

SUMMARY AUDIT REPORT



**ICMI Cyanide Code Principle 2
EDEWIT, S.R.LTDA
SUMMARY AUDIT REPORT
Cyanide Transportation Recertification Audit
Comas, Lima - Perú**

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



Geosoluciones Panamá, S.A.
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2017 Three year Cycled Audit

EDEWIT, S.R.LTDA
Name of Facility


Signature of Lead Auditor

February, 14th 2017
Date

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A- GENERAL SUMMARY

A.1 Information of the Audited Operation

Name of Cyanide Transportation Facility: EDEWIT S.R.LTDA.
Name of Facility Owner: EDEWIT, S.R. LTDA
Name of Facility Operator: EDEWIT S.R.LTDA
Name of Responsible Manager: Edgar Grimaldo Valentin López
Address: Calle Rio Caplina N°158 Urb Santa Isolina
State/Province: Country: Comas /Lima / Perú
Telephone: (511) 989589574 E-Mail: edgarv@edewit.com

(RECERTIFICATION AUDIT)

Location detail and description of operation:

EDEWIT S.R.LTDA., facilities are located in Comas, District of Lima, Republic of Peru.

Operation beginnings in 1976, when Mr. Valentin Rojas started Urban Transport Services to Milpo Mining Company, offering Light Cargo, Heavy Haul and Transport of Mineral.

It currently has mining clients, industrial and construction companies in the country, keeping a good history of services, with no accidents or major losses.

The new selection process for transport units indicates that the maximum vehicle age for units carrying cyanide is 15 years. Section 2.2.9 SGSST-PR-010 underwent modifications in its 2016 version.

EDEWIT invest in technological advances included in 2017, so that our equipment has modern security systems which we mention:

- ADR system, wire shielded eliminating the risk of fire by short circuit.
- Warning Light Seatbelt
- Air Bag
- Intelligent Auto Pilot
- Auxiliary lamp turning
- Rain sensor
- All of units are equipped with GPS
- Satellite Phon

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EDEWIT provides environmental health and safety system to their employees, having a Risk Management Program, applied to each of the areas, fostering a culture of incidents prevention and occupational diseases to ensure the workers welfare, care equipment, facilities and good environment.

EDEWIT have detailed hazard identification and risk assessment, developing programs of constant training drills, emergency response plan, where we have the participation of all our employees.

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A.2 Overall Auditor's Finding

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

This operation has maintained full compliance with the International Cyanide Management Code Throughout the previous three-year audit cycle.

Audit Company: Geosoluciones Panamá, S.A.



Audit Team Leader: Jorge Efrén Chong Pérez

Email: geosoluciones@cwpanama.net

Date of Audit: February 14th, 2017

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

I attest that this Summary Audit Report accurately 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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B- ROLE AS CYANIDE TRANSPORTATION

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

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.1
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

In 2014 EDEWIT, S.R.L. developed an assessment for 271 destinations, rather than just (11) eleven routes used to transport materials and/or hazardous waste. During the recertification audit I verified that the government entities information was updated based on new data. Healthcare centers were also classified and divided in two categories: hospitals for insured government employees of Peru called "ESSALUD" and hospitals belonging to the Health Ministry (MINSA) which provide general healthcare for every person without distinctions.

In terms of security, EDEWIT evaluated 1300 police stations approximately.

The first eleven routes approved by the Ministry of Transport and Communications (MTC, for its Spanish acronym), with Directorial Resolution 026-2013-MTC/16 were expired. The current Resolution in force is 076-2015-MTC / 16, which went into effect on February 4, 2015 until May 29, 2019. The hazardous materials permit for 271 destinations will also expire on May 29, 2019.

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The 271 new destinations are included and described in SGSST-PDC-001(Emergency Response Plan).

The routes initially approved were:

Colquijirca, Corona, Marhtunel, El Porvenir, Atacocha, Argentum, Paragsha, Yauricocha, Caraveli and Pampa de Cobre which are still in used.

The routes´ latest update is January 2nd, 2014.

EDEWIT has created an electronic link system in which a hyperlink redirects the user to a route map instantly.

Procedure SGSST-PR-021, section 2.3 for route selections development by EDEWIT did not change in 2017, except that the term "high risk" is changed to "irrational risk".

