



**ICMI Cyanide Code Consigner Supply Chain
Summary Audit Report**

**DuPont U.S. / Canada Rail & Barge Transportation
Supply Chain Certification Audit**

**Submitted to:
International Cyanide Management Institute
888 16th Street, NW – Suite 303
Washington, DC 20006
USA**

2010 Audit Cycle



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U.S. / Canada Rail & Barge Supply Chain Summary

Consignor Name & Contact Information

Name of Operation: E.I. DuPont de Nemours and Company
2571 Fite Road
Memphis, TN 38127 USA


Name and contact information for DuPont Contact: Donald Jeffery
Cyanide Business Global Product Stewardship Manager
Email: Donald.W.Jeffery@USA.dupont.com
Tel. (623) 444-2989

Operational and Audit Information – U.S. / Canada Rail & Barge Supply Chain

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 Strategic Business Unit. The plant is located just outside of Memphis in Woodstock, Tennessee.

DuPont was one of the original 14 Cyanide Code signatory companies announced on November 3, 2005. As such, DuPont made the commitment to obtain Cyanide Code certification for its Memphis Solid Cyanide Plant and its packaging operations. DuPont was the first Cyanide Producer to achieve certification in June 2006. The operation was re-certified in 2009.

DuPont transportation supply chains are highly complex due to the global reach of its supply capabilities. After its initial certification in 2006, DuPont contracted ICMI-approved Code Transportation Auditors to perform non-certification audits for its supply chain in the U.S., Mexico, and throughout Central and South America. Audits were conducted of DuPont operations and trucking partners. Due Diligence Investigations were conducted for ocean carriers (including ports) and rail partners (including rail yards). The original audit of DuPont as a

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Consignor / Transporter and due diligence investigations of the ocean carriers (including ports) and rail partners (including rail yards) was done in February 2007. Now, three years later, similar auditing and due diligence investigation activities were performed again.

The certification audit of DuPont on February 9-10, 2010 was a combined audit of Consignor / Transporter management for U.S. / Canada Rail & Barge transport and Global Ocean transport. This report contains information regarding the results of the DuPont consignor / transporter certification audit and the results of the rail carrier and rail yard due diligence investigations. The Global Ocean Supply Chain results are contained within a separate report.

The certification audit and due diligence investigations were conducted according to the 2009-adopted ICMI certification process that calls for consignors to become signatories and undergo transportation supply chain third-party certification audits.

Description of the U.S. / Canada Rail & Barge Supply Chain:

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 semi-bulk packages. The bulk and semi-bulk packages are shipped from Memphis and its packaging terminals via rail and truck. Domestic shipments go coast to coast. International shipments go by rail to U.S. ports and to the U.S./Canadian and U.S./Mexican borders.


This evaluation included the following components:

Certification audit of DuPont supply chain management practices according to the requirements of the ICMI Transportation Protocol (2009 Revision)

US / Canada Rail & Barge Supply Chain – This report addresses all rail and barge transport of sodium cyanide in the United States and Canada. The four transportation partners that are covered under this combined DuPont certification audit / due diligence investigations are:

- 1) Union Pacific Railroad (UP)
- 2) Canadian National Railway (CN)
- 3) Alaska Railroad Company (ARRC)
- 4) Alaska Marine Lines (AML) (Contracted by ARRC for barge movement)

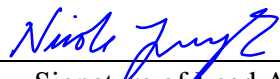
All transportation in the United States and to Canada using the transportation partners noted above is within scope of this review. The sampling of specific information and records was done using the primary routes being used at the time of the audit. These were the routes from the DuPont Memphis Plant to the DuPont Carlin facility in Nevada, the Fairbanks rail yard in Alaska (via the Port of Seattle and an Alaska Marine Lines (AML) barge movement), the Laredo rail yard at the Texas/Mexican border, and the Nogales rail yard at the Arizona/Mexican Border.

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Several other routes were also in use, but no additional rail/barge transportation companies other than the ones mentioned here were in use for sodium cyanide shipments. Rail transportation to U.S. Ports for international ocean carrier shipments is controlled and managed by DuPont’s ocean carrier partners. Rail transport of the cyanide starting at the U.S./Mexican border crossings and within Mexico is addressed in separate DuPont Mexico due diligence and certification audit reports. The due diligence review of the ocean ports used by DuPont is addressed in the DuPont Global Ocean Supply Chain certification audit report.

