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INTERNATIONAL CYANIDE MANAGEMENT CODE

ALMACENERA EL PACIFICO S.A.C.

SUMMARY AUDIT REPORT

CODIGO

20512445513

BASE PRODUCTION, LURIN, LIMA, PERU

VERSION

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FECHA

30/12/2017

In collaboration with:



INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Production Operations Summary Audit Report



For The
International Cyanide Management Code
and **ALMACENERA EL PACIFICO S.A.C. –**
Lurin – Lima – Peru

Verification Protocol

www.cyanidecode.org
December 2017



DECEMBER 2017 | ALPA

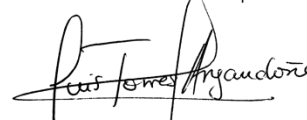

Lead Auditor Signature

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INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: ALMACENERA EL PACIFICO S.A.C.

Name of Facility Owner: ALMACENERA EL PACIFICO S.A.C.

Name of Facility Operator: ALMACENERA EL PACIFICO S.A.C.

Name of Responsible Manager: Ronald Escajadillo

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Aspects of the location and description of the operation:

Almacenera el Pacifico SAC (hereinafter ALPA) was created in 2006, with the purpose of providing logistic services to mining companies, but due to market needs, services were expanded to other items at the national level for which The warehousing areas and the services that the company has managed to offer, offering logistical solutions for storage, distribution and transportation.

The company has an area of 93,000 m² where it has a variety of modular warehouses of different areas that fit the needs of its customers, including warehouses destined for the storage of sodium cyanide that has an area of approximately 10,000 m².

In 2010 they were audited under the International Code for Cyanide Management (hereinafter the Code) for the certification of the company MERCANTIL SA and in 2013 were audited for the recertification of the same company, because ALPA is the operator of MERCANTIL SA.

ALPA has devices for the transfer of sodium cyanide to isotanks, through metal boxes with cutting devices inside for the opening of the bags with sodium cyanide.

ALPA stores sodium cyanide in the presentation of Wooden Boxes per 1TM and Cylinders of 50Kg and 100Kg. The operation of ALPA includes the control in the management of Customs Transport (Port - Warehouse Lurín), Storage of Distribution (Discharge of the cyanide packages of the containers, storage of the cyanide packages and loading of the cyanide packages to the containers) And control in the management of Distribution Transport (Lurín Warehouse - Customer). These activities were carried out 11 years ago with ZERO (00) accidents.

SUMMARY AUDIT REPORT
FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Production 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)

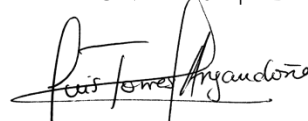
1400 I Street, NW, Suite 550

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.



DECEMBER 2017 | ALPA


Lead Auditor Signature

Auditor's Finding

This Operation is:

- in full compliance
- in substantial compliance
- not in compliance

**The International
Cyanide
Management Code**

with the International Cyanide Management Code.

Audit Company: ISOSURE SAC | CIANURO INCORPORATED EIRL

Audit Team Leader: Luis Torres Argandoña

E-mail: auditoria@iso-sure.com

Date(s) of Audit: 29 and 30 December 2017

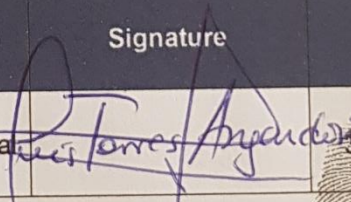
No significant cyanide incidents or exposures and releases were note as occurring during the audit period.

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

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

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

Name and Signatures of Other Auditors

Name	Position	Signature	Date
Luis Torres Argandoña	Lead Auditor and Technical		30 December 2017

CERTIFICO: Que la firma que antecede pertenece a don **LUIS ALBERTO TORRES ARGANDOÑA** identificado con Documento Nacional de Identidad DNI **09993105**, la misma que es auténtica, de lo que doy fe.
El Notario no asume responsabilidad sobre el contenido del documento Art.108 D.Leg.1049.
Lima, 20 de Junio del 2018



ALFONSO BENAVIDES DE LA PUENTE
Notario de Lima

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Verification Protocol

OPERATIONS

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

1.1 PRODUCTION PRACTICE 1.1

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

The construction of storage facility was approved by the District Municipality of Lurin, Lima, Peru, and subjected to quality control of municipal inspectors and customers of ALPA. The designs and drawings submitted were approved under the structural considerations of seismic, electrical, fire, health, in accordance with the Rules of the Peruvian Structural Standards risks, and these are signed by a professional engineer qualified referee, enabling to ALPA for the Storage of Cylinders and Boxes with cyanide. These records are available at ALPA and were reviewed during the audit.

