



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

**DuPont Hermosillo Operation
Re-Certification Audit**

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

2013 Audit Cycle



Hermosillo Summary

Company Name & Contact Information

DuPont – Mexico
Marcos Cervantes
Cyanides Business Mexico Operations Leader
Email: Marcos.Cervantes-1@dupont.com
Tel. (444) 824-52-65, (444) 824-52-63

DuPont Hermosillo
Location
Carretera a la Colorada
Parque Industrial Dynatech Sur.
Avenida Fusion Final
Ciudad Industrial, Sonora
CP 89293

Operational and Audit Information

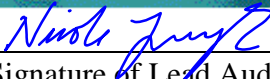
E.I. DuPont de Nemours and Company, Inc. (DuPont) is a science-based company operating in more than 70 countries. DuPont offers a wide range of products and services for markets including agriculture, nutrition, electronics, communications, safety and protection, home and construction, transportation and apparel. Solid sodium cyanide for use in the gold mining sector is manufactured at the Memphis, Tennessee plant, which is part of the DuPont Cyanides Business and Chemicals & Fluoroproducts Business. Bulk and semi-bulk shipments of sodium cyanide are shipped to the Hermosillo Terminal for warehousing, loading into ISO tanks, and distribution to customers in ISO tanks, drums, and Intermediate Bulk Containers (IBCs).

DuPont was one of the original 14 International Cyanide Management Code (ICMI Cyanide Code) signatory companies announced on November 3, 2005. As such, DuPont made the commitment to obtain ICMI Cyanide Code certification for its Memphis Solid Cyanide Plant and its warehouse, packaging, and ISO tank loading operations. DuPont was the first Cyanide Producer in the world to achieve certification in June 2006 and the production operations were re-certified in 2009 and 2012.

The DuPont Hermosillo operation was commissioned in 2006. It was originally in a different location in Hermosillo. The warehouse activities were first certified to the ICMI Cyanide Code as part of the DuPont Mexico Supply Chain audit in 2010. In 2011 operations in Hermosillo were

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expanded and moved to a new facility nearby. The facility was specifically constructed to DuPont specifications and in alignment with ICMI Cyanide Code requirements.

Hermosillo receives product via rail box car, delivered by Ferromex Railroad, and by ALR truck. The new facility was certified to the ICMI Cyanide Code in 2011. Since the 2011 certification audit an ISO tank loading operation was introduced at the facility. All operations (warehousing, re-packaging, ISO tank loading, and truck dispatch) were included in the scope of this 2013 audit.

This audit was conducted over two on-site visits on August 15-16 and October 23, 2013. The *ICMI Cyanide Production Verification Protocol* was used to verify compliance to ICMI Cyanide Code requirements.

Description of the Hermosillo Operation:

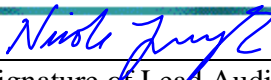
The DuPont Mexico operations are headquartered in the Homero Building in Mexico City, Mexico. The DuPont Hermosillo location is operated by Intermodal Mexico (IMEX). DuPont manages operations directly with DuPont Leadership personnel. The Hermosillo facility receives rail shipments of sodium cyanide via the Ferromex railroad. The cyanide arrives in rail boxcars. Rail spurs lead to the warehouse area and unloading occurs within a fenced and secure area. Truck shipments are also brought in by ALR in cargo trailers. The unloading of trucks occurs at the loading dock which is also within the secure area. The cyanide is stored in a covered well-ventilated warehouse prior to being dispatched to customers by truck.

The material unloading, warehousing, truck loading, and ISO tank loading operations are the subject of this report. The Hermosillo audit was conducted at the same time as the entire DuPont Mexico Supply Chain audit. The other parts of the supply chain (rail and trucking carriers) are part of the DuPont Mexico Supply Chain certification audit report.

Hermosillo Operations - Auditor's finding and attestation

The audit was performed at the DuPont Hermosillo facility which is operated by Intermodal Mexico (IMEX) with on-site DuPont management personnel. Personnel from DuPont and IMEX were audited during this assessment. The audit was performed by independent third-party auditors who were pre-approved by the ICMI. The certification audit was conducted on August 15-16 and October 23, 2013.

