



**International Cyanide Management Code
Summary Audit Report**

**DuPont Mexico Cyanide Supply Chain
Re-Certification Audit**

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

2013 Audit Cycle

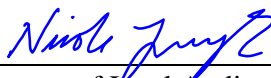


Address and Contact Information for Organizations Audited:

DuPont – Mexico Supply Chain	Marcos Cervantes Cyanides Business Mexico Operations Leader Email: Marcos.Cervantes-1@dupont.com Tel. (444) 824-52-65, (444) 824-52-63
Transportes Especializados S.A. de C.V (Segutal)	Chupícuaro 85. Col. Letrán Valle. Delegación Benito Juárez. México, D.F. CP 03650.
DuPont San Luis Operation (Operated by: Suministros Industriales Potosinos S.A. de C.V. (S.I.P))	Eje 120 #500. Zona Industrial del Potosí.. San Luis Potosí, San Luis Potosí CP 78090.
Auto Lineas Regiomontanas S.A. de C.V. (ALR)	Díaz Ordaz #205 Fracc. Díaz Ordaz San Nicolás de los Garza, Nuevo León CP 66480 Nuevo Laredo Truck Yard
DuPont Hermosillo Operation (Operated by: Intermodal Mexico S.A. de C.V. (IMEX))	Avenida Fusion Final S/N. Carretera a la Colorada. Parque Industrial Dynatech Sur. Hermosillo, Sonora CP 83299.
Interamerica Forwarding, Co. Inc. (Grupo FH Company)	14420 Maquila Loop Laredo Texas 78045-7950
FH Logistica (Grupo FH Company)	Nuevo Laredo Carretera a Piedras Negras Km 14.2 Ejido La Cruz. 88176

Company Background 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 Chemicals &

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date

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Fluoroproducts business. The plant is located just outside of Memphis in Woodstock, Tennessee.

DuPont was one of the original 14 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 packaging operations. DuPont was the first Cyanide Producer to achieve certification in August 2006.

DuPont has been producing and shipping sodium cyanide since 1953. In the United States, the solid sodium cyanide briquettes are packaged at the Memphis Plant, at the LSI Terminal directly adjacent to the plant and at the DuPont packaging terminal in Carlin, Nevada, USA. The Memphis Plant ships sodium cyanide in railroad hopper cars, bulk, and in semi-bulk packages. The bulk and semi-bulk packages are shipped from Memphis and its packaging terminals via rail and truck. Shipments in this Supply Chain are routed through Laredo, Texas and Nogales, Arizona as they cross the U.S./Mexican border.

This report contains audit results from the re-certification audits conducted for DuPont regarding its management of the Mexico Cyanide Supply Chain. This report also contains the audit results for the three trucking companies involved in the Mexico Supply Chain (Segutal, ALR, and FH Logistica), two interchange terminals, (Interamerica Forwarding and ALR), and the Due Diligence results for the two Supply Chain rail carriers (KCSM and Ferromex).

DuPont San Luis Potosi and Hermosillo operations are also part of the Mexico Supply Chain. Each operation was certified separately and the details regarding those production audits are contained in separate reports.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date

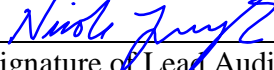
DuPont Mexico Cyanide Supply Chain Description

The DuPont Mexico Cyanide Supply Chain consists of the following organizations:

Name of Company	Description of Organizations Audited
E. I. du Pont de Nemours and Company (DuPont)	DuPont Management of Supply Chain, DuPont Hermosillo Operation, DuPont San Luis Potosi Operation (separate ICMI certifications and audit reports), and Due Diligence Assessments for Ferrocarril Mexicano Railroad (Ferromex) and Kansas City Southern de Mexico (KCSM) railroads
Transportes Especializados S.A. de C.V (Segutal)	Mexico City HQ, San Luis Potosi drivers and equipment, Hermosillo drivers and equipment
Suministros Industriales Potosinos S.A. de C.V. (S.I.P)	DuPont San Luis Potosi sodium cyanide operations (audit results are in the San Luis Potosi Operations Re-Certification Audit Report)
Auto Lineas Regiomontanas S.A. de C.V. (ALR)	Monterrey HQ, drivers and equipment at San Luis Potosi and Hermosillo facilities, Nuevo Laredo Terminal, Mexico
Intermodal Mexico S.A. de C.V. (IMEX)	DuPont Hermosillo sodium cyanide operations (audit results are in the Hermosillo Operations Re-Certification Audit Report)
Interamerica Forwarding, Co. Inc. (Grupo FH Company)	Freight Forwarding operations in Laredo, Texas
FH Logistica (Grupo FH Company)	Trucking operation for U.S. / Mexico border crossing operations – Nuevo Laredo, Mexico
Ferrocarril Mexicano Railroad (Ferromex)	Rail transport from U.S.-Mexican border to the DuPont Hermosillo Facility
Kansas City Southern de Mexico (KCSM)	Rail transport from U.S.-Mexican border to the DuPont San Luis Potosi Facility

DuPont personnel involved in the management of the Mexico Cyanide Supply Chain were audited using the ICMI Cyanide Code Transportation and Production Protocols. The audit included participants from several different organizations within DuPont. The ICMI Transportation Protocol portions of the Mexico Supply Chain audit are contained in this report. The ICMI Production Protocol portions of the Mexico Supply Chain (Hermosillo and San Luis Potosi Operations) are in separate certification audit reports.

ALR is one of the three DuPont cyanide trucking partners in Mexico. ALR transports hazardous materials, general commodities and bulk shipments. They have operated in Mexico for over thirty

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



years. ALR has been part of the DuPont sodium cyanide supply chain since 2005. The ALR headquarters is in Monterrey, Mexico. ALR also operates a terminal facility from the same location. Trucks used for sodium cyanide transport are dispatched out of Monterrey. The ALR audit was performed in Monterrey where headquarter operations were reviewed, equipment and terminal maintenance records were evaluated and drivers were interviewed. The ALR Terminal is also involved in this Supply Chain and was also audited on-site to confirm that ICMI requirements are fulfilled at this location.

The ALR headquarters/terminal is one of several terminals located in Mexico. ALR is one of the largest trucking companies in the country. ALR is ISO 9001:2008 certified and has integrated their safety program into their overall management system structure.

Sodium Cyanide FLO-BIN®s, drums and IBCs are loaded in the United States into cargo trailers which are transported to Laredo, Texas by Empire Express (ICMI Certified Signatory Company). The trailer is interchanged by Interamerica Forwarding to FH Logistica in Laredo, Texas.

Interamerica Forwarding Co., Inc. was established in 1975 and is a Grupo FH company. Grupo FH is also ISO 9001:2008 certified and has integrated their safety program into their overall management system structure. Interamerica Forwarding provides DuPont with freight forwarding services. Another company within the Grupo FH family of companies is FH Logistica, the trucking company that brings the product from Laredo, Texas across the U.S./Mexican border to the ALR Terminal in Nuevo Laredo, Mexico. ALR transports the cargo to the DuPont San Luis Potosi and Hermosillo facilities. The shipment remains sealed and the cargo van is not opened by any of the trucking operations during transit.