At the time of the 2010 DuPont Certification Audit / Due Diligence Investigations, the following rail yards (start and end locations) were the primary rail yards being used by DuPont in the United States:

Rail Terminals – Origin Loading Location	Rail Terminal – Destination Unloading Location
Marion, AR Memphis, TN Woodstock, TN (rail sidings within DuPont and LSI facilities)	Fairbanks, Alaska Laredo, Texas Nogales, Arizona Seattle, WA Vivian, NV (Carlin Terminal Siding)

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U.S. / Canada Rail & Barge Supply Chain - Auditor's finding and attestation

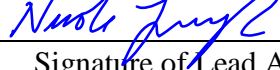
The certification audit was performed at the DuPont Sourcing and Logistics building in Wilmington, Delaware – USA. The audit was performed by an independent third-party auditor who was pre-approved by the ICMI as a Lead Auditor for all types of Code audits and as a technical expert for Code audits of cyanide transportation and production operations.

The certification audit of DuPont US/Canada Rail & Barge Supply Chain management operations was conducted on-site on February 9-10, 2010 with additional reviews of due diligence information following the on-site audit activity. The supply chain management processes and the due diligence investigations of rail carriers and rail yards were conducted in accordance with the agreed upon audit plan and due diligence documentation requirements.

The DuPont cyanide transportation management practices using rail carriers (including rail yards) and the AML Barge Operator were evaluated against the Cyanide Code requirements documented in the *ICMI Cyanide Code (2009)*, *ICMI Cyanide Code Transportation Protocol (2009)*, and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol (2009)*. DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the Cyanide Transportation 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 carrier performance evaluations, incident tracking, equipment maintenance, security measures, shipment tracking, cargo labeling practices, shipping documentation, community involvement, and emergency response records were randomly sampled and found to be acceptable.

DuPont and its transportation partners were evaluated previously during a non-certification Cyanide Code verification audit using the 2005 revision of the Cyanide Code transportation Protocol. Although the 2007 audit and due diligence reviews were non-certification activities, these 2010 audit and due diligence review activities were conducted in accordance with Re-Certification Guidelines, namely the confirmation that DuPont and its transportation partners have continued to be in conformance since the original audit in 2007.

The results of this certification audit and the related due diligence investigations indicate that DuPont and all portions of its U.S. / Canada Rail & Barge Supply Chain are in FULL COMPLIANCE with Cyanide Code requirements.

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U.S. / Canada Rail & Barge Supply Chain - Auditor's Finding

This U.S. / Canada Rail & Barge Supply Chain is

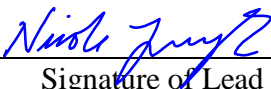
- in full compliance**
- in substantial compliance
- not in compliance

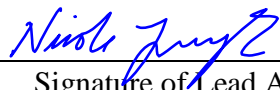
with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010

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 the Audit Reports accurately describe 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.

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Consignor Summary


Operational & Audit Information for Consignor

The DuPont Corporate Sourcing & Logistics group located in Wilmington, Delaware manages the domestic and international transportation of sodium cyanide. The Rail Transport Procurement Group has overall responsibility and authority for coordinating rail carrier selection, safety, security, and quality performance tracking, rail carrier contracts, booking of shipments, shipment tracking, and incident investigation.

Cyanide Product Stewards within the DuPont Cyanides Business coordinate activities associated with route risk evaluation when customers are originally established and again at established frequencies. The Product Stewards also coordinate community communications, training sessions, rail yard evaluations, customer evaluations, and package & label reviews. Corporate Emergency Response Specialists work together with the DuPont Cyanides Business to coordinate emergency response planning procedures, preparation and maintenance of emergency equipment, training of DuPont emergency response personnel, and evaluation of plans and procedures through periodic emergency response drills.

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 maintain desk manuals with specific procedures for the procurement of transportation services and the management of carriers.

Personnel interviewed during the February 9-10, 2010 DuPont Certification Audit / U.S./Canada Rail & Barge Due Diligence Investigations:

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Transport Practice Discussed →	1.1 Route selection Risk Assessment	1.2 Driver / Operator Training & Qualifications	1.3 Equipment Suitability	1.4 Safety Program & Preventive Maintenance	1.5 Ocean Transport N/A	1.6 Tracking of shipments	2.1 Interim Storage	3.1-3.5 Emergency Response	Supply Chain Management - General Discussions	Rail/Barge Operations - General Discussions
Audit Participants										
Senior Buyer (Rail Transport)	X	X	X	X	-	X		X	X	X
Product Stewardship Manager, North America Cyanides	X				-		X	X		
Cyanide Business Global Product Stewardship Manager	X	X	X	X	-	X	X	X	X	
Logistics Leader, Cyanides Business			X	X	-	X		X	X	X
Regional Rail Services Coordinator, DC&F				X	-	X				X
Emergency Response Specialist/Site Fire Chief DuPont Memphis Plant					-			X		
Rail Fleet Manager			X	X	-					X
Safety, Health & Environmental Manager – Sourcing & Logistics					-			X	X	
Regulatory Affairs – Cyanides Business (packaging requirements and certifications)		X			-					
Internal DuPont Hazmat Consultant		X			-					

DuPont US/Canada Rail & Barge Supply Chain

Nicole Juy

August 26, 2010

Name of Operation

Signature of Lead Auditor

Date

Compliance finding for Consignor’s activities

The DuPont cyanide transportation management practices using rail carriers (including rail yards) were evaluated against the Cyanide Code requirements documented in the *ICMI Cyanide Code* (2009), *ICMI Cyanide Code Transportation Protocol* (2009), and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol* (2009). DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the Cyanide Transportation 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 carrier performance evaluations, incident tracking, security measures, shipment tracking, cargo labeling practices, shipping documentation, community involvement, and emergency response records were randomly sampled and found to be acceptable.