The review of building stores ALPA is performed by a multidisciplinary group of professionals made up of 01 Structural Engineer, 01 Sanitary Engineer, 01, Electrical Engineer, 01 and 01 Architect Engineer Safety and Health at Work, which are qualified referees. This is done every two years and is a requirement of the Municipality of Lurin, Peru to get the "License to Operate" concluding APTO facilities ALPA for storage cylinders and boxes cyanide.

ALPA does not handle cyanide in the free state only packed in cylinders and boxes, ALPA has implemented a management plan cyanide "Cyanide Storage".

Cyanide is stacked up four levels.

There are quality control and quality assurance documentation.

The warehouse built with concrete floor, walls and roof of iron corrugate (has a chute end to end to prevent water ingress as secondary containment. It also has natural ventilation, which consists of windows covered with microfiber, which allows air circulation and prevents the rain to pass if this was given.

The failure or power outage does not affect the operation of ALPA nor cause a leak or spill. Warning system for reporting emergency brigade staff and hazardous materials to meet any spills promptly was evident.

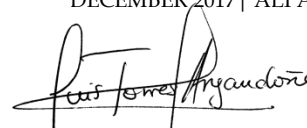
The boxes and cylinders of cyanide are stored on a pallet surface, which is on a concrete floor.

ALPA does not develop activities filling tanks.

ALPA does not involve the use of pipes and tanks for storage of cyanide.



DECEMBER 2017 | ALPA


Lead Auditor Signature

ALPA not employ the use of pipes for the storage solution cyanide.

1.2 PRODUCTION PRACTICE 1.2

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

The standard practices necessary for the safe and environmentally responsible operation are verified and documented as described in "Cyanide Storage".

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

Possible emergency cases must:

- Cyanide Spill
- Warehouse Fire
- Cyanide Poisoning
- Natural Disasters (Earthquake, Tsunami)

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

ALPA implemented a program of preventive maintenance of equipment, maintenance, and repair. Maintenance records of equipment used for loading / unloading and storage of cyanide were checked.

During the entry or exit from storage, the levels of hydrogen cyanide (HCN) are controlled with a calibrated instrument.

ALPA has TWO (02) Portable Monitoring Equipment, Brand: MSA) monitoring equipment.

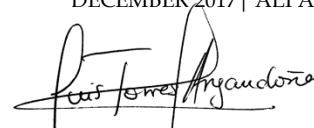
ALPA does not handle cyanide solutions.

The Emergency Plan - Sodium Cyanide Management establishes procedures to dispose of cyanide in contaminated soil, which is described below.

Decontamination



DECEMBER 2017 | ALPA


Lead Auditor Signature

This activity is decontaminated personnel who had contact with NaCN. The DECON (decontamination corridor) is set in the warm zone and according to:

- Level of risk of contamination of personnel.
- Personal protective level assigned to the decontamination area.
- Grade and number of stations required for installation and riders decontamination personnel.

The basic equipment for decontamination corridors consisting of: plastic marked routes, mechanical cleaning utensils or pressure cleaner containers, thinners, waste recovery containers.

The contaminated clothing and equipment should be removed after use and stored in a controlled area (warm zone) until cleanup procedures can be initiated. In some cases, the protective clothing and equipment cannot be decontaminated and should be properly disposed of as hazardous waste.

The storage facility ALPA is build for ventilation naturally which allows entry of air entering avoiding rain.

The storage area ALPA has roof and walls of iron corrugate, additionally has a system of gutters to catch rainwater and direct it to a sump. It also has a secondary containment system that consists of a trough which avoids water ingress and this is located opposite the entrance doors of the store.

ALPA makes a Risk Assessment Matrix of loading, unloading and storage.

Access to the Warehouse for ALPA is restricted, prohibited the public has a perimeter fence 6 feet tall and security based on two (02) security guards, also has a closed system of security cameras.

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

The cyanide is packaged as required peruvian political jurisdiction.

