**INTERNATIONAL CYANIDE MANAGEMENT CODE**

**TRANSPORTE SURI, S.A. de C.V.**

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In collaboration with:

[PR Consulting & Auditing Group]

[CN Inc.]
INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Operations Summary Audit Report

For The
International Cyanide Management Code and TRANSPORTE, S.A. de C.V – HERMOSILLO – MEXICO

Verification Protocol

www.cyanidecode.org
October 2017

LIMA, PERU
MONTERREY, MEXICO
LIMA, PERU
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INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: TRANSPORTE SURI, S.A. de C.V (SURI)
Name of Facility Owner: TRANSPORTE SURI, S.A. de C.V (SURI)
Name of Facility Operator: TRANSPORTE SURI, S.A. de C.V (SURI)
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State/Province/Country: Hermosillo | Mexico
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E-mail: fernandad@alsa.com

Aspects of the location and description of the operation:

TRANSPORTE SURI, S.A. de C.V (hereinafter SURI).

The scope of this audit includes the land transport operation from the "WINNEMUCCA" Distribution Center, Hermosillo or Huaymas Port, to the mining units, where cyanide is released. The cyanide is received in the mining units in the following presentations:

- Super-polypropylene inner bag filled up to 1 ton and placed inside a polyethylene bag and wooden box.
- Isotanks of 16 TN

No less than 20 tons are placed in standard shipping containers of 20 feet; the boxes are placed so that lateral movement inside the container is avoided. In addition, normal anchoring of the container to the truck chassis is used. The containers are received blocked and labeled.

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

Instructions

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

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

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

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

   International Cyanide Management Institute (ICMI)
   1400 I Street, NW, Suite 550
   Washington, DC  20005, USA

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

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

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

X in full compliance

in substantial compliance

not in compliance

with the International Cyanide Management Code.

During the last 3 years no accidents have been recorded

Audit Company: ISOSURE SAC | CIANURO INCORPORATED EIRL

Audit Team Leader: Luis Torres Argandoña

E-mail: auditoria@isosure.com

Date(s) of Audit: 16 and 19 October 2017

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

I attest that this Summary Audit Report accurately describes the findings of the verification audit.

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

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<tr>
<td>Luis Torres Argandoña</td>
<td>Lead Auditor and Transportation, Production, and Mining Technical</td>
<td>Luis Torres Argandoña</td>
<td>31 October 2017</td>
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<tr>
<td>Carlo Vargas</td>
<td>Transportation and Mining Technical</td>
<td></td>
<td>31 October 2017</td>
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Transport cyanide in a manner that minimizes the potential for accidents and releases.

1.1 **TRANSPORT PRACTICE 1.1**

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

X in full compliance with

The operation is

- [ ] in substantial compliance with Transport Practice 1.1
- [ ] not in compliance with

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

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

SURI implemented the route evaluation process identified as “DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide), which includes the AB01 Design and apply internal procedures to select, evaluate, reevaluate and / or validate routes, Cyanide Transport which describes the items to be assessed during the route analysis in accordance with the ones pointed in the International Cyanide Management Code.

The route is evaluated:

- WINNEMUCCA, Distribution Center to the Mines CHANATE (Town of ALTAR, Sonora), MULATOS (Poblado Mulatos, Sonora)
- Puerto de Huaymas, Sonora to San Felipe (San Felipe Town, Baja California)

Other route evaluated:

- Mulatos Mine
- San Francisco Mine (Estación Llano)
- Nueva Laredo Mine
- Concheños Mine

The evidenced records are as follows

- Roadmap
- Risks of Cyanide Transportation

In the procedure "AB01 Design and apply internal procedures to select, evaluate, reevaluate and / or validate routes", the Security Manager together with the client performs the evaluation of the route in person, in any case, a new route, according to the evaluated risks, the Security controls for the route, such as:
Minas San Francisco (Llano Station), Hermosillo | Identical to Chanate with the modification that in the area of Benjamin Hill there is a detour to the mine where a risk of flooding of the road is described.

