



**Chemours™**

**ICMI International Cyanide Management Code  
Summary Audit Report**

**Chemours Canada Cyanide Supply Chain  
Transportation Re-Certification Audit**

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

*2015/2016 Audit Cycle*



## Chemours Canada Supply Chain Summary

### Contact Information:

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## Chemours Supply Chain Overview

The consignor for this Canadian supply chain is The Chemours Company (Chemours) headquartered in Wilmington, Delaware. The Cyanide Business is one of the Chemours businesses that operates globally. Chemours (formerly DuPont) was one of the original 14 International Cyanide Management Code (ICMC) signatory companies announced in 2005. As such, Chemours made the commitment to obtain ICMC certification for its global operations and supply chains. Chemours was the first cyanide producer in the world to achieve certification in June 2006 and the operation was re-certified in 2009 and in 2012.

Chemours produces sodium cyanide for use in the gold mining sector at their Memphis, Tennessee plant in the United States. The company maintains several cyanide distribution terminals and delivers cyanide to mining customers throughout the world. Cyanide that is distributed through the Canada Supply Chain is brought into Canada from Memphis. The sodium cyanide that is sold to gold mining customers is packaged in 1-ton bag-boxes, 1-ton Eco-paks, 1.4 ton Flo-bins, and ISO tanks.

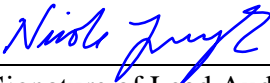
This Chemours Canada Supply Chain has substantially changed since the previous 2012 ICMC certification audit. The Canada Supply Chain used to consist of warehousing activities at the DuPont Pointe Claire Distribution Centre (PCDC) and the TONA trucking operations based out of the PCDC facility, in Pointe Claire, Quebec. Chemours stopped using TONA for cyanide transportation services in January 2015 and started using Groupe Robert to transport cyanide from the PCDC warehouse on January 21, 2015. ICMI was notified of the change to the supply chain at this time. The last shipment of cyanide that was stored in the DuPont PCDC warehouse in the spring of 2015 was completed on June 19, 2015. Chemours split from DuPont shortly thereafter, on July 1, 2015, and therefore no longer used the DuPont PCDC facility.

This Supply Chain was not active after June 2015 until the first shipment of 2016 arrived at the Octium Solutions facility shortly before this re-certification audit on January 4, 2016. The delay in the auditing of the new supply chain components was approved by ICMI in 2015 due to the fact that the supply chain was not actively being used in the second half of 2015.

Confirmation was made during this audit process that Chemours conducted annual internal audits of its Canada Supply Chain partners between the 2012 audit and the end of the TONA / PCDC operations in 2015. Records were available to demonstrate that PCDC confirmed on June 30, 2015 that all cyanide had been removed from the warehouse earlier that month. Records of the shipments from the PCDC warehouse to mine customers using Groupe Robert in 2015 were evaluated and found to be acceptable during this audit.

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The current Canada Supply chain as of January 2016 is as follows: Cyanide is transported by the ICMC-certified signatory company Empire Express to the Octium Solutions interim storage facility located in Malartic, Quebec or is transferred directly to a Groupe Robert driver at the Boucherville Terminal for continued transportation to mine customers. Storage of cyanide only takes place at the Octium Solutions facility in Malartic. Groupe Robert is the only trucking company transporting cyanide in this supply chain. Supply Chain activities consist of the transport of cyanide into storage at the Octium Solutions facility in Malartic or transport from Malartic directly to mine customers in Canada.

The Boucherville Terminal functions as a corporate office for this supply chain and activities such as the coordination of drivers and equipment, training of personnel, provision of emergency response services, the oversight of the proper maintenance, and the tracking of equipment and shipments. The product is transported from the Malartic facility to mine sites using drivers dispatched from the Groupe Robert Boucherville Terminal or from the Groupe Robert (DCR Logistics) terminal in Rouyn Noranda, Quebec.

Chemours, Groupe Robert, DCR Logistics, and Octium Solutions personnel were included in this ICMC Re-Certification Audit. All three Canadian locations underwent full on-site ICMC audits and were found to be in full compliance with ICMC requirements.

