

# ***SUMMARY AUDIT REPORT***

***CIATEITE S.A.***

***Transport Operation - Guayaquil, Ecuador***

***For The  
International Cyanide Management Code***

**December 2020**



# SUMMARY AUDIT REPORT

Page

## Content

1.	TRANSPORT: .....	5
	Transport Practice 1.1 .....	5
	Transport Practice 1.2 .....	6
	Transport Practice 1.3 .....	7
	Transport Practice 1.4 .....	8
	Transport Practice 1.5: .....	10
	Transport Practice 1.6: .....	10
2.	INTERIM STORAGE.....	12
	Transport Practice 2.1 .....	12
3.	EMERGENCY RESPONSE: .....	13
	Transport Practice 3.1 .....	13
	Transport Practice 3.2 .....	14
	Transport Practice 3.3 .....	15
	Transport Practice 3.4 .....	16
	Transport Practice 3.5 .....	17

## SUMMARY AUDIT REPORT

### Information on the audited operation

Name of Cyanide Transportation Facility: Ciateite S.A.  
Name of Facility Owner: Grupo Torres y Torres  
Name of Facility Operator: Ciateite S.A.  
Name of Responsible Manager: Fausto Moreta Tomsich – General Manager  
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### Location detail and description of operation

Ciateite S.A. is a company of the Torres & Torres group that consists of a group of companies dedicated to providing an Integral Logistics Service of Foreign Trade since 1995. Ciateite S.A. (Ciateite) was established in 1998 to provide road freight transport services. In the beginning he used outsourced vehicles but in 2002 he made his first import of truck fleet to provide a total service. Ciateite has its main base in the city of Guayaquil and in 2014 expanded its facilities so it currently has an operations yard for the maintenance of its vehicles and a building that houses its trucks and trailers’.

Ciateite currently has about 200 employees. Since 2005, the company has been certified in Business Alliance for Secure Commerce (BASC) safety processes and ISO 9001 quality certification, and also has an environmental transport license for hazardous materials.

The company offers the service of transport of heavy import and export cargo from the Maritime and Air Cargo Terminals of Ecuador to different national destinations where the wineries of its customers are located. Ciateite provides 20- and 40-foot, loose-cargo, refrigerated container, and oversized cargo shipping services in special equipment.

The transport of sodium cyanide is carried out with its own fleet.

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

# SUMMARY AUDIT REPORT

## Auditor's Finding

This operation is

- in full compliance with with the International Cyanide Management Code
- in substantial compliance with
- not in compliance with

This operation is in full compliance with the International Cyanide Management Code.

Audit Company:	BP Cyanide Auditors SAC
Audit Team Leader and Technical auditor   Email:	Bruno Pizzorni   <a href="mailto:bpizzorni@cyanideauditor.com">bpizzorni@cyanideauditor.com</a>
Dates of Audit:	December 3, 2020

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

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

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

# SUMMARY AUDIT REPORT

## Verification Protocol

### 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 Transport Practice 1.1
- in substantial compliance with
- not in compliance with

Ciateite has the Instructive for Analysis, Selection, Risk Evaluation and Authorized Stops. It provides for the identification of critical factors in the field in order to assess traffic risks and safe stops and thus reduce the likelihood of accidents, road damage and the environment, and in the case of any event materializing, mitigate the severity of the damage caused, as well as preserve the integrity of the load and compliance of the operation. Instruction, among other potential impacts of accidents and spills, considers population, conditions of roads, pitch and grade, proximity of water bodies and areas with prevalence of fog.

The Instructive for Analysis, Selection, Risk Evaluation and Authorized Stops Ciateite includes performing route risks identification. Based on this document, the Instructive for Execution of Safe Transportation, sin section Risk Analysis by Operation, lays down provisions to assess the characteristics of the products to be transported on a work order in order to assign safety measures during transport in order to preserve the integrity of the cargo. Risk are categorized by colors, being sodium cyanide shipments in code blue color, categorized as the highest risk product category to transport. Section Controls Assigned by Risk Code, o the same document, is dedicated for cyanide transportation and lists the measures necessary to manage these risks.

The Periodic Route Assessment of the Instructive for Analysis, Selection, Risk Evaluation and Authorized Stops, states the routes reevaluation will be performed under the same initial analysis methodology and its updating will be carried out annually or as needed (Report of internal or external developments).