Transportation from San Luis Potosi and Hermosillo to customer sites is performed by Transportes Especializados Segutal, S.A. de C.V. (hereafter referred to Segutal). Segutal is a dedicated transporter of DuPont hazardous materials. The company has been operating both 3-axle straight trucks and tractor-trailer combination vehicles in Mexico since 1991 and has been a dedicated carrier for DuPont since 2001. Segutal delivers solid cyanide briquettes in FLO-BIN®s, drums, Intermediate Bulk Containers (IBCs), and ISO tanks that are mounted on chassis.

Segutal is headquartered in Mexico City. Drivers are dispatched from the San Luis Potosi and Hermosillo facilities and transport the product to customers across Mexico.

The audit team evaluated each organization referred to in this report via an on-site audit. The rail carriers were evaluated using Due Diligence information that was provided by DuPont.

The DuPont San Luis Potosi facility is operated by Suministros Industriales Potosinos, S.A. De C.V. (S.I.P.). DuPont manages the operation directly with a DuPont Leadership Team. The operation was moved to San Luis Potosi in 2006. The San Luis Potosi facility receives rail shipments of cyanide via the KCSM railroad. The cyanide arrives in intermodal containers, box cars, and hopper cars. Rail spurs lead to the warehouse area and unloading occurs within a fenced and secure area. Truck

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



shipments are 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 covered well-ventilated warehouses prior to being dispatched to customers by truck.

Bulk cyanide arriving into the San Luis Potosi facility in hopper cars or FLO-BIN®s is transloaded and/or packaged into FLO-BIN®s and/or ISO tanks. The transloading and packaging operations were audited during the same time period as the other parts of the Mexico Supply Chain. The details regarding this part of the operation are contained in the DuPont San Luis Potosi Operations Re-Certification Audit report that uses the ICMI Production protocol.

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 Cyanide Supply Chain audit in 2010. In 2011 operations in Hermosillo were 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 DuPont operations were included in the scope of the 2013 Mexico Cyanide Supply Chain audit. The audit results are contained in the DuPont Hermosillo Operations Re-Certification Audit report.

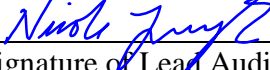
Due Diligence Investigations were performed for the two rail partners Ferrocarril Mexicano Railroad (Ferromex) and Kansas City Southern de Mexico (KCSM). Ferromex was formed in 1997 by a group which includes Grupo Mexico and the Union Pacific Railroad. KCSM is one of three railroads that comprise Kansas City Southern, an international holding company headquartered in Kansas City, Missouri, USA.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date

Audit Implementation:

The audit was performed by independent third-party auditors who were pre-approved by the ICMI as Lead and Technical Auditors for transportation and production audits. The re-certification audit of the DuPont Mexico Cyanide Supply Chain was conducted on-site with additional reviews of due diligence information for rail partners following the on-site audit activity.

DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the Mexico Cyanide Supply Chain were reviewed. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at DuPont. Additionally, records regarding carrier selection, ongoing transportation partner performance evaluations, incident tracking, equipment maintenance, security measures, rail safety information, shipment tracking, cargo labeling practices, shipping documentation, community involvement, and emergency response records were randomly sampled and found to be acceptable.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



Auditor's Findings

All components of the DuPont Mexico Cyanide Supply Chain were found to be in FULL COMPLIANCE with the requirements of the ICMI Cyanide Code.

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

This supply chain has not experienced any significant cyanide incidents, releases, exposures since the previous ICMI Cyanide Code audit in 2010. The supply chain was found to have been in compliance with the ICMI Cyanide Code since the previous certification audit.

Audit Company:	MSS Code Certification Service, a Division of Management System Solutions®, Inc. www.mss-team.com
Audit Team Leader:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Name of Second Auditor	Gabriel Rodriguez
Date(s) of Audit:	August 13-16, October 23 and October 28-29, 2013

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 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.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



Description of Consignor’s role in ensuring compliance of its trucking partners, rail carriers, warehouses, and interim storage locations

DuPont maintains formal standards, policies, guidelines, and procedures for ensuring Distribution Safety. DuPont Corporate standards exist for Incident Prevention, Emergency Response, Transportation Risk Assessment, Distribution Regulatory Compliance, and Training, and Distribution Handling & Storage. In addition, the Sourcing & Logistics Groups maintains formal procedures for the procurement of transportation services and the management of carriers. Carrier performance is evaluated monthly and carriers with poor performance are required to take corrective actions. In addition to organizing the third-party Cyanide Code audit of its trucking partners, DuPont also performs second-party Cyanide Code audits of its cyanide trucking partners to confirm that all ICMI Cyanide Code requirements continue to be fulfilled over time.

DuPont participates actively with all partner companies in its Supply Chain (trucking, rail, warehouse, and interim storage operations). DuPont personnel are very active in providing many different types of cyanide-related training classes to its partners, customers, emergency responders, and the public. DuPont personnel also participate in route planning and auditing of partner operations to ensure continued compliance with ICMI Cyanide Code requirements.

The warehouse facilities used by DuPont are owned and operated by DuPont partners, but DuPont also has management personnel located at each facility to directly manage day-to-day operations at each location.

DuPont Re-certification Audit Results

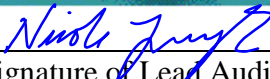
1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

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:

Interviews were conducted with the DuPont Mexico personnel to confirm that before DuPont initially qualifies a new customer for sodium cyanide they follow a standard procedure for evaluating the customer and the route. The Cyanide Product Steward evaluates the new customer for their ability to safely use and store material and they evaluate the possible routes

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



that can be used to transport the cyanide from DuPont warehouse locations to the customer site. Truck route risk assessments are done by the three trucking companies that transport the cyanide.

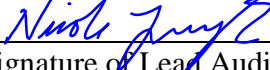
DuPont is involved in the process and approves of the routes, but the trucking companies take full responsibility for the evaluation. The results from the route assessments were audited at all three trucking companies. The evaluation of the routes includes consideration of population densities, infrastructure issues, pitch and grade of roads, and prevalence and proximity of water bodies. In some cases there are limited or no choices available for the selection of alternative routes. DuPont and its trucking partners generally choose shorter routes that do not go through population centers when possible.

The risks associated with the route used to bring cyanide from DuPont to a customer are evaluated as part of the First Order Process when the initial contract with the customer is established. The route assessment is performed by the Product Stewardship function within the DuPont Cyanides Business. Any necessary risk-mitigation measures are identified and defined during this First Order Process. Examples of route-specific risk mitigation measures including the use of escorts on specific road segments and the re-routing of shipments around major population centers were reviewed and were found to be appropriate.

DuPont also employs non-route specific risk mitigation measures via the establishment of safety policies for carriers, contractual agreements with truck carriers, and periodic evaluations of adherence to safety policies. Formal policies were available for alcohol testing, night-time driving restrictions, medical exams, GPS tracking, safe resting locations, and driver qualification criteria. Compliance with these safety policies was confirmed during the audits of the trucking partners.

