
**ICMI Cyanide Code Transportation
Certification Audit
Summary Report**

**Supply Chain:
Transportes Suri S.A. de C.V
and Port of Guaymas
Guaymas, Sonora - Mexico**

**Submitted to:
The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA**

2014 Audit Cycle



Company Information:

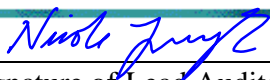
<p>Name of Supply Chain Operations:</p>	<p>Transportes Suri S.A. de C.V. (Suri) Fracc. Las Batuecas S/N, Col. Termoelectrica Guaymas, Sonora 85430, Mexico</p> <p>Port of Guaymas Interior Recinto Portuario s/n Col. Punta Arena Guaymas, Sonora, C.P. 85430, Mexico</p>
<p>Names and contact information:</p>	<p>Suri: Lic. Gaspar Arellano R. Unidad de Negocio Nogales - Division MRP Transportes Suri S.A. de C.V. Email: gaspar@alsua.com Tel. + 52(622) 222.5530 & 224.1885</p> <p>Port of Guaymas: Lc. Arturo E. Sandoval Soto Jefatura de Seguridad Y Ecologia Email: jdseguridad@puertodeguaymas.com.mx Tel. (622) 225 2267</p>

Location detail and description of Supply Chain:

This cyanide transportation supply chain consists of the transport of solid sodium cyanide and liquid sodium cyanide solution in Mexico by the trucking company Transportes Suri S.A. de C.V. (Suri). This Supply Chain includes cyanide handling and interim storage activities at the Port of Guaymas. The Port of Guaymas is located at the southern end of the Mexican State of Sonora. Sonora is on the Northwest Coast of Mexico, approximately 117 km south of Hermosillo, Sonora.

Solid sodium cyanide is received at the Port of Guaymas in sea containers, stored for a short time (no more than several days), and is picked up by Suri and transported to either a near-by Shipper-managed warehouse, or directly to mine customers. Liquid cyanide solution is picked up at the Cyanide Producer distribution operation in Hermosillo and is transported in ISO tanks to gold mining Customers. The Cyanide Producer manages all loading and unloading activities. Suri is responsible for interactions with the Port of Guaymas and for safe transport of the product.

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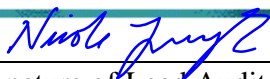
The audit included on-site assessment of the Port of Guaymas, the Suri Guaymas offices and truck terminal, and operations at the Posabro cyanide distribution facility located in Hermosillo, Sonora. This audit was limited in scope to Suri and Port of Guaymas activities.

Transportes Suri S.A. de C.V. (Suri) is a trucking company that was established in Mexico in 1978. The company has five offices and three trucking terminals. The company started transporting solid cyanide from the Port of Guaymas in 2012 and liquid cyanide solution from Hermosillo in 2014. Cyanide deliveries are dispatched from the Guaymas terminal with dispatch and business support from the Hermosillo, Sonora operation. Business and preventive maintenance support is provided by the Nogales, Sonora operation.

The Port of Guaymas has been in operation for hundreds of years and has been in commercial use since the 1800s. The Port of Guaymas is considered to be a medium sized full-service seaport with a sheltered harbor. The port has been included in an ICMI Cyanide Code certified supply chain since 2012. All aspects of ICMI Cyanide Code compliance were evaluated at the Port during this audit.

Suri is responsible for route determination, shipment tracking, truck inspections, preventive maintenance, training, safety program management, and emergency response planning. All of these operations were reviewed during the certification audit. The ICMI-approved Auditor verified that Suri operations are in FULL COMPLIANCE with Cyanide Code requirements for transporters.

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Auditor's Finding

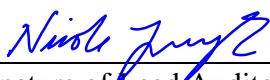
This Supply Chain is in FULL COMPLIANCE with the International Cyanide Management Code.

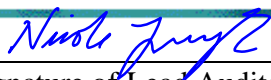
The operations included in this audit, Suri truck transport and Port of Guaymas activities, have not experienced any cyanide incidents, releases, or exposures since the previous ICMI Cyanide Code audits that were performed in support of the Evonik Supply Chain in 2012 and 2013. The operations were found to have been in compliance with the ICMI Cyanide Code since the previous ICMI Cyanide Code audits.

Audit Company:	MSS Code Certification Service, a Division of Management System Solutions www.mss-team.com
Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	March 17 & 31 and April 1-2, 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 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.*

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

Summarize the basis for this Finding:

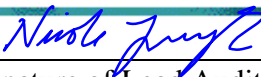
Suri uses a formally documented procedure to determine routes. Each route segment is evaluated for risks associated with population density, infrastructure, pitch & grade, proximity to water bodies, and likelihood of encountering poor driving conditions. Routes are also evaluated for security issues and for cell phone coverage. Routing considerations were found to be consistent with those required by the ICMI Cyanide Code. Each route is evaluated using publically available data and also through a physical driving evaluation process. Only those routes deemed to be safe are approved.