The Hermosillo Operations were evaluated for compliance with the ICMI International Cyanide Management Code requirements using the *ICMI Cyanide Management Code Production Verification Protocol*. DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the operations were reviewed. The audit was conducted through discussions

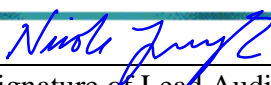
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and interviews with multiple individuals in cross-functional roles at DuPont and IMEX (see table below). Records were randomly sampled for all ICMI Cyanide Code requirements and were found to be acceptable.

Production Practice Discussed →	Organization	1.1 QA / QC – Design of Facility	1.2 Safe Operations to Avoid Accidents	1.3 Inspect Facilities and Equipment	2.1 Safety Procedures – Protect Against Exposure	2.2 Plans and Procedures for Response to Exposure	3.1 Environmental Monitoring	4.1 Train Employees in Safe Operations	4.2 Train Employees to Respond to Emergencies	5.1 Emergency Response Plan	5.2 Involve Stakeholders	5.3 Emergency Response Resources	5.4 Notification Procedures	5.5 Remediation & Cyanide in Water Hazards	5.6 Emergency Response Drills
		Audit Participants													
Operations Leader	DuPont - Mexico	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Cyanides Product Steward	DuPont - Mexico	X			X			X	X	X	X	X		X	X
Product Stewardship Manager	DuPont - US	X							X	X	X	X	X	X	X
Operations Supervisor	DuPont - Mexico		X					X							
Operations & Warehouse Personnel – Hermosillo	IMEX		X	X	X	X		X	X	X		X	X		X

The results of this certification audit indicate that the DuPont Hermosillo Operations are in FULL COMPLIANCE with International Cyanide Management Code requirements.

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Auditor's Finding

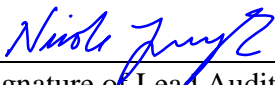
All activities at the DuPont Hermosillo Operation continue to be in FULL COMPLIANCE with the requirements of the ICMI according to the *ICMI Cyanide Production Verification Protocol*. No audit findings requiring corrective action were noted during the audit. All personnel were very well prepared for the audit. The audit team found that the overall level of preparedness and understanding of International Cyanide Management Code requirements was excellent.

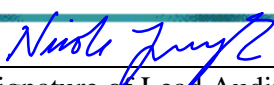
The Hermosillo Operation continues to be in full compliance with the International Cyanide Management Code. There has been no break in the valid certification of the Hermosillo operations. There have been no significant spills or human exposures to cyanide since the previous certification audit.

Audit Company:	MSS Code Certification Service, a Division of Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Auditor:	Gabriel Rodriguez
Date(s) of Audit:	August 15-16 and October 23, 2013

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 Verification Auditors.

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

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1. OPERATIONS: *Design, construct and operate cyanide production facilities to prevent release of cyanide.*

Production Practice 1.1: *Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.*

The operation is **in full compliance with Production Practice 1.1**

Summarize the basis for this Finding:

The Hermosillo facility was built using sound, accepted engineering practices and quality control processes. Construction & Safety Review records for the construction of the facility were reviewed and were found to be acceptable. Appropriate documentation and records were available to demonstrate compliance to ICMI Cyanide Code requirements. The floor of the storage area and the loading dock are made of concrete. The materials of construction were found to be appropriate.

All cyanide is stored under a roof in a well-ventilated open-design building that has lined concrete secondary containment areas with concrete sumps. The warehouse area has appropriate containment systems that ensure full containment with sufficient capacity in case of a storm event bringing rain water.

The ISO tank loading operation was newly introduced in 2013. The equipment was evaluated during the audit. Records were available to show that an engineering professional had concluded that the equipment is safe and appropriate for the application. Materials of construction were consistent with DuPont Engineering Standards and ICMI requirements.