Routes are re-evaluated periodically, usually during customer visits which typically occur at least every three years. Additionally, DuPont has a very formal Product Stewardship Review process in which all aspects of cyanide product stewardship (labeling, product trail, use or transportation incidents, MSDS, etc.) are reviewed at least every three years. With regards to feedback from transportation partners, DuPont maintains very close relationships with its transportation partners on topics of safety.

DuPont personnel perform outreach activities and training sessions with local emergency responders in strategic locations near DuPont facilities and along routes to the mines. Records were available to show that training and outreach sessions were performed by DuPont personnel since the last Mexico Supply Chain audit in 2010. Trainees included doctors, hospital personnel, mining personnel, fire fighters, and people from the civil protection agency. Records were reviewed and found acceptable.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date

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:

DuPont has a formal policy for driver qualification criteria and trucking partners are contractually required to ensure that drivers maintain all necessary qualifications. A review of training records and interviews from the on-site audits of the DuPont sub-contracted warehouse facilities confirmed that all personnel operating cyanide handling equipment can perform their jobs safely and appropriately. Training records were available for material handlers to demonstrate that they had been trained on cyanide hazards, safe handling and emergency response. The auditors found that the material handlers displayed a high level of safety awareness and understanding regarding their responsibilities.

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:

DuPont ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during the audit and were found to be compliant. DuPont maintains a fleet of rail equipment to transport cyanide that includes: hopper cars, box cars, and ISO tanks. The equipment is designed and maintained to operate within the loads it will be handling. DuPont maintains specific specifications for each type of equipment that it owns or leases. A database of equipment specifications, maintenance requirements, inspections requirements, and records that planned activities took place was evaluated during the 2013 DuPont U.S. Rail & Barge Re-Certification Audit. The team involved with tracking rail equipment and ensuring that appropriate maintenance is performed was interviewed. Rail equipment is maintained according to maintenance requirements that are defined by U.S. Federal law.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date

DuPont Mexico does not have specific responsibilities with regards to this question. Its sub-contractors, the warehouse facilities only use forklifts to move pallets of cyanide into and out of storage. The equipment at each warehouse facility was observed as being appropriate for the task. Heavy lifting equipment at the Hermosillo facility was reviewed during the Hermosillo audit and was found to be properly maintained and operated. The capacity of the crane was sufficient for the loads lifted.

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

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

Summarize the basis for this Finding:

The DuPont Memphis Plant maintains detailed cyanide loading procedures for loading boxcars, hopper cars, and truck trailers. LSI maintains detailed procedures for loading intermodal containers. Safety interlocks are used to prevent overfilling of hopper cars. The shipments of bulk and semi-bulk packages in railcars and cargo trailers are standard weights and standard blocking and bracing configurations are used. Procedures and inspection checklists were reviewed during the audit to confirm that planned arrangements for protecting product packaging and securing the load with blocking and bracing techniques are fulfilled.

Memphis Plant and LSI operational procedures and checklists for loading of boxcars were also reviewed for this requirement. All documentation (procedures and checklists) require for proper placarding (all 4 sides) to be confirmed prior to the railcar being released. Additionally, hopper cars were observed with all four placards showing the UN 1689 diamond at the 2013 re-certification audit of DuPont Mexico operations. Properly placarded rail boxcars and hopper cars were observed at the San Luis Potosi warehouse during this audit. Documented procedures are also used for the loading, placarding, and inspection of inter-modal sea containers.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



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

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

Summarize the basis for this Finding:

This section of the ICMI Cyanide Code does not apply to this supply chain.

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

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

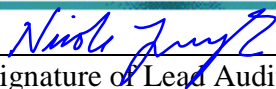
Summarize the basis for this Finding:

DuPont monitors cyanide shipments in Mexico very closely and stays in close contact with trucking partners, warehouse personnel, and customers. DuPont personnel were interviewed and email records were reviewed to confirm that the status of cyanide shipments is being received and reviewed on a continuous basis.

The following documentation is used to track inventory and movement of cyanide: bills of lading, vehicle weight upon filling or at the interchange point, vehicle weight upon arrival at destination, and shipping papers indicating the number of packages and amount of material.

DuPont ensures that all shipping records show shipment details such as weight, number and type of packages, destination, and UN number. DuPont sends a copy of the MSDS a "Transportation Emergency Information" sheet with every shipment. Emergency contact numbers and response information is on the emergency sheet and drivers must sign that they have read the emergency response information each time they are dispatched with a cyanide shipment. Shipping documents were sampled and were found to be appropriate.

DuPont Mexico Cyanide Supply Chain
Name of Operation


Signature of Lead Auditor

December 18, 2013
Date



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

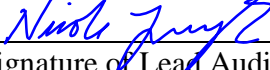
Transport Practice 2.1: *Store cyanide in a manner that minimizes the potential for accidental releases.*

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:

The only warehouse storage locations in this Supply Chain are the San Luis Potosi and Hermosillo operations. These operations were audited in the same time period according to the ICMI Production protocol. The full audit results are contained in individual facility reports. All operations fulfilled not only interim storage requirements, but all ICMI production protocol requirements.

Technically, some of the Grupo FH operations (Interamerica Forwarding) and some of the ALR operations could be classified as "Interim Storage" due to the interchanges that occur at the U.S./Mexican border. On-site audits were conducted at Interamerica Forwarding and the ALR Nuevo Laredo Terminal. Both operations were found to be compliant with ICMI requirements. The details of these evaluations appear under the Grupo FH and ALR results sections of this report.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



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:

DuPont provides cyanide emergency response services and support to its plants, customers, and transportation partners. For the Mexico Supply Chain there are several key documents that were reviewed as part of the DuPont Transporter Re-certification audit. The DuPont facilities maintain emergency response information for both on-site (warehouse) and off-site emergencies. The documents provide extensively detailed plans, procedures and information to address all ICMI Cyanide Code emergency response requirements.

DuPont's emergency response plans are appropriate for all modes of transportation used by DuPont and for interim facilities. The most detailed scenarios with specific action steps to be taken were found in the Emergency Response Procedures. The scenarios and emergency plans address actions to be taken for spills inside buildings, outside, and in sea containers. Plans also include steps to be taken in case of fire or human exposure. The Transportation Emergency Information sheet has quick, but complete, information that has been seen in use during transportation activities observed during previous DuPont ICMI Cyanide Code audits.

The emergency response procedures consider steps to be taken for wet, dry and gaseous cyanide. The Transportation Emergency Information sheet is designed to address solid briquettes and there is also a fact sheet for solution. The plans and information were reviewed and were found to be acceptable for both trucking companies and both DuPont operations. The DuPont operations maintain emergency response information for both on-site (warehouse) and off-site emergencies. Roadway infrastructure differences, and the roles of the different emergency responders (i.e., DuPont personnel, warehouse personnel, mine personnel) are discussed in the emergency planning information.