Risks such as security issues, traffic congestion, steep grades, and poor road conditions were considered during the development of the routes. Routes are established in a way that avoids heavily populated areas when possible, one example of this noted during the audit was the routing into and out of the Port of Guaymas.

Suri has a security plan and theft avoidance procedures in place. Community input regarding the transport of cyanide was gathered in 2014 through meetings held with city planners, civil protection, and the Red Cross. Risks and risk mitigation measures are used. One example of a risk mitigation measure is the use of escorts for the delivery of liquid cyanide solution from Hermosillo to the mine sites. Cell phone black-out areas are identified during the route planning process and drivers are informed of the special precautions to be used during these times.

Driver feedback is obtained after each delivery through the use of a Driver Feedback form that is filled out. According to interviews, routes are re-reviewed as necessary when driver feedback or changes to route conditions suggest that an approved route may require a change.

Suri has regular contact with customers and mine sites to which it delivers. Suri interacts pro-actively with all parties to ensure alignment of expectations and requirements for normal operations and emergency situations.

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Suri does not use subcontractors for any portion of its cyanide transportation operations.

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

The operation is	<input checked="checked" type="checkbox"/> in full compliance with	
	in substantial compliance with	Transport Practice 1.2
	not in compliance with	

Summarize the basis for this Finding:

Suri maintains a formal training procedure and program and uses only trained, qualified and licensed drivers. Confirmation was made that drivers have driver's licenses that permit the transport of hazardous materials. Drivers are trained on cyanide safety and all procedures prior to being dispatched for the first time. Training is refreshed annually and testing is performed to confirm competency.

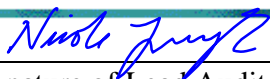
Records were reviewed and interviews were held to confirm that all personnel operating cyanide transport equipment are qualified and have been trained sufficiently to enable them to perform their jobs safely and appropriately.

Training records were very well organized and were available for all drivers who are authorized to transport cyanide. Training records showed that drivers had been trained on the hazards of cyanide, established routes, pre-trip inspection procedures, and emergency notification procedures. Hazardous materials handling, emergency preparedness training, and cyanide safety training are refreshed annually.

Suri also has a Medical Prevention Policy and procedure that calls for medical evaluations every six months. Drug and alcohol testing is also performed randomly as part of the overall medical "fit for duty" program.

A sample of driver's licenses were also reviewed and showed that cyanide drivers have the necessary hazardous materials licenses. Records for all drivers and operations personnel are maintained centrally. Record packages were randomly sampled and were found to be complete.

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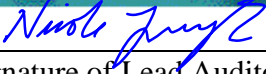
Transport Practice 1.3: *Ensure that transport equipment is suitable for the cyanide shipment.*

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

Summarize the basis for this Finding:

A sample of Suri tractors and trailers were evaluated during this audit. Fleet specification files were available for review. The tractors and trailers were found to be mechanically sound and capable of carrying the loads for which they were being used. Tractor and loaded trailer weights are carefully monitored to ensure that trucks are not overweight. Suri has a formal preventive maintenance program to ensure that its tractors and trailers are safe for transport. ISO tanks and the chassis used for ISO tank deliveries are maintained by the Cyanide Producer. Suri does, however, perform pre-trip inspections prior to each departure to ensure that all equipment is suitable.

Weight tolerances were confirmed through the review of records and data plates on the equipment. A review of shipping papers confirmed that loads have not exceeded the equipment capacity ratings.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.4
 not in compliance with

Summarize the basis for this Finding:

Solid cyanide packages are loaded into sea containers by the shipper. Suri drivers confirm that the sea container is sealed and has been properly secured to the Suri trailer prior to departure from the port. Cyanide solution is loaded into ISO tanks by the producer. Suri performs a pre-trip inspection of the ISO tank prior to departure to ensure that the tank is properly closed, sealed, and that the ISO tank is properly secured to the tractor. This process was observed during the audit.

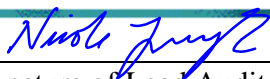
Appropriate placards (UN 1689 for solid and UN 3414 for liquid) are displayed on all four sides of the trailers. This is confirmed during the pre-trip inspections. Equipment markings were found to be adequate and conformant during the audit.