1. The trace of the route is described
   a. Product: Sodium Cyanide in 20 FEET CONTAINER - SOLID
   b. Product: Sodium Cyanide in ISOTANQUES - LIQUID, it should be mentioned that the operation is temporary in a route of 180 km, in a straight line without slopes, or winding road.
   c. Start: Port Administration of Guaymas

Mines Concheños, Hermosillo

1. The trace of the route is described
   a. Product: Sodium Cyanide in 20 FEET CONTAINER - SOLID
   b. Start: Port Administration of Guaymas

Mines Chanate, Hermosillo

1. The trace of the route is described
   a. Product: Sodium cyanide in ISOTANK - SOLIDO
   b. Start: Installation of the Winnemucca Client - Sahuaripa Km 22
   c. Main Risks
      i. School areas
      ii. Train tracks
      iii. Vehicular traffic to the exit of "Hermosillo"
      iv. Track crossings
      v. Areas of military check revision
      vii. Road blockage by manifestation of social nonconformity of a certain group of individuals
      viii. Road blocking due to accidents
      ix. Road block pro military, police or mixed checkpoint
      x. Blockade of road by snowfall, growth of rivers, streams, exhaust of rough waters by torrential rains, landslides or landslides of hills, fall of bridges, rupture of road, with notice price
      xi. Blockade of road due to snowfall of rivers, streams, exhaust of rough waters due to torrential rains, landslides or landslides of hills, fall of bridges, road rupture, without previous warning.
d. Also, the security suggestions for each of the risks identified during the route evaluation are described. Which is described in the "Operational Logistics Sheet of Action in case of Atypical Situation in the Development of Traveling Transporting Cyanide" and "Route Validation", in the latter it concludes with the viability of the transport of sodium cyanide.

e. It has the contacts and location of:
   
i. Cia. Bomberos (04)
ii. Red Cross
iii. Hospitals
iv. Public Security Unit (Federal Police, State Police and Prosecutor's Office)

SURI implemented the "AB01 Design and apply internal procedures to select, evaluate, reevaluate and / or validate routes", in the route evaluation report the main risks were identified as urban areas, population density, road infrastructure, proximity to water bodies, presence of fog, probability of free fall.

The risks associated with these characteristics include: vehicle accident, vehicle rollover, vehicle skidding, cargo, loss, pedestrian accidents, product spillage in the body of water and water contamination, among others.

For each specific route, a risk assessment was developed with a photographic record in 2017. Risk management measures are listed for each part of the routes according to the characteristics and level of risk.

According to "AB01 Design and apply internal procedures to select, evaluate, reevaluate and / or validate routes", routes are verified entirely once a year or to the first transport to a client by SURI’s Control and Analysis team. In addition, for all cyanide transportation operations, the driver must present a travel log, in which the driver has to note if there were any changes on the route. If any changes are identified, these are reviewed and assessed; and if applicable, the route risk assessment is updated. Temporary changes, such as route diversions, are verbally informed to the driver prior to the departure of the convoy.

SURI identified the fire stations, Police stations, technical support and hospitals and medical centers in the area, as well as phones and contacts.

As previously noted, the risk assessment of each routes describes the risks identified along them and the specific measures to be taken to address the risks.

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

SURI includes comments from interested parties (communities, other stakeholders, government agencies) in compliance with the procedure "AB01 Design and apply internal procedures to select, evaluate, reevaluate and / or validate routes".

The centers are included in the Emergency Response Plan of SURI and consultation centers were evident during the audit.

SURI for the transport of sodium cyanide. SURI has a control room at the base of HERMOSILLO, MEXICO, where the GPS system provides a continuous positioning of each vehicle at all times, as well as a continuous monitoring of the speed at each point of the route from the point from start to end point.
SURI also established through a "DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide)", asimismo has established the following controls:

- AB01 Design and apply internal procedures to select, evaluate, reevaluate and / or validate routes
- AB02 Geo Monitoring Satellite Positioning (GPS) 24 hours
- AB03 Staff training
- AB04 Supervision at the client's facilities
- AB05 Patrol and / or route validation actions
- AB06 Selection of drivers
- AB07 Define authorized stops
- AB08 Vehicle inspection
- AB09 Escort service
- AB10 Emergency care
- AB11 Investigation in case of accidents and non-compliance with procedures

The specifications of use of escort trucks during the transport of sodium cyanide, are defined in the "DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide)".

Only ONE (01) CONTAINER can be loaded per platform and each car can only drag one chassis. The convoy may include one or more escort vehicles at the request of the client. The trip of the convoy will depend on the weather condition.

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

SURI does not subcontract any of this cyanide transport operations.

1.2 **TRANSPORT PRACTICE 1.2**

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

X in full compliance with

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

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

The operation is in FULL COMPLIANCE with Standard of Practice 1.2 requiring an operation Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.
The SURI establishes minimum requirements for drivers “Job profile”: health, defensive driving training, and response training on sodium cyanide emergencies (spills and poisoning prevention).