The DuPont plans are general and universally applicable to all types of emergencies. Professional emergency responders together with technical guidance from DuPont would be responsible for addressing issues involving the way in which the structure of the vessel should be managed after an emergency. This was accepted by the auditor as a reasonable response.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



The types of transport equipment and types of storage areas were appropriately referenced in the emergency plans. Solid cyanide is transported in cargo trucks, in cargo trailers, in ISO tanks mounted on chassis, in hopper cars, and in rail boxcars. The primary difference in response descriptions address whether a spill occurs in a building or enclosed space (truck, rail car) or if the spill occurs on the ground. The enclosed space response information in the emergency response plans discusses the need to use a personal cyanide monitor before entering the area. The outside spill scenarios discuss the need to stand up-wind and keep the cyanide dry (by covering it with a tarp).

The emergency response plans from both trucking companies and both DuPont operations and the emergency response information sheets define the roles of warehouse employees, drivers, DuPont personnel and emergency responders. The DuPont Mexico operations also have the "Cyanides Global Response Plan for Off-Site Incidents" that contains all key procedures and contact information and is updated regularly.

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:

DuPont Mexico offers cyanide safety training to transportation partners, warehouse employees, customers, and others, as appropriate. Training records were reviewed for 2011-2013. 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 drivers, warehouse employees, rail personnel, and the broker who manages cyanide shipments entering Mexico. 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 each of the emergency plans. Additionally, the emergency response procedures detail the different types of personal protective equipment necessary for the different types of response scenarios.

The maintenance of emergency equipment maintained by DuPont at the San Luis Potosi and Hermosillo facilities is addressed in the respective warehouse emergency response plans. Emergency equipment is checked at least monthly at each location. Records and interviews confirmed this practice.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



Compliance finding for Segutal Trucking Operations

The Segutal Trucking operations were evaluated against the ICMI Cyanide Code requirements documented in the *ICMI Cyanide Code*, *ICMI Cyanide Code Transportation Protocol*, and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol*. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at the company. Procedures, records, and equipment were evaluated for Segutal personnel at several locations during the audit.

Segutal Trucking Operations - Auditor's Finding

Segutal Trucking Operations are in **FULL COMPLIANCE** with the International Cyanide Management Code.

Segutal has not experienced any significant cyanide incidents, releases, exposures since the previous ICMI Cyanide Code audit in 2010. The operation was found to have been in compliance with the ICMI Cyanide Code since the previous certification audit.

Audit Company:	MSS Code Certification Service, a Division of Management System Solutions, Inc. www.mss-team.com
Audit Team Leader:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Name of Second Auditor	Gabriel Rodriguez
Date(s) of Audit:	August 13-16, 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 Certification 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 Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Segutal		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



Description of Segutal's Role in the DuPont Mexico Cyanide Supply Chain

Transportation from the San Luis Potosi and Hermosillo facilities to customer sites is done by Transportes Especializados Segutal, S.A. de C.V. (hereafter referred to Segutal). Segutal is a dedicated transporter of DuPont hazardous materials. The company has been operating both 3-axle straight trucks and tractor-trailer combination vehicles in Mexico since 1991 and has been a dedicated carrier for DuPont since 2001. Segutal delivers solid cyanide briquettes in FLO-BIN®s, drums, Intermediate Bulk Containers (IBCs), and ISO tank containers that are mounted on chassis.

The Segutal sodium cyanide transportation operation is headquartered in Mexico City. At the time of the audit, drivers were dispatched from San Luis Potosi and Hermosillo facilities and were transporting sodium cyanide to customers across the central and NW part of Mexico. The audit team went to each of the three locations and reviewed all company operations with regard to ICMI Cyanide Code compliance.

Segutal's Certification Audit Results

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:

Segutal has developed and implemented a detailed routing selection method that takes into account population density, infrastructure, pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather and resulting poor driving conditions. Procedure 0-04 describes the process in its entirety. Phase 1 of the process is a research phase including the review of satellite information and getting feedback from drivers. Phase 2 is a field study where the route is driven, recorded, and evaluated for suitability and location of optimum (safest) rest areas. Routes are evaluated at least every two years. Extensive up-to-date records were available for review. The most recent route evaluations were completed in 2013. All information and interview discussions were found to be acceptable.

The documented procedure to evaluate risks and take necessary countermeasures is part of the Segutal "Designated Loaded Cyanide Truck Routes" document. Many of the destinations to which Segutal needs to deliver cyanide have limited options for which roadways can be used.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



Risk mitigation measures focus primarily on security, the avoidance of night-time driving, use of safe truck stops for overnight trips, and the use of escorts as required by mine customers on mine roads. Risk mitigation measures also included the avoidance of high traffic times of day and the avoidance of roads that are dangerous in poor weather conditions. Notes within the route risk ranking documents indicated what risk mitigation measures are to be taken for specific routes. Drivers were interviewed and maps were referenced. Drivers showed excellent awareness of designated routes, risk mitigation measures, and general operating procedures.

Routes are reviewed at least every two years for adequacy and for any changes in conditions that would result in a changed risk ranking. Records were reviewed showing that the most recent route assessments had been conducted in 2013. Segutal uses a process of having drivers sign-off on filled-out trip logs after the completion of deliveries to gather feedback. Numerous driver signatures were evident in the records and indicated good communication between drivers and management regarding routes.

Segutal seeks input from relevant stakeholders, as appropriate. SETIQ (an emergency response notification company) is contacted for feedback regarding the routes. SCT (similar to the U.S. Department of Transportation (DOT)) guidance is also utilized in planning the safest routes. Examples of input included approvals from DuPont, input from mines, and interactions with authorities during cyanide training and emergency planning. Records, in the form of emails, letters, and DuPont sign-offs on individual routes were reviewed and found acceptable. Segutal participates in the DuPont training and outreach activities regarding emergency response and maintains contact with SETIQ, an organization that provides emergency notification and coordination services (similar to CHEMTREC in the USA).

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 not in compliance with Transport Practice 1.2

Summarize the basis for this Finding:

Training records and interviews were used to confirm that all personnel operating cyanide transport equipment can perform their jobs safely and appropriately. Extensive employee records are maintained by Segutal at headquarters for each of the drivers. All drivers had valid commercial licenses with an “E” endorsement for hazardous material transport. Drivers were interviewed and displayed a very good understanding and awareness of company policies and procedures as well as regulatory requirements.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date

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

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

Summarize the basis for this Finding:

This section of the ICMI Cyanide Code does not apply to this supply chain.

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

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

Summarize the basis for this Finding:

Drivers have several communication options during shipments. Auditors confirmed that communication equipment was appropriate and that it is included in the preventive maintenance program to ensure that it continues to be operational over time. Records were available to show that equipment is tested every six months. Black-out areas along on the routes are appropriately managed with procedures. Records showed that procedures are followed. According to interviews, black-out areas do not present a significant problem on the routes traveled by Segutal.

Segutal maintains a Shipment Tracking Procedure to keep track of cyanide shipments from the DuPont facilities to the mines. Records were also available to show close communication and tracking between the trucking companies, the mines, and DuPont on the days that shipments were made.