Suri maintains documented procedures that address pre-trip inspections, preventive maintenance, limitations on driver hours, and the drug and alcohol abuse prevention program. Maintenance records were very well maintained and equipment was found to be in good condition.

Driver hours are limited to daylight hours. Further limitations on hours of service are typically set by the shipper and are generally limited to 8 hours per day of driving. Records were checked to confirm that shipper requirements were being fulfilled.

Documented procedures detail the process to be used if a driver needs to modify or suspend a shipment due to unsafe conditions. A drug abuse prevention program has been implemented and a random selection of drivers undergoes testing on a regular basis. Records were available to demonstrate conformance to all safety program requirements.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.5
 not in compliance with

Summarize the basis for this Finding:

Suri picks up intermodal containers from the Port of Guaymas. Packing, blocking and bracing is performed by the shipper. Adherence to the requirements of the Dangerous Goods Code (IMDG) of the International Maritime Organization is the managed by the shipper. Neither Suri nor the Port of Guaymas have IMDG labeling requirements since the containers are only transported by land after arrival at the port.

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

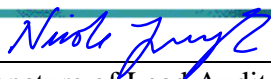
The operation is in full compliance with
 in substantial compliance with Transport Practice 1.6
 not in compliance with

Summarize the basis for this Finding:

Suri uses a number of methods to ensure that trucks are continuously tracked. Interviews with drivers, dispatchers, and management personnel and a review of computer records from shipments made in 2014 were used to confirm that cyanide shipments are being tracked. Real-time GPS information was reviewed during the audit. All shipments that were in transit were visible in the tracking software. Drivers reported that they have cell phones and radios to enable communication with the company transportation dispatcher, the destination mine, the cyanide producer, and emergency responders, as necessary.

The proper functioning of equipment is checked during the driver pre-trip inspections. Black-out areas are identified during the initial route evaluation process and drivers are held accountable for following the black-out documented procedure. The information is also refreshed through driver feedback and the periodic re-review of routes. Suri's approach to managing its communication and shipment tracking needs was found to be acceptable by the auditors.

Drivers have shipping documentation with them at all times during a shipment. Shipping paperwork was reviewed. Information regarding the type of material transported, the type of

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container, the number of packages, and the weight of the shipment is consistently entered onto the shipping papers. Drivers also have the sodium cyanide Safety Data Sheet (SDS) and Emergency Response Guide with them during deliveries. This practice was confirmed through interview and a review of information kept in trucks.

Trailers, ISO tanks, and intermodal containers are sealed upon loading and are not opened by Suri. Shipping paperwork was reviewed and was found to be conformant to ICMI Cyanide Code requirements, including chain of custody requirements.

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.*

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

Summarize the basis for this Finding:

Interim storage, according to ICMI definitions, is provided at the Port of Guaymas only. Suri does not operate a warehouse, nor does it bring trailers loaded with cyanide to its truck yards. The Port of Guaymas was evaluated during this audit and was found to be compliant with relevant ICMI requirements. A further discussion regarding the Port of Guaymas audit results appears at the end of this audit report.

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

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

The operation is in full compliance with
in substantial compliance with Transport Practice 3.1
not in compliance with

Summarize the basis for this Finding:

Suri has an extensive emergency response plan that was last revised in January 2014. The plan is appropriate for all transportation incidents. In addition to the main Emergency Response Plan (ERP), specific emergency response procedures have been developed for each client. The Evonik emergency response procedure (TSOP EK00112) and the Posabro procedure (TSRE PS00213) are included in the overall master ERP book. The ERP is available on the company's intranet and is available in hard copy the Terminal.

Suri drivers are to secure the scene and make a number of notifications. The information was reviewed and was found to be acceptable. Suri drivers have the emergency response sheets, the Emergency Response Guidebook (ERG), emergency telephone numbers, and the Safety Data Sheets with them during all deliveries. Suri only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging. Solid and liquid sodium cyanide characteristics, roadway infrastructure differences, and the roles of the different emergency responders are discussed in the emergency response plans.

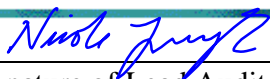
Transport Practice 3.2: *Designate appropriate response personnel and commit necessary resources for emergency response.*

The operation is in full compliance with
in substantial compliance with Transport Practice 3.2
not in compliance with

Summarize the basis for this Finding:

The roles and responsibilities of relevant internal and external personnel are clearly described in the emergency response information and the Suri procedures.

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Suri ensures that its personnel are trained in relevant emergency response procedures. All cyanide drivers and their supervisors form the brigade. Records were available to show that all drivers and supervisors were trained in First Aid, in Cyanide Emergency Response. Personnel also received emergency response training by the shippers that utilize this supply chain (Evonik and Posabro). Training was most recently done in 2013 and 2014 and is repeated annually.