Drivers are legally required to hold a for hazardous materials “Type E driver’s license”. In order to obtain this license, have completed high school, undergo a psychological evaluation and a psycho-technical assessment, and hold a certificate from Professional Driver School.

The auditor reviews the documentation of the 03 drivers:

- Carlos Hernandez | Licencia SON0015819 | 02 years of experience
- David Cribeli | Licencia SON0014222 | 04 years of experience
- Carlos Fabian Martinez | Licencia SON0010626 | 03 years of experience

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

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

The organization has implemented the P-R-Y-S Recruitment and Selection Procedure, through which the organization evaluates:

i. Chemical examination (Toxicological)
   1. Canabinoids
   2. Cocacina
   3. Mentanfetamine
   4. Amphetamine
   5. Opiaceos

ii. R-Control, risk assessment (Financial, criminal, judicial, housing)

iii. Work Letters, work certificates (5 years)

iv. Copy of proof of course of management and receipt of payment

v. Copy of the license

vi. Copy of the Apt, medical examination enabled

vii. Social security card

viii. Proof of studies (Secondary complete)

SURI, has been working on a Program Management System Safety and Health at Work.

This program provides training related to leadership activities and management commitment, and Training, Hazard Analysis Working Procedures, Use of Personal Protective Equipment, Incident Investigation, Safety Inspections, Emergency Response, Drills, Environment Protection, Security, and Health Program.
SURI selects the most specialized drivers to transport sodium cyanide.

According to PD TR 005 Cyanide Transportation Service, drivers drive up to FIVE (05) continuously, with breaks of TWO (2) hours. Sleep at least EIGHT (08) hours before each trip, and one must not drive for more than TEN (10) hours per day.

In their Cyanide Emergency Response Plan, SURI includes a training program that must be complemented by all drivers, consisting of the following:

- Introduction to the Company
- Basic Ricks Prevention and Use of Personal Protection Equipment (PPE)
- Hazardous Materials Handling and Transportation
- Emergency Response
- Defensive Driving
- Cyanide First Emergency Response
- General Information of Cyanide Product

According to Plan cyanide related training is refreshed once a year. During the audit, files of two (02) drivers were reviewed, and all relevant training certificates were available.

SURI does not subcontract any of this cyanide transport operations.

1.3 TRANSPORT PRACTICE 1.3

ENSURE THAT TRANSPORT EQUIPMENT IS SUITABLE FOR THE CYANIDE SHIPMENT.

X in full compliance with

The operation is

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

Summarize the basis for this Finding/Deficiencies Identified:

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

SURI establishes requirements for maintenance of the units carrying cyanide in the DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide), SURI is registered at the Government of Mexico for the transport of hazardous materials.

Trailer:

- Category / Class: N3 / Trailer.
- Bodywork: Trailer.
- Fuel: Oil.

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

**Excessive load**

• SURI provides that the charge should not exceed the carrying capacity, and this control is performed by using the format “Verification Pre-Use Units”.

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

According to the “DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide)”, SURI safety chief together with a driver have to check the trucks and trailers completing a checklist per vehicle prior to the departure of the convoy. The checklist requires reviewing:

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

During the audit, three (03) packages of travel records that complied with the provisions are evidenced.

According to the DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide), SURI has procedures in place to prevent overloading of the transport vehicles, one CONTAINER of cyanide can be loaded on the vehicle.

SURI does not subcontract any of this cyanide transport operations.

1.4 **Transport Practice 1.4**

**Develop and implement a safety program for transport of cyanide.**

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 1.4

□ not in compliance with

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

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

SURI established a transportation method avoiding disturbances during motion.
For the transportation of sodium cyanide, SURI has a control room at the base of HERMOSILLO, Mexico, where the GPS system provides continuous positioning of each of the vehicles at all times.

Additionally, SURI has a security program which includes:

- AB01 Design and apply internal procedures to select, evaluate, reevaluate and / or validate routes
- AB02 Geo Monitoring Satellite Positioning (GPS) 24 hours
- AB03 Staff training
- AB04 Supervision at the client's facilities
- AB05 Patrol and / or route validation actions
- AB06 Selection of drivers
- AB07 Define authorized stops
- AB08 Vehicle inspection
- AB09 Escort service
- AB10 Emergency care
- AB11 Investigation in case of accidents and non-compliance with procedures

With the evidenced procedures, the inspection at the time of the loading and the controls along the transport, the organization avoids liberation of the product.