DuPont Consignor / Transporter - Auditor’s Finding

DuPont Consignor / Transporter operations are

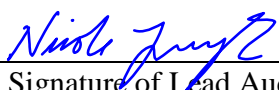
- in full compliance**
- in substantial compliance
- not in compliance

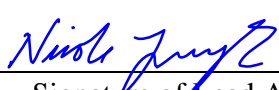
with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010

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 the Audit Reports accurately describe 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.

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Description of Consignor's role in ensuring compliance of its carriers

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.*

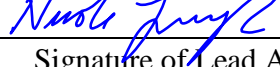
The operation is in full compliance with
 in substantial compliance with Transport Practice 1.1
 not in compliance with

Summarize the basis for this Finding:

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 maintain desk manuals with specific procedures for the procurement of transportation services and the management of carriers.

Interviews were conducted to confirm that before DuPont initially qualifies a new customer for sodium cyanide, they follow a standard practice which is called the "First Order Process". Regional Cyanide Product Stewards evaluate the new customer for their ability to safely use and store material. They also evaluate the possible routes that can be used to transport the cyanide from DuPont to the customer site. This evaluation of the route includes consideration of population densities, infrastructure issues, pitch and grade of roads, and prevalence and proximity of water bodies. The route evaluation includes an evaluation of all portions of the route including rail transport, origination and destination rail yards, ocean carrier transport, ports, and barges, when applicable. 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 risk mitigation measures were evaluated and found to be acceptable during the audit.

Routes are re-evaluated periodically, usually during customer visits. A review of records and the results of interviews show that routes are re-evaluated at least every three years, or more

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frequently if necessary. 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. . DuPont trains community responders and hospitals in Memphis, Tennessee, Carlin, Nevada, and Fairbanks, Alaska. Records of community interactions / training sessions were reviewed and found to be acceptable.

The primary safety / security concern with the movement of cyanide by rail is that the rail cars are not to be stored anywhere along the route. DuPont uses a secure web-based rail car tracking system to track the movement of its rail cars. Interviews and a review of records showed that the movement of cyanide rail cars is tracked continuously by personnel for whom the tracking of rail shipments is their prime responsibility.

DuPont uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

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:

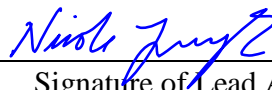
This requirement does not apply to DuPont for this supply chain.

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 2007 audit and were found to be compliant. Confirmation was made

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during this audit that no package changes have been made since the initial Cyanide Code audit of this supply chain.

DuPont maintains a fleet of rail equipment to transport cyanide that includes: hopper cars, box cars, and sea containers. 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 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.

A sample of loading checklists was reviewed in which the adequacy of the transportation equipment is confirmed prior to each shipment. The Memphis Plant maintains detailed cyanide loading procedures for loading boxcars and hopper cars. LSI (DuPont packaging facility adjacent to the production facility) maintains 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 inter-modal containers are standard weights and standard blocking and bracing configurations are used. Shipping paperwork was reviewed to confirm that shipment weights were consistent and acceptable.

Additionally, DuPont tracks transportation incidents for all transportation modes throughout the world. The incident tracking database was reviewed during the audit. No cyanide-related incidents associated with failure of equipment were recorded in 2007-2010 (period sampled during this audit).

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 shipments of bulk and semi-bulk packages in railcars and inter-modal containers are standard weights and standard blocking and bracing configurations are used. One LSI procedure for the loading of boxcars with bag-in-box 1 metric ton packages was reviewed. The procedure is detailed and explains the procedures for properly closing the package, the diagram for how the material is to be properly loaded into a boxcar for weight loading considerations, and how the packages are to be blocked and braced. Several completed checklists used for the inspection of the railcars before and after loading were reviewed and were found to be appropriate.

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A Memphis Plant procedure for boxcar unloading and loading was also reviewed during the audit. The procedure is specifically for the inspection of the boxcar before and after loading and for the blocking and bracing of FLO-BINS® in boxcars. Several checklists are also part of this procedure to ensure that packages (FLO-BINS®) are in proper condition, clean, and properly blocked and braced.

