INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Gold Mining Operations

Summary Audit Report Form

For the
International Cyanide Management Code
JACOBINA MINERAÇÃO E COMÉRCIO Ltda.

YAMANA GOLD GROUP
2nd RECERTIFICATION AUDIT
APRIL 04 to 06, 2017

www.cyanidecode.org
SUMMARY AUDIT REPORT
FOR GOLD MINING OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Standard of 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 mine 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 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, 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 web site, 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 gold mining company.

7. The description of the operations should include sufficient information to describe the scope and complexity of the gold mining operation and gold recovery process.

Yamana Gold – Jacobina Mine

Lead Auditor Signature
Julio C. M. Monteiro

Date: April 2017
GENERAL INFORMATIONS

Name of Mine: JACOBINA MINERAÇÃO E COMÉRCIO Ltda.
Name of Mine Owner: Yamana Gold
Name of Mine Operator: Yamana Gold
Name of Responsible Manager: Sandro da Silva Magalhães (Plant Manager)
Address: Fazenda Itapicuru, S/N – Jacobina
State/Province: City of Jacobina – Bahia State
Country: Brazil
Telephone: 55 (74) 3621-8000
E-Mail: sandro.magalhaes@yamana.com

Location detail and description of operation:

The Operation of the JMC is located in a complex at underground mines called: Morro do Vento, Joao Belo, Serra do Córrego, Lagartixa and Canavieiras. Mines are located in north-central portion of Bahia State, on the western most edge of Chapada Diamantina. JMC is a Metallurgical Plant with situated at the Serra da Jacobina, Jacobina City, Bahia State. The administrative complex and operate mining are situated near the Itapicuru Village 10 km from the Jacobina City and 358 km of Salvador northwest. The JMC Metallurgical Plant operates in CIP (Carbon in Pulp) equipped with primary and secondary crushing and tertiary with two ball mills and a set of 13 tanks for the metallurgical process of leaching and CIP. The complex also endowed with a tailings dam provided with a set of pumps called closed-loop pickup water from the tailings dam for the operation of the plant.
SUMMARY AUDIT REPORT

Auditor's Finding

This operation is

X in full compliance
□ in substantial compliance *(see below)
□ not in compliance

With the International Cyanide Management Code.

This Operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

Audit Company: JULIO MONTEIRO AUDITORES DA QUALIDADE LTDA.
Audit Team Leader: JÚLIO C. M. MONTEIRO
Names and Signatures of Other Auditors: MARCELO VIEIRA MONTEIRO
E-mail: jmaq@ig.com.br
Date(s) of Audit: 2nd RECERTIFICATION AUDIT – APRIL, 04 to 06/2017

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 conduct in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Gold Mine Operations and using standard and accepted practices for health, safety and environmental audits.

Lead Auditor Signature
Júlio C. M. Monteiro

Yamana Gold – Jacobina Mine

Lead Auditor Signature
Júlio C. M. Monteiro

Date: April 2017
1. PRODUCTION: Encourage responsible cyanide manufacturing by purchasing from manufacturers who operate in a safe and environmentally protective manner.

**Standard of Practice 1.1:** Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

- X in full compliance with
- □□ □□ in substantial compliance with
- □□ □□ not in compliance with

**Standard of Practice 1.1**

The operation is

- X in full compliance with
- □□ □□ in substantial compliance with
- □□ □□ not in compliance with

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

The Operation contract with Unigel clearly address the requirement that the cyanide shall be produced in a facility that is in compliance with the Code for cyanide producers and be transported by a transporter also both recertified by ICMI. There is a formal agreement dated Dec./02/2015, where in the contract has been explicit duties of the contractor. The Unigel has been audited and recertified, as “In Full Compliance” is therefore a signatory to the International Cyanide Code.

Unigel has two facilities (Camaçari and Candeias in Bahia State - Brazil) certified in conformance with ICMI protocol for cyanide producers and Concórdia Transport is also certified by ICMI, as evidenced at the ICMI website.

The following contracts were review:

a) Jacobina Mining and Unigel - Nr 2735 (dated December / 02 / 2015 – Valid until December / 01 / 2017). Contract Manager is Mr. Albert Soares de Souza.

b) Unigel and Concórdia (dated December / 02 / 2015 – Valid until December / 01 / 2017). Supply of Sodium Cyanide is provided in solution with the following specifications:

- 33.0 ~ 35.0% with minimum of 0.5%, according to the Specification in MSDS HIG.F.20.
- The container has a capacity of 26,000 liters - isotank.
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2. TRANSPORTATION: Protect communities and the environment during cyanide transport.

Standard of Practice 2.1: Establish clear lines of responsibility for safety, security, and release prevention, training and emergency response in written agreements with producers, distributors and transporters.

X in full compliance with Standard of Practice 2.1

The operation is
in substantial compliance with
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The following agreements among the Operation, the cyanide producer and the cyanide transporter were evidence and reviewed:
- Jacobina Mining and Unigel - Nr 2735 (dated December / 02 / 2015 – Valid until December / 01 / 2017). Contract Manager is Mr. Albert Soares de Souza.
- Proquigol and Concórdia (dated December / 02 / 2015 – Valid at December / 01 / 2017).

The Unigel also had previous contract with Concordia Transportation it was renovated.

Standard of Practice 2.2: Require that cyanide transporters implement appropriate emergency response plans and capabilities and employ adequate measures for cyanide management.