1.3 PRODUCTION PRACTICE 1.3

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

No tanks containing cyanide solutions in ALPA facilities.

ALPA, only stores solid sodium cyanide in their respective packaging, at the time of transfer to At the time of the transfer to ISOTANKS, it is carried out on a surface of earthenware, and inside a warehouse, it has mechanisms to prevent the entry of water "gutters".

In case of spills, there is a kit to collect the briquettes.



DECEMBER 2017 | ALPA

Paula Torres Arcaudón
Lead Auditor Signature

No piping, pumps or valves handle cyanide solutions on site.

ALPA has load-lifting equipment. The lifting and handling charges are inspected daily and maintained in accordance with supplier has to do ALPA Maintenance Plan. These records were evidence during the audit.

In the check list be observed, name of inspector, date of inspection, to inspect items and recommendations on items that are found in the document.

The types of items included in the inspection checklist are:

- Infrastructure
- Security equipments
- Personal protective equipment
- Lift
- Response kit
- Training

During the audit is observed along with inspection records evidence of lifting the non-compliance is observed.

WORKER SAFETY

Protect workers' health and safety from exposure to cyanide.

2.1 PRODUCTION PRACTICE 2.1

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

ALPA receive cyanide cylinders and boxes (finished product). ALPA has develop a proceeding for the entry, storage and disposal of the product PR-19 Cyanide Storage. Additionally this procedure is part of the general induction of staff working in the cyanide storage area.

After interview was evident that the staff has been training in PR-19 Cyanide Storage procedure.

ALPA has the Emergency Plan Emergency Plan. Sodium Cyanide Management, which establishes the necessary measures to prevent exposure of personnel during an emergency, which considers the following emergency scenarios:

- Cyanide Spill
- Warehouse Fire
- Cyanide Poisoning
- Natural Disasters (Earthquake and Tsunami)

Maintenance relates only to forklifts and stackers, held outside the company premises by the supplier of the equipment.

ALPA has procedures to review the proposed process and changes and operational modifications for its possible impacts on the health and safety of workers through a matrix of risk assessment in cyanide operations, being the Head of Safety and Health, responsible for maintaining and always update the significant changes made in practices with cyanide for the protection of facilities and workers.

Workers participate in relevant meetings of review of issues of safety and health at work which takes at least once a month or whenever an emergency occurs topics related to health and safety at work are discussed, review or creating procedures.

It is noteworthy that after interviews with staff these declaring be consult at any health and safety issue at work.

ALPA uses THREE (03) monitoring devices confirmation of proper control of exposure to hydrogen cyanide (HCN) to the limits of 4.7 ppm (5 mg/m³) or less, during the visit was evidenced both teams were calibrated and a calibration certificate is issued by them.



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A handwritten signature in black ink, appearing to read 'Luis Gomez Arcaudón', is written over a white background.
Lead Auditor Signature

ALPA has THREE (03) monitoring teams hydrogen cyanide which have their respective calibration certificate valid at all times.

Reportedly, they have not identified areas or activities with such concentrations. Despite this, the A class of personal protective equipment (encapsulated suit) is required on the installation and use of cyanide when a container is damaged and repairs are made to it.

Through interviews with staff and storage forklift driver confirmed using "buddy system" that otherwise may notify or communicate with other staff assistance, support or help where it is determined that it is necessary. ALPA also establishes that all work with sodium cyanide realizer must be at least TWO (02) workers and must be supervise. ("Cyanide Storage").

Radios and telephones are use to communicate between the relevant personnel related to the operations of cyanide. Forklift operators have radios with them at all times.

ALPA occupational medical exams performed all workers at the start of labor relationship. Also occupational medical exams are performed annually to monitor the health of workers and finally at the end of laboral contract an additional medical examination is performed to certify the good health of the worker at the time of being separated from the organization.

This information is evidence during the audit.

The protocol is developing occupational medical examination by a medical surgeon with specialty in health and safety at work according to the hazards and level of risk to which the worker is exposed.

ALPA has a change clothing policy, personnel performing work of loading and unloading cyanide level C uses costumes, which are disposable once they has been used. This Plan is applicable to anyone who enters the area with sodium cyanide.

It was evident that during the loading, storage and unloading has signs indicating the presence of cyanide between them this:

Signals USE OF HELMETS, USE OF SAFETY MASK, USE OF SAFETY SHOES, USE OF UNIFORM GLOVES.