Appropriate placards are displayed on all four sides of the transport vehicles. A photo of a loaded inter-modal container being shipped to Alaska was available for review at the audit. Additionally, the International Maritime Organization (IMO) requirement for the marine pollutant signage to be posted on the container was also observed as being properly placed on the inter-modal container. Memphis Plant and LSI operational procedures and checklists for loading of boxcars were also reviewed for this requirement.

All documentation (procedures and checklists) require 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 2010 re-certification audit of DuPont Mexico operations. Similar procedures exist for the loading, placarding, and inspection of inter-modal sea containers. These procedures and practices were audited when the LSI shipping methods were observed during the 2009 cyanide re-certification production audit.

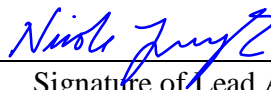
DuPont and LSI rail loading procedures reviewed during the audit require that railcars be inspected for safety appurtenances, braking systems, and connection mechanisms prior to being released. According to procedures reviewed during the audit, rail cars must be thoroughly inspected on at least 35 different parameters prior to being released. Repairs are either done by the certified mini-shops or by the certified full service repair facilities. Registrations for mini-shops were reviewed during the audit and were all current with the appropriate authorizations for the equipment used by DuPont.

DuPont maintains an extensive database of equipment maintenance requirements, inspections requirements, and records that planned activities took place. This database was evaluated during the audit and Fleet Management personnel involved with tracking rail equipment and ensuring that appropriate maintenance is performed were interviewed. Preventive maintenance and railcar inspection requirements are regulated by U.S. Federal law. Records were sampled for equipment used to transport cyanide in 2008 through 2010. Records showed that all required maintenance and inspection actions have occurred in a timely manner.

Limitations on worker hours in the U.S. rail industry are strictly regulated and enforced by the U.S. Government. DuPont contracts require transportation partners to adhere to all applicable regulations. There is therefore no need for DuPont to impose additional worker hour limitations in its contractual agreements. Detailed procedures, blocking and bracing diagrams, and checklists are used by DuPont and the LSI packaging operation during the loading of rail cars and inter-modal sea containers. U.S. Federal regulations require that railroads conduct random

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drug and alcohol testing and that drug abuse prevention programs are maintained. DuPont also has these requirements are part of its contractual standard terms and conditions. Records were available to demonstrate that the applicable ICMI Cyanide Safety Program requirements 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:

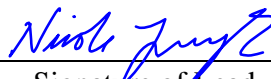
In order to confirm that DuPont's Alaska Rail partner and barge movement to Alaska are compliant to Cyanide Code requirements, a DuPont Product Steward performed an on-site Due Diligence investigation. The results in this section reflect DuPont's efforts as a Consignor to ensure that Cyanide Code requirements are fulfilled by its partners.

The DuPont Due Diligence Review of the Alaska Railroad Company (ARRC) performed in April 2010 by DuPont included a review of the ARRC contracted barge operator (Alaska Marine Lines – AML). DuPont concluded that the ARRC maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements. As recommended by the ICMI *Auditor Guidance for the Use of the Cyanide Transportation Verification Protocol*, dated October 2009, specific information regarding this practice is addressed below:

- a) The DuPont packaging specifications were reviewed as part of the certification audit and were found to be conformant to the packaging requirements of the IMDG Code.
- b) Photos of packaging for drums and IBCs presented at the audit were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
- c) Photos of packaging for drums and IBCs presented at the audit were appropriately labeled and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
- d) Photos of loaded inter-modal containers were reviewed and were found to be marked and placarded in accordance with the IMDG Code. This aspect of compliance was also evaluated in 2009 at the on-site certification audit of the LSI operation in Memphis, TN.

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- e) Shipping documents were reviewed for a sample of cyanide shipments. All information required by the IMDG Code is required as standard practice on DuPont shipping paperwork.
- f) The container packing certificates were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMDG Code requirements.
- g) DuPont concluded that the ARRC maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements. The ocean carrier confirmed to DuPont that they have cyanide emergency response information available on board each vessel.
- h) DuPont concluded that the ARRC maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements.

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 uses a secure web-based rail car tracking system to track the movement of its rail cars. The movement of cyanide rail cars is tracked continuously. Interviews were conducted and personnel stated that appropriate actions are taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that location can always be confirmed. The database was reviewed during the audit and confirmation was made that rail cars are being tracked continuously and that DuPont has access to “real-time” information regarding the location and status of its rail shipments of cyanide. Shipping paperwork was reviewed and was found to be conformant to Code requirements, including chain of custody requirements. The following documentation is used to track inventory and movement of cyanide: bills of lading and shipping papers indicating the number of packages and amount of material. The abovementioned documents were reviewed during the audit. Rail companies maintain databases with MSDS information for the products they carry. This aspect of rail transportation is regulated and inspected by the U.S. Federal government.

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:

This supply chain does not include any interim storage activities.