Section 3.2 makes the route sheet according to SGSST-FT-027 possible routes to follow. This form was not changed.

Section 3.3 Identify hazards and assess risks according to SGSST-FT-019 FORMAT OR IPER possible routes to follow; this form remains unchanged.

Section3.4 Record the routes in the database according to SGSST-FT-035 DATABASE, This format remains the same. The auditor reviewed an excel file containing the following:

Workers' information, EPP history, training history, traffic violations history, registration of government entities, transportation processes maintenance including bill of lading records. The file is also used to record mechanical maintenance for the different equipment: Volvo, DAF and Kenworth. Maintenance manager, Dennys Valentín, is in charge of general preventive and corrective maintenance. He is also in charge of brakes, fluid and lubrication maintenance and repair of load bed platforms or chassis. The records are based on SGSST-PR-016 procedure, which states to follow the manufacturer's recommendations. A Volvo Manual was reviewed and after that the maintenance manager was interviewed. He stated that all maintenance services of the units are carried out according to manufacturer´s instructions.

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Section 3.5 Select the route according to the two documents that represent the lowest risk to the process of sodium cyanide transportation. The structure of route descriptions remains unchanged.

In the route sheet will consider the analysis of at least the following hazards:

- Population density.
- Construction of the road.
- Route kind.
- Condition of the road.
- Proximity to water bodies.
- It includes additional telephone numbers of government entities as well as radio station frequencies on one-way routes in case of emergencies.

The criteria used for evaluation of the route is according to traffic density, cities, bridges, canals, road conditions, route design (curves, berms, number of lanes), altitude, crossroads, detours, weather conditions, and the socio-political conditions being in compliance with the provisions of the Code.

In the 2017 version hazard assessment report (IPER) for each of the two hundred seventy one (271) routes, there were identified some aspects considered as major risks.

Maps of the routes identified in the hazard assessment report (IPER) of the Emergency Plan (called "Plan de Contingencia" as peruvian national glossary) were included and updated "by quadrant". Graphically every quadrant includes the location of the cargo destination mines, fire stations, Health Ministry (MINSA) hospitals and ESSALUD. This is to ensure important information is at hand in case of emergency such as the location of the mine or project nearby to provide support.

The first version of the ERP approved by D.R. 026-2013-MTC/16 included approximately 120 telephone numbers of government entities for emergency response. The second version approved by D.R. 076-2015-MTC/16, includes approximately 1,500 registered telephone numbers of government entities and 673 radio stations (one-way communication) for emergencies.

The risks are discussed in the Risk Matrix, where Hazard Identification, Risk Assessment, and determining controls are described.

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Section 2.2.14 SGSST-PR-021 indicates the frequency and procedure to reevaluate route selection. Since 2013 the only change is the term high risk for irrational risk.

The evaluation of the route will be regularly updated by EDEWIT to find new significant hazards or risks to the trip report to be presented at the end of each of the customer services.

No significant additional risks in EDEWIT routes were found since 2013 audit.

The objective of evaluating the route to be developed is to provide drivers the safest routes on the way to the client. Drivers always have access to the latest information on the conditions of the recommended route, safety information, and relevant situations.

Escort personnel and supervisors provide detailed information of the transport journey in the trip report form SGSST-FT-40 to correct or improve any aspect of safety or environment.

The documents resulting for evaluations, developed for each route indicated in the scope of this Emergency Response Plan, called "Plan de Contingencia" as peruvian glossary requirement are:

- Risk Matrix.
- Distance, speed, and time traveled during transport.
- Quadrants maps (*)
- Route sheet and description

(*) With the approval of the latest ERP last November 2014 graphic routes are eliminated and quadrants maps mentioned on page 225/1106 of the Plan become effective. The maps include healthcare centers, fire stations, police stations and mines.

EDEWIT has re-evaluated and documented the risks and the measures taken on the new selected routes, as well has increased emergency centers assistance such as primary health centers, ambulances, police stations; based in travel reports.

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EDEWIT continues using letters form SGSST-FT-0029, even to communicate to fire stations and medical centers.

On August 15, 2014 The “Communication to government entities” procedure SGSST-PR-009 underwent some changes. The frequency of letters delivery to communities was changed from 1 year to 1-2 years and will be sent electronically.