Ciateite documents the measures taken to address risks identified with the selected routes. Risk mitigation measures are noted on the route documentation. The dispatch orders indicate the routes. Risk mitigation measures focus primarily on the avoidance of social unrests, high traffic times of day and the avoidance of roads that are dangerous in poor weather conditions. The high levels of risk, are reinforced

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

## SUMMARY AUDIT REPORT

or controlled through training and follow-up to the activities of the responsible driver personnel. The training program will be given annually and can be reinforced depending on the worker's performance.

Ciateite interacts with communities, governmental agencies en emergency responders in the development of risk management measures. Also, the evaluation of routes and as an alert for day-to-day operations, ECU 911 is available as a source of information for the latest developments in the country's roads (<https://www.ecu911.gob.ec/consulta-de-vias/>), to know general states of roads and implications of transit through public works in development (<https://www.obraspublicas.gob.ec/>); in addition to that provided by tolls. ECU 911 is the Integrated Security Service, the immediate and comprehensive emergency response service in the Ecuadorian territory that coordinates the attention of articulated response agencies, for cases of claims, disasters and emergencies, mobilizing available resources to provide rapid attention to citizens.

For high risk products transportation (set as blue code), Ciateite requires as first option to consider an alternate route, if this is not possible, a preventive measure should be implemented according to the approach applied, such as: "Use of convoy for security", "Use of Convoy Leader as a warning of road status and third parties". Ciateite uses convoys and escorts. The interviewed driver confirmed all the cyanide operations are performed in convoys. Trip reports and recommendations are provided by convoy supervisor in the report issued for each trip.

Ciateite has provided information regarding its emergency response procedures to the national Secretary of Risk Prevention, the Ecuadorian national entity responsible to coordinate support with emergency centers (emergency responders, medical centers, and Fire fighters) along the routes, upon calling its 911 emergency number.

Ciateite does not subcontract any portion of their cyanide transportation operations. Tractors and trailers are owned by Ciateite. The International Cyanide Management Code (ICMC) requirements pertaining to subcontractors are, therefore, not applicable to the organization.

### *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 Transport Practice 1.2
- in substantial compliance with
- not in compliance with

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

## SUMMARY AUDIT REPORT

Ciateite work with qualified and licensed drivers. To be able to qualify as a driver in Ciateite, they must be pass the company's evaluation as for experience and test of driving, police records and medical examination, among others. Diving test is first performed on the company driving simulator a sophisticated tool and software to ensure drivers ability. Drivers are required to have continuously training to maintain their driver credentials. For example Hazmat training is required to be refreshed every two years.

According to local regulations, all drivers must pass psych technical and a medical examination to be able to drive. Drivers are also trained in defensive driving, firefighting, first aid, sodium cyanide and its emergencies (cyanide spill and poisoning). The convoy leader must have transport background, to be knowledgeable on basic mechanics, and leadership qualities. The current convoy leaders have over five years of experience escorting hazardous materials convoys.

Operational training is given upon hire and there is a skills evaluation process to ensure that drivers are competent to perform their job and to drive the designated route prior to their first delivery. Safety- related training is given at defined intervals to ensure that all personnel operating cyanide transportation equipment can perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. Training records were reviewed and found to be acceptable. Drivers licenses and training records were reviewed.

### Transport Practice 1.3

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

Ciateite use equipment designed and maintained to operate within the loads it will be handling. Before buying any equipment, they perform a technical study to determine the characteristics of the vehicle needed, taking into account the engine power, haul and cargo capacity, torque, transmission capacity to the last axis. Trucks and trailers were reviewed during the audit. All available tractors and trailers have been checked and were rated for weights that exceed maximum loaded weights. The load capacity of the platforms used by Ciateite is larger than the gross weight of an ocean container fully loaded with cyanide which is approximately 22 t.

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

## SUMMARY AUDIT REPORT

To ensure the adequacy of the equipment for the load it must bear, Ciateite inspects and performs regularly preventive maintenance actions. The maintenance program is well organized, defined checklists showing all necessary maintenance activities are used and records were available. Inspections are scheduled, tracked and documented. Each tractor and trailer has its own file that is maintained. The file shows all preventive maintenance activities, repair activities, and inspection activities that were performed on the truck and/or trailer over time. There are restrictions in operative system that blocks the vehicle availability in case of any inconvenient with the unit.

Prior to loading and use, trucks are inspected by Ciateite personnel to ensure there are no deviations that could affect the operation. They are guided by the load capacity of the equipment, also, the load weights are recorded before and during the trip.

To prevent overloading of the transport vehicle, Ciateite has established that each platform will be loaded with only one cyanide container and that each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklist and was confirmed during the interviews.