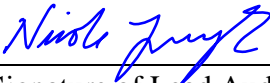
## Description of the Groupe Robert Transport Trucking Operation

Groupe Robert personnel have been transporting dangerous goods in Canada safely for many years. The company was established in 1946 and is headquartered in Boucherville, Quebec. The company started transporting cyanide for Chemours in 2015. The Groupe Robert drivers involved in this supply chain are dispatched from the Boucherville and Rouyn Noranda terminals. The Rouyn Noranda terminal operates under the name DCR Logistics. Groupe Robert is quite diverse and has 41 distribution centers and terminals in Canada. Groupe Robert administrative support and corporate governance activities for this supply chain are managed from the Boucherville location.

Groupe Robert manages all aspects of the trucking operations including driver selection, training, dispatch, communication, and emergency preparedness and response.

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## Description of Octium Solutions Operation

Octium Solutions was established in 2015 and is affiliated with Quadra, a company founded in 1976 that has extensive chemical distribution experience. Octium benefits from Quadra's highly mature quality, environmental, health, and safety integrated management system. Octium uses this management system to ensure that their operation is compliant with ICMC requirements. Octium has one facility: the cyanide interim storage yard in Malartic, Quebec. Product is brought to this location by Empire Express drivers and the trailers are then picked up for delivery to mine sites by Groupe Robert drivers. At the time of the audit, ISO tanks were at the facility and the facility was not involved in opening any containers.

## Audit Implementation

This report contains information regarding the on-site International Cyanide Management Code (ICMC) re-certification audits of the Chemours Canada Cyanide Supply Chain management activities, Groupe Robert (including DCR Logistics) trucking operations, and Octium Solutions interim storage activities.

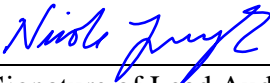
The audit was conducted on January 12-15, 2016 in Boucherville, Rouyn-Noranda, and Malartic, Quebec, Canada. Personnel from Chemours, Groupe Robert, DCR Logistics, Octium, and Quadra (parent company to Octium) were included in the audit. Interviews were conducted, policies and procedures were reviewed, records were evaluated, operations were observed, and equipment and facilities were inspected. Records of the shipments from the PCDC warehouse to mine customers using Groupe Robert in 2015 were also evaluated and found to be acceptable during this audit.

The supply chain was audited fully using the ICMI Cyanide Transportation Protocol. Chemours personnel were in attendance throughout the auditing process and were interviewed, as necessary, in order to verify supply chain compliance with the ICMC transport protocol questions.

The audit was performed by an independent third-party auditor who was pre-approved by the ICMI as a Lead Auditor for all types of International Cyanide Management Code (ICMC) audits and as a technical expert for ICMC audits of cyanide transportation and production operations.

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## **Chemours Supply Chain Re-Certification Audit - Auditor's Finding and Attestation**

Cyanide management practices for the Chemours Canada Supply Chain were evaluated for ICMC compliance using the *ICMI Cyanide Cyanide Transportation Protocol*. Chemours, Groupe Robert, and Octium internal policies, standards, and procedures, regarding the management of the Cyanide Transportation Supply Chain, were reviewed. Records of the shipments from the PCDC warehouse to mine customers using Groupe Robert in 2015 were also evaluated and found to be acceptable during this audit.

The audit was conducted through discussions and interviews with Chemours, Groupe Robert (including DCR Logistics), and Octium personnel. Operations, facilities, and equipment were physically evaluated. Records regarding shipment tracking, security measures, shipping documentation, community involvement, operational procedures, training, and emergency response records were randomly sampled during the audit and were also found to be acceptable.

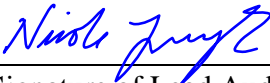
All personnel were very well prepared for the audit. The audit team found that the overall level of preparedness and understanding of ICMC requirements was excellent.

No cyanide environmental spills or human exposures have occurred in this supply chain.

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. 2015 and 2016 shipment records were available for review during this audit. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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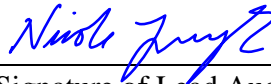
The Chemours Canada Sodium Cyanide Supply Chain was found to be in FULL COMPLIANCE with the ICMI International Cyanide Management Code requirements.