X in full compliance with Standard of Practice 2.2

The operation is
in substantial compliance with
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

As previously referred and evidenced, the contract among operation, producer and transporter clearly addresses the requirement that the transporter must be a ICMI recertified company.

The following agreements among the operation, the cyanide producer and the cyanide transporter were evidence and reviewed:
- Jacobina Mining and Unigel - Nr 2735 (dated December / 02 / 2015 – Valid at December / 01 / 2017).
- Unigel and Concórdia (dated December / 02 / 2015 – Valid at December / 01 / 2017).
3. HANDLING AND STORAGE: Protect workers and the environment during cyanide handling and storage.

**Standard of Practice 3.1:** Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

The operation is □□ in substantial compliance with Standard of Practice 3.1

□□ not in compliance with

The Operation has a receiving / storage area for the reception of the cyanide solution. It was evidenced through the project documentation and it designed and constructed in accordance with acceptable Brazilian Engineering Standards. The reception / storage area (and the cyanide unloading activity) of the Operation is monitored (from the control room) by an internal TV circuit. The cyanide tanks area is isolated and apart from other storage areas. It was evidenced that this area is well maintained, clearly signalized, and clean. Food and tobacco products are not allowed in this area.

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linked to a specific containment pool. It was evidenced the design / construction documentation through the field audit. Verified the Construction Project Nr. PTC 044/08 - GERIN / BA. Technical Report - HTP Company of Brazil dated July 7, 2009.

The cyanide discharging area has the following constructive characteristics:

- Floor in gravel leveled and compacted;
- Cover with HDPE canvas;
- Application of steel wires with a diameter of 1/16 "with cover of 5.0cm having in its composition fine gravel and special additives.

Tanks level is controlled by the Plant Operator in the Control Room. High-level alarms are in place. The Operation established lower levels alarm values in order to work in a preventive and safe way. The cyanide reception and storage area were built in concrete and HDPE, inside a secondary containment pool, as evidenced in the design / construction documentation. The containment pools are constructed in concrete and HDPE, according to specific Brazilian technical standards.

**Standard of Practice 3.2:** Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

The operation is

- X in full compliance with Standard of Practice 3.2
- □□ in substantial compliance with
- □□ not in compliance with

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

The Operation uses only cyanide solution (33%) that brought into operation in ISO-containers, specifically designated for this purpose, which is return to the cyanide producer (Unigel) just after the unloading activity is concluded by the cyanide transporter (Concórdia Transportes).

It was evidenced that the defined, documented and implemented a procedure POP 04-09-3.5-088 to unload the cyanide during the reception. The Operators are trained and qualified in this procedure. Records of such training activities and the field audit were evidenced. The operational procedure clearly addresses the couplings activities as well the valves maneuvers.

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Julio C. M. Monteiro

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In the event of any real spills, the operational procedure covers the neutralization and cleaning of the spills, which is force to the drainage system. Procedure POP 04-09-3.5-174 - Neutralization of NaCN.

A qualified Operator, using appropriate PPE (including calibrated HCN detectors) is observed full time by a second operator that remains in a safe area.

4. OPERATIONS: Manage cyanide process solutions and waste streams to protect human health and the environment.

Standard of Practice 4.1: Implement management and operating systems designed to protect human health and the environment utilizing contingency planning and inspection and preventive maintenance procedures.

X in full compliance with
The operation is in substantial compliance with Standard of Practice 4.1
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

A procedure for unloading cyanide solution was confirmed (POP-04-09-3.5-088), as well as a procedure for leaching POP-04.09-3.5-005 and a procedure for operation of tailing dam POP-04-09-3.5-020. The Operation uses only liquid cyanide and does not use briquette cyanide in the process.

A procedure for tailing dam operation was presented - POP-04-09-3.5-020 with limits definitions of Cyanide WAD concentration; the freeboard for tanks is established on the procedure POP-04.09-3.5-005. The safety freeboard for tailing dam is established by the guide DAM Operation Manual – JM02-390-C-MO-0003, February / 2017, stage 4. Operation does not discharge to surface water. The system is based on a closed circuit. The tailing dam freeboard is 3 meters (quote: 587m and crest: 590 during the audit).

The Maintenance Plan "Preventive and Corrective Maintenance of Civil Structures" is in place for cyanide leaching and unloading areas plant, including ponds, pipelines and valves and found in compliance. The checking of tailing dam freeboard and integrity of watercourses is record in the RDOS - Daily Report of Operation and Safety. Reviewed some RDOS records from February and March/2017.

The Plan of Metallurgical Plant Maintenance uses a system to create all the Work Orders and related preventive inspections that have been carry out by Inspectors.

The Maintenance Plan "Preventive and Corrective Maintenance of Civil Structures" is in place for cyanide leaching and unloading areas plant, including ponds, pipelines and valves and found in compliance. The checking of tailing dam freeboard and integrity of watercourses is record in the RDOS - Daily Report of Operation and Safety.

Yamana Gold – Jacobina Mine

Lead Auditor Signature
Julio C. M. Monteiro

Date: April 2017
The Operation has the necessary emergency power resources to operate pumps and other equipment to prevent unintentional releases and exposures in the event its primary source of power is interrupted, as confirmed in the maintenance plan managed by the software DATASUL. The Operation has 5 generators, ensuring that, if necessary, they become active. Evidences are available in the document Schedule of Inspection to ensure the functionality of the power generators.