Drivers were interviewed and awareness of emergency procedures was appropriate. Each truck is equipped with an emergency equipment box that includes: PPE (boots, gloves, Tyvek suit), shovel, fire extinguisher, tarp, yellow tape to block off area, etc. Drivers are responsible for checking to make sure that the emergency kit is present and complete during the pre-trip inspection process. The spill kit is also checked when the tractor is brought through the maintenance shop for regular maintenance. The emergency response plan has a list of the equipment that is to be maintained in the spill kit. Equipment and records were checked and were found to be complete and appropriate.

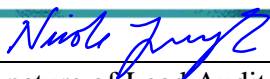
Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.3
 not in compliance with

Summarize the basis for this Finding:

The notification procedures, including telephone numbers, are described in the Emergency Response Procedure, Annex II. In the case of an emergency, drivers are instructed to contact the Suri Supervisor.. The plan also calls for the notification of the shipper, the insurance company that coordinates emergency response services, and local authorities, as appropriate. Drivers have the necessary telephone numbers noted on the paperwork they carry in their trucks. Interviews confirmed that the Suri Supervisor ensures that notification procedures and telephone numbers remain current. The plan, including notification information, is also reviewed each year for adequacy. Information in the plan was reviewed and was found to be current at the time of the audit.

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.4
 not in compliance with

Summarize the basis for this Finding:

Suri procedures detail their role in an emergency which is strictly a notification role. Suri has made arrangements for hazardous materials experts to remediate a spill onto ground or into water and to dispose of contaminated solids, in the case of a spill. The ERP does, however, detail all steps to be taken after the immediate response to a spill, however the remediation of a spill is contracted to hazardous spill remediation experts. The ERP is very detailed and describes the acceptable containers to be used and the decontamination steps.

The emergency response procedures ban the use of cyanide treatment chemicals in surface water. Interviews with the Suri Supervisor confirmed awareness of the hazards of using decontamination chemicals in surface waters.

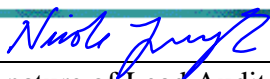
Transport Practice 3.5: *Periodically evaluate response procedures and capabilities and revise them as needed.*

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding:

The emergency plan is reviewed annually and tested periodically. Records from a drill run in March 2014 were available for review. The results of the drill were excellent. Interviews confirmed that the plan would also be reviewed after any deployment of the plan. Any changes would be made, as necessary. Emergency planning information was last updated in 2014.

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Port of Guaymas - Background Information

This Supply Chain includes cyanide handling and interim storage activities at the Port of Guaymas. The Port of Guaymas is located at the southern end of the Mexican State of Sonora. Sonora is on the Northwest Coast of Mexico, approximately 117 km south of Hermosillo, Sonora.

Solid sodium cyanide is received at the Port of Guaymas in sea containers, stored for a short time (no more than three days), and is picked up by Suri. This audit included on-site assessment of the Port of Guaymas.

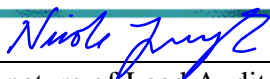
The Port of Guaymas has been in operation for hundreds of years and has been in commercial use since the 1800s. The Port of Guaymas is considered to be a medium sized full-service seaport with a sheltered harbor. The port has been included in an ICMI Cyanide Code certified supply chain since 2012. All aspects of ICMI Cyanide Code compliance were evaluated at the Port during this audit.

Port of Guaymas - Due Diligence Assessment Results
The Due Diligence Audit results were very positive and the Audit Team confirmed that the Port of Guaymas is suitable for the receipt and dispatch of solid sodium cyanide transported in sea containers. The port is authorized to receive Dangerous Goods. Equipment, security, and safety practices were found to be very well aligned with ICMI Code requirements. Personnel were very aware of safe handling and operational practices such as the need to segregate incompatible materials and the need to carefully manage chain of custody paperwork and truck dispatch. The port maintains a management system that conforms to ISO 14001, ISO 9001, and ICMI Cyanide Code requirements.

The Port is currently certified to the International Ship and Port Facility Security (ISPS) Code. This certification was available for review during the audit. The International Ship and Port Facility Security (ISPS) Code was enacted in 2004 through an amendment process under the Safety of Life at Sea Convention in 2002. The concept of the ISPS Code is to provide layered and redundant defenses against smuggling, terrorism, piracy, stowaways, etc. The ISPS Code requires ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Port Facility Security Plans.

Port personnel were very well prepared for the review and were very helpful in facilitating the audit. The road infrastructure to and from the port was found to be acceptable. One road leaves the port through the town of Guaymas and another road by-passes the town. The route planning for this Supply Chain calls for shipments to be routed along the by-pass road.