On August 12, 2016, the communication channel was modified; it could be either in hard copy or electronic. This decision was taken because EDEWIT never received any feedback or response the first two occasions hard copies were sent out.

For all hazardous materials transport (including sodium cyanide), EDEWIT has a control room based in Callao and use escorts in all circumstances. However, as the amount of customers increases control bases depend on the location of the customer to whom the service is provided.

EDEWIT continues to use its long time GPS service provider and has incorporated three new GPS services providers as well. All providers use the same mapping by quadrants platform.

SGSST-EST-003 standard applied requirements for the escort unit for the transport of cyanide specifications was modified for escort emergency equipment such as signs; first aid kits and tool kits were standardized.

EDEWIT provided information (MSDS, Emergency Response Plan and product information) to support emergency health centers, fire companies and authorities along the above routes, and received a signed letter with that information. This activity is carried out for external support centers that should be prepared for emergencies. EDEWIT continues sending hard copy and electronic letters to all external responders. It is mandatory within Peru legislation to provide medical care and attention.

EDEWIT, S.R. LTDA does not subcontract other companies to transport Sodium Cyanide.

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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.

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.2
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

EDEWIT has consistently maintained defensive driving training courses, thus, keeping all pertaining personnel with valid licenses.

The Annual Health and Safety Program indicated by document SGSST-PROG-001, Section 5 provides programming courses, as well as the progress achieved in accordance with the goals. The training program has remained unchanged with 9 basic courses including Defensive Driving.

EDEWIT personnel have continued with regular training in cyanide handling. Training records of the Safe Handling and transportation of Sodium Cyanide course were verified and reviewed according to national and international regulations.

Jaime Urbano, truck driver, was interviewed about his training in equipment inspection. He answered positively.

EDEWIT, S.R. LTDA. does not subcontract other companies to transport Sodium Cyanide.

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

This operation is

- ✓ In full compliance
- In substantial compliance Transport Practice 1.3
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Units are registered and approved with the Ministry of Transport and Communications (MTC) for the transport of hazardous materials, where only equipment designed and maintained to operate with the load is accepted.

According with an interview with maintenance manager, EDEWIT has incorporate Volvo, Kenworth y DAF trucks as recommended by suppliers, platforms trailers to which provided maintenance according to manufacturer's specifications, purchased with load capacities which are certified for transport of sodium cyanide by the Peruvian government.

In accordance with legal requirements in Peru, every semester trucks and flatbed platforms or chassis are inspected by a third party company, Revisiones Técnicas del Perú-RTP, in order to apply for the "Peruvian National Vehicle Technical Inspection Certificate". EDEWIT surpasses the requirements of the norm related to brakes efficiency (over 60%). Platform pins are inspected with containers on it. Platforms functionality is periodically inspected.

During the past three years the document for inspections SGSST-FT-022 has been updated two times, on June 16, 2014 and February 1, 2017. Vehicle inspection records were reviewed, without significant nonconformities

According to Supreme Decree 058-2003-MTC, all cyanide suppliers generating the cargo, issue a certificate of weights and measures verification. The supplier or generator of the cargo must certify capacity and dimensions of the cargo to be transported, which is then verified by the transporter.

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EDEWIT, S.R. LTDA does not subcontract other companies to transport Sodium Cyanide.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.4
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

EDEWIT has established a safe method for transportation, documented in form SGSST-FT-027, this format related to the route map, load and equipment inspection remains unchanged and in force since the 2013 audit.

Cyanide was classified by Decree Law 1126 of October, 2012 as a regulated and controlled chemical. The transporter is not allowed to open any cyanide cargo until reaching its destination; the cargo has controlled numbered seals.

Before the trip, in the three visible sides of the containers are placed UN, DOT, and NFPA diamond number. Peruvian law complied with Supreme Decree 021-2008-MTC Regulation for the transport of hazardous materials and waste.

EDEWIT standard procedure SGSST-EST-010 provides the detailed specifications for the labeling; this procedure has not changed since 2013. Additionally to it the load inspection check list form also requires the driver to verify all placards and signs.

EDEWIT implements SGSST-FT-022 Pre Trip Check list and SGSST-FT-023, escort vehicle check for sodium cyanide transportation.