Loading of ISO tanks is done using a standard documented process. Known quantities of product are loaded into the ISO tanks from intermediate bulk containers. Records show that quantities of product loaded into ISO tanks is less than the weight and/or volume capacity of the transportation equipment.

There is no cyanide solution processed or packaged at this facility. ICMI Cyanide Code requirements pertaining to the management of solutions, such as interlock, overfilling, and pipeline requirements, are not applicable to this facility.

DuPont uses mature documented and formally controlled management system procedures and processes to operate the facility.

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Production Practice 1.2: Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

The operation is in full compliance with Production Practice 1.2

Summarize the basis for this Finding:

DuPont has many detailed procedures that were specifically developed for this facility and operation. Five new operational and preventive maintenance procedures were introduced in 2013 for the new ISO tank loading operation. Procedures define how the facility is to be operated in a safe and environmentally sound manner. Procedures for abnormal conditions such as a spill or exposure scenario are also in place for this operation. Operations and Management personnel were interviewed and their awareness level of normal operating procedural requirements and emergency and contingency procedures was excellent.

Formal Process Safety Management (PSM) and Management of Change (MOC) processes are used to manage the operation and changes to any part of the operation. Job Cycle checks are performed regularly to confirm that actual practice fulfills procedural requirements and that no unintended changes have been introduced to the process. All material handling equipment and cyanide monitoring equipment is carefully maintained to ensure proper function at all times. Records showed that required maintenance and calibrations according to manufacturer's recommendations are being completed as planned.

Procedures are in place to prevent unauthorized/unregulated discharge to the environment of any cyanide-containing water. There are no water bodies near the facility. The Region is quite arid and receives an average rainfall of less than 200 mm (less than 8 inches) of rain each year. If there is a rain event or truck wash water, the water is collected in secondary containment and is managed using an on-site evaporator. In the event that there is contaminated water that needs disposal, this would be done using an authorized hazardous wastewater disposal company. Interviews confirmed that there have been no unauthorized cyanide discharges.

Documented procedures are used for the management and disposal of cyanide and cyanide-contaminated solids. All cyanide is stored under a roof and in packaging that is designed to protect the cyanide from water. The building has adequate ventilation to prevent the build-up of air-borne cyanide concentrations. The site has a secure perimeter and access to the facility is tightly controlled. ISO tank loading operations are within the secure fence line. Material storage and dispatch practices were evaluated to confirm that product is safely and securely managed at all times.

Warehouse procedures and DuPont internal controls ensure that cyanide is packaged, labeled, and placarded in accordance with requirements of the political jurisdictions through which the

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load will pass. This was confirmed by the auditor through an inspection of cyanide that was in inventory at the time of the audit.

Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

The operation is in full compliance with Production Practice 1.3

Summarize the basis for this Finding:

This location only stores and handles solid sodium cyanide. The facility was constructed in 2011 and expanded to include the ISO tank loading operations in 2013. All ISO tank loading operations are conducted over a cement loading pad with secondary containment and a rain water collection. The warehouse is also built on concrete with secondary containment and rain water collection systems. All containment systems were found to be in excellent condition and to be appropriate for the operation. Containment systems are monitored as part of the facility maintenance program. New monthly maintenance equipment inspections were introduced when the new ISO loading equipment was put into operation.

Rain water that is collected is tested for cyanide as part of the disposal procedure. The possible deterioration of secondary containment areas is also monitored as part of the regular maintenance inspection and monitoring activities. There are no cyanide solution tanks, process solution tanks, production equipment, or piping at this facility. Maintenance and inspection records were reviewed for material handling equipment. Records were complete and demonstrated that there is good control over equipment condition and that it is suitable for use.

2. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1: Develop and implement procedures to protect plant personnel from exposure to cyanide.

The operation is in full compliance with Production Practice 2.1

Summarize the basis for this Finding:

Worker exposure to cyanide is minimized through the use of personal protective equipment (PPE) and through the safe operation of the facility. The minimum PPE requirements are defined in the Standard Operating Procedures, which were reviewed during the audit. Proper use of PPE was observed in all areas of the operation during rail car unloading, material handling, truck loading, and ISO tank loading. New safety showers were installed in the operation when the new ISO tank loading equipment was installed in 2013.