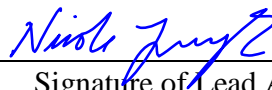
3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities

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 has several key documents that were reviewed as part of this certification audit: 1) Cyanides Global Response Plan for Off-Site Incidents; 2) U.S. Integrated Emergency Response Team Standard Operating Guidelines; and 3) Sodium Cyanide Emergency Response Procedures; 4) Transportation Emergency Information fact sheet for DuPont Solid (Sodium or Potassium) Cyanide. Together, 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 inter-modal 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 Cyanide Code audits. The emergency response procedures consider steps to be taken for wet, dry and gaseous cyanide. The Transportation Emergency

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Information sheet is designed to address solid briquettes. There is another fact sheet also available (for solution), but at the time of the audit only solid sodium cyanide was being transported by rail carrier.

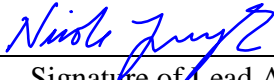
The DuPont emergency plans are general and universally applicable to all types of emergencies. The Transportation Emergency Information sheet has details of action steps for transporters. This was deemed appropriate by the auditor. Professional emergency responders together with technical guidance from DuPont would be responsible for addressing issues involving the way in which the structure of a transportation container or vessel should be managed after an emergency. The three response plans describe the different levels of response actions for anticipated emergency situations. The emergency procedures offer descriptions of the tactical steps that need to be taken to contain and clean up a spill or manage an exposure incident. The Integrated Emergency Response Team Guidelines define the action steps to be taken by the responding team and the notifications that need to be made in case of an emergency. The Cyanides Global Response Plan for Off-Site Incidents describes the steps that are to be taken by Cyanide Hot Line and other Cyanides Business personnel. All of the plans and emergency response information clearly outline the roles and responsibilities of internal and external responders.

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:

Training requirements and are detailed in the U.S. Integrated Emergency Response Team Standard Operating Guidelines. According to Section II of this document, all emergency responders receive initial and then annual re-fresher training. DuPont also offers cyanide safety training to all of its transportation partners and customers. DuPont also offers this type of training to community responders in many strategic locations. Records of the training sessions were reviewed during this and previous Cyanide Code audits of DuPont transportation partners. The roles and responsibilities of relevant internal and external personnel are clearly described in the Transportation Emergency Information sheet, DuPont emergency plans and procedures. 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. According to interviews, emergency response equipment listed in the different plans is checked during emergency response drills, which occur at least annually. The emergency equipment listed in the Cyanides Business plan is maintained at the Memphis Plant. Availability of the equipment is ensured through Plant processes that were confirmed during the 2009 Cyanide Code Production audit.

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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 plans, procedures, and Transportation Emergency Information sheet. The two response plans have DuPont internal contact information and the U.S. Integrated Emergency Response plan has external phone numbers (such as governmental contact information, etc.). Emergency contact information is also contained in the Transportation Emergency Information sheet. According to Section 4 of the Cyanides Global Response Plan for Off-Site Incidents, emergency plans including notification numbers are checked at least annually. The Cyanides plan had last been updated in 2010 and the U.S. Integrated Emergency Response plan was last updated in 2009. The Emergency Response Procedures were last updated in 2010.

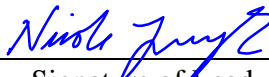
Transport Practice 3.4: *Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.*

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:

Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the DuPont Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the document. Interviews with DuPont personnel during this and previous Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. Page 7 of the Emergency Response Procedures specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water.

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

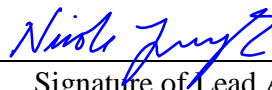
The operation is in full compliance with
 in substantial compliance with Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding:

According to Section 4 of the Cyanides Global Response Plan for Off-Site Incidents, emergency plans including notification numbers are checked at least annually. The Cyanides plan had last been updated in 2010 and the U.S. Integrated Emergency Response plan was last updated in 2009. The Emergency Response Procedures were last updated in 2010.

Many emergency drills are conducted at DuPont on an on-going basis. Emergency response drills at the Memphis Plant, for example are conducted quarterly. This was evaluated during the 2009 re-certification audit. According to the Cyanides Global Response Plan for Off-Site Incidents, the plan is to be tested by conducting drills at least annually.

Records were available to show that the Global Cyanides Business has conducted emergency response drills each year for the past three years. Drills typically involve at least one transportation partner and often one or more customers. Drill critiques were sampled and were found to be appropriate.

