



INTERNATIONAL CYANIDE MANAGEMENT CODE

**ORICA AUSTRALIA PTY LTD, BOX TO SPARGE
VENTANILLA TRANSFER FACILITY, CALLAO, PERU**

SUMMARY AUDIT REPORT

DECEMBER 2014



**INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE**

**Cyanide Production Operations
Summary Audit Report**



**For The
International Cyanide Management Code
and ORICA MINING SERVICES PERU S.A.
– Callao – Callao – Peru**

Verification Protocol

**www.cyanidecode.org
December 2014**



TABLE OF CONTENTS

INTRODUCTION	4
SUMMARY AUDIT REPORT	5
AUDITOR'S FINDING	6
1 OPERATIONS	7
1.1 PRODUCTION PRACTICE 1.1	7
1.2 PRODUCTION PRACTICE 1.2	8
1.3 PRODUCTION PRACTICE 1.3	9
2 WORKER SAFETY	10
2.1 PRODUCTION PRACTICE 2.1	10
2.2 PRODUCTION PRACTICE 2.2	11
3 MONITORING	14
3.1 PRODUCTION PRACTICE 3.1	14
4 TRAINING	15
4.1 PRODUCTION PRACTICE 4.1	15
4.2 PRODUCTION PRACTICE 4.2	16
5 EMERGENCY RESPONSE	17
5.1 PRODUCTION PRACTICE 5.1	17
5.2 PRODUCTION PRACTICE 5.2	18
5.3 PRODUCTION PRACTICE 5.3	18
5.4 PRODUCTION PRACTICE 5.4	19
5.5 PRODUCTION PRACTICE 5.5	20
5.6 PRODUCTION PRACTICE 5.6	20

INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: Box to Sparge Ventanilla Transfer Facility
Name of Facility Owner: Orica Australia Pty Ltd.
Name of Facility Operator: ORICA MINING SERVICES PERU S.A.
Name of Responsible Manager: JULIO VALVERDE PONTE
Address: Av. Dionisio Derteano 144, P.20, San Isidro
State/Province/Country: Lima/Lima/Peru
Telephone: +51 1 217 6000 Fax: (511) 217 6000 E-mail:Julio.valverde@orica.com

Aspects of the location and description of the operation:

Orica Australia Pty Ltd

Orica is an Australian-owned, publicly listed company with global operation. Orica is managed as discrete business units that produce a wide variety of products and services. The Mining Chemicals unit is based in Australia and exports products to Asia, Africa and the Americas, as well as supplying the local Australian industry. This unit's main product is sodium cyanide (cyanide), which is manufactured at Orica's Yarwun cyanide production facility (Yarwun Facility) in QLD, Australia.

Yarwun Production Facility

Orica's Yarwun Facility, which is located at Yarwun approximately eight kilometres (km) by road from Gladstone, QLD, commenced operations in 1989 and is engaged in the manufacture of cyanide (both solid and liquid forms), etc.

Solid cyanide is packaged in either sparge isocontainers, which have a maximum gross weight of 26 tonnes, or intermediate bulk containers (IBCs), which are in turn packed into a container. A maximum of 20 IBCs can be packed into a freight container with a maximum gross weight of 28 tonnes. Liquid cyanide is packaged into isocontainers with a maximum gross weight of 26 tonnes.

Ventanilla Box to Sparge Transfer Facility

Orica's Transfer Facility in Lima, Peru was constructed to supply mine site customers in Peru with cyanide transported within sparge isotanks. The Transfer Facility is comprised of a purpose-built structure that houses material handling equipment and associated facilities (these include a partly open warehouse protecting sea containers containing boxes cyanide; change rooms; equipment storage; office, ablutions, guardhouse; and yard area) located within the Neptunia S.A. empty container warehouse at Callao.

The Transfer Facility was constructed in 2007 and commissioned with the first isotank batch transfer complete on 6 June 2007.

The storage and transfer facility has not been modified since that initial certification audit. The initial certification report documented that quality control and quality assurance programs were implemented for storage and transfer facility.

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.

Auditor's Finding

This Operation is:

X in full compliance

in substantial compliance

not in compliance

**The International
Cyanide
Management Code**

with the International Cyanide Management Code.