Reviewed the specific procedure PIS-04-00-3.5.013 - Change Management that establishes a methodology to ensure that changes are evaluated prior to their implementation and ensure that only those that do not cause impacts or damage to people, property, quality of the product and the environment are implemented.

The change management flow described in PIS-04-00-3.5.013 states:

1. Identify change;
2. Definition of the team and analysis of the potential risks of change;
3. Plan for change;
4. Perform the change;
5. Evaluate the results;
6. Systematize the controls.

In item 6.1 of the procedure are described the items that are considered changes. In item 6.2 of the procedure indicates that the process to be followed since the change identification, team formation, items to be evaluated, check list to be followed.

In item 6.4 of the procedure is described regarding the implementation of the changes (information, training, revision of risks, damages and anticipated impacts and, if there is reason for divergences).

In case of Temporary cessation of the operation the Procedure POP-04-09-3.5-290 describes in item 6.4.2 Disposal of Residual Reagents in Storage Areas that "reagents not used until the end of operations shall be delivered and used for other units of the Yamana group, and must follow the chemical handling manifest or similar control document”. In item 6.1.1 the Procedure for Decontamination of the Plant, a procedure for the neutralization of tanks, pipes and equipment and the sampling and analysis necessary to validate the neutralization is informed. In item 6.2 of the Base Calculation procedure for Oxidation of NaCN with 50% Hydrogen Peroxide the stoichiometric ratio for neutralization reaction is described and in item 6.3 of the procedure the cost for this activity is described.

According to item 6.4.3 of the procedure Demobilization of Metallic and Civil Structures, the demobilization should follow the recommendations mentioned in the PRAD - Degraded Areas Recovery Plan of JMC.

Inspections are carrying out at suitable intervals, which are checked: physical structure, tanks, containment basins, pipes, HCN detection systems, among others, and ensure that the facilities of the unit are within the design parameters.
There are inspections records for the RDOS – Daily Report of Operation and Safety, including name of inspector, signature, and date of inspection, corrective actions taken, revision status and specific check lists. Checked the reports from April, 03/2017.

*Standard of Practice 4.2:* Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

X in full compliance with

The operation is

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

Operation has ball mill in its process, however no cyanide is added into it, but in the leaching – Tank 03. A study was done using PDCA (Deming Cycle) to determine and reduce appropriate cyanide addition rates are in place. The mineralogical conditions are stable according to the 2015 and 2016 Annual Mining Reports do not present significant variations that demand frequent analysis to determine the optimal cyanide concentration to be use in the leaching process. The latest reports Optimization of Cyanide Consumer – Metallurgical Operation Plant related to June 2015 and 2016, presented the same results. (That reassert the mineralogical characteristics are stable).

In the Metallurgical Plant there is the TAC equipment that does all the dosage control from the concentration of cyanide in the circuit. The cyanide concentration set point, indicated by the Plant Engineering Area, is inserted into the control logic of the equipment which adjusts the inverter of the dosing pumps in order to control the concentration in the circuit. The cyanide dosage in the circuit is performed in three distinct points: leaching, acacia (intensive leaching) and caustic solution used in desorption.

The use of sodium cyanide is evaluated periodically and the reduction of consumption is the objective of operational improvement. By 2015, the average concentration in the metallurgical plant circuit was 330 g / t. In 2016, the reduction work averaged 310 g / t. In 2017, a new reduction project with a challenging target of 300 g / t was initiated with a focus on operational improvement, and in March, the first month of operation before the new parameters, the average of 270 g / t was reached.

In the Metallurgical Plant there is the TAC equipment that does all the dosage control from the concentration of cyanide in the circuit. The cyanide concentration set point, indicated by the Plant Engineering Area, is inserted into the control logic of the equipment which adjusts the inverter of the dosing pumps in order to control the concentration in the circuit.
The mineralogical conditions are stable according to the 2015 and 2016 Annual Mining Reports, and do not show significant variations that demand frequent analysis to determine the optimal cyanide concentration to be use in the leaching process. The latest reports Optimization of Cyanide Consumer – Metallurgical Plant of Operation related to 2015 and 2016, presented the same result. (That reassert the mineralogical characteristics are stable).

**Standard of Practice 4.3:** Implement a comprehensive water management program to protect against unintentional releases.

X in full compliance with

The operation is not in compliance with Standard of Practice 4.3

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

The Operation has developed a comprehensive and probabilistic water balance, as checked in the water balance document - Water Balance of Metallurgical Plant and Dam – JMC Balance Sheet - Calibrated from January, 11/2017.

They found according to the established, as they consider the applicable items to Operation reality. The balance found probabilistic as pluviometric data was obtained from Jacobina Pluviometric Station 01140016 and the evaporation obtained from Meteorology National Institute - INMET, and extreme conditions were accounted.

The water balance considers design storm duration and storm return interval in the study Water Balance of the Tailing Dan. Precipitation and maximum likely precipitation was account in the study Water Balance of Metallurgical Plant and Dam – Revision 2015 with Analysis of 2016 and Water Balance of the Tailing Dam.

It was evidence that there is no precipitation entering a pond or impoundment resulting from surface run-on from the up gradient watershed, as there are drains “corta-rios” to deviate precipitation and avoid variations in the total volume of ponds and impoundments. Freezing and thawing condition are not applicable to this region because of tropical climate.

The Operations system in close circuit and there is no discharge to surface waters. Evidence was available of Procedure POP-04-02-3.5-170 Monitoring of Surface Water, groundwater and wastewater.