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Non-routine and emergency operations are performed by trained personnel wearing appropriate PPE. Emergency procedures are defined in the site Emergency Response Plan. The buddy system and increased PPE requirements are used for any non-routine operations. This helps to protect the workers. General PPE requirements for all areas in which cyanide may be present are clearly defined and are well understood by all personnel interviewed. Operations personnel showed excellent awareness of PPE requirements.

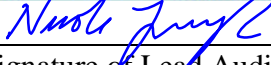
Management of Change (MOC) procedures are used to evaluate the potential safety, health, and environmental impact of proposed and implemented operational changes and modifications. Interviews and a review of records demonstrated that DuPont Engineering and Management personnel had worked closely with operations personnel to ensure that all 2013 operational changes had been appropriately reviewed and approved prior to the commencement of operations.

Worker input and feedback is an integral part of safety at DuPont. Operators are encouraged to suggest improvement ideas to management and provide feedback on safety and other topics. The storage area is a semi-open design and there is no opportunity for cyanide gas to build up. Operators do wear personal cyanide monitors when they are moving, loading, or otherwise handling cyanide. This practice was observed during the audit and operators showed excellent awareness of the proper operation of the monitors and of the need to use them.

The buddy system is used for all tasks. Employees have radios and access to Management, Security, and Emergency Response Personnel at all times. Employees' health is evaluated upon hire and periodically thereafter. Health exams are used to evaluate the employee general health and confirm fitness for duty. Records were available to confirm this practice. The clothing change policy for employees and visitors is documented.

The operation has posted signs that limit access to storage and production areas. PPE signs are posted in appropriate locations. Eating, drinking, smoking, and open flames are prohibited where there is a potential for cyanide contamination. Employees showed very good awareness of the restrictions and of the potential dangers of not following the rules. Eating is allowed in a designated lunchroom area and in offices. Smoking is restricted to a designated smoking area.

Although cyanide signs were not posted due to security concerns, all warehouse, vehicles, and rail cars were clearly marked with appropriate labeling and placards. The operations are not commingled with other operations and the auditor concluded that no additional signage specifically stating "cyanide present" was necessary.

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Production Practice 2.2: Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

The operation is in full compliance with Production Practice 2.2

Summarize the basis for this Finding:

DuPont maintains comprehensive Emergency Response Plans and procedures for rapid and effective response to cyanide exposure. The procedure for on-site treatment of cyanide exposure is very detailed and the response kit was complete. The Operations Leader and employees interviewed showed excellent awareness of emergency cyanide exposure response procedures.

Commercially supplied combination shower / low-pressure eye wash stations were in use at the facility. The DuPont Standard for Safety Shower and Eye Wash performance (K09) defines that eye wash stations must deliver a controlled water flow that is in conformance with accepted industry standard specifications. The water pressure of the emergency shower was confirmed during the Process Safety Start-Up Review process. New combination shower / low-pressure eye wash stations were installed at the ISO tank loading area when the equipment was built in 2013.

ABC-type fire extinguishers and eye wash/shower units are located at strategic locations in the facility. The fire extinguishers and eye wash/shower units are checked regularly. Records were reviewed and were found to be complete. The facility has water, oxygen, resuscitator, antidote and a means of communication readily available at the facility. Emergency equipment is inspected on a monthly basis. Records were complete and readily available.

Hermosillo appropriately maintains emergency response equipment and antidote to ensure their availability during an emergency. Recent records of equipment inspections were reviewed for the facility. The methods by which shelf-life medicines and antidotes are managed were also reviewed. Antidote is stored in locations that are temperature controlled. The antidote is replaced regularly, well before the expected shelf-life. This practice was deemed appropriate by the auditor. The medicine is stored in a manner that protects it from moisture and from light, as recommended by the manufacturer. Emergency response equipment is stored and tested according to manufacturer's recommendations. MSDS and first aid procedures in Spanish are available to workers in operational areas. Detailed safety procedures that describe how to respond to a cyanide exposure and how to use the medical kit were reviewed.