No significant cyanide incidents or exposures and releases were note as occurring during the audit period.

Audit Company: ISOSURE SAC | JMAQ

Audit Team Leader: Julio C. M. Monteiro

E-mail: jmaq@ig.com.br / auditoria@iso-sure.com

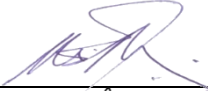
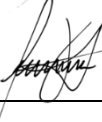
Date(s) of Audit: December 2014

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 conduct 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

Name	Position	Signature	Date
Julio Monteiro	Lead Auditor / Production Technical		20 December 2014
Carlo Vargas	Auditing Assistance		20 December 2014

Verification Protocol

1 OPERATIONS

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

1.1 PRODUCTION PRACTICE 1.1

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.1 requiring an operation design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

The storage and transfer facility has not been modified since that initial certification audit. The initial certification report documented that quality control and quality assurance programs were implemented for storage and transfer facility.

A group of processes documents and plans were review, including the definition of the specific requirements of the storage and transfer facility. In addition, a Certificate until 2015 issued by the Municipality of Callao in confirming that ORICA storage and transfer facility is suitable.

The storage and transfer facility built with concrete floor, walls and roof of iron corrugate. Cyanide is handle within the container manufacturer. A failure of power outage or power equipment would not Affect the operation of ORICA nor cause a leak or spill.

ORICA facilities have a concrete floor. A channel along the side to side of the storage zone is present as secondary containment. ORICA not manage cyanide in liquid form in containers or tanks; and cyanide through pipelines. ORICA has solid cyanide in plastic bags in a wooden box or isotanks.

1.2 PRODUCTION PRACTICE 1.2

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

The standard practices necessary for the safe and environmentally responsible operation are verify and documented. They interviewed the personnel of ORICA evidencing that they have the training to identify the deviations in case of their detection.

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

ORICA has a procedure in place and implemented to identify when site operating practices have or will be changed from those on which the initial design and operating practices were predicated.

ORICA implemented a program of preventive maintenance of equipment (Forklift), maintenance and repair of the transfer facility and storage, emergency equipment (eyewash and showers), cyanide monitoring equipment, which is verify by ORICA. Maintenance records of equipment were check.

During the entry or exit from storage and operation of transfer facility, ORICA controls the levels of hydrogen cyanide (HCN) with calibrated instrument. ORICA has three monitoring equipment.

The Emergency Plan Establishes Procedures to dispose of cyanide.

This done with the company GREENCARE PERU SAC Company accredited by the Peruvian state for the disposal of hazardous solid waste (sodium cyanide).

Cyanide is stored in the manufacturer's original containers until the transfer to isotanks. The containers are stored outdoors in ORICA and protect the cyanide rain.

The cyanide stored with adequate ventilation to prevent the build-up of hydrogen cyanide gas.

It also has a secondary containment system that consists of a trough which avoids water ingress.

Access to the storage and transfer facility for ORICA is restricted, prohibited the public has a perimeter fence three (03) meters tall and security based on one (01) security guards.

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

The cyanide is packaged as required peruvian political jurisdiction.

1.3 PRODUCTION PRACTICE 1.3

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

No tanks containing cyanide solutions in ORICA facilities. No piping, pumps or valves handle cyanide solutions on site. The inspections of the storage area are performed continuously. The transfer facility of Orica has a maintenance plan which was review annually by ORICA, during the auditing process, the correct status of the transfer facility and optimum performance was evident, further studies supporting the correct status was evident transfer facility equipment. Further inspection records showed, that identify the same incidents, required actions.

The inspections are documented and that the inspection check list includes the name of the inspector, the date of inspection, inspection items, and completion of corrective actions.

2 WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

2.1 PRODUCTION PRACTICE 2.1

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

X in full compliance with

The operation is in substantial compliance with Production Practice 2.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

ORICA receive cyanide boxes (finished product). ORICA has develop a proceeding for the entry, storage, transfer facility and disposal of Sodium Cyanide. Additionally this procedure is part of the general induction of staff working.

After interview was evident that the staff has been training and performs the practices, there are also reports that demonstrate the fact.

For non-routine and emergency operation activities. ORICA has implemented the "Abnormal Operating Instructions" and "Emergency Plan" are valid for ONE (01) year. Additionally, it has the Emergency Plan, which establishes the necessary measures to prevent exposure of personnel during an emergency.