Audit Company:	MSS Code Certification Service <a href="http://www.mss-team.com">www.mss-team.com</a>
Lead / Technical Auditor:	Nicole Jurczyk E-mail: <a href="mailto:CodeAudits@mss-team.com">CodeAudits@mss-team.com</a>
Date(s) of Audit:	January 12-15, 2016

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Certification 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 Certification Auditors.

I attest that the Audit Reports accurately describe the findings of the re-certification audit. I further attest that the re-certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

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**1. TRANSPORT:**      *Transport cyanide in a manner that minimizes the potential for accidents and releases.*

Transport Practice 1.1:      *Select cyanide transport routes to minimize the potential for accidents and releases.*

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

*Summarize the basis for this Finding:*

Groupe Robert has implemented a process to address ICMI requirements regarding route selection, route risk assessment, route approval, and driver feedback. Records were available to show that ICMC route determination, risk assessment, and risk mitigation requirements were fulfilled. Population density, road infrastructure, pitch and grade of the roads, and proximity of the routes to water bodies were considered during the route evaluation process.

The Groupe Robert Transportation Manager reviews and approves all transportation routes used for cyanide shipments. The Transportation Manager reviews the cyanide routes at least every three years and maintains the approved routing documentation for each cyanide transportation route. Feedback from drivers is given in real time using the satellite communication system. Drivers have direct communication with the dispatchers and route planners and give feedback on routes, as necessary.

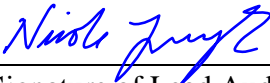
Records were available to show that the Groupe Robert Transportation Manager evaluated risks associated with routes when they were initially established. Specific routes, risks, and risk mitigation measures are detailed in the records. The company also publishes a pamphlet that outlines allowed weights for normal times of year and during the spring thaw so that drivers have the necessary information at all times.

The consideration of stakeholder concerns, such as the use of only government-designated hazmat route, ensures adherence to local requirements regarding hazardous materials. Hazmat roads are readily available and there are no special concerns associated with these routes. Stakeholder concerns are also considered by Chemours during the establishment of the Emergency Response Assistance Plan (ERAP) that is on file with the Canadian government (Transport Canada).

There are no special security concerns. The containers are sealed. Trucks originate at the Memphis, TN production facility and are transported to either Octium Solutions interim storage facility

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located in Malartic, Quebec or the Groupe Robert Boucherville Terminal outside of Montreal. The product is then transported to mine sites. Drivers are instructed not to stop in undesignated locations or take detours from the pre-established routes.

Chemours communicates emergency response information to external responders who would respond in the event of an emergency. Chemours has trained personnel at the local hospital and also trained its Canadian response contractor, per the Chemours Emergency Response Assistance Plan (ERAP) that is required by Canadian regulations. A letter from Transport Canada was reviewed and confirmation was made that the Emergency Response Assistance Plan (ERAP) is current and valid.

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

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. 2015 and 2016 shipment records were also reviewed during this audit. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

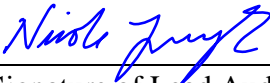
*Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.*

The operation is  in full compliance with  
 in substantial compliance with      Transport Practice 1.2  
 not in compliance with

*Summarize the basis for this Finding:*

Groupe Robert uses only trained, qualified and licensed drivers. Drivers have a minimum of three years of experience and each has a Commercial Driver's License with hazardous material transportation cards. There is an annual check that the driver has a valid license; the Canadian

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Class 1 commercial license is valid for 5 years. Groupe Robert issues a Dangerous Goods authorization card that is valid for three years.

The training "Transporting Dangerous Goods" is given to drivers every three years. The training materials were found to be thorough. A written test is given after training to ensure competency and understanding. The computer dispatch system indicates when the training is due. The system prevents dispatch of a load to drivers who have not completed their training requirements or who have expired documentation.

Record reviews and interviews confirmed that all personnel operating cyanide transport equipment are qualified and have been trained sufficiently to enable them to perform their jobs safely and appropriately.