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Rail Carriers, Barge Operator & Rail Yards – Summary of Due Diligence Investigations

Operational and Audit Information for Rail Carriers, Barge Operator and Rail Yards

This report addresses all rail and barge transport of sodium cyanide in the United States and Canada. The due diligence reviews of ocean ports are addressed in the DuPont Global Ocean Supply Chain certification audit report. The four transportation partners that are covered under this combined DuPont certification audit / due diligence investigations are:

- 1) Union Pacific Railroad (UP)
- 2) Canadian National Railway (CN)
- 3) Alaska Railroad Company (ARRC)
- 4) Alaska Marine Lines (AML) (Contracted by ARRC for barge movement)

All transportation in the United States and to Canada using the transportation partners noted above is within scope of this review. The sampling of specific information and records was done using the primary routes being used at the time of the audit. These were the routes from the DuPont Memphis Plant to the DuPont Carlin facility in Nevada, the Fairbanks rail yard in Alaska (via Seattle and a barge movement), the Laredo rail yard at the Texas/Mexican border, and the Nogales rail yard at the Arizona/Mexican Border. Several other routes were also in use, but no additional rail/barge transportation companies other than the ones mentioned here were in use for sodium cyanide shipments. Rail transportation to U.S. Ports for international ocean carrier shipments is controlled and managed by DuPont’s ocean carrier partners. Rail transport of the cyanide starting at the U.S./Mexican border crossings and within Mexico is addressed in separate DuPont Mexico due diligence and certification audit reports.

At the time of the 2010 DuPont Certification Audit / Due Diligence Investigations, the following rail yards (start and end locations) were the primary rail yards being used by DuPont in the United States:

Rail Terminals – Origin Loading Location	Rail Terminal – Destination Unloading Location
Marion, AR Memphis, TN Woodstock, TN (rail sidings within DuPont and LSI facilities)	Fairbanks, Alaska Laredo, Texas Nogales, Arizona Seattle, WA Vivian, NV (Carlin Terminal Siding)

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Nicole J. [Signature]
 Signature of Lead Auditor

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Compliance finding for Rail Carriers, Barge Operator and Rail Yards


The Due Diligence portion of this evaluation included a review of information available for the U.S. / Canada Rail & Barge Supply Chain. The details regarding specific partners 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. The current rail partners and rail yards were evaluated during this due diligence review as a way to validate the DuPont Supply Chain management processes. The due diligence reviews of ocean ports are addressed in the DuPont Global Ocean Supply Chain certification audit report.

The CN and UP railroads have continued to be certified Responsible Care® Partner companies for more than four years. As such, their rail management system, including rail yards and interchange point safety and security, has been audited by a 3rd – party auditing firm and has been found to be suitable and effective. A safety presentation from 2006 and the CN 2008 Corporate Citizenship Report show that the CN has strong safety programs and strong safety performance. Safety presentations and data from UP, including the most recent data from January 2010 show that UP safety performance is also very strong. According to interviews, DuPont maintains close relationships with CN and UP regarding safety. One document from the CN entitled the "CN Customer Safety Handbook" explains the shipping requirements for chemical customers. The detailed training document clearly explains requirements related to proper loading of railcars, inspection of rail equipment, and placard requirements, among many other topics. The document explains the requirements, the consequences of not adhering to requirements.

The CN, UP, and the Alaska Railroad Corporation are all part of the TRANSCAER® (Transportation Community Awareness and Emergency Response) organization. Records regarding safety performance and the commitment to safe transportation through communities were reviewed and found to be consistent with Cyanide Code requirements. Rail transport is generally understood to be safer than truck transport. The Association of American Railroads (AAR) evaluations have stated that trucks are 16 times more likely to be involved in an accident than trains. For this reason, DuPont ships via rail rather than truck when possible.

For cyanide transport to destinations in Alaska, DuPont contracts the Union Pacific Railroad (UP) to move NaCN in intermodal containers to Seattle where the Alaska Railroad Corporation (ARRC) takes possession and the containers are loaded onto special railcars used for rail-barge shipments to Whittier Alaska by Alaska Marine Lines (AML). In Whittier the railcars are moved on the ARRC and taken to the Alaska West Express (AWE) yard in Fairbanks and onward via truck to Alaskan mines (Fort Knox and Pogo Mine at the time of the audit). The on-site audit of Alaska West Express is the subject of a separate audit and report and is not discussed further here.

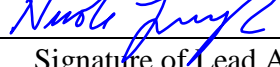
The Alaska Railroad Corporation (ARRC) is owned by the State of Alaska, but it is incorporated and run like a private business. The railroad operates year-round passenger service and freight

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train service from Seward to Fairbanks-North Pole. DuPont conducted a Due Diligence review of ARRC using a customized Cyanide Code protocol. According to information provided by ARRC and information available on the company web-site, ARRC has a strong safety, security and environmental program. Formalized policy statements for safety and environmental stewardship are in alignment with Code requirements. ARRC has consistently received environmental stewardship-related awards since 1993 and they are committed to continual improvement through significant capital projects that are listed on the company web-site.

Alaska Marine Lines (AML) is part of the Lynden family of companies; with Corporate headquarter offices in Anchorage, Alaska and Seattle, Washington. The Lynden companies received the EPA Green Star award for having strong environmental programs in 2009. A formalized policy statement for environmental stewardship posted on the company web-site is in alignment with Code requirements. The DuPont due diligence review of ARRC included a review of the AML barge portion of the transportation. DuPont tracks all accidents and incidents involving their product shipments and no accidents or incidents have been reported for either ARRC or AML since DuPont started using these companies in 1996.