The tailing dam presents a freeboard enough to operate in a safe manner according to the water balance. Checked in the Water Balance document of Metallurgical Plant and Dam – Revision 2017 presents the capacities of pounds that are over the volume stored in tanks, according to the design checked.

The mineralogical conditions are stable according the 2015 and 2016 Annual Mining Reports, and do not show significant variations that demand frequent analysis to
SUMMARY AUDIT REPORT

determine the optimal cyanide concentration to be use in the leaching process. The latest reports Optimization of Cyanide Consumer – Metallurgical Plant of Operation related to 2015 and 2016, presented the same result. (That reassert the mineralogical characteristics are stable).

Standard of Practice 4.4: Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 4.4 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

No WAD cyanide concentration over 50 mg/l was found in the leaching tanks. The water impounded in the tailings dam are collected in samples and analyzed periodically in an independent laboratory. No WAD results above 50 mg/l cyanide are detected. The tailings dam is completely fenced and with restricted and controlled access. The same was verified in the area of tanks that are protected and in restricted and controlled access area inside the metallurgical plant.

Monthly monitoring is performed, as described by the Procedure POP-04-02-3.5-170 Monitoring of Surface Water, groundwater and wastewater. The results are recorded on the appraisal Quality Report, and results are satisfactory and below 50-mg/l WAD cyanide limit. The results do not indicate WAD cyanide concentration in the tailings dam lake that exceeds 50 mg / L. The monitoring of containment, thickener, and CAT, supernatant, the new dam and percolation basins are performed.

According to the JMC records, there is no wildlife mortality.

The results are recorded on the appraisal Quality Report, are satisfactory, and below 50mg/l WAD cyanide limit. During the audit it was reviewed the "Environmental Inspections Worksheet" for 2017.
SUMMARY AUDIT REPORT

Standard of Practice 4.5: Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

X in full compliance with
The operation is
substantial compliance with
not in compliance with

Standard of Practice 4.5

Summarize the basis for this Finding/Deficiencies Identified:

The Operation of the JMC operates in a closed circuit, and does not discharge direct to surface water. The Operation is located at Bahia State inland, a desert climate region with few surface waters surrounding.
The Operation does not have any indirect discharge to surface water.
Records presented indicate undetectable result (SHEC Records). The surface water is monitored according to POP-04-01-3.5-170 - Monitoring Plan for Waters. The WAD cyanide is analyzed and demonstrates that free cyanide concentrations have been less than 0.022 mg/l throughout the audit period.
During the 3 year cycle elapsed audit no history of incidents were recorded. If this type of problem occurs, the operation has specific procedures for treatment and investigation like the Procedure PIS-04-02-3.6-251 - Emergencies involving cyanide.

Standard of Practice 4.6: Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water.

X in full compliance with
The operation is
in substantial compliance with
not in compliance with

Standard of Practice 4.6

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide unloading area is waterproof. No changes were observed in the projects, constructions and QA / QC in the areas that use cyanide. The operation complies with these established standards and practices.
According to the monitoring results for groundwater performed, the WAD cyanide concentrations are under appropriated levels to protect the groundwater. The results were in compliance to environmental parameters as requested by Brazilian Legislation - CONAMA 357.
There is no history of seepage that caused contamination of groundwater.

Yamana Gold – Jacobina Mine

Lead Auditor Signature
Julio C. M. Monteiro

Date: April 2017

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Standard of Practice 4.7: Provide spill prevention or containment measures for process tanks and pipelines.

X in full compliance with
The operation is in substantial compliance with Standard of Practice 4.7
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced during the audit that prevention or containment measures were provide for all cyanide unloading, distribution tank and process solution tanks. Secondary containments are properly designed according to Brazilian construction standards. The volume of the containments exceeds 10% of the biggest tank.

In the POP-04-09-35-088 - (35% approx.) Unloading Operation NaCN solution methodology is to store only a volume of 59.86 m³ each tank, so the containment basin has the ability to store 110% of the volume of the larger tank. The audit has checked again that all pipelines carrying cyanide solution are protecting by lining to avoid any leakage and further contamination of environment. Pipes pumping waste are located in trenches lined with plaid pad, and there blockage of valves. A pipe that carries waste has secondary containment.

It was presented the performing of risk analysis accounting for a short pipeline segment crossing Itapicuruzinho River. It was evidenced that the construction was performed according to the design during the commissioning and that materials used were compatible to cyanide and high PH conditions.

All secondary containments have sump pump to drive any liquid that may occur in its interior, back to the process. The Procedures POP-04-09-3.5-005 – Leaching Operation and POP 04-09-3.5-088 – NaCN Unloading Operation were checked.
SUMMARY AUDIT REPORT

**Standard of Practice 4.8:** Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 4.8

not in compliance with

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

All facilities are built according to design and Brazilian Legislation and technical standards and operate in adequate conditions. It was evidenced through the project documentation and the facilities are designed and constructed in accordance with acceptable Brazilian Engineering Standards.

A QA/QC program has addressed materials and soil compaction, as checked in the compliance Report Conformity Result – Metallic Structure.

All facilities are built according to design and Brazilian Legislation and technical standards and operate in adequate conditions. It was evidenced through the project documentation and the facilities are designed and constructed in accordance with acceptable Brazilian Engineering Standards.