- UN 1689
- Rombo IMO (class 6.1)
- NFPA Diamond
- Sodium Cyanide Shop
- MSDS

It was evident that during the loading, storage and unloading has signs indicating the presence of cyanide between them this:

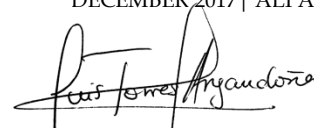
- No unauthorized personnel
- Prohibited Food and Drinking
- Prohibited use of water
- No Smoking
- Prohibited ignite

2.2 PRODUCTION PRACTICE 2.2

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



DECEMBER 2017 | ALPA


Lead Auditor Signature

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

ALPA has developed an emergency plan for quick and effective management of sodium cyanide Emergency Plan - Sodium Cyanide Management.

Response to cyanide exposure several detailed procedures are given, among which are:

- Cyanide Spill
- Warehouse Fire
- Cyanide Poisoning
- Natural Disasters (Earthquake and Tsunami)

This program includes drills two times per year of which was evidence that conducted in January 2017 during the visit.

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

The site has showers and portable wash stations eyes low pressure dry chemical extinguishers of 50 Kg, these last every 50 meters. Daily inspections of eyewash and showers are evidenced and the extinguishers are inspected once a month, 2016 and 2017 records were evidenced..

ALPA features water distribution system, oxygen resuscitator.

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

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

ALPA sets the "Cyanide Storage" in the elements detailing first aid that must be present during operation with cyanide (receipt, storage and dispatch) provides a checklist to check the existence of these, if one was use be set to be replace immediately.

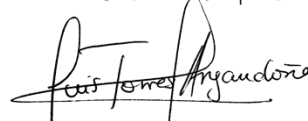
ALPA in the checklist provides a review of first aid kit this should be reviewed prior to performing any operation related to cyanide Checklists from January 2015 to December 2017 were reviewed; availability of equipment was confirmed during the audit.

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

No tanks, pipes or containers. Cyanide is stored in warehouses, which are clearly marked with the following pictures:



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Lead Auditor Signature

Signals USE OF HELMETS, USE OF SAFETY MASK, USE OF SAFETY SHOES, and USE OF UNIFORM GLOVES.

- UN 1689
- Rombo IMO (class 6.1)
- NFPA Diamond
- MSDS
- No unauthorized personnel
- Prohibited Food and Drinking
- Prohibited use of water
- No Smoking
- Prohibited ingite

It only allows authorized to enter the work area with cyanide staff.

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

ALPA not have medical services on site because it only handles cases and cylinder cyanide, however ALPA informed the nearest health center (10 minutes by car) and the company of firefighters (10 minutes) on the application first aid in case of poisoning with cyanide and the application of Oxygen if required.

The Emergency Plan includes a guideline for transporting workers exposed to the nearest medical facility (10 minutes).

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

ALPA performs annual drills for cyanide spills, simulation of 2016 and 2017, as specified in its "simulation plan"; Simulations were developed within the ALPA facilities, and then the same feedback was given to all the personnel involved. The reports simulated the improvement opportunities described during the visit and highlighted opportunities for improvement.

ALPA has implemented a couple to care and accident investigation methodology, which aims to ensure that all accidents and near misses are report and investigated immediately in order to make the respective corrections. This procedure is the responsibility of the Head of Safety. The procedure is divide into the accident / incident care, Accident Investigation / Treatment Failure and the accident / incident.

As part of this research, this method indicates that the investigation of the incident / accident must be support by a report.

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

MONITORING:

Ensure that process controls are protective of the environment.

3.1 PRODUCTION PRACTICE 3.1:

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

ALPA makes no discharges to surface waters, stored ALPA presentation end briquettes packed in boxes and cylinders product. The waste generated by an emergency would be handle as hazardous waste.

ALPA not perform any type of discharge, terminated ALPA stores briquettes packed in presentation boxes and cylinders product. The waste generated by an emergency would be handle as hazardous waste.

ALPA not perform any type of indirect discharge to surface water, stored ALPA finished briquettes packed in presentation boxes and cylinders product.

ALPA not perform any type of discharge to groundwater, stored ALPA finished briquettes packed in presentation boxes and cylinders product. The waste generated by an emergency would be handle as hazardous waste.

