximum frequency annually Evidenced that the selection of route process considered the population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, policy stations, hospitals, emergency stations, 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 were reviewed. Most of the routes are asphalted and only the last 20 Km (way to the mine) are not asphalted. Evidenced that all risks related to the selected routes were clearly identified by Transportes NIQUINI in the route record (traveling plan). Several controls such as speed limit, driver qualification and training, truck maintenance, pre-traveling brief with the driver, planned transport observations, full time monitoring of the truck from a remote station, limited traveling time, were implemented by the operation in order to mitigate the risks related to the selected routes.

The operation constantly evaluates the condition of the selected routes. In the end of each travel, the driver records, on the traveling plan, his perceptions and findings about the route condition. This travel report is reviewed by the operations officer and, when necessary, the route plan is updated and the risks re-evaluated.

The operation prepares, before each travel, the traveling plan (which is delivered to the driver and a briefing is performed), identifying all the risks and related controls that shall be observed by the driver, including Track trafficability conditions, points allowed to stop

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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. Transportes NIQUINI 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. Transportes NIQUINI, 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. Transportes NIQUINI 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

The operation is
☐ in substantial compliance with Transport Practice 1.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Transportes NIQUINI established, implemented and maintained internal documented procedure PRH 01 dated on March 19, 2016 – Training which defines methodology for training activities (how to plan, provide, record). The above mentioned documented procedure defines that all new employee has to do an induction training related to handling and transportation of NaCN before perform activities with this chemical product.

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Transportes NIQUINI only uses trained and licensed drivers as required by Brazilian regulation law “Resolution CONTRAN Nº 168”, dated on December 14, 2004 which establishes that drivers of dangerous products shall have training in “MOPP – Movimentação Operacional de Produtos Perigosos”. Reviewing pertinent training records evidenced that all drivers of Transportes NIQUINI that conduct NaCN were trained as stated. Also evidenced that all NIQUINI drivers were trained by the cyanide producer about cyanide handling and transport. Evidenced that all drivers received a specific training on the route that is used to transport cyanide (route training) on April 28, 2016, July 12, 2016 and September 28, 2016,

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

X in full compliance with

☐ in substantial compliance with Transport Practice 1.3
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Transportes NIQUINI uses fifteen trucks for transportation of solid sodium cyanide. The maximum load capacities are: clearly identified. trucks have lockers, without 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 NIQUINI only uses equipment designed and maintained to operate within the loads defined. Records of periodic inspections were reviewed and provided evidence that only use equipment designed and maintained to operate within the loads it will be handling the operation uses its own drivers and equipments and do not subcontract nobody. E evidenced that Transportes NIQUINI established internal documented procedure PO -8- “ Manutenção corretiva e preventiva dos veículos e equipamentos”. Noted that 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 Transportes NIQUINI implemented preventive maintenance as required.

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Before loading the cargo container, the driver reviews 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 the operation uses its own drivers and equipments and do not subcontract nobody

**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 Niquini Transporters 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. Internal documented procedure PO 10 – Inspecoes veiculares establishes that all trucks shall be inspected before loading the cyanide. Records of such inspections were reviewed and provided evidences that above-mentioned procedure is 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. 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. Evidenced that Brazilian Invoice named “NF – Nota Fiscal” refers Check list issued by the driver also mention the Seal Number and the pertinent traceability is ensured. “NF- Nota Fiscal” and Check list Driver were reviewed and provided evidence that the solid sodium cyanide is transported in a manner that maintains the integrity of the producer’s packaging container. Evidenced duly implemented.

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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). Transportes NIQUINI defined and documented PO 10 - 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 Transportes Niquini implemented a effective preventive maintenance program for its trucks in accordance with truck producers requirements. 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. The driver is not allowed to drive at night. The working hours is controlled through the remote tracking station. 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. Yes. 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. The operation 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 annually, during the occupational health-monitoring program, the drivers pass through a drug detection test. Evidenced records of alcohol test duly implemented as required..Evidenced that Transportes NIQUINI defined and implemented a process to manage all records related to its activities.

All requested records were promptly retrievable and are adequately maintained.