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

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. 2015 and 2016 shipment records were also reviewed during this audit. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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

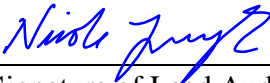
The operation is                       in full compliance with  
   in substantial compliance with      Transport Practice 1.3  
   not in compliance with

*Summarize the basis for this Finding:*

Groupe Robert maintains a "Weight and Restrictions" procedure that details the allowed weights per axle and per trailer. In addition to this procedure, printed weight requirements are issued to drivers for normal conditions and thaw conditions. Drivers can use up to 6-axle aluminum chassis to support the weight in the thaw period. The planner aligns the bill of lading with the trucks, chassis, and roads where the load will be shipped. Confirmation was made that Groupe Robert equipment is suitable for Chemours' standard shipping weights indicated on shipping papers.

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

Chemours loads the cyanide into the ISO tanks and trailers. Chemours and its packaging partners utilize documented procedures for the loading of trailers. Standard weights are loaded and shipped. Groupe Robert drivers check the axle weights upon departure with a cyanide shipment to ensure that the load is evenly distributed and to ensure that packaging integrity is retained.

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

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. 2015 and 2016 shipment records were also reviewed during this audit. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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

	<input checked="checked" type="checkbox"/> in full compliance with	
The operation is	in substantial compliance with	Transport Practice 1.4
	not in compliance with	

*Summarize the basis for this Finding:*

Chemours and its packaging partners load the cyanide into ISO tanks and trailers using formal procedures and checklists. Extensive blocking and bracing is used for the packing of bag-boxes, flo-bins, and Eco-paks. ISO tanks are inspected prior to shipment to ensure that the unit is secure and ready for shipment. Groupe Robert drivers check the axle weights to ensure that the product is evenly distributed and to ensure that packaging integrity is retained.

UN 1689 placards are displayed on all four sides of the trailers. Drivers maintain records to show pre-trip and post-trip inspections and the results of these inspections. Vehicle inspections are required by procedure, the performance of the inspection is recorded in the electronic log system. A paper log book is also maintained. There is a formal preventive maintenance program in place. The frequency of preventive maintenance tasks are defined by the type of activity for which that

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equipment is used. Trucks undergo preventive maintenance on a defined frequency and are fully inspected at least annually, as required by Canadian law.

Groupe Robert drivers use designated truck stops and limit driver hours of service, in accordance with Canadian law. The Transportation Manager receives a warning if anyone is driving beyond the allowed hours. Logs demonstrated that drivers are not exceeding limitations.

Groupe Robert maintains a procedure entitled "Load Securing Labels and Tags". The ISO containers are all sealed. The loads are secured by the shipper and the loads are not opened by the driver.

According to interviews with the General Manager and the Driver Trainer, Groupe Robert drivers are empowered to stop a shipment if weather conditions or road conditions are unsafe. There is also a driver fatigue program to ensure that drivers know that they can stop a shipment and rest if necessary. Groupe Robert runs a campaign in the spring and fall to remind drivers that they need to be well-rested. Drivers need to notify the dispatcher if they want to stop a shipment.

There is a documented Drug and Alcohol policy entitled: "Illicit drugs". This policy was reviewed during the audit. There is a zero tolerance for drug and/or alcohol use while on duty. The policy expressly forbids driving while under the influence of illicit drugs and alcohol. Testing is done pre-employment, random testing, post-accident, reasonable doubt, return to duty, and follow-up testing.

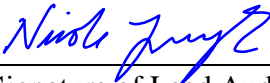
Records were available to demonstrate that the requirements of each of the above mentioned sections (1.4.3 a) through f) had been fulfilled.

Groupe Robert does not use subcontractors for any portion of its cyanide transportation operation.

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. 2015 and 2016 shipment records were also reviewed during this audit. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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

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

*Summarize the basis for this Finding:*

Groupe Robert does not transport containers by sea or by air. This section of the Cyanide Code does not apply to the supply chain.