ALPA stores briquettes of sodium cyanide in boxes, cylinders or ISOTANKS, all the facilities are on concrete, making some type of soil contamination or infiltration impossible. Solid waste, generated by an emergency, is handled as hazardous waste.

During the transfer process ALPA workers wear personal protective equipment which consists of a mask with filters, tyveks suits, safety boots and gloves. Additionally, all activities are monitored by the staff to detect possible cyanide fumes. During the audit, there were no incidents with the product or gas emissions.

ALPA not perform any type of discharge to surface water or groundwater

ALPA not perform any type of discharge to surface water or groundwater, or air emissions, stocks ended ALPA briquettes packed in presentation boxes and cylinders product. These packages are not OPEN during storage so no air emissions are generate. The waste generated by an emergency would be handle as hazardous waste.



TRAINING:

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

4.1 PRODUCTION PRACTICE 4.1:

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

ALPA has an annual training program in which the hazard identification and training is given on risk analysis (IPER for its acronym in Spanish) to all operators of cyanide. This training is delivered by the Head of Safety Operations ALPA once a year and lasts one hour. Training records were reviewed during the audit. The Head of Safety ALPA maintains all training records recorded and archived.

All training sessions included in the annual training program have been designed as a result of hazard identification and risk assessment to address the risks associated with the activities of each job in the warehouse.

ALPA provides training programs for workers in annual form, the training program of 2016 and 2017 on the entire course "Personal Protective Equipment" included was evident.

ALPA names a person or entity responsible for each training session, all of which are ALPA qualified staff and external companies. ALPA has a procedure for evaluating potential suppliers in terms of their suitability to work with ALPA.

According to "Loading, Unloading and Storage of Sodium Cyanide Sodium" all personnel operating cyanide must have prior training. When interviewed stated that an employee had been trained before the start of its activities in the company.

The efficiency of formation of cyanide is tested during exposure to cyanide or cyanide spill drills according to ALPA training program. A separate report is prepared in the wake of each year based on the results of the need for training is present and communicated. In addition, the courses taught by qualified third minimum passing grade of 13 otherwise they must retake the course.

4.2 PRODUCTION PRACTICE 4.2:

TRAIN EMPLOYEES TO RESPOND TO CYANIDE EXPOSURES AND RELEASES.

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

ALPA has the Emergency Plan - Sodium Cyanide Management, in which all employees are training in the different scenarios that could result in a release cyanide as emergently. This is impart by the Chief Safety ALPA training once a year.

Training Program of ALPA Indicates that must perform TWO (02) exhaust drills of cyanide per year. the drills include responses to worker.

Simulations performed are evaluate in terms of effectiveness, to determine the level of knowledge, skills, and identifying weaknesses of staff and the organization. This assessment was evident in the reports of the drills conducted in 2016 and 2017.

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

EMERGENCY RESPONSE:

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

5.1 PRODUCTION PRACTICE 5.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is in substantial compliance with Production Practice 5.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

ALPA developed the Emergency Plan - Sodium Cyanide Management (hereinafter referred to as the Plan). The Plan is a document that covers all operations during the operations in the warehouse. A section that describes the characteristics of sodium cyanide, emergency organization, communication protocol, and emergency evaluation levels are included.

The scenarios are related to releases of wooden boxes and action plan includes specific response to these scenarios.

- Cyanide Spill
- Warehouse Fire
- Cyanide Poisoning
- Natural Disasters (Earthquake and Tsunami)

ALPA stores ended briquettes packed in presentation boxes and cylinders product. These packages are not OPEN during storage so no catastrophic atmospheric emissions are generated. In case of any release will be detect by HCN monitoring equipment.

The Plan considers releases during loading operations. ALPA does not make solutions of cyanide only works with solid product.

ALPA Consider the following activities in the event of fire, which are, describe in the Plan Workers assigned to this work should have appropriate physical and psychological conditions to address the risk and effort to their duties require. Must also maintain and follow a training program and training in firefighting, the use of portable fire extinguishers PQS and systems firefighting foams.

ALPA not have activities where pipes, valves or cyanide solutions are included. ALPA stores ended briquettes packed in presentation boxes and cylinders product.

ALPA activities are not affect by power cuts and equipment failure, ALPA stores ended briquettes packed in presentation boxes and cylinders product.