ORICA has procedure changes, where the process is shown to apply operational changes and modifications which include issues related to safety and health of workers and incorporate the necessary protective measures. This process is by its own internal system ORICA which was evident during the audit process.

Workers participate on continuously in relevant meetings of review of issues of safety and health at, review or creating procedures. Furthermore, induction talks was evident to all new personnel hired to work the stock cyanide in which the safe handling of the product, first aid in poisoning, spill management is explained.

It is noteworthy that after interviews with staff these declared to be consulted at any health and safety issue at work.

Maintenance relates to forklifts, transfer facility, emergency equipment (wash eyes and showers), HCN monitoring equipment.

ORICA has three (03) controlling detectors cyanide gas concentrations of cyanide (HCN), while unloading containers of cyanide; detectors are calibrated to alarm at 4.7 ppm. The detectors are calibrated and a calibration certificate is issued by the manufacturer.

Reportedly, they have not identified areas or activities with concentrations of cyanide gas (HCN).

The "buddy system" is set for establishing activities that cyanide must have a minimum of 2 persons and 1 extra person for supervision. Radios and telephones are used to communicate between the relevant personnel related to the operations of cyanide. Forklift operators have radios with them at all times.

Pre-employment medical examinations are required before hiring new staff, periodically while working on ORICA, and out ORICA. Specific requirements are defined for different trades and positions. Relevant documentation was reviewed during the audit process in connection with this.

Disposable Suits level C are used as part of the Personal Protective Equipment required for tasks in loading and unloading of cyanide.

There are warning signs posted on the cyanide storage area, advising that cyanide is present and, if necessary, the appropriate personal protective equipment should be used. In addition, smoking is prohibited, dining, and open flames in areas where there is the possibility of contamination by cyanide.

2.2 PRODUCTION PRACTICE 2.2

DEVELOP AND IMPLEMENT PLANS AND PROCEDURES FOR RAPID AND EFFECTIVE RESPONSE TO CYANIDE EXPOSURE.

X in full compliance with

The operation is in substantial compliance with Production Practice 2.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

ORICA has developed an emergency plan for quick and effective management of sodium cyanide.

This program includes for each of the stages of the emergency plan per year, evidence that conducted on 2012, 2013 and 2014 of which was evidence that conducted in December, 18 2013, February, 12 2014, October, 13 2014, during the visit.

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

The site has showers and portable wash stations eyes low pressure dry chemical extinguishers of 50 Kg, these last every 50 meters. According to eyewash stations, interviewed staff is inspecting daily and extinguishers are inspecting once a month.

ORICA features water distribution system, oxygen resuscitator and antidote. The staff is trained to the use of amyl nitrite and after interviews evidence knowledge of the application of amyl nitrite and also informed the center ORICA nearest health to 20 minutes drive and the fire company to 20 minutes drive on the application of first aid in case of cyanide poisoning and application of sodium nitrite and sodium thiosulfate if required.

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

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

ORICA has procedures detailing first aid that must be present during operation with cyanide (receipt, storage, transfer facility and disposal) provides a checklist to check the existence of these, if one was use be set to be replace immediately.

ORICA in the checklist provides a review of first aid kit (for Cyanide Antidote Kit) this should be reviewed prior to performing any operation related to cyanide

Checklists December 2011 until December 2014 were reviewed; availability of equipment and first aid kit was confirmed during the audit.

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

The Emergency Plan is stable guidelines for the care of people with cyanide poisoned by skin contact.

ORICA not have medical services on site because it only handles box and isotanks cyanide. They found in the Emergency Plan and are evidenced deliver a copy thereof to be send by the document.

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

ORICA has completed drill cyanide spill on 2011, 2012, 2013 and 2014 as indicated by the training plan that keeps ORICA; simulations were develop within facilities ORICA, and then proceeded to the same feedback from all personnel involved. Reports mock improvement opportunities described taken during the visit implementing opportunities for improvement was evident.

ORICA has implemented a care and accident investigation methodology, which aims to ensure that all accidents and near misses are report and investigated immediately in order to make the respective corrections.

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

3 MONITORING

Ensure that process controls are protective of the environment.