Loading is done by the port operator using scales to confirm the shipment weight. The loads being hauled are standard loads that do not vary in weight. Records were checked against weight capacities and weight limit regulatory information. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. Office personnel and driver showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

### *Transport Practice 1.4*

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

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

Ciateite transports only solid cyanide in sealed containers. Normal safe driving procedures and unloading procedures ensure that the truck and the trailer are not damaged during transit. The transport procedure establishes that the load cannot be altered during the transportation process. To ensure this, tags are placed on the ocean container's locks at the manufacturing facility. These tags can only be removed at the mine. The containers received in the port are placed on platform trailers hauled by trucks without the need of changing the packaging. Per the interviewed personnel, the load is not removed from the container.

Ciateite S.A.		December 3, 2020
_____ Name of Facility	_____ Sign of Lead Auditor	_____ Date



## SUMMARY AUDIT REPORT

Appropriate placards showing UN 1689 (solid cyanide) are displayed on all four sides of the sea containers. Drivers visually inspect the containers prior to each movement. Equipment markings were found to be adequate and conformant.

The transport procedure establishes that placards with cyanide's UN number and poison signs must be placed in the container; this is verified through the vehicle inspection checklist. Per the reviewed operation files, the presence of the placards was verified through the checklist.

Ciateite has a safety program for cyanide transport. Drivers conduct a pre-trip inspection before the vehicle departs to the port facility for loading (documented through the vehicle inspection checklist). Mechanical defects are called to the attention of the on-site mechanics. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site. Driver interviewed demonstrated knowledge of the process of performing pre-trip inspections. Pre-trip inspection checklists were reviewed and found to be acceptable.

Ciateite has a Maintenance Program for their vehicles for preventive and corrective activities. The maintenance program was reviewed and found in compliance.

The working day of drivers traveling with sodium cyanide may not exceed twelve hours a day discontinuous, allowing stoppings every two to three hours for ten minutes or more for equipment review, feeding and active stops. According to procedures, the transport will only be carried out during daytime hours.

The load shifting within the container is not considered possible as all containers are filled with 20 boxes and block and brace is applied at the cyanide production plant to prevent load movement. At the same time, trailers have pins where the container is embedded preventing it from shifting. Cyanide travels in sealed containers, which are secured to the platform safely, eliminating the possibility of displacement during transport.

According to the sodium cyanide transport procedure the transport can continue only if the leader of the convoy has provided the relevant conditions. The supervisor of the convoy informs the state of progress of the operation and any event in each one of the points indicated in its itinerary, and any event requiring stopping the convoy. If conditions are not favorable to allow the convoy to reach its destination, it will be parked in an appropriate place.

Before each trip, the employee must undergo alcohol testing and periodically through a drug test.. Violation of this policy has resulted in the separation of the worker from the organization.

Records were available to demonstrate that the requirements of each of the Code requirements above mentioned had been fulfilled. Records are maintained in hard copy at the office for a period.

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

## SUMMARY AUDIT REPORT

### *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

Ciateite does not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

### *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

Cyanide shipments are tracked using a GPS tracking system that is monitored by Ciateite. The convoy leader is provided with a cellular phone and a satellite phone if necessary to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders. The convoy leader has also a radio and he is responsible of communications with Ciateite in case of an emergency. The drivers also have cell phones as a back-up means of communication.

The communication and tracking equipment is properly maintained and is used daily. Communication systems is part of the pre-work inspections and is maintained along with the formal preventive maintenance program. The system is used each day and correct operation of the system is confirmed at that time.

Communications blackout areas are identified in each route risk assessment. The transporter's procedure Instructive for Safe Transport describes procedures implemented for the blackout areas. Ciateite's control room has set geofences identifying this places and they expect to recover communication with the convoy after an established time.

Ciateite has a communication and GPS tracking system which allows continuously monitoring of the location of the convoy. The convoy leader communicates Ciateite upon dispatch, upon arrival at the customer sites, and after unloading is complete. Personnel responsible for tracking shipment status from Ciateite were interviewed, the GPS system was demonstrated, and logs showing that shipment status was

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

## SUMMARY AUDIT REPORT

being recorded were reviewed and were found to be complete. Ciateite procedure for tracking of shipment status was reviewed during the audit and found to follow current practices.

The transport document shows the amount of cyanide delivered. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The amount of cyanide delivered is carefully monitored by the driver and remotely through the Ciateite dispatch office.

Additionally, the containers are locked and tagged at the manufacturer's facilities and these tags are only removed at the mine. The auditor reviewed the trucks cyanide shipment bill of lading matching the port scale reports, coinciding the weights always.