DuPont visits its Alaska transportation partners at least every two years, generally at the same time as the two Alaskan mining customers. DuPont has confirmed through its interactions and due diligence reviews that its Alaska transportation partners operate in a manner that is consistent with Cyanide Code requirements.

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***DuPont U.S. / Canada Rail Carriers (including Barge) and Rail Yards -
Auditor's Finding***

Due diligence investigations have been performed so that it can reasonably be concluded that rail carriers (including barge) & rail yards used by DuPont for sodium cyanide shipments are

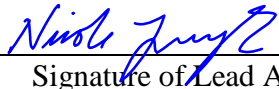
- in full compliance**
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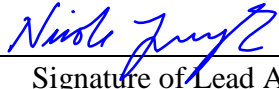
with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010

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 the Audit Reports accurately describe 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.

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Description of Due Diligence Information Reviewed for Rail Carriers, Barge Operator and Rail Yards

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 management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 1.1
substantially consistent
not consistent

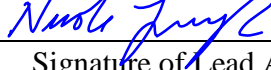
Summary of the basis for this finding:

DuPont started transporting Sodium Cyanide via rail in the 1980s. Transportation studies have shown that rail transportation of hazardous materials is significantly safer than truck transportation. The railway that services DuPont out of the Woodstock, TN location is the Canadian National Railway (CN), which is privately owned. The rail cars are interchanged to the Union Pacific Railroad (UP) at the Memphis, TN interchange yard. UP is also privately owned. There are no other choices of rail partners for the moves out of Woodstock, TN due to the fact that the railroads own the track that is used.

The point of loading rail box cars and hopper cars into the rail system is within the DuPont plant site. The facility was evaluated during the 2009 ICMI Production Certification Audit. The rail sidings are within the secure fence-line of the facility and there is no storage of loaded rail cars outside the secure point of loading. The railroads maintain control over routing and employ specific safety measures to ensure the safest transit of hazardous materials possible.

The point of loading cargo in inter-modal containers is Marion, Arkansas. The inter-modal containers are trucked to the Union Pacific rail head in Marion, at which point they are loaded onto a rail car. According to interviews, the security at all rail yards is very high. Truck drivers must be registered for each individual rail yard and entry into many yards, including Marion, is strictly controlled.

The current route of transporting sodium cyanide to Alaska was originally evaluated and chosen in 1996. Although a remote and very extensive routing over highways could be used to reach customers in Alaska, the more direct and safer routing that was chosen to transport cyanide to the Fairbanks, Alaska area is a combination of rail to Seattle, ocean (barge contracted by ARRC and operated by AML) to Whittier, rail to Fairbanks (to interim storage), and highway to the mine. The interim storage and truck transport operations are the subject of a separate audit and report.

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The Alaska shipments are trucked to the Marion, Arkansas rail yard and loaded onto the Union Pacific Railroad (UP) which transports the shipments to the Port of Seattle, Washington. From this point onwards, DuPont has contracted with the Alaska Railroad (ARRC) to manage the delivery (from the Port of Seattle to the Alaskan customers). DuPont performs a complete due diligence evaluation of the ARRC including the AML barge move every three years.

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 management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 1.2
substantially consistent
not consistent

Summary of the basis for this finding:

During this Due Diligence Review confirmation was made that the CN and UP railroads have continued to be certified Responsible Care® Partner companies for more than four years. As such, their training programs and employee qualification processes have been audited by a 3rd – party auditing firm and have been found to be suitable and effective. The fulfillment of required training is a specific requirement of the Responsible Care Management System (RCMS). Although no railroad training files are maintained by DuPont, information regarding the safety practices of the CN and UP railroads is maintained on file and was reviewed during the audit.

As part of DuPont’s due diligence review of ARRC and AML in 2010 it was confirmed that employees are trained annually in the transportation of hazardous materials. According to information provided by ARRC, it regularly trains its employees in the safe handling of hazardous materials and conducts regular emergency response drills – including drills involving NaCN.

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

The management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 1.3
substantially consistent
not consistent

Summary of the basis for this finding:

The CN & UP railroads have maintained Responsible Care Management System certifications for more than four years and undergo a full management system audit which includes a review that the preventive maintenance program for transportation equipment is suitable, adequate and effective. Equipment used in the transport route to Alaskan customers was reviewed visually

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during the due diligence audit and customer visit in 2010. No problems were noted during this DuPont on-site review of equipment and operations. The proper maintenance of rail equipment is also heavily regulated and inspected by the U.S. Federal government, which also helps to ensure fulfillment of rail equipment preventive maintenance and inspection requirements.