The following documentation is used to track inventory and movement of cyanide: bills of lading, vehicle weight upon filling or at the interchange point, vehicle weight upon arrival at destination, and shipping papers indicating the number of packages and amount of material. All of the abovementioned documents were sampled for both carriers. Material management practices and inventory controls were found to be appropriate.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date

DuPont ensures that all shipping records show shipment details such as weight, number and type of packages, destination, and UN number. DuPont sends a copy of the MSDS a “Transportation Emergency Information” sheet with every shipment. Emergency contact numbers and response information is on the emergency sheet and drivers must sign that they have read the emergency response information each time they are dispatched with a cyanide shipment. Shipping documents were sampled and were found to be appropriate.

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

Not Applicable - Segutal is a trucking company and does not have interim storage responsibilities.

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:

Segutal maintains an emergency response plan that fulfills ICMI Cyanide Code requirements. Drivers also carry the DuPont emergency information response sheets, a laminated card showing all emergency telephone numbers and procedures, and the MSDS with them during all deliveries. The plans and information were reviewed and were found to be acceptable for Segutal. Segutal transports cyanide via truck and all scenarios considered in the plans were related to either truck accidents or small cyanide spills from packaging.

All emergency response plans discuss the response to solid sodium cyanide, the only physical form transported or stored in this supply chain. Segutal does deliver solid cyanide in ISO tanks which is mixed with water at the mine sites. DuPont has emergency information sheets for cyanide solution. The emergency response on a mine site would, however, be coordinated using the mine site emergency response plan and personnel.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



Compliance finding for ALR Trucking Operations

The ALR Trucking operations were evaluated against the ICMI Cyanide Code requirements documented in the *ICMI Cyanide Code*, *ICMI Cyanide Code Transportation Protocol*, and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol*. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at the company. Procedures, records, and equipment were evaluated for ALR personnel at several locations during the audit.

ALR Trucking Operations - Auditor's Finding

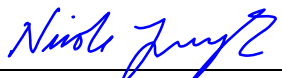
ALR Trucking Operations are in **FULL COMPLIANCE** with the International Cyanide Management Code.

This supply chain has not experienced any significant cyanide incidents, releases, exposures since the previous ICMI Cyanide Code audit in 2010. The supply chain was found to have been in compliance with the ICMI Cyanide Code since the previous certification audit.

Audit Company:	MSS Code Certification Service, a Division of Management System Solutions, Inc. www.mss-team.com
Audit Team Leader:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Name of Second Auditor	Gabriel Rodriguez
Date(s) of Audit:	August 13-16 and October 28, 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 Certification 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 Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

ALR		December 18, 2013
Name of Facility	Signature of Lead Auditor	Date

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



Description of ALR's Role in the DuPont Mexico Cyanide Supply Chain

ALR is one of the three DuPont cyanide trucking partners in Mexico. ALR transports hazardous materials, general commodities and bulk shipments. They have operated in Mexico for over thirty (30) years. ALR has been part of the DuPont sodium cyanide supply chain since 2005. The ALR headquarters is in Monterrey, Mexico. ALR also operates a terminal facility from the same location. Trucks used for sodium cyanide transport are dispatched out of Monterrey. ALR also maintains a terminal near Nuevo Laredo that is used in this supply chain. The ALR audit was performed at both the Monterrey headquarters and Nuevo Laredo Terminal locations. Operations were reviewed, equipment and terminal maintenance records were evaluated, and personnel, including drivers, were interviewed.

The headquarters/terminal is one of several ALR facilities in Mexico. ALR is one of the largest trucking companies in the country. ALR is ISO 9001:2000 certified and has integrated their safety program into their overall management system structure.

Sodium Cyanide FLO-BIN®s, drums and IBCs are loaded in the United States into tractor trailers which are transported to Mexico. The trailer is interchanged by Interamerica to F.H. Logistica and then ALR. ALR transports trailers to the DuPont San Luis Potosi and Hermosillo facilities. The shipments remain sealed and the trailers are not opened during transit.

ALR's Certification Audit Results

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:

ALR uses a detailed routing selection method that takes into account population density, infrastructure, pitch & grade, proximity to water bodies, and prevalence and likelihood of poor weather and resulting poor driving conditions. Routes are evaluated at least every three years. Procedure P-751-17 was reviewed and sections 5.1 and 5.2 of this procedure specifically addressed ICMI Cyanide Code requirements. Interviews indicated that Mexican Law (NOM-

DuPont Mexico Cyanide Supply Chain *Nicole Jung* December 18, 2013
Name of Operation Signature of Lead Auditor Date



012-SCT-2008) requires that a route risk assessment be done for hazardous material shipments and that the regulatory requirements match well with ICMI Cyanide Code risk assessment requirements.

The documented procedure to evaluate risks and take necessary countermeasures is part of the ALR procedure P-751-17. The destinations to which ALR needs to deliver cyanide (San Luis Potosi and Hermosillo facilities) have limited options for which roadways can be used. Risk mitigation measures focus primarily on security, the avoidance of night-time driving, use of safe truck stops for overnight trips, and the use of escorts as required by DuPont or the mine customers. Risk mitigation measures focus primarily on security, the avoidance of night-time driving, use of safe truck stops for overnight trips, and the use of escorts as required by DuPont or the mine customers. Risk mitigation measures also included the avoidance of high traffic times of day and the avoidance of roads that are dangerous in poor weather conditions. Notes within the route risk ranking documents indicated what risk mitigation measures are to be taken for specific routes. Drivers were interviewed and maps were referenced. Drivers showed excellent awareness of designated routes, risk mitigation measures, and general operating procedures.

Routes are reviewed at least every three years for adequacy and for any changes in conditions that would result in a changed risk ranking. Records were reviewed showing that the most recent route assessment activity had been conducted in 2013. The driver feedback process is integrated into the annual route review process. Records were available to show that drivers were refreshed on the cyanide routes and the addition of new truck stops in 2013. This information was also confirmed through interviews with management and several drivers. Approval records for several changes in routes were also available for review and were found acceptable.

ALR participates in the DuPont training and outreach activities regarding emergency response and maintains contact with SETIQ, an organization that provides emergency notification and coordination services (similar to CHEMTREC in the USA).

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



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:

Training records and interviews were used to confirm that all personnel operating cyanide transport equipment can perform their jobs safely and appropriately. Extensive employee records are maintained by Segutal and ALR at headquarters for each of the drivers. All drivers had valid commercial licenses with an “E” endorsement for hazardous material transport. Drivers were interviewed and displayed a very good understanding and awareness of company policies and procedures as well as regulatory requirements.

Training records were available for drivers to demonstrate that they had been trained on cyanide hazards, safe handling and emergency response. The auditors found that the drivers displayed a high level of safety awareness and understanding regarding their responsibilities.

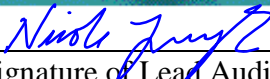
Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

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:

ALR Trucking transports cyanide using power units which are mechanically sound, inspected and meet Mexican Federal Regulatory requirements as well as customer requirements. The cargo trailers pulled by ALR tractors are owned and maintained by Empire Express, another ICMI Cyanide Code-certified Signatory company. The weight capabilities of the cargo trailers and the preventive maintenance of that equipment were audited during the Empire Express certification audit in 2013.