The transport document, the SDS, and emergency response information are carried by each driver. The drivers have an on-board file that includes copies of its, licenses, and the cyanide SDS.

Ciateite S.A.

\_\_\_\_\_  
Name of Facility



\_\_\_\_\_  
Sign of Lead Auditor

December 3, 2020

\_\_\_\_\_  
Date

## SUMMARY AUDIT REPORT

### 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*

The operation is

- in full compliance with Transport Practice 2.1
- in substantial compliance with
- not in compliance with

Ciateite does not operate any cyanide trans-shipping depots and interim storage sites. Transport Practice do not apply to Ciateite.

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

## SUMMARY AUDIT REPORT

### 3. EMERGENCY RESPONSE:

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

#### *Transport Practice 3.1*

*Prepare detailed emergency response plans for potential cyanide releases.*

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

Ciateite maintains an Emergency Response Plan (ERP), to respond to potential releases and exposures to cyanide during transport. The ERP is appropriate for all transportation incidents. Ciateite personnel were interviewed, leadership understanding and responsibilities was good. Ciateite personnel demonstrated a high level of commitment to ensuring that cyanide shipments are made in compliance with ICMC requirements.

The Plan is appropriate and designed for the specific circumstances. The Plan reflects specific issues that could arise during the transportation route (several different routes). The Plan identifies possible emergency situations as sodium cyanide release to road, land, surface water and robbery during transportation. Ciateite do not has interim storage facility.

The Plan considers the physical and chemical form of the cyanide. The only form of cyanide to be shipped using this supply chain is solid sodium cyanide. Emergency response procedures address actions to be taken in response to a solid sodium cyanide spill. The Plan includes the sodium cyanide SDS where is defined the physical and chemical form of cyanide: solid white granular cyanide and specific information regarding the hazardous material to be transported.

The Plan considers the method of transport, truck. No other methods of transport are used in this trucking company. The Plan considers the transport of cyanide in its own trucks and appropriately addresses the emergency response actions. The Plan is adequate for the selected transport routes, based on a review of the hazards and risk assessments after the completion of the route sheet. Whenever transport of sodium cyanide is performed, an evaluation is conducted.

The Plan considers all parts of the transportation infrastructures, as it was identified in the route risk analysis, including the conditions of the roads (mine road versus highway) and urban areas. The plan considers the conditions of the roads, existing water courses, bridges conditions and danger of landslides on the route, among others. The Plan addresses the emergency response to events that occur in relation to these risks and hazards.

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

## SUMMARY AUDIT REPORT

The ERP considers the trucks design of the transport vehicles. It describes the appropriate trucks and chassis to use to transport cyanide, also indicates cyanide is transported in 20' containers.

The Plan specifically considers response actions that may be needed for emergency situations during transportation. The Plan includes detailed response actions for each case, including spills in both current and open water bodies and for the other risks identified on the routes. The Plan considers a series of instructions covering the potential hazards that could occur during the loading, transportation and unloading of the cyanide cargo. It includes emergency response actions against collision or rollover, spillage of dry cargo to water sources, on the road and landslides.

The Plan, also establishes the logical line of actions that the leader and convoy drivers must take when irregularities arise during transport of sodium cyanide, including civil commotion, adverse conditions, bad weather, traffic congestion and unplanned stops.

The role of outside responders and medical facilities in emergency response procedures are clearly established. The police will provide support and safety to the transport units during the passage through cities and towns medical facilities and will take control of traffic routes in case of an accident.

### *Transport Practice 3.2*


*Designate appropriate response personnel and commit necessary resources for emergency response.*

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

Training on emergency response is given periodically to drivers, convoy leaders and supervisors. They are trained in appropriate emergency response in safe cyanide management (spill and intoxication), firefighting, first aid, hazardous materials. Training is provided by internal staff and external companies as workouts which are renewed annually complying with the training plan and verifying compliance with specific skills.

Drivers were interviewed and awareness of emergency procedures and documentation was confirmed. Training records were reviewed in emergency response, type "B" suits, and in the uses of HCN gas detectors.

The ERP has detailed descriptions of the specific emergency response duties and responsibilities before, during and after an incident / accident or an emergency of situation for the managers, transport coordinator, control room, the convoy leader and drivers, among others.