SURI requires inspection of cartels load information (DOT and UN) verification of the truck “Verification Pre-use units”. Signage is provided in order to comply with local regulations, which are based on the UN Recommendations on the Transport of Dangerous Goods. Copies of the placards are included in the Emergency Response Plan.

SURI conducts vehicle inspections prior to each departure/shipment

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

SURI has a maintenance plan. The maintenance records were reviewed and the practice was confirmed during the observation of the vehicle and interview with the maintenance supervisor and drivers.

There are units KENWORTH T660 (06 Units) and INTERNATIONAL PROSTAR (07 Units), ALSUA MA 002 ALSUA Maintenance Procedure (Corporate), the Maintenance Plan is generated indicating that it must be performed every 24,000 km

The company has a fleet designated for cyanide of 13 units, the plates are indicated below:

- 0223
- 0813
- 1313
- 12213
- 12613
- 10313
- 10413
- 5114
- 14714
- 14814
- 14914
- 15114
- 15015
The training record of the aforementioned units was evidenced.

According to DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide), drivers drive up to FIVE (05) continuously, with breaks of TWO (2) hours. Sleep at least EIGHT (08) hours before each trip, and one must not drive for more than TEN (10) hours per day.

SURI states that the load of cyanide must travel in 20 or 40 foot CONTAINER, developing mechanisms to prevent its movement.

According to the DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide), SURI has anchoring mechanisms for the container and lashing system for cyanide in the container.

Before the departure of the United States, an evaluation of the climatic conditions and social conflicts is carried out. To do so, we have information from the police in real time.

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

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

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

The records of the audit and of the operations are stored up to three (03) years by the organization, this was verified during the audit.

1.5 TRANSPORT PRACTICE 1.5:

FOLLOW INTERNATIONAL STANDARDS FOR TRANSPORTATION OF CYANIDE BY SEA AND AIR.

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:

The operation is in NOT APPLICABLE with Standard of Practice 1.5 requiring an operation Follow international standards for transportation of cyanide by sea and air.

SURI not transported by sea transport and air transport within the territory of Mexico.
1.6 **Transport Practice 1.6:**

**Track cyanide shipments to prevent losses during transport.**

X in full compliance with

The operation is ☐ in substantial compliance with Transport Practice 1.6

☐ not in compliance with

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

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

SURI uses a GPS system. They also have telephone service, radio UHF and cell phones which ensure full coverage during movement and are completely connected to the control room in their base in HERMOSILLO, Mexico. During the audit, the operability equipment was verified.

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

Additional, SURI periodically test communication equipment to ensure it functions properly. "Verification Pre-use units" contains the inspection criteria of communication equipment.

SURI has identified areas without cellular and radio UHF coverage; in such areas the driver makes use of satellite equipment.

The GPS system has location actualizations in real time, in areas without GPS coverage it saves the information transmitted after the passing of vehicles.

The bill of lading and the shipment reference are part of the shipping records of the amount transported; the Material Safety Data Sheet is checked before each trip and is available throughout the transportation.

In the sender shipment reference is indicated the name of the product, the United Nations (UN) number, the transported amount of packages and weight of the load, and it is also necessary to indicate the product safety considerations. Upon the delivery of the sender shipment reference, the provider delivers the Material Safety Data Sheet to the carrier.

SURI does not subcontract any of this cyanide transport operations.
INTERIM STORAGE

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

2.1 TRANSPORT PRACTICE 2.1

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

SURI has no stores or warehouses in territory of Mexico.
EMERGENCY RESPONSE:

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

3.1 TRANSPORT PRACTICE 3.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.1

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

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

It covers strategic and tactical response of emergencies that might occur during the transport process in the following routes.

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

The Emergency Response Plan has the following information:

• General information carrier
• Organizational Transport
• Functions of staff in emergencies en route - Incident Command
• Communication system
• Characteristics of vehicle units
• General and specific characteristics of sodium cyanide
• Identification of risks along the route
• Response Planning
• Communication Processes
• Procedures for emergency care
• Review and update contingency plan

The Emergency Response Plan is suitable for the selected transport route, taking into account the physical and chemical form of cyanide clearly based on the Safety Data Sheet of the Product "Sodium Cyanide". SURI is a transporter of sodium cyanide supply in solid state (briquettes).
SURI indicates the use of trucks to transport sodium cyanide taking into account the characteristics of the equipment and assesses the structural condition of the road where the transportation sodium cyanide is done. (Control of Hazardous Merchandise),

- UN Number: 1689
- UN Classification: Toxic
- Class Number: 6.1
- Transport type: truck more wagon tract
- Container Type: 20 or 40 ft shipping container or ISOTANKS
- Quantity per container: 20 tons
- Product Form: solid briquettes

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

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

SURI uses trucks; in addition, all shipment is dispatched within low platform trailers purchased with a maximum load capacity of 20 tons.