3.1 PRODUCTION PRACTICE 3.1

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

X in full compliance with

The operation is in substantial compliance with Production Practice 3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.1 requiring an operation conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

ORICA stores the product in boxes until the transfer is made to isotanks; operations do not generate air emissions or wastewater containing cyanide in normal conditions. The waste generated by an emergency would be handle as hazardous waste. This section does not apply to facilities.

4 TRAINING

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

4.1 PRODUCTION PRACTICE 4.1

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

X in full compliance with

The operation is in substantial compliance with Production Practice 4.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

ORICA provides training programs for workers, customers and annual form, the training program of 2011, 2012, 2013 and 2014 was evidentin.

ORICA performs evalaution risks to which it is exposed staff to trainings definer that this should also follow ORICA sets and performs an initial induction and regular training on safety and health at work. In order to prevent accidents and spills this induction includ: operating procedures, safe handling of cyanide (spill and intoxication), first aid and use of personal protective equipment. These records were evidence during the audit.

ORICA, has a person or entity responsible for each training session, all of which are ORICA qualified staff and external companies, was evidenced after reviewing the resumes of pre-employment with the same instructor. ORICA has a procedure for evaluating potential suppliers in terms of their suitability to work with ORICA.

ORICA sets and performs an initial induction to all staff and regular training on safety and health, in order to prevent accidents and spills this induction include: operating procedures, safe handling of cyanide (spill and intoxication), firefighting, first aid and use of personal protective equipment. These records were evidence during the audit. In addition, 30-minute briefings prior to commencing activities with sodium cyanide whose records were evidence during the audit process.

The efficiency of formation of cyanide is test during exposure to cyanide or cyanide spill drill according to ORICA training program. An independent report after each drill and depending on the results of the need for this training is prepared and communicated. In addition courses offered by outside entities, are evaluated and are certificated.

4.2 PRODUCTION PRACTICE 4.2

TRAIN EMPLOYEES TO RESPOND TO CYANIDE EXPOSURES AND RELEASES.

X in full compliance with

The operation is in substantial compliance with Production Practice 4.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

ORICA has Emergency Plan in which all employees are training in the different scenarios that could result in an emergency such as the release of cyanide. The drills ORICA constantly made, addressing each stage of the Emergency Plan, compliance plan drills the years 2011, 2012, 2013 and 2014 was evident.

Simulations performed are evaluate in terms of effectiveness, to determine the level of knowledge, skills, and identifying weaknesses of staff and the organization. This assessment was evident in the reports of the drills conducted in 2013 and 2014.

Training records were review to confirm the execution of the training program described above. These records include the names and signatures of the worker as worker and trainer, date of training and the topics covered. Three employees were interview and responded correctly to all questions regarding cyanide management in your work area.

5 EMERGENCY RESPONSE

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

5.1 PRODUCTION PRACTICE 5.1

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is in substantial compliance with Production Practice 5.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

The Plan establishes general and specific considerations for emergency scenarios cyanide operations. These instructions should be consider in any type of accident, either for spill or intoxication of sodium cyanide.

The tasks of each brigadas of emergency response are identifying in the Plan. Additionally cyanide store is just over 1 km from the nearest population center and has a peripheral wall six (06) feet tall avoiding any contact with the inhabitants. Therefore, the Plan does not include instructions to evacuate communities as possible scenarios have consequences beyond the limits of the facilities ORICA. Furthermore, only handles ORICA sodium cyanide solid state (briquettes). In addition, the Plan includes specific instructions and detailed response to the identified scenarios

The Plan does not include instructions to evacuate communities as possible scenarios have consequences beyond the limits of the facilities ORICA. In addition, ORICA only manages sodium cyanide in solid state (briquettes) no residential areas adjacent to the facility. In addition, the Plan includes specific instructions and detailed response to the identified scenarios.

The Plan comprises a method for the treatment of poisoning of people spilled cyanide reaction portion includes instructions for the use of cyanide antidotes and first aid procedures. The medical staff of the health center is familiar with these procedures.

ORICA Plan will be review after an emergency. This would help prevent future releases.

5.2 PRODUCTION PRACTICE 5.2

INVOLVE SITE PERSONNEL AND STAKEHOLDERS IN THE PLANNING PROCESS.