**Standard of Practice 4.9:** Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 4.9

not in compliance with

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

There is a Procedure POP-04-01-3.5-170 - Monitoring of Surface Water, groundwater and wastewater. All results are recorded on the appraisal Quality Report, and those results are satisfactory and below 50mg/l WAD cyanide limit.

The sampling and analytical protocols were established by the document Standard Methods for The Examination of Water and Wastewater.

The record Water Monitoring - JMC – Field File was checked, but it has no field for wildlife or livestock activity to be filled or wildlife mortality, although some records presents evidences of livestock during the data collection.

The Operation carries out in a closed circuit and does not discharge process water to surface waters however JMC monitors WAD, free and total cyanide in its facilities.
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A procedure to investigate wildlife mortality is in place and a regular inspection at areas (including the Dam area) is carried out. According to the records of wildlife monitoring evidenced during the inspection of tailing and plant, no mortality was associated to contact with or ingestion of cyanide.

The operational procedure POP-04-01-3.5-170 - Monitoring of Surface Water, Groundwater and Wastewater defines how and where samples should be taken, sample preservation techniques, chain of custody procedure and defines cyanide species to be analyzed. The surface water monitoring has a daily frequency defined, monitoring of surface water is performing monthly and monitoring of wildlife is performing daily. The Auditor considers that these frequencies are adequate.

All the documented operational procedures address the required personnel protective equipment (PPE).

There are automatic sensors in the areas – Leaching, Distribution, Storage Tanks and Smelting.

The parameters are:
- 2 ppm high alarm
- 4 ppm alarm too high

All operational procedures have a specific Risk Matrix for each stage of the operation, in addition to pre-operational inspections, risk analysis and check lists.

5. DECOMMISSIONING: Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities

Standard of Practice 5.1: Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife and livestock.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 5.1
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The procedure POP-04—09-3.5-290 – Metallurgic Facility Decommissioning and POP-04-09-3.5-174 - Neutralization of NaCN are implemented and assure the decontamination of the cyanide facilities. The decommissioning process also defines how to act to remove residual reagents from leaching process. Formal actions to manage surface water and groundwater are included in the Decommissioning Plan. The decommissioning activities have a schedule for the three years planned for total decommissioning. Evidence was available in the Final Closure Plan.

Yamana Gold – Jacobina Mine

Lead Auditor Signature
Julio C. M. Monteiro

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**Standard of Practice 5.2:** Establish an assurance mechanism capable of fully funding cyanide related decommissioning activities.

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

There is a cost estimation consolidated in the corporate document “Closure”, which is provided by the detailed costs reported on the document. The estimated closure costs described in the response are for third party implementation, and the bases for the estimates, such as rates quoted by or applicable to an outside contractor.

Evidences: "PRAD - Plan for Recovery of Degraded Areas and Report and Financial Statements for Fiscal Year 2012 and Report of Independent Auditors on the Financial Statements dated Dec. 31/2105, prepared by Deloitte Touche Tohmatsu. Auditor’s opinion: “The object to financial statements present fairly, in all material respects, the financial position of the JMC on Dec. 31/2015, the performance of its operations and its cash flows for the year ended that date, in accordance with accounting practices adopted in Brazil”.

The corporate document for cost estimation “Closure” was reviewed in 2016, Including Tailing Dam I and II and industrial area. The current estimate for mine closure is in the year 2031.

JMC has decided to have a self-insurance to cover the estimated costs for cyanide related decommissioning activities.

6. **WORKER SAFETY:** Protect workers’ health and safety from exposure to cyanide.

**Standard of Practice 6.1:** Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce or control them.

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

The Operation identified and evaluated all the SHE risks associated with the cyanide in order to have the risks under control and mitigated. Verified the Risk Matrix JMC, version...
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March/2017. The Operation defined, documented and implemented specific operational procedures for cyanide related activities. All the documented operational procedures address the required personnel protective equipment (PPE). There are automatic sensors in the areas – Leaching, Distribution, Storage Tanks and Smelting. The work force participates effectively in the risk identification and evaluation and in the development of operational procedures.

*Standard of Practice 6.2:* Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 6.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Operation determined that the minimum pH value should be equal or greater than 10.5 maintained throughout the cyanidation time. The pH is effectively controlled and monitored (through calibrated pH meter device) in the operation. Alarm systems are in place. Verified, during the field audit, that the usual pH value is between 10.2 and 11.5. The pH is controlled through the online addition of a CaOH solution (concentration above 33%).

It was evidenced during the field audit that the signage is effective, covering the presence of cyanide, that eating, drinking and smoking is not allowed and, opened flames are prohibited. All cyanide tanks and piping are clearly painted, very well identified and the flow direction clearly showed, as evidenced in the field audit. This is a strong point in the plant.

It was evidence that the operation implemented an emergency office inside the plant where all cyanide related information is available in Portuguese. This emergency room is also equipped with telephone and first aid products, which are monthly inspected.

As mentioned both, the fix and portable ones are maintain and calibrated in accordance with a Calibration Management System. Through traceability was reviewed calibration records of HCN detectors, fixed and portables.

The Jacobina Mine has the Management System (SYG) certified and establishes in documented procedures the retention and preservation of all related documents and records for specified periods, including hydrogen cyanide monitors calibration records. The retention periods are always more than 1 year, according to the SYG system, including for hydrogen cyanide monitor calibration records.