ALR maintains a listing of tractor capabilities to ensure that the units are not overloaded when the trailer is transported to the DuPont facilities. The trailer is inspected at interchange points and again upon dispatch. The seals are not broken by anyone in the supply chain before the cargo arrives at the DuPont San Luis Potosi or Hermosillo facilities. Gross Vehicle Weight

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



incoming and outgoing condition of the equipment is recorded on the checklists and associated repair orders. Records were reviewed and were found to be complete and acceptable.

ALR has a strong program for ensuring drivers do not violate their Hours of Service internal policies. According to ALR policy, no transportation of cyanide is permitted to occur between 10PM until 5AM. Records were reviewed and were found to conform to procedural requirements with regards to limitations on driver hours. Driver awareness of this requirement was excellent.

ALR does not load its trailers; the trailers remain sealed at all times. ALR has procedures to address potential problems such as movement inside the trailer. ALR also performs a documented pre-trip inspection to confirm that the trailer is properly secured prior to departure. Interviews with drivers confirmed this practice. Procedures for such disruptions in operations are clearly defined and the dispatch center contacts DuPont as necessary.

ALR maintains a written drug abuse prevention policy. Training records on drug abuse prevention were reviewed and were found to be acceptable. ALR has a medical professional on staff that tests and evaluates all drivers prior to them being dispatched.

Records were available to demonstrate that the requirements of each of the Code requirements in this section (1.4.3 a) through f)) had been fulfilled.

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

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

Summarize the basis for this Finding:

This section of the ICMI Cyanide Code does not apply to this supply chain.

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

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

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



Summarize the basis for this Finding:

ALR maintains a tracking system and drivers have cell phones at all times. Some drivers also have CB radios. Interviews with drivers indicated that there is no communication black out area on the route to San Luis Potosi and that there are minimal disruptions of service on the route to Hermosillo.

Interviews were conducted with the ALR person who is primarily responsible for tracking shipments and with the Safety Director. The tracking system was demonstrated during the audit and all known cyanide trucks that were on the road at the time were visible through the system. Tracking procedure reviewed was last revised January 2013. Emails and phone calls are used to confirm the status of each shipment several times per day. Records were complete.

The following documentation is used to track inventory and movement of cyanide: bills of lading, vehicle weight upon filling or at the interchange point, vehicle weight upon arrival at destination, and shipping papers indicating the number of packages and amount of material. All of the abovementioned documents were sampled during the audit. Material management practices and inventory controls were found to be appropriate.

DuPont ensures that all shipping records show shipment details such as weight, number and type of packages, destination, and UN number. DuPont sends a copy of the MSDS a "Transportation Emergency Information" sheet with every shipment. Emergency contact numbers and response information is on the emergency sheet and drivers must sign shipping documents to confirm that they have read the emergency response information each time they are dispatched with a cyanide shipment. Shipping documents were sampled and were found to be appropriate.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



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

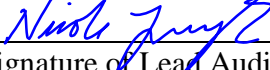
Transport Practice 2.1: *Store cyanide in a manner that minimizes the potential for accidental releases.*

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:

ALR receives loaded trailers in this Supply Chain at the ALR Terminal outside of Nuevo Laredo. This location in the on-site audit and was found to be compliant with ICMI Cyanide Code requirements. Signs are posted indicating that personnel are not permitted to eat, smoke, or have open flames in the area where cyanide is present.

The trailers are not opened and no personal protective equipment is necessary. The area is fenced and manned at all times. The designated cyanide storage area is separated from other areas to ensure that the cyanide is not stored next to incompatible materials. ALR only transports solid sodium cyanide in multiple layers of packaging within sealed trailers. No additional secondary containment systems were deemed to be necessary by the auditor for this operation. The audit team found ALR's cyanide operations and terminal to be ICMI Cyanide Code compliant.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



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

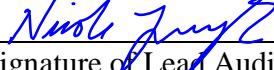
Summarize the basis for this Finding:

ALR maintains an emergency response plan that fulfills ICMI Cyanide Code requirements. The plans are appropriate for transportation incidents. Drivers also carry the DuPont emergency information response sheets, a laminated card showing all emergency telephone numbers and procedures, and the Safety Data Sheets (SDSs) with them during all deliveries.

The plans and information were reviewed and were found to be acceptable for ALR. The document is under document control, the last date of revision is August 2013. All emergency response plans discuss the response to solid sodium cyanide, the only physical form transported or stored in this supply chain. ALR transports cyanide via truck and all scenarios considered in the plans were related to either truck accidents or small cyanide spills from packaging.

Roadway infrastructure differences, and the roles of the different emergency responders (i.e., DuPont personnel, warehouse personnel, mine personnel) are discussed in the emergency planning information. The design and types of transport equipment are considered in the emergency response plans. Response actions were also appropriately addressed in the plans.

The ALR emergency response plan and the DuPont emergency response information sheets define the roles of drivers, DuPont personnel and emergency responders. The DuPont Mexico operations also have the “Cyanides Global Response Plan for Off-Site Incidents” that contains all key procedures and contact information and is updated regularly.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



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:

The notification procedures, including telephone numbers, are described in the Emergency Response Plan. In the case of an emergency, drivers are instructed to contact the main office and DuPont. SETIQ is also notified in the case of any emergency. SETIQ is a service provider that notifies appropriate emergency responders. Drivers have the necessary telephone numbers noted on the paperwork they carry in their trucks and on the laminated cards they also carry with them. Interviews confirmed that DuPont Mexico works closely with its supply chain to ensure that notification procedures and telephone numbers remain current. The plan, including notification information, is also reviewed each year during the emergency drill.

ALR reviews and practices their emergency response plan with DuPont at least once per year. During this review and practice session any information that needs to be updated is revised. All emergency response information reviewed during the audit had been revised in either 2012 or 2013. Contact information was reviewed during the audit and was found to be accurate.

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

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:

ALR utilizes the DuPont “Transportation Emergency Information” sheets as part of the emergency preparedness documentation. Information about clean-up procedures and the neutralization of solids or contaminated debris is detailed on the information sheet.

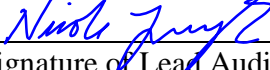
DuPont maintains formal procedures that describe all of their operations including remediation and the prohibition of using decontamination chemicals in surface waters. Additionally, the

DuPont Mexico Cyanide Supply Chain *Nicole Jung* December 18, 2013
Name of Operation Signature of Lead Auditor Date

Compliance finding for Interamerica Forwarding & F.H. Logistica (Grupo FH) Operations

The Grupo FH operations were evaluated against the ICMI Cyanide Code requirements documented in the *ICMI Cyanide Code*, *ICMI Cyanide Code Transportation Protocol*, and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol*.

The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at the company. Procedures, records, and equipment were evaluated for Grupo FH personnel at several locations during the audit.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



Interamerica Forwarding & F.H. Logistica (Grupo FH) Operations - Auditor's Finding


Grupo FH Operations are in **FULL COMPLIANCE** with the International Cyanide Management Code.