There are no process storage tanks or piping that contains cyanide solutions at this facility.

Decontamination procedures for employees, contractors, and visitors are outlined in formal procedures. Cyanide safety training is given annually and employees and supervisors demonstrated a very good understanding of the decontamination policy and the need for safety precautions.

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All employees are trained to provide first aid assistance to workers who may be exposed to cyanide. First-aid supplies are available at the facility. The site also maintains a medical response kit with instructions for use. The medical kit would be brought to the hospital with an exposure victim to ensure availability of appropriate supplies at the hospital.

3. MONITORING: *Ensure that process controls are protective of the environment.*

Production Practice 3.1: *Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.*

The operation is in full compliance with Production Practice 3.1

Summarize the basis for this Finding:

The facility does not have any requirements or demonstrated need to perform environmental monitoring. This part of the ICMI Cyanide Code is therefore deemed to be “not applicable at this time”. The facility does not discharge directly or indirectly to surface water. Water from the sumps near the storage area is sent to a licensed operator for disposal. There are no water bodies near the operation and there are no known spill events that could have impacted groundwater. There has been no known cyanide release by the site that would have led to measurable air emissions. There is no processing or handling of cyanide solution and there is no known generation of measurable quantities of hydrogen cyanide gas.

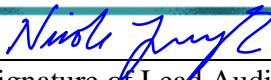
4. TRAINING: *Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.*

Production Practice 4.1: *Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.*

The operation is in full compliance with Production Practice 4.1

Summarize the basis for this Finding:

DuPont has a formal training program that includes cyanide safety training prior to the start of work and annual refresher training on all procedures. The training program discusses cyanide hazards and safety precautions. The training program is very well organized and records are maintained. Safety training records were readily available and complete. All personnel are trained on all of the operating and safety procedures. Fork lift drivers also receive specialized

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training in order to perform their jobs safely. Records demonstrating the completion of this training were complete and readily available. All workers are trained prior to being allowed to work with cyanide.

Personnel are trained on the use of personal protective equipment as part of the safety training and again during the on-the-job training done by supervisors. Employees are trained to perform normal production tasks to minimize risks to personal safety and the environment. Personnel are trained on each procedure. Awareness of procedural requirements was evaluated through interviews. Employees showed excellent awareness of procedural requirements for both normal and upset operating conditions. Experienced and qualified DuPont personnel provide the training. Training effectiveness is evaluated through testing, regular Job Cycle Checks, and observation of on-the-job performance by a qualified person.

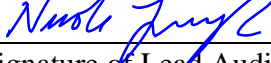
Production Practice 4.2: Train employees to respond to cyanide exposures and releases.

The operation is in full compliance with Production Practice 4.2

Summarize the basis for this Finding:

DuPont trains personnel on emergency response procedures and on what to do if a cyanide release is discovered. This is done as part of the annual training on the spill handling procedure and the emergency response plan. Interviews with personnel showed excellent awareness of procedures.

DuPont trains personnel on what to do in the case of cyanide exposure. Drills are conducted annually. Drill critique records were reviewed for 2012 and 2013. Records were complete and showed that drills have been effective. Corrective actions are processed and emergency procedures are revised as necessary following drill critiques. Detailed training records were retained in each employee file sampled during the audit. Records are maintained for at least as long as the employee is working at the site. All records pertaining to cyanide safety were sufficiently detailed to be found conformant.

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

Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.

The operation is **in full compliance with Production Practice 5.1**

Summarize the basis for this Finding:

The Emergency Response Plan (ERP) and emergency response procedures were reviewed and found to be appropriate for the operation. Potential failure scenarios considered in the emergency response procedures include releases during truck loading operations, rail car unloading, and releases during fires and explosions. The emergency response plan and detailed support procedures for managing emergency situations fulfill all ICMI Cyanide Code Emergency Response Plan requirements.