ALPA not have activities where ponds, tanks and sewage treatment facilities are included. ALPA stores ended briquettes packed in presentation boxes and cylinders product.



The Plan establishes general and specific considerations for emergency scenarios cyanide operations, including the following general considerations are described below:

These instructions should be consider in any type of accident, either clash with vehicles, people, stationary items, fall and / or breakage of containers (container / packaging) of sodium cyanide.

The tasks of each brigadas of emergency response are identify in the Plan. Additionally cyanide store is just over 1 km from the nearest population center and has a peripheral wall 6 feet tall avoiding any contact with the inhabitants.

Therefore, the Plan does not include instructions to evacuate communities as possible scenarios have consequences beyond the limits of the facilities ALPA. Furthermore, only handles ALPA sodium cyanide solid state (briquettes). In addition, the Plan includes specific instructions and detailed response to the identified scenarios.

Due to the characteristics of the organization, a spill or incident with cyanide is limited to the ALPA area.

The Plan describes the use of sodium cyanide and first aid, additional staff is trained annually in the use thereof. The procedure is described first aid.

In The Plan actions in the case a spill occurs has specified actions to control of releases at their source.

In the plan the actions to be performed during a spill, ALPA set to Plan procedures and corrective actions will be review after an emergency to prevent future releases.

5.2 PRODUCTION PRACTICE 5.2:

INVOLVE SITE PERSONNEL AND STAKEHOLDERS IN THE PLANNING PROCESS.

X in full compliance with

The operation is in substantial compliance with Production Practice 5.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

The Chief Safety ALPA developed the plan. The nearest residential area is located more than 1 km of the facility. According to the emergency response procedure at worst an area of 400 m should be evacuated; not covering the residential area.

However, ALPA government informed the district about its operations and that require their support ALPA evacuate in an emergency.

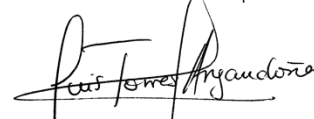
ALPA has contacted the local police, local firefighters, and local hospital, and informed them that are consider as supporting facilities for emergency cyanide.

The Plan includes a communications protocol in writing stating the emergency communication should be with all stakeholders; include Employees, the Client, Regulatory Agencies (OEFA) and other Institutions (IFSEC).

5.3 PRODUCTION PRACTICE 5.3



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Lead Auditor Signature

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

The Plan includes the name of the individual members of the emergency committee and outlines their roles and responsibilities. In general, high - more current manager in place that authority is grant to provide all necessary resources. The Plan also shows the contact number of the coordinators of alternative emergency response.

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

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

Plan the roles and responsibilities of the emergency committee for each emergency stage (before, during and after) are list.

Plan includes a list of emergency response kit and personal protective equipment.

The site has implemented a checklist inspection prior to any operation with cyanide and equipment availability was confirm during the audit.

The Plan also includes the role of outside responders.

The plan shows the contact details of all external entities involved. It further states that these entities are inform on an annual basis on the contingency plan and operational risks.

5.4 PRODUCTION PRACTICE 5.4

DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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



The plan includes a communication protocol that includes internal communication functions, as well as notification to the authorities and external response personnel.

The Plan includes a directory of internal and external contacts. It also displays the contact information of the entire team of internal and external response to emergencies; members of that team have telephones and are available 24 hours a day that was check after calls to these numbers during the visit. Plan evacuation of communities deemed necessary. Click for communication with Authorities and External Response Personnel.

5.5 PRODUCTION PRACTICE 5.5

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

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

Based on the Risk Assessment Matrix, there isn't potential to affect water bodies. None of specific scenarios rather think that a spill would reach the floor (warehouse and concrete patios are paved). The body of water closer is 2km away. The monitoring is limited to the air and is carried out with detector gas cyanide (HCN) portable.

5.6 PRODUCTION PRACTICE 5.6

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

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

In the plan provides that the Chief Safety - ALPA should review the Plan after each mock emergency after emergency. According to the pages of signatures, the plan was under review at the time of the audit. The site has an Annual Program of Emergency Drills including cyanide spill.



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A handwritten signature in black ink, appearing to read "Paul Jones", is written over a horizontal line. Below the signature, the text "Lead Auditor Signature" is printed in a black, sans-serif font.

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Alcance de certificación:
PROVISIÓN DE SERVICIOS DE CONSULTORÍA,
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