Both documents for trucks and escorts inspection remain unchanged, since 2013.

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EDEWIT has a maintenance program that was modified in 2014 to comply with the manufacturer's equipment maintenance program instead of every 10,000 kilometers.

According to Peruvian Supreme Decree 009-2004-MTC all drivers must rest at least (8) hours before a trip and not driving more than (12) hours a day for the transportation of hazardous materials.

The transportation schedule was modified in August 15, 2015; before it was from 6:00 a.m. to 6:00 p.m. Transportation is currently taking place as long as there is visible natural light.

According with SGSST-PR-011 the escort supervisor must notify the safety officer to stop the transporter operation, in case any event puts in risk the load, drivers or the environment, and go ahead order when conditions are safe.

According to SGSST-PR-017, is prohibited for all drivers and convoy members the consumption of alcohol, drugs or any medication that may affect their performance. On August 12, 2016 the drug test procedure had a modification in terms of tests frequency, every 24 months, randomly, after an accident or reasonable doubt. Alcohol test remain for every transportation process.

Section 3.6.6 SGSST-PR-011 states that the escort supervisor and second supervisor will be in charge of controlling the driver's alcohol consumption in the presence of all personnel involved in the transport process according to SGSST-FT-042 Alcohol Consumption Control.

Zero tolerance to anyone above 0%, any case will be immediately reported to the occupational health and safety supervisor in order to take action.

Records of alcohol tests were reviewed.

EDEWIT has documents and evidence of inspections, maintenance, alcohol testing, as well as pre and post-cyanide transport records. SGSST-PR-002 Documents control established 20-year file retention time.

EDEWIT does not subcontract other companies to transport Sodium Cyanide.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.5
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

EDEWIT, S.R. LTDA. does not transport by sea or air.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.6
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

EDEWIT has a communication procedure in order to be in contact with all transport units and a GPS system as an alternative, radio and cellular pathway that ensure full coverage during movement and fully connection to the control room that has its base in Callao. Moreover, this system continuously provides the position of each vehicle at all times.

EDEWIT has installed security cameras inside the transport units' cabins to maintain audiovisual communication between the driver and command center.

Based on document SGSST-FT-022 it was verified the communication equipment functionality. Satellite telephone service integrity was verified at the provider's facilities. Camera functionality in units DAF ANC839 and Kenworth C5C856 was verified.

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Units' Camera functionality parameters are governed by program SGSST-PROG-002.

EDEWIT has identified areas without cell and radio coverage, in these areas the convoy makes use of satellite equipment: "La Oroya 15 Kilometer (Km) interval, Junin (15 Km interval) and Chicla (15 Km interval). The following blind spots have been identified within the past three years: Cajamarca (gallito ciego), Arequipa (entre Sibayo y Calloma).

The system has GPS location updates in real time, in areas without GPS coverage it saves information transmitted, then after passing vehicles. By procedure SGSST-PR-011 transport development process is established the escort control, and all the documentary control and chain of custody to ensure the cargo tracking from origin to final delivery.

All operations in progress are reported in the SGSST-FT-039 format, real time images of the road are generated.

The bill of lading and reference guide ("Guía de Remisión del Remitente y Guía de Remisión del Transportista" is part of shipping records.

Starting from 2015 all reference guides must be electronically issued as required by SUNAT (Peru tax collector entity).

With the sender documentation from the vendor, it is delivered Data Sheet Material Safety to the transporter company.

The sender reference guide should be preserved and stored by the carrier for not less than five (5) years.

The electronic shipping record indicates product name, number of the United Nations (UN), and number of packages transported. Data of origin and destination of the cargo, number of security seal.

As required by the government of Peru it is mandatory to carry the Material Safety Data Sheet during transport. This is included in EDEWIT transport procedure checklist.

EDEWIT, SR.LTDA does not subcontract other companies to transport Sodium Cyanide.

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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.

This operation is: THIS PRACTICE DOES NOT APPLY TO THIS OPERATION.

- In full compliance
- In substantial compliance Transport Practice 2.1
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

EDEWIT, S.R.LTDA transportation operations do not involved the use of interim storage facilities.