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

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

*Summarize the basis for this Finding:*

Groupe Robert uses a satellite system and cell phones to ensure that drivers are always able to communicate with dispatch personnel and others, as necessary. The communication equipment is used on a daily basis and is checked during the pre-trip inspections to ensure that it functions properly. Interviews confirmed this practice.

Blackout areas do not present a significant problem on the routes traveled due to the use of satellite tracking equipment.

Groupe Robert trucks are tracked using GPS. Electronic logs are maintained and dispatchers monitor each trip. Dispatch personnel demonstrated their ability to access real-time information if there were any question as to the location of a truck.

Drivers have shipping documentation including the Bill of Lading with them at all times during a shipment. Bills of Lading were sampled and were found to be complete with amount of cyanide, full description of materials, emergency phone numbers; and receipt of material by the mine.

Drivers carry emergency response procedures and a book entitled the Emergency response Guidebook with them during deliveries.

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

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. 2015 and 2016 shipment records were also reviewed during this audit. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

**2. INTERIM STORAGE: *Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.***

Transport Practice 2.1: *Store cyanide in a manner that minimizes the potential for accidental releases.*

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

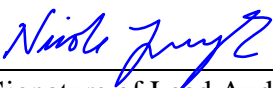
*Summarize the basis for this Finding:*

Octium Solutions is the interim storage facility for this supply chain. Cyanide signs are posted on the fence. There is also signage that bans eating, smoking and indicates which PPE is required.

The Octium Solutions facility has a locked fence, camera surveillance, and a sign-in process. Unauthorized access is prohibited. Surveillance footage is retained for a defined period of time. The ISO tanks observed during the audit were sealed and secured so that they could not be moved by unauthorized personnel.

ISO tanks are brought to Octium Solutions by Empire Express drivers and are then picked up for delivery to mine sites by Groupe Robert drivers. ISO tanks are not being opened, only stored in a secure truck yard. There were no other materials being stored near the ISO tank trailers. Defined practices require that other materials at the facility be stored far away from the cyanide.

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The Octium Solutions facility is compacted gravel with a membrane underneath. There are no water bodies in close proximity. The entire site is surrounded by a rain water retention system. There is a valve to close off storm water, if necessary. The storage area is sloped to ensure proper containment in the unlikely event of a spill event involving rainwater or fire water. Trailers are stored outside in this interim storage facility. The ventilation requirement does not apply. The storage area was deemed to be acceptable by the auditor.

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. 2015 and 2016 shipment records were also reviewed during this audit. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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

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

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

*Summarize the basis for this Finding:*

The Groupe Robert Emergency Intervention Plan is kept in the trucks at all times and indicates the telephone numbers that are to be called in the case of an emergency. The Chemours document “Transportation Emergency Information” is also used by Groupe Robert and is maintained in the trucks. The emergency planning information was found to be appropriate for the routes driven. Octium Solutions maintains an emergency response plan that is appropriate for the facility and was found to be up-to-date. The Chemours ERAP was up-to-date and records were available to demonstrate that it is on file with the Canadian government. This information was shared with Groupe Robert and is maintained by Chemours. In addition to the emergency documentation noted

here, drivers reported that they also have the Emergency Response Guidebook in the truck at all times.

The plans for Groupe Robert and Octium Solutions were found to be appropriate for the operations. Groupe Robert also has a security plan that is based on a risk assessment and was found to be up-to-date.

Only solid sodium cyanide is transported in this supply chain. All procedures and plans specifically reference the response steps that are to be taken for solid cyanide spills. The emergency response plan maintained by Groupe Robert is specific to trucking. The emergency response plan maintained by Octium Solutions is specific to interim storage. The Chemours ERAP addresses all modes of transport.

Groupe Robert only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, and the roles of the different emergency responders are discussed in the planning information.

The emergency planning information is appropriate for the type of product being transported, solid sodium cyanide. The planning information is general, but was found to be appropriate for the different types of containers and trailers that are used in this supply chain.