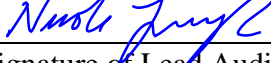
Production Practice 5.2: Involve site personnel and stakeholders in the planning process.

The operation is **in full compliance with Production Practice 5.2**

Summarize the basis for this Finding:

DuPont involves operators and stakeholders, including potentially affected communities, in the emergency planning for the facility. The facility is located in an industrial zone and is not near residential areas. DuPont personnel perform outreach activities and training sessions with local emergency responders in strategic locations near the facility and along routes to the mines. Records were available to show that training and outreach sessions were performed by DuPont personnel in recent years. Trainees included hospital personnel, mining personnel, fire fighters, and people from the civil protection agency. Records were reviewed and found to be acceptable.

Annual drills and training sessions are conducted with a wide number of stakeholders. Current conditions and risks are evaluated during regular meetings with the stakeholders that are directly adjacent to the operation and annually during the extensive emergency response drill sessions.

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Production Practice 5.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

The operation is in full compliance with Production Practice 5.3

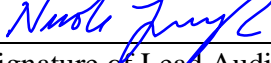
Summarize the basis for this Finding:

Primary Emergency Response Teams are identified and alternate coordinators are identified in the ERPs. The emergency response plan clearly designates full responsibility, authority, and duties for managing an emergency situation to coordinators and team members. Call-out procedures including 24-hour contact information for coordinators and response team members are included in the plan. Records of training on the plan were sampled and were found to be acceptable.

DuPont Mexico offers cyanide safety training to stakeholders including employees, IMEX personnel, other supply chain partners, customers, emergency responders, and community members, as appropriate. Training records were reviewed and were found to be appropriate. DuPont offers Brigade Training for Emergency Response, Cyanide Handling / Safety, Defensive Driving, Cyanide Emergency Response Drills, and Fire Extinguisher training. Training is offered each year. Trainees included operations and warehouse personnel. Training sessions on cyanide safety and emergency response were also offered to mine customers, hospitals, fire fighters, and emergency responders in strategic locations. Records showed that DuPont allocates substantial resources to outreach programs and training programs to ensure that personnel are well prepared for a potential emergency situation.

Lists of necessary emergency response equipment are contained within the emergency plan. Additionally, the DuPont emergency response procedures detail the different types of personal protective equipment necessary for the different types of response scenarios.

The processes for maintaining emergency equipment is addressed in the Hermosillo emergency response plan. Emergency equipment is checked at least monthly. Records and interviews during the Hermosillo audit confirmed this practice.

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Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.

The operation is in full compliance with Production Practice 5.4

Summarize the basis for this Finding:

The notification procedures, including telephone numbers, are described in the Emergency Response plan for the facility. Internal and external emergency contact information is also contained in the Cyanide Emergency Information sheet. Notification numbers are checked at least annually. Extensive notification information is also contained in the “Cyanides Global Response Plan for Off-Site Incidents.” For on-site emergencies at Hermosillo, notifications are made to personnel within DuPont first and to emergency responders, when necessary. The emergency response plans were last updated in 2013.

Production Practice 5.5: 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 Production Practice 5.5

Summarize the basis for this Finding:

DuPont maintains detailed procedures for the neutralization and decontamination of solids and contaminated debris. Additional details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the DuPont Global Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the procedures.

The emergency response plan prohibits the use of treatment chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide if cyanide spills into surface waters. Interviews with DuPont personnel during this and previous ICMI Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters.

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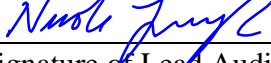
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Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is in full compliance with Production Practice 5.6

Summarize the basis for this Finding:

Emergency plans are checked at least annually. Many emergency drills are conducted at DuPont on an on-going basis. The DuPont Mexico team conducts drills with the Hermosillo operation, its transportation partners, warehouse partners, and customers. Records were reviewed for DuPont drills held in 2012 and 2013. Full incident investigations are conducted in the event that an actual emergency occurs.

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