This supply chain has not experienced any significant cyanide incidents, releases, exposures since the previous ICMI Cyanide Code audit in 2010. The supply chain was found to have been in compliance with the ICMI Cyanide Code since the previous certification audit.

Audit Company:	MSS Code Certification Service, a Division of Management System Solutions, Inc. www.mss-team.com
Audit Team Leader:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Name of Second Auditor	Gabriel Rodriguez
Date(s) of Audit:	October 28-29, 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 Certification 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 Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Grupo FH		December 18, 2013
Name of Facility	Signature of Lead Auditor	Date

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



Description of Grupo FH's Role in the DuPont Mexico Cyanide Supply Chain

Interamerica Forwarding located in Laredo, Texas and F.H. Logistica located in Nuevo Laredo, Mexico, are both part of the Grupo FH of companies. Interamerica Forwarding provides DuPont with customs / border crossing services. Empire Express in-gates their trailers into the Interamerica facility in Laredo, Texas and F.H. Logistica drivers pick up the loads and bring them over the U.S./Mexican border to ALR in Mexico. The trailer remains sealed and is not opened during transit.

This section of the report includes the results of the on-site audit of Interamerica Forwarding and F.H. Logistica personnel. The results are collectively referred to as being the results for the Grupo FH.

Grupo FH management, maintenance, operations personnel, and drivers were interviewed. Equipment (tractors and trailers) used to transport cyanide over the U.S./Mexican border was evaluated during the audit.

Grupo FH's Certification Audit Results

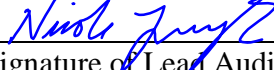
1. TRANSPORT: *Transport cyanide in a manner that minimizes the potential for accidents and releases.*

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:

Grupo FH (F.H. Logistica) transports cyanide over the U.S./Mexican border to ALR. Routes that are to be used for hazardous materials being transported over the U.S./Mexican border are pre-determined by the U.S. and Mexican governments. Grupo FH maintains a route planning procedure entitled "Rute de Transportacion del Cianuro." The routing procedure takes into account population density, infrastructure, pitch & grade, and proximity to water bodies. The procedure also addresses the need to identify risks and take necessary precautions. The route is re-evaluated every three years. Records demonstrated that the route had been approved by DuPont and Grupo FH Management. Mexico Supply Chain interviews indicated that Mexican Law (NOM-012-SCT-2008) requires that a route risk assessment be done for hazardous material shipments and that the regulatory requirements match well with ICMI Cyanide Code risk assessment requirements.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date

Risk mitigation measures focus primarily on security and cautious driving in the areas where the roads cross over the rivers and small water bodies. Deliveries are carefully monitored and drivers do not stop when they are loaded. Late night driving is avoided. Drivers were interviewed and maps were referenced. Drivers showed a very good awareness of the designated route, risk mitigation measures, and general operating procedures.

The route is reviewed at least every three years for adequacy and for any changes in conditions that would result in a changed risk ranking. Records were reviewed showing that the most recent route assessments had been conducted in 2013. The driver feedback process is integrated into the route review process.

DuPont has trained Grupo FH employees on cyanide safety. DuPont personnel maintain contact with SETIQ, an organization that provides emergency notification and coordination services (similar to CHEMTREC in the USA). CHEMTREC would be contacted for any incident in the United States during transport.

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:

Training records and interviews were used to confirm that all personnel operating cyanide transport equipment can perform their jobs safely and appropriately. Complete employee records are maintained by Grupo FH for each of the drivers. All drivers had valid commercial licenses with an “E” endorsement for hazardous material transport. Drivers were interviewed and displayed a good understanding and awareness of company policies and procedures. Training records were available for drivers to demonstrate that they had been trained on cyanide hazards, safe handling and emergency response.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



Placards are used by Grupo FH personnel to identify the shipments as cyanide, as required by local regulations and international standards. Appropriate placards are displayed on all four sides of the transport vehicles at all times. Equipment markings were found to be adequate and compliant.

Grupo FH drivers conduct pre-trip inspections prior to departure and a post-trip report on the condition of the vehicle. Mechanical defects are called to the attention of a mechanic. Issues are resolved, as necessary.

Grupo FH performs preventive maintenance on transportation equipment. Pre-defined checklists showing the required maintenance tasks are used to record actions. The incoming and outgoing condition of the equipment is recorded on the checklists and associated repair orders. Records were reviewed and were found to be acceptable.

Grupo FH drivers are subject to U.S. Hours of Service regulations which limit the number of hours that can be driven. The transportation segment managed by Grupo FH drivers is very short. Deliveries are managed according to the opening hours of the U.S./Mexican border crossing and are typically of a short duration.

Grupo FH drivers perform pre-trip inspections to confirm that the trailer is properly secured prior to departure. Interviews with drivers confirmed this practice.

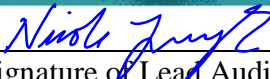
Grupo FH maintains a written drug abuse prevention policy and conducts random testing. Records were available to demonstrate that the requirements of each of the Code requirements in this section (1.4.3 a) through f)) had been fulfilled.

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

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

Summarize the basis for this Finding:

This section of the ICMI Cyanide Code does not apply to this supply chain.

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



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

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

Summarize the basis for this Finding:

Grupo FH maintains a tracking system and drivers have cell phones at all times. Interviews with drivers indicated that there are no black-out areas on the route to the ALR Terminal.

Shipments are tracked closely, especially since the distance on this route is so short. The tracking system was demonstrated during the audit and all known cyanide trucks that were on the road at the time were visible through the system. Emails and phone calls are also used to confirm the status of each shipment. Shipping records were complete and showed the in-gate times of arrival at ALR. Shipping and interchange papers indicating the number of packages and amount of material were available for review.

Grupo FH ensures that the shipping document package that travels with the shipment shows details such as weight, number and type of packages, destination, and UN number. This type of detailed information is necessary in order to cross the U.S./Mexican border and in-gate the trailer into the ALR terminal.

All of the abovementioned documents were sampled. Material management practices and inventory controls were found to be appropriate.

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

Grupo FH (Interamerica Forwarding facility) provides DuPont with interchange and freight forwarding services. The Interamerica Forwarding facility was included in the on-site audit and was found to be compliant with ICMI Cyanide Code requirements. Signs are posted indicating that personnel are not permitted to eat, smoke, or have open flames in the area where cyanide is present.

The trailers are not opened and no personal protective equipment is necessary. The area is fenced and manned at all times. The designated cyanide trailer parking area is separated from other areas to ensure that the cyanide is not parked next to incompatible materials. Grupo FH only transports solid sodium cyanide in multiple layers of packaging within sealed trailers. No additional secondary containment systems were deemed to be necessary by the auditor for this operation. The audit team found Grupo FH's operations to be ICMI Cyanide Code compliant.