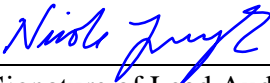
Groupe Robert maintains Vehicle Accident Procedures for accidents with, and without spilled materials. The emergency procedures are thorough and are maintained as part of the Driver's Manual. The manual is required to be in the trucks during transport. In addition to this information, the Chemours Transportation Emergency Information is available in the trucks during deliveries. The emergency planning information and Driver's Manual were found to be appropriate for the routes driven. The documentation describes what steps are to be taken in response to traffic accidents. The procedures include cyanide-specific response actions and general cyanide safety information.

Octium Solutions' emergency response plan is appropriate for anticipated emergency situations specific to interim storage.

Chemours maintains an Emergency Response Action Plan (ERAP) for all transportation modes in Canada, as required by regulations. These emergency plans are appropriate for this supply chain and address all modes of transportation in Canada. Emergency Response Contractors are trained by Chemours every three years, as described in the ERAP.

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Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, and the roles of the different emergency responders are discussed in the planning information.

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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

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

*Summarize the basis for this Finding:*

Emergency response training and cyanide-specific safety and emergency response training is covered as part of general Dangerous Goods training all drivers receive. Octium personnel are also trained in emergency response procedures. Records were available for review and were found to be acceptable. The responsibilities of the drivers and/or interim storage personnel are clearly defined in the emergency planning information.

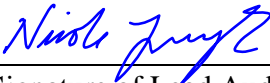
At the time of dispatch, the driver is issued an emergency equipment bag and Sodium Cyanide Driver PPE Checklist. Records were available to show that the drivers are checking equipment availability and kit completeness before each trip. The bag contains: goggles, chemical suit, rubber boots, gloves, tarp, and containment pool. The bags are sealed to ensure that the contents have not been disrupted. If the seal is broken the Quebec Fleet Supervisor/Driver Trainer is notified by the driver and the bag is re-stocked. Octium Solutions also maintains a list of emergency response equipment that it maintains at the interim storage facility.

Emergency response training and cyanide-specific safety and emergency response training is given to employees every three years during their Dangerous Goods training. Octium Solutions personnel are refreshed on emergency response procedures at defined frequencies.

The emergency equipment bags that are put in the trucks are sealed to ensure that the contents have not been disrupted. If the seal is broken the Quebec Fleet Supervisor/Driver Trainer is notified by

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the driver and the bag is re-stocked. Octium Solutions has implemented an inspection process to ensure that emergency response equipment is in suitable condition and available for use at all times.

Groupe Robert does not use subcontractors for any portion of its cyanide transportation operations

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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

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

*Summarize the basis for this Finding:*

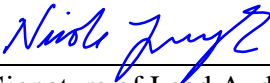
Emergency telephone numbers and contact information for Chemours, regulatory agencies, and medical facilities were available in all emergency response plans for each of the organizations in this supply chain. All emergency response planning documents reviewed for Groupe Robert, Octium Solutions, and Chemours are reviewed on an annual basis to ensure that the information is up-to-date and accurate.

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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

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

*Summarize the basis for this Finding:*

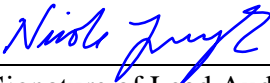
Chemours maintains a document entitled "Cyanides Global Emergency Response Plan". Chemours would manage / guide any remediation activities using this document and the "Sodium Cyanide Emergency Response Guidelines" document. The documents were found to be detailed and appropriate for the supply chain.

Groupe Robert, Octium Solutions and Chemours procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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

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

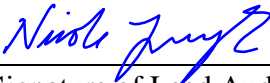
*Summarize the basis for this Finding:*

Emergency response drills are conducted at least annually in this supply chain. Drills were held by Groupe Robert and Octium Solutions in 2016. Records were available for review and were acceptable. The emergency procedures are reviewed by Groupe Robert, Octium Solutions, and Chemours at least annually to ensure adequacy. Changes are implemented as required.

Confirmation was made during this audit that Chemours personnel confirmed continuous ICMC compliance to this transport practice through the performance of internal audits of the previous supply chain TONA and PCDC operations several times between 2012 and 2015. Chemours drill records from the entire re-certification period were also reviewed during this audit. According to records and interviews, all operations within this supply chain (previous and current warehouse and transportation partners) were maintained in compliance with ICMC requirements continuously since the previous ICMC certification audit in 2012.

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