All the required auxiliary installations (showers, low-pressure eyewash stations and dry powder or non-acidic sodium bi-carbonate fire extinguishers) were evidenced to be in place and operational. They were tested and verified during the audit. The operation has also
implemented a system to manage all the fire extinguishers available at the plant. There are two types (CO2 for electrical installations and dry powder for the other cases) of fire extinguishers, identified through a specific number and the maintenance seals and stickers. It was evidenced the 2017 Fire Extinguishers Master List, which is used to support the maintenance frequency and other information like venue, details, TAG, type, inspections, maintenance and tests.

Last inspections were carried out on February and March/2017. Inspections and tests of the showers and eyewash stations are carried out monthly.

The Operation has defined, documented and implemented the Procedure PIS-04-00-4.2-031 – Incidents Analysis to investigate and evaluate any kind of incidents or accidents. No cyanide related incident / accident has occurred so far.

**Standard of Practice 6.3:** Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

X in full compliance with

The operation is in substantial compliance with

Standard of Practice 6.3

not in compliance with

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

The Operation has an Emergency Office inside the leaching plant and a Health Care Center, fully equipped with two resuscitator (one fixed and the other mobile), two ambulances, antidote kits, telephone, radio and oxygen cylinders. These facilities were evidenced in the field audit.

The first aid equipment is effectively inspected by the local Nurses in a monthly basis, including the ambulances. Evidenced was available of the inspection records.

The Operation developed specific emergency response procedures for cyanide exposures. Verified the Operational Process Standard PIS-04-02-3.6-251 - Emergencies involving cyanide.

The operation implanted an emergency office inside the leaching plant, fully equipped with oxygen, first aid procedures, telephone, filters and masks. The Operation has also a Health Care Center (one Doctor, one Occupational Health Nurse and four Technical Nurses), also equipped with oxygen center, antidotes, two ambulances and two resuscitator. Both installations and personnel were evidence during the field audit.

The Operation has two ambulances and a qualified local clinic (Santa Bárbara Clinic) to assist cases related with emergencies with cyanide. The transportation procedures are tested, at least, once a year, according to Procedure PIS-04-02-3.6-251 – Emergencies involving cyanide. The Santa Bárbara Hospital has an adequate infrastructure to assist cyanide contaminated personnel.
The Operation has two ambulances and a qualified the local clinic (Santa Bárbara Clinic). The transportation procedures are tested at least once a year. The Santa Bárbara Clinic was evaluated and qualified by JMC and found to have an adequate infrastructure to assist cyanide contaminated people, including the Antidotes Kit. During the audit were checked training evidences with the ER Team, including Santa Barbara Clinic personnel. Verified the Class Roster from November, 03/2016 - Cyanide Operation Training, directing the emergency team of Santa Bárbara clinic, addressing activities involved in mining, risks, emergencies and care for poisoning victims. The training tutor was Doctor Pedro Advíncula Falcão.

It was evidenced that emergency drills cyanide related are performed by the Operation. Evidenced the 2016 Annual Emergency Mock Drills Plan – nr. REG-04-02-3.6-026 – Drill nr. 01 from April, 09/2016 and the Mock Drill Report from July, 25/2016 – Scenario: Chemical products spill with Sodium Cyanide. Venue – Metallurgy Plant. Lessons Learned – Positive items and opportunities for improvement.

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

*Standard of Practice 7.1: Prepare detailed emergency response plans for potential cyanide releases.*

\[\text{X in full compliance with} \]

The operation is

\[\begin{align*}
\text{in substantial compliance with} & \quad \text{Standard of Practice 7.1} \\
\text{not in compliance with} & 
\end{align*}\]

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

The Operation defined, documented, implemented and developed specific emergency response procedure for cyanide exposures. Verified the Operational Process Standard PIS-04-02-3.6-251 - Emergencies involving cyanide and Emergency Response Plan (PAE) PIS-04-00-3.6-062.

The Operation has an integrated drainage system, with six emergency pools, beyond the secondary containment of the cyanide tanks area. PIS-04-02-3.6-251 - Emergencies involving cyanide item 12.8.

The plan has an agreement with Unigel (NaCN producer) and Concórdia Transportes (NaCN transporter), both ICMI certified suppliers, for emergencies related to external NaCN transportation activities. In addition, addresses the responses related to internal NaCN transportation activities. PIS-04-02-3.6-251 - Emergencies involving cyanide item 11.3, 11.4 and 11.5.
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The above-mentioned Operational Process Standard PIS-04-03-3.5-251 details all types of possible incidents and scenarios and describes specifically the response for all cyanide related emergencies.

**Standard of Practice 7.2:** Involve site personnel and stakeholders in the planning process.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 7.2

not in compliance with

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

The Operational Process Standard PIS-04-02-3.6-251 and Emergency Response Plan (PAE) PIS-04-00-3.6-062 were reviewed, approved and communicated to several stakeholders (internal and external), including Security and Health Authorities, Public Authorities, Emergency Response Suppliers (Suastran Cotec) and Community Representatives.

When performing emergency drills, the Operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) in the POP-04-02-3.6-251.

**Standard of Practice 7.3:** Designate appropriate personnel and commit necessary equipment and resources for emergency response.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 7.3

not in compliance with

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

The Operation defined, documented and implemented procedures to respond to cyanide related emergencies. Evidenced Operational Process Standard PIS-04-02-3.6-251 and Emergency Response Plan (PAE) PIS-04-00-3.6-062. Also evidenced the 2016 Annual Emergency Drills Plan nr. REG-4-02-3.6-026 – Drill nr.01, April, 09/2016 and Report from July, 25/2016. Responsibilities and Authorities are clearly defined and communicated to all involved stakeholders (internal and external). The Emergency Committee Organizational Flowchart was evidenced. The Brigade Members and First Responders were trained by the Firemen Brigade of the Juazeiro County.