Additionally, DuPont tracks transportation incidents for all transportation modes throughout the world. The incident tracking database was reviewed during the audit. No rail transportation incidents involving sodium cyanide shipments have occurred in this supply chain in over 10 years.


DuPont ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during this audit and were found to be compliant. The LSI packaging operation was audited and certified to the Cyanide Code using the Cyanide Code Production Protocol in March 2006. LSI checklists and procedures require an inspection of the cargo, containers, and rail equipment to ensure that all equipment is deemed to be safe for transport.

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

The management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 1.4
substantially consistent
not consistent

Summary of the basis for this finding:

Limitations on worker hours in the U.S. rail industry are strictly regulated and enforced by the U.S. Government. DuPont contracts require transportation partners to adhere to all applicable regulations. There is therefore no need for DuPont to impose additional worker hour limitations in its contractual agreements. Detailed procedures, blocking and bracing diagrams, and checklists are used by DuPont and the LSI packaging operation during the loading of rail cars and inter-modal sea containers. U.S. Federal regulations require that railroads conduct random drug and alcohol testing and that drug abuse prevention programs are maintained. DuPont also has these requirements are part of its contractual standard terms and conditions. Records were available to demonstrate that the applicable ICMI Cyanide Safety Program requirements had been fulfilled. Barge operations, including worker safety programs are strictly regulated through a number of U.S. regulatory agencies including the U.S. Occupational Health and Safety Administration and the U.S. Coast Guard.

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

The management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 1.6
substantially consistent
not consistent

Summary of the basis for this finding:

DuPont uses a secure web-based rail car tracking system to track the movement of its rail cars. The movement of cyanide rail cars is tracked continuously. Interviews were conducted and personnel stated that appropriate actions are taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that location can always be confirmed. The database was reviewed during the audit and confirmation was made that rail cars are being tracked continuously and that DuPont has access to "real-time" information regarding the location and status of its rail shipments of cyanide. Shipping paperwork was reviewed and was found to be conformant to Code requirements, including chain of custody requirements. The following documentation is used to track inventory and movement of cyanide: bills of lading and shipping papers indicating the number of packages and amount of material. The abovementioned documents were reviewed during the audit. Rail companies maintain databases with MSDS information for the products they carry. This aspect of rail transportation is regulated and inspected by the U.S. Federal government.

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 management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 2.1
substantially consistent
not consistent

Summary of the basis for this finding:

There is no interim storage in this supply chain. The interim storage at Alaska West Express in Fairbanks, Alaska is the subject of a separate audit and report.

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

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

The management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 3.1
substantially consistent
not consistent

Summary of the basis for this finding:


Information for all three rail carriers and AML was reviewed to confirm that they have emergency response plans in place which include the prompt notification of all involved parties. DuPont provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

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

The management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 3.2
substantially consistent
not consistent

Summary of the basis for this finding:

DuPont offers immediate technical assistance for any cyanide spill, and offers emergency resources for spills that might occur near a DuPont site. DuPont contracts with CHEMTREC to ensure that appropriate notifications and emergency response is initiated if there is an incident.

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

The management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 3.3
substantially consistent
not consistent

Summary of the basis for this finding:

The CN, UP, and ARRC are all part of the TRANSCAER® (Transportation Community Awareness and Emergency Response) organization which helps with notifications requirements. DuPont contracts with CHEMTREC to ensure that appropriate notifications and emergency response is initiated if there is an incident on any rail or barge move.

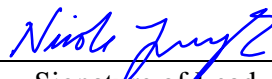
Transport Practice 3.4: *Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.*

The management of U.S. / Canada Rail & Barge Transport is: consistent with Transport Practice 3.4
substantially consistent
not consistent

Summary of the basis for this finding:

Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the DuPont Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the document. Interviews with DuPont personnel during this and previous Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. Page 7 of the Emergency Response Procedures specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water.

No information regarding this requirement was available for CN and UP. The Alaska Rail due diligence investigation concluded that ARRC uses the cyanide safety information and remediation information given to them by DuPont directly without modification.

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

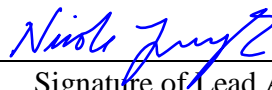
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U.S. / Canada Rail & Barge Transport is:	substantially consistent
	not consistent

Summary of the basis for this finding:

DuPont Cyanide Hotline personnel are periodically involved in drills performed by sites and transportation partners. Safety conferences are held with rail and ocean carriers periodically. The adequacy of emergency preparedness plans is one of the topics discussed at these conferences.

DuPont cyanide safety meetings provide the forum for the discussion and updating of response procedures and expectations. As part of the rail carrier safety programs such as TRANSCAER® (Transportation Community Awareness and Emergency Response), drills and exercises (not necessarily cyanide specific) are conducted to test response capabilities.

According to the ARRC due diligence investigation, ARRC and AML perform annual drills, as required by the State of Alaska. DuPont has and continues to observe and provide assistance in these drills.

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