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Port personnel have experience with handling sodium cyanide and this cargo is currently handled at the port. The Port initially implements an ICMI Cyanide Code-conformant management system in 2012 as part of another Supply Chain certification process.

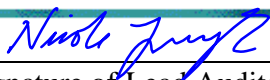
The sea containers are not opened and no specialized personal protective equipment is necessary at this location. The Port is fenced and manned at all times. The designated outdoor cyanide storage area is separated from other areas to ensure that the cyanide is not stored next to incompatible materials. The solid sodium cyanide is packed in multiple layers of packaging within sealed sea containers. No additional secondary containment systems were deemed to be necessary by the auditor for this operation. The auditor found the Port of Guaymas' cyanide interim storage policy and storage area to be compliant.

Port of Guaymas - Detailed Assessment Findings

The results of this Due Diligence Assessment are arranged by topic: Port Security, Safety & Training, Material Handling & Storage (including environmental considerations), and Emergency Response.

Topic	Assessment Results
Port Security	<ul style="list-style-type: none"> • The port is completely surrounded with a fence and access to the port is strictly controlled. Security of the port was found to be consistent with ICMI Code requirements. • Confirmation was made that the following practices are in place: 24/7 manned security; complete fence line; no public access; sealed (locked storage containers); security cameras. International Ship and Port Security certificate was verified. • Sea Containers remain sealed and they are not opened while at the port. • Truck Driver credentials are checked and the driver's authority to receive cargo is confirmed prior to dispatch of the cargo. Material chain of custody records are maintained. The port uses a checklist and a defined process to dispatch cargo. Records were available for review and were found to be acceptable.
Safety & Training	<ul style="list-style-type: none"> • The port currently handles sodium cyanide. • Personnel receive Dangerous Goods training on a recurring basis. Testing is done after the training to confirm understanding. IMDG (International Maritime Dangerous Goods) training is given to all operations personnel who handle hazardous cargo. • Forklift Drivers and Crane Operators are trained each year to ensure safe equipment operations. Testing and refresher training are a part of the program. Records are maintained. • The port maintains a strict Drug and Alcohol policy. This is communicated to all personnel and random drug / alcohol testing is conducted regularly. • Confirmation was made during the audit that no eating, smoking, or open flames

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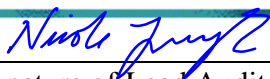

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Topic	Assessment Results
	are allowed in areas where cargo is handled and stored.
<p>Material Handling & Storage</p> <p>Material Handling & Storage</p>	<ul style="list-style-type: none"> • Material handling equipment and handling practices were found to be excellent. Equipment appeared to be well-maintained. • Forklifts and cranes are rated for weights in excess of the typical cyanide containers. Confirmation was made using data plates on the equipment versus shipping paperwork showing sea container weights. • Equipment is regularly maintained with a defined preventive maintenance program. Preventive maintenance is performed according to manufacturer's specifications. • All sea containers observed had appropriate UN labeling and cautionary markings. No cyanide containers were observed in the port at the time of the audit. • The port is allowed to temporarily store dangerous goods, such as Cyanide, for a maximum of three days before the cargo needs to be removed. Records showed that cargo is sent out of the Port within the necessary time limits. • Dangerous Goods cargo is stored using standard chemical compatibility management practices. • Port Personnel ensure that the Truck Driver inspects the truck prior to dispatch; Port Personnel check to make sure the container is securely loaded onto the trailer and that the container is sealed. Customs paperwork and a Port checklist are used as part of the dispatch process.
<p>Emergency Response</p>	<ul style="list-style-type: none"> • A written Emergency Response Plan (ERP) was available for the audit. It is reviewed and revised at defined frequencies. The ERP was last revised in 2014 and is under formal document control. • The roles and responsibilities of the Emergency Response Team are defined in the ERP. The ERP addresses actions to be taken in response to a number of different emergencies including spill, fire, and medical incidents. Contact information is kept up-to-date and revised as necessary. Emergency contact information is included for the Emergency Response Team members, local hospitals, and the local fire department. The information in the ERP was found to be acceptable. • The Port has a Clinic that is open 24 hours a day, 7 days per week. Cyanide antidote is maintained at the Port and clinic personnel have been trained in its use. The antidote is maintained according to manufacturer's specifications and was within its expiration date. • Emergency Responders are trained at defined frequencies. Emergency drills are conducted regularly with all necessary personnel (all people who would be expected to respond to the emergency). The last drill was held within the past two years. • Appropriate emergency response equipment was available at the Port.

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