The basic emergency response hardware is consisted of two ambulances, one complete equipped emergency truck, one pick-up car 4X4, and auxiliary equipment (PPEs) for the
brigade members, such as chemical/flame resistant overall, chemical gloves, oxygen masks and cylinders, chemical masks.
The Emergency Response Brigade Members are voluntary but passed through a selection process (medical, theoretical and practical), to be assigned as a Brigade Member. The Brigade Members were trained by the Firemen Brigade of the Juazeiro County.
The Emergency Brigade and First Responders master list addresses all the necessary Information about the Brigade Members, including contact details.
The basic emergency response hardware is consisted of two ambulances, one complete equipped emergency truck, one pick-up car 4X4, and auxiliary equipment (PPEs) for the brigade members, such as chemical/flame resistant overall, chemical gloves, oxygen masks and cylinders, chemical masks.
The emergency response hardware is monthly inspecting by the Safety Officers of the operation. Records of such inspections were evidence and found in place.
The Operational Process Standard PIS-04-02-3.6-251 and Emergency Response Plan (PAE) PIS-04-00-3.6-062 were reviewed, approved and communicated to several stakeholders (internal and external), including Security and Health Authorities, Public Authorities, Emergency Response Suppliers (Suastran Cotec) and community representatives. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary).
The Operational Process Standard POP-04-02-3.6-251 and Emergency Response Plan (PAE) PIS-04-00-3.6-062 were reviewed, approved and communicated to several stakeholders (internal and external), including Security and Health Authorities, Public Authorities, Emergency Response Suppliers (Suastran Cotec) and Community Representatives. When performing emergency drills, the Operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) in The Operational Process Standard POP-04-02-3.6-251.

Standard of Practice 7.4: Develop procedures for internal and external emergency notification and reporting.

X in full compliance with
The operation is in substantial compliance with
not in compliance with Standard of Practice 7.4

Summarize the basis for this Finding/Deficiencies Identified:

The Operational Process Standard POP-04-02-3.6-251 and Emergency Response Plan (PAE) PIS-04-00-3.6-062 were reviewed including procedures and contact information for notify
management, regulatory agencies, outside response providers and medical facilities of the cyanide emergency. The PIS-04-00-3.3-044 – Communication with Interested Parties is approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers (Suastran Cotec), and community representatives. The plan clearly defines the communication procedures to be used during an cyanide related emergency, including (but not limited to) a list of emergency telephones (24hours a day) of all Emergency Brigade Members, Leaders, Managers and General Manager (emergency response leader), Public Authorities, Hospital and Clinics, Response Suppliers, Cyanide Supplier and Cyanide Transporter. The communication procedures also involve the security process of the operation. Resources, such as radios, cell and satellite phones were evidenced during the audit. Those communication procedures were checked and work in a good way. When performing emergency drills, the operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the Operational Process Standard PIS-04-00-3.6-062. The emergency communication loop is clearly defined and contact information is available in the plan and at the security process.

Standard of Practice 7.5: Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

The operation is

- X in full compliance with
- in substantial compliance with
- not in compliance with

Standard of Practice 7.5

Summarize the basis for this Finding/Deficiencies Identified:

The Operation defined, documented and implemented procedures that are included in the Plan to recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media, management and/or disposal of spill clean-up debris, and provision of an alternate drinking water supply. Verified the procedures and they considered appropriate to this activities. The Sodium Hypochlorite, Hydrogen Peroxide and Ferrous Sulfate are chemicals that not permitted to be use in the treatment of surface water, and they should not be use. Evidences: POP-04-09-3.5-174 – NaCN Neutralization and POP-04-09-3.5-342 - Operation of drainage and cleaning of containment basins. The Operation in the POP-04-02-3.6-251 and Emergency Response Plan (PAE) PIS-04-00-3.6-062 clearly defines the required monitoring procedures to be implemented in the event of soil and water potential contamination. An Environmental Monitoring Plan is addressed into the Emergency Response Plan (PAE).

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Standard of Practice 7.6: Periodically evaluate response procedures and capabilities and revise them as needed.

X in full compliance with
The operation is in substantial compliance with Standard of Practice 7.6
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Operation defined, documented and implemented procedures to respond to cyanide related emergencies. Evidenced that the Operation in the POP-04-02-3.6-251 and Emergency Response Plan (PAE) PIS-04-00-3.6-062 were reviewed, approved and communicated to several stakeholders (internal and external), including security and health authorities, public authorities, emergency response suppliers (SOS Cotec), community representatives. When performing emergency drills, the Operation invites specific stakeholders to participate in the drills. Another implemented control is to perform periodic meetings with stakeholders, in order to discuss and updated (if necessary) the Emergency Response Plan. The emergency communication loop is clearly defined and contact information is available in the plan. The plan is reviewed at least once a year.

It was evidenced that emergency drills cyanide related are performed by the Operation. Evidenced the 2016 Annual Emergency Mock Drills Plan – nr. REG-04-02-3.6-026 – Drill nr. 01 from April, 09/2016 and the Mock Drill Report from July, 25/2016 – Scenario: Chemical products spill with Sodium Cyanide. Venue – Metallurgy Plant. Lessons Learned – Positive items and opportunities for improvement. Also verified the 2017 Mock Drill Plan, revision 01 from March, 20/2017.