DuPont Mexico Cyanide Supply Chain *Nicole Jung* December 18, 2013
Name of Operation Signature of Lead Auditor Date



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:

Grupo FH maintains three emergency response procedures, a general emergency response plan, a response plan for emergencies involving hazardous materials, and a spill response plan. Emergency response plans are well organized and are under document control using the company’s ISO 9001-certified quality management system. The emergency response plans were found to be in compliance with all ICMI Cyanide Code requirements. Drivers also carry a laminated card showing all emergency telephone numbers and the Safety Data Sheet (SDS) with them during all deliveries.

Emergency plans address all necessary components of an emergency response. The need for a potential response to a cyanide emergency was referenced. The appropriate notification information was included and the plans were found to be in alignment with DuPont procedures. The only physical form transported or stored in this supply chain is sold sodium cyanide. Grupo FH stores cargo trailers and transports cyanide via truck. All relevant scenarios in the U.S. and in Mexico were considered in the plans.

Jurisdictional infrastructure differences and the roles of the drivers, operations personnel, and emergency responders in the U.S. versus Mexico are discussed in the emergency planning information. The design and types of transport equipment are considered in the emergency response plans. Response actions were also appropriately addressed in the plans.

DuPont Mexico Cyanide Supply Chain *Nicole Jung* December 18, 2013
Name of Operation Signature of Lead Auditor Date



Rail Carriers & Rail Yards – Summary of Due Diligence Investigations

Operational and Audit Information for Rail Carriers and Rail Yards

Two Due Diligence Investigations of rail partners Ferrocarril Mexicano Railroad (Ferromex) and Kansas City Southern de Mexico (KCSM) were conducted during this supply chain audit. Ferromex was formed in 1997 by a group which includes Grupo Mexico and the Union Pacific Railroad. KCSM is one of three railroads that comprise Kansas City Southern, an international holding company headquartered in Kansas City, Missouri, USA.

At the time of the audit, Mexican cyanide shipments were being routed from the DuPont Memphis Plant in the U.S. to customers in Mexico using rail and truck. Rail shipments cross the U.S./Mexican border at Laredo, Texas and Nogales, Arizona and are routed to either the San Luis Potosi facility or the Hermosillo facility. The cyanide is then offloaded and stored in the warehouses.

Compliance finding for Rail Carriers and Rail Yards

The Due Diligence portion of this evaluation included a review of information available for the Mexico Supply Chain. The details regarding Ferromex and KCSM and rail yards were evaluated in order to confirm that DuPont's actual supply chain management practices match internal requirements and fulfill ICMI Cyanide Code requirements.

DuPont conducted a due diligence investigation as part of the original Mexico Supply Chain certification audit for both Ferromex and KCSM. As part of that investigation, each rail partner was asked to fill out a customized ICMI Cyanide Code Due Diligence protocol and participate in the interviews held during the 2010 Mexico Supply Chain audit. As part of this 2013 audit cycle, the information on the Due Diligence protocol was updated by the rail carriers and records demonstrating compliance to ICMI Cyanide Code requirements were sampled. No significant changes have occurred to the operations since the previous certification audit.

The information contained in this section of the report was gathered from the filled out protocols, records that were collected as part of the review, and interviews with DuPont personnel.

DuPont Mexico Cyanide Supply Chain		December 18, 2013
Name of Operation	Signature of Lead Auditor	Date



DuPont Mexico Rail Carriers and Rail Yards - Auditor's Finding

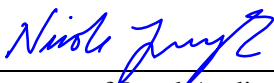
Due diligence investigations have been performed so that it can reasonably be concluded that Ferromex and KCSM rail carriers & rail yards used by DuPont for sodium cyanide shipments are in **FULL COMPLIANCE** with the International Cyanide Management Code.

This supply chain has not experienced any significant cyanide incidents, releases, exposures since the previous ICMI Cyanide Code audit in 2010. The supply chain was found to have been in compliance with the ICMI Cyanide Code since the previous certification audit.

Audit Company:	MSS Code Certification Service, a Division of Management System Solutions, Inc. www.mss-team.com
Audit Team Leader:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Name of Second Auditor	Gabriel Rodriguez
Date(s) of Audit:	August 13-16 and October 23, 28-29, 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 Certification 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 Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

<u>DuPont Ferromex & KCSM</u>		<u>December 18, 2013</u>
Name of Operation	Signature of Lead Auditor	Date

<u>DuPont Mexico Cyanide Supply Chain</u>		<u>December 18, 2013</u>
Name of Operation	Signature of Lead Auditor	Date



All DuPont package types used for solid sodium cyanide conform to International Maritime Organization (IMO) and US DOT requirements. Certifications and approvals were reviewed for all package types. Seals are checked upon arrival and any instances of a security breach would be detected at that point.

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 management of Mexico Transport is: consistent with Transport Practice 3.1
substantially consistent
not consistent

Summary of the basis for this finding:

DuPont Mexico has an Emergency Response Plan that applies to all transportation incidents. Ferromex and KCSM representatives participate in the DuPont emergency response drills and safety meetings. DuPont has also transmitted its emergency response information to the railroads. The information was found to be appropriately detailed.

According to ICMI Cyanide Code protocol information, Ferromex and KCSM both have general safety programs that include accident prevention plans, emergency plans, and remediation plans. Ferromex involved the SCT (Transportation Bureau) and DuPont in the development of its response plans.

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

The management of Mexico Transport is: consistent with Transport Practice 3.2
substantially consistent
not consistent

Summary of the basis for this finding:

Ferromex and KCSM reported that they contract with professional remediation firms that would assist in the case of a spill needing remediation. DuPont personnel confirmed that they would travel immediately to any site where DuPont material had been spilled. DuPont ensures emergency contact information (telephone number), and initial response information is clearly identified on every shipping paper for each shipment of Sodium Cyanide. DuPont has

DuPont Mexico Cyanide Supply Chain  December 18, 2013
Name of Operation Signature of Lead Auditor Date



established its confidence in the Ferromex's and KCSM's abilities to respond to an emergency through interacting with them through safety forums and meetings. Interviews confirmed that DuPont and the railroads interact on a regular basis in regards to environmental and safety matters.

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

The management of Mexico Transport is: consistent with Transport Practice 3.3
substantially consistent
not consistent

Summary of the basis for this finding:

DuPont ensures emergency contact information (telephone number), and initial response information is clearly identified on every shipping paper for each shipment of Sodium Cyanide. Interviews confirmed that contact information, notification, and reporting requirements are kept up-to-date and apply to emergencies that may occur during a rail incident.

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

The management of Mexico Transport is: consistent with Transport Practice 3.4
substantially consistent
not consistent

Summary of the basis for this finding:

DuPont product stewardship personnel and environmental personnel are involved in developing comprehensive environmental plans in the event of an on-site spill. In the event of an off-site spill, DuPont emergency response personnel are sent to the scene. DuPont coordinates clean-up efforts with professional remediation services. DuPont cyanide experts coordinate any remediation with the remediation service. Interviews confirmed that DuPont experts are very aware of the additional hazards of cyanide treatment chemicals and they would communicate these hazards to necessary personnel in the event of a spill.

DuPont Mexico Cyanide Supply Chain *Nicole Jung* December 18, 2013
Name of Operation Signature of Lead Auditor Date