<u>Ciateite S.A.</u>		<u>December 3, 2020</u>
Name of Facility	Sign of Lead Auditor	Date

## SUMMARY AUDIT REPORT

The transporter has defined in the ERP the materials required for emergency response during transportation along the route including spill response equipment. The emergency equipment and Personal Protection Equipment (EPP) includes Tyvek suits, leather and impermeable gloves, PVC boots, safety goggles, area isolating tape rolls, HCN detector, amyl nitrite ampoules, sodium thiosulfate and sodium nitrite, disposable respirators, oxygen, shovels, sweeps, polyethylene bags, and empty containers. Ciateite's escort personnel are trained to administer the inhalable cyanide antidote amyl nitrite ampoules; the injectable antidotes sodium thiosulfate and sodium nitrite are expected to be administered by external responders. During transportation the antidotes are stored according to the manufacturers' recommendations.

Each truck has the required emergency response equipment. In addition, the convoy escort vehicle has a complete emergency response equipment, including personal protective equipment, spills containment kit, and antidote as amyl nitrite ampoules, sodium thiosulfate and sodium nitrite. The emergency equipment and materials are checked prior to each cyanide delivery. A checklist is used to verify that it is available and it is part in the operation files.

Ciateite drivers receive an appropriate level of training to enable them to fulfill their role in emergency response, which is limited to a notification role. Formal training in cyanide is given periodically. Records were checked. Drivers were interviewed and awareness of emergency procedures was appropriate. The auditor reviewed training records in first aids for cyanide exposures, in the procedure for safe cyanide transportation and in the emergency response plan.

In addition, prior to each operation the drivers receive refresher training regarding cyanide handling and emergency response. This training session is provided by the convoy leader prior to the start of the convoy.

Among the control measures to adopt for the transportation of hazardous materials, the ERP addresses to perform inspections to the emergency response equipment before loading the truck by transport and operations personnel of Ciateite. Also, the emergency equipment is inspected on a regular basis when vehicles trucks are brought in for maintenance and inspections. A checklist is used to verify that it is available prior the convoy's departure and it is kept in the operation file. The availability and completeness of the material was confirmed during the audit.

### *Transport Practice 3.3*

*Designate appropriate personnel and commit necessary equipment and resources for emergency response.*

The operation is

- in full compliance with  
 in substantial compliance with

Transport Practice 3.3

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date

## SUMMARY AUDIT REPORT

not in compliance with

The ERP has current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. Ciateite prepares an information package for drivers which includes a sheet with an updated telephone list.

The ERP is reviewed once each year. During this activity, the phone numbers are checked for accuracy to ensure that internal and external emergency notification contacts are kept current. Records were available to show that this is done.

### *Transport Practice 3.4*

*Develop procedures for internal and external emergency notification and reporting.*

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

The ERP describes how the recovery will take or neutralize the solid, the decontamination of soils, or other contaminated media and how these wastes are managed. The Plan addresses the immediately actions to follow in case of spills, preventive measures to avoid, cleaning methods and how to treat waste.

Ciateite personnel will perform spill cleanup and remediation in case of small cyanide spills. For a significant accident with cyanide spill, according to local regulations (Ministerial Agreement 061 R.O 316 Art 5 subsection p), Ciateite must call the Secretary of Risk Management (are identified in the Emergency Response Plan) which will be the competent authority uncharged to manage the emergency response assigning a specialized contractor to perform cleanup and remediation activities to ensure the land has been free of cyanide contamination.

In accordance with the information provided by Ciateite' s Code Certification Líder, Ecuadorian regulations require, regardless of the magnitude of the spill, it is mandatory to notify the Secretary of Risk Management about of any spill of hazardous substances occurred, who will indicate where to dispose the waste product of the hazardous material.

Ciateite prohibits the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The ERP addresses that the use of these chemical substances in any incident for the treatment of solid sodium cyanide spilled in surface waters is prohibited.

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date



## SUMMARY AUDIT REPORT

### *Transport Practice 3.5*

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

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

The ERP states to be reviewed once each year. Records were available to show that this is done.

The ERP establishes that mock emergency drills must be carried out every year. Also, that the practices will be scheduled in coordination with the client, to keep the personnel permanently prepared for an emergency. The auditor reviewed a drill report finding to be effective. The scenarios simulated human exposure with the testing of the decontamination procedures.

The Plan establishes that after implementing the Plan and mock drills, an analysis of the observations or failures detected during it be carried out, for which it will have to prepare a schedule of actions and courses that must be received by the personnel to correct these observations and of that to complete the equipment or information needed. At the date of the audit, there had been no need to activate the Plan, so no revisions to it had been carried out for this reason.

Ciateite S.A.

Name of Facility



Sign of Lead Auditor

December 3, 2020

Date