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

Standard of Practice 8.1: Train workers to understand the hazards associated with cyanide use.

X in full compliance with
The operation is in substantial compliance with Standard of Practice 8.1
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The procedure Internal Training – PIS-04-05-3.4-255 and the 2016 Monthly Training Plan defines the training strategies for the personnel working in cyanide areas. Training records
were found and they include cyanide hazard recognition for security, maintenance and plant personnel. Records of Induction Training were presented for contractors as well as records of trainings held for the Employees, including training evaluation records according to the Procedure POP-04-05-3.4-255. It was evidenced a formal refresher training periodicity in the procedure POP-04-05-3.4-255. Evidences were available of the following training courses: Cyanide Code / Handling and Storage – André Ribeiro (January, 01/2017), Cyanide Code / Unigel – Vanderlei P. dos Santos (November, 07/2016), Cyanide Code / Unigel – Maicon Suammer da Silva (January, 05/2017) and Internal Auditor / Cyanide Code for some employees.

**Standard of Practice 8.2:** Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

The operation is X in full compliance with Standard of Practice 8.2

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

All trainings are provided by position and its duration was inserted into the software DATASUL. It was found evidences of trainings, including training to perform liquid cyanide unloading, operate facilities and several production and maintenance activities. All trainings present safety, health and environment hazards issues. The procedure PIS-04-05-3.4-255 defines the qualification of Instructors. All Instructors were trained in pedagogical teaching techniques and comply with the procedure requirements. There is refresher training on cyanide management provided to ensure that all employees and contractors continue to perform their jobs in a safe and environmentally protective manner. The document Activities Plan mentions that refresh training is linked to procedures and processes review. The Auditor has evidenced that the training elements necessary for each job involving cyanide management are identified in all training materials. All new or transferred employees have induction training covering general and specific cyanide hazards. Records, Reports and Action Plans were verified about simulated cyanide emergency drills periodically conducted for training purposes. This mock drill covers the work exposures and environmental releases. It was evidenced that emergency drills cyanide related are performed by the operation. Evidenced the 2016 Annual Emergency Mock Drills Plan – nr. REG-04-02-3.6-026 – Drill nr. 01 from April, 09/2016 and the Mock Drill Report from July, 25/2016 – Scenario: Chemical

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products spill with Sodium Cyanide. Venue – Metallurgy Plant. Lessons Learned – Positive items and opportunities for improvement. Also verified the 2017 Mock Drill Plan, revision 01 from March, 20/2017.

Standard of Practice 8.3: Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 8.3
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

There are evidences that the plant operators and maintenance employees participated in the preparation of the Procedures PIS-04-02-3.6-251 and Emergency Response Plan (PAE) PIS-04-00-3.6-062.
Training records for rescue team and first aid were found, including plant operators and maintenance employees. The decontamination training was held by the company specialized Suastran Cotec.
Was verified the records of refresher training for response to cyanide exposures and releases, conducted annually.
Verified the reports made after drills that include strong performances and opportunities for improvement. The PAE (Emergency Response Plan) defines that any kind of deficiency are identified and the procedure must to be changed e revised.


Standard of Practice 9.1: Provide stakeholders the opportunity to communicate issues of concern.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 9.1
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

An opening door program named “Portas Abertas” is in place to meet community members, schools, local organization members, public prosecutor and associations. Reception phone numbers were also published to the community and stakeholders. There is also a contract between JMC and an electronic newspaper “Teor Semanal”/ “Weekly Content” to allow JMC to release safety, health and environment issues weekly.
Standard of Practice 9.2: Initiate dialogue describing cyanide management procedures and responsively address-identified concerns.

X in full compliance with Standard of Practice 9.2

The operation is in substantial compliance with not in compliance with Standard of Practice 9.2

Summarize the basis for this Finding/Deficiencies Identified:

The Operation gives opportunities for the operation to interact with stakeholders and provide them with information regarding cyanide management practices and procedures. There are evidences of visits from Itapicuru community, located near to JMC, and information material were distributed containing cyanide information, emergency phone numbers and others. The 2015 Sustainability Report was also delivery to the City Hall, District Associations, Radios Stations, Public Prosecutor and Universities.

Standard of Practice 9.3: Make appropriate operational and environmental information regarding cyanide available to stakeholders.

X in full compliance with Standard of Practice 9.3

The operation is in substantial compliance with not in compliance with Standard of Practice 9.3

Summarize the basis for this Finding/Deficiencies Identified:

There is an information material with simplified information about cyanide management at JMC. Evidences of meetings with several local organizations, Police, municipal secretariat, hospitals and communities were checked. The material was also distributed for those locals, with the necessary explanation related to its contents. During the last 3 year cycle elapsed audit no history of incidents that could jeopardize.

As described in PIS 04-00-3.6-062 - Emergency Response Plan - Administrative, any emergency involving sodium cyanide, the communication area should advise the preparation of communications regarding possible emergencies, when applicable. For the purpose of crisis communication, the event and its possible outcomes should be considered taking into account their potential short and long-term damage to the equity and image of the JMC or impacts on the parties involved, in addition to the impact or Severity identified at the time of occurrence. As communication tools, the local press, blogs, newspapers and radios and for the nearby communities can be used, communications can be carried out personally by the team of the Social Communication Area and emergency team.