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

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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. The operation scope is 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 Auto Track Trucks). 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. As previously mentioned, the truck is monitored 100% of the time, by a remote control station, by the operation headquarters and the tracker provider. Transportes NIQUINI defined and implemented a chain of custody records management, according to the Brazilian law. The documentation is verified prior the transportation and before the unloading at the mine operation. The transport documentation clearly identifies the amount of cyanide being transported and the product MSDS is part of this documentation. Evidenced during the field audit the documentation mentioned in item 6.1 – reviewed permits.

Evidenced during the field audit duly implemented.

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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.

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

Evidenced that Niquini has two Emergency Plans. The first one named PAE - Plano de Atendimento a Emergência issued by WGRA - Wagner Gerenciamento de Risco Ambiental dated on April 13, 2016 for Transportes NIQUINI, contract # C05052014583 revision 2 which clearly defines several matters such as – Objectives, Characterization of Transportes NIQUINI, Routes characterizations (main and alternate routes), Scope of Emergency Plan, Organizational Structure, Human Resources, materials resources, Communication systems, Updating PAE, Training activities, Dangerous products classification. The other one was defined and documented by Transportes NIQUINI itself named as "Plano de Emergência revision 11 dated on November 14, 2016 which remains in the truck with the driver. Evidenced that Transportes NIQUINI 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

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available infrastructure and resources available in the selected routes. The plans describe the specific response actions that shall be applied to each Transport emergency situation, such as accident with fire, fall into a river, cyanide leakage on a rainy day, among other specific emergency scenarios. 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

The operation is
- □ in substantial compliance with Transport Practice 3.2
- □ not in compliance with

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

Evidenced that Transportes Niquini provided emergency training for drivers, emergency coordinators, emergency response members. Evidenced records of emergency response trainings duly established and maintained. Sampled examples were: Record training in "Plano de Emergencia and in PAE – Plano de atendimento de Emergencia for the drivers. Besides evidenced record of training of the Operational Manager Alvim Antonio, the Administrative manager Mr. Marcos Jardim, the Work Safety Technical Mr. Rogerio Silva and the Associated Director Mr. Dario Niquini.

Niquini provides initial and refresh training, as verified through pertinent training records

Evidenced that both above-mentioned 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 and are checked before each travel.

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 Tyvek, antidotes, brush, cords,

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MgO powder and plastic blankets. 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. During the field audit was verified for proper implementation and updating of information related to emergency notification. Reviewed PAE - Plano de Atendimento a Emergências para Situações no Transporte de Cianeto de Sódio" issued by. Transportes NIQUINI

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

X in full compliance with

☐ 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 Transportes NIQUINI dated December 11, 2016 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", "Polícia Militar", "Polícia Federal", "Polícia Rodoviária Federal", "Defesa Civil", "Pronto Socorro", "PROCON", "PRÓ QUÍMICA", "ABIQUIM", WGRA, CETESB, Mineração Anglo Gold Ashanti, COPAM, Dario de Souza Niquini, Alvim Antonio de Oliveira e Marcos Augusto Jardim. During the field audit was verified for proper implementation and updating of information related to emergency notification. Reviewed PAE – Plano de Atendimento a Emergências para Situações no Transporte de Cianeto de Sódio" issued by Transportes NIQUINI

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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:

Evidenced that Emergency Plans as well as “Manual do Motorista” - issued by NIQUINI 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. Transportes NIQUINI has contract with WGRA, a commercial chemical remediation company to provide this service to the transporter which is clearly identified in Transportes NIQUINI’s Emergency Response Plan so WGRA 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
The operation is □ in substantial compliance with Transport Practice 3.5
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Transportes NIQUINI 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, WGRA

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Evidenced that Transportes NIQUINI plans and implement mock emergency drills, related to its emergency plans and in conjunction with the emergency responder expert. Reviewed emergency drill plans for 2014, 2015 and 2016. (in conjunction with WGRA), including the participation of external stakeholders, such as Brazilian Federal road policy, road administration rescue team, local firefighters). Evidenced that NIQUINI 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 October 04, 2014..September 28, 2015 and March 24, 2016.

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