**Trailer:**

- Category / Class: N3 / Trailer.
- Bodywork: Trailer.
- Fuel: Oil.

**Semitrailer:**

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

SURI sets action if incidents occur on the route which is described below.

- Incident without injury / continuous journey
- Mechanical problems / non-continuous journey
- Overturning with effusion / without spillage
- Collision with injuries
- Spill dry - cleaning and decontamination
- Water Spill - cleaning and decontamination
- Social conflicts
- Adverse weather conditions
- Traffic congestion
- First aid for cyanide poisoning

Awareness on the part of drivers and supervisors of the actions in each case was evidenced after interview with the staff.

SURI has defined three levels of emergency response. The Emergency Response Plan identifies the roles of outside responders, medical facilities or communities in emergency response procedures.
The plan indicates the functions of external media involved in managing the contingencies that arise, for example:

- Provider of solid waste services
- National Police of Mexico
- Volunteer fire department of Mexico (specify the role and responsibility of firefighters)
- Medical centers.

SURI includes information regarding hospitals, police stations, Fire Company along the route.

3.2 **TRANSPORT 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:**

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

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

Training given to staff

- Hazardous Material
- Defensive driving
- Safe handling of cyanide
- Emergency response plan

The training program is developed annually and can be enhanced according to performance and safety indicators and / or customers’ requirement.

The Emergency Response Plan, Drivers, Supervisors, Chief safety, Operations Manager, Central Monitoring Coordinator, and General Manager are responsible to respond in an emergency; They have received the necessary training for efficient emergency response.

The Emergency Response Plan each truck has the necessary amount of emergency response equipment and the safety escort also has a Response Kit for spills and poisoning, and personal protective equipment which must be verified before the trip, as well as the verification of courses prior to starting the travels and the periodic emergency response training.
SURI has the necessary equipment for emergency response in the event of a major spill. Which is verified by the "Verification Pre-Use Units "

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

In the DG / GOS / PSTyMSP-17 Internal Procedure for Comprehensive Safety for the Service of Transportation of Materials and / or Hazardous Substances (Cyanide), is specified the verification criteria of the units before each journey.

During the audit, inspection records were evident.

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

SURI does not subcontract any of this cyanide transport operations.

### 3.3 TRANSPORT PRACTICE 3.3:

#### DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with

The operation is

- [ ] in substantial compliance with Transport Practice 3.3
- [ ] not in compliance with

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

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

It was noticed that the contact information in case of emergency is updated, in case of emergency it will be set and updated the Emergency Response Plan. The Emergency Response Plan indicates the current contact list which is reviewed and updated through every review of the Emergency Response Plan.

The Emergency Response Plan detailing the program communications, taking into consideration:

- Emergency levels.
- Communication of an emergency.
- Roadside communications flow emergency.
- Information during an emergency call.
- Communication to the National Police of Mexico / Competent Authority / Other Institutions Support / Community.

The Emergency Response Plan includes an internal communication and external schema that specifies the call flow by the safety personnel, the receptors, the regulatory agencies, external response providers, medical centers, fire departments, and communities potentially affected by an emergency.
3.4 **Transport Practice 3.4:**

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

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.4

□ not in compliance with

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

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

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

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

3.5 **Transport Practice 3.5:**

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

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.5

□ not in compliance with

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

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

The period of review and evaluation of this Emergency Response Plan is at least once a year.

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

During the audit, the Emergency Response Plan has been updated to date.

When you change the route, an updated contingency plan is generated and sent to the Ministry of Transport and Communications for review and final approval.

Also they scheduled drills periodically to assess the adequacy of the plan and the level of compliance of the actions planned emergency.
During the audit, records spill drill evidenced in 2017.

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

The simulations are made by the Safety Chief who has an ANNUAL DRILLS PROGRAM indicating the completion of FOUR (04) practical simulation, for the purpose of evaluating the effectiveness of the Emergency Plan and correct what is indicated on it.

The simulated evidences are:

- First aid
- Fire protection
- Contingency en route
- Safe handling of cyanide

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

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

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