X in full compliance with

The operation is in substantial compliance with Production Practice 5.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

The nearest population center is 1 km from the facility. According to the emergency response procedure at worst an area of 500 m should be evacuate; not covering the residential area. However, ORICA government informed the district about its operations and that require their support ORICA evacuate in an emergency.

ORICA has contact the local police, local firefighters, and local hospital, and informed them that are consider as supporting facilities for emergency cyanide. The Plan includes a communications protocol in writing stating the emergency communication should be with all stakeholders, including; Employees, customers, regulatory agencies and other institutions.

5.3 PRODUCTION PRACTICE 5.3

DESIGNATE APPROPRIATE PERSONNEL AND COMMIT NECESSARY EQUIPMENT AND RESOURCES FOR EMERGENCY RESPONSE.

X in full compliance with

The operation is in substantial compliance with Production Practice 5.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

The Plan includes the name of the individual members of the emergency committee and outlines their roles and responsibilities. The Plan also shows the contact number of the coordinator of emergency response.

The Plan determines that workers in the transfer facility operation will be part of the emergency team. Training in emergency response is generally to all staff and this training is included in the annual training program.

The Emergency Response Plan, require appropriate training for emergency responders. All operational staff are training in cyanide emergencia response and spilled cyanide.

The contact information of those responsible is in the plan. This plan states that these members have been give phones must respond at all times (24 hours).

The Plan includes the roles and responsibilities of the emergency committee for each emergency stage. The Plan includes a list of emergency response kit and personal protective equipment.

The plan mentions that the Kit Antidoto and emergency response equipment must be reviewed and verify that is in good condition before each operation with sodium cyanide. Addition, in case the absence of equipment must be replaced before the start of operations.

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

5.4 PRODUCTION PRACTICE 5.4

DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with

The operation is in substantial compliance with Production Practice 5.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 5.4 requiring an operation develop procedures for internal and external emergency notification and reporting.

The plan includes a communication protocol that includes internal communication functions, as well as notification to the authorities and external response personnel. The Plan includes a directory of internal and external contacts. It also displays the

contact information of the entire team of internal and external response to emergencies; members of that team have telephones and are available 24 hours a day after calls to these numbers during the visit.

Plan evacuation of communities not considered necessary due to an emergency will not reach more than 500 meters distance and the nearest community is at a larger radius 1 km. The information for communication with authorities and responders external are included in the plan.

The Emergency Response Plan include procedures and contact information for communication with the media.

5.5 PRODUCTION PRACTICE 5.5

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

X in full compliance with

The operation is in substantial compliance with Production Practice 5.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

The plan describes the methodology to decontaminate, remediate soil or other contaminated materials and dispose of all spill cleanup debris and bodies of water test for the presence of cyanide. In the Plan prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

There is no possibility of affecting water bodies. Only the concrete floor will be affected if spilled. The monitoring is limited to the air and is carried out with HCN monitoring equipment.

5.6 PRODUCTION PRACTICE 5.6

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

X in full compliance with

The operation is in substantial compliance with Production Practice 5.6
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 5.6 requiring an operation periodically evaluate response procedures and capabilities and revise them as needed.

.

The Plan needs to be update at every opportunity there are changes in form and content, in terms of procedures, people, phone numbers, equipment, methods, or any other consideration to allow us to more effectively and efficiently. It should also be amended following comments during drills, emergencies, request any interested parties or at least one (01) once a year, we can fit the pages of signatures, the Plan was submitted in October 2014 Version 05 Reference ORI_06_653.

The site has an annual program of emergency drills including cyanide spill. During the audit process was evident that similar drills were scheduled and conducted in the years 2012, 2013 and 2014.

In the Plan specifies that should be amended following comments during drills, emergency request for any interested parties or at least ONE (01) Once a year, we can fit the pages of signatures, the Plan was submitted in October 2014 Version 05 Reference ORI_06_653.

iso**sure** SOCIOS EN LA GESTIÓN



ACREDITADO POR **ENAC**



ACREDITADO POR **ENAC**



ACREDITADO POR **ENAC**

Informes: capacitaciones@iso-sure.com | ventas@iso-sure.com

Teléfonos: +51 944 701 038 | +51 987 54 0006

WWW.ISO-SURE.COM