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

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 3.1
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

EDEWIT has an Emergency Response Plan updated in November 1th, 2016 called as per Peruvian government glossary “Plan de Contingencia para el Transporte de Cianuro de Sodio”, Procedure SGSST-PDC-001. The plan was updated through Directorial Decree No. 076-2015-MTC/16. Route maps were updated by quadrant, the amount of general care centers increased as the list of telephone numbers of help centers.

The current plan underwent improvement including new location coordinates and government entities telephones. The mining units are included in the Plan by geographical coordinates.

EDEWIT Emergency Response Plan (ERP), approved on November 1st, 2014 takes into account the sodium and potassium cyanide chemical properties based on the Safety Data Sheet Product.

EDEWIT’s PRE takes into consideration cleaning and detoxification methods during cyanide loading, unloading and transportation. The emergency response procedure (PRE) and the actions to be taken are described in the control measures.

EDEWIT has developed a risk matrix and road map by quadrants. Section 3 of the Plan updated in November 1st, 2014 considers locations of possible risk sites and possible responses or actions to be taken while passing through those sites.

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Chapter IV of the Emergency Plan established the parameters for emergency response planning. The organization focuses its efforts and provides the necessary resources for the implementation of preventive and response procedures, systems, manuals and practical improvements based on internal and external experiences of the organization.

EDEWIT has established in the Emergency Plan the specifications to select the vehicles used to transport hazardous materials and / or waste. Those vehicles are in compliance with the Peruvian Law and their characteristics are included in the corresponding permit.

All emergency response actions included in section 4.4.2 of the Emergency Plan (SGI-PDC-001) are based on the risk matrix developed during the loading, unloading and transport of cyanide.

- Vehicle accident.
- Criminal acts, assault, sabotage, terrorism.
- Collision
- Fall and / or spillage of material or residue.
- Collision against objects and / or people or animals.
- Collision or rollover without potential loss of load.
- Social conflicts / Disturbances.
- Contamination of air, soil and / or water.
- Roads out of service (landslide, mud, rock fall).
- Illness of the driver.
- Explosion.
- Fire.
- Intoxication.
- Malfunction of the vehicle.
- Damaged bridges.
- Earthquake.
- Electric storm.

The control measures are established in section 3.2 of the Plan, based on those measures specific procedures are followed in the Emergency Response Procedure "PRE". Depending on the level of gravity of the incident the guide describes in detail the procedures to follow.

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Pages 685-688 of “PRE 14” detail the sequence of actions to follow in case of cyanide spills in dry or wet surfaces and bodies of water; also include treatment in case of poisoning.

Currently, there is a mandatory request by the government of Peru which forces EDEWIT to provide and maintain the means and response personnel for emergencies.

Section 2.3 of ERP establishes the emergency levels depending on the severity of the incident, risk of human lives, property and/or the environment.

Level I (Incident)

- Minor emergency that can be controlled by EDEWIT, without external assistant.
- Controlled by own resources.
- Any incident in route (mechanical failure, collisions with animals, etc.).

Level II (Emergency)

- Emergencies that affect the driver, the transport unit and merchandise.
- Controlled by external assistant.
- Involves the intervention of support agencies (Police, fire, health) and local authorities.

Level III (Crisis)

- Emergency that must require local or regional external support, from sender and the transporter, including authorities and communities. These kinds of incidents could bring attention to the international media.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 3.2
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Section 4.0 of the Safety and Environment program establishes the required training for all personnel such as defensive driving, hazardous materials, emergency planning, firefighting, accident investigation, and reporting. Procedure SGSST-PR-006 establishes skills training.

On December 2014 Training in Emergency Communication and Control was issue to personnel.

Drivers and supervisors of the convoy including the escort are the first responders in case of an emergency. Section 2.1 of the current Emergency Plan indicates the organization of emergency responders.

By creating and organizing an Emergency Management Committee (“CME”) EDEWIT SRL guarantees effective response prior, during and after an emergency. This committee has specific responsibilities widely spread to all concerning personnel.

According to the SGSST-EST-003 “Sodium Cyanide Escort Equipment” form latest version of February 2017 each truck has the required emergency response equipment. It also details other items each truck must have during transport. Records were verified.

EDEWIT included in its emergency response plan to have all required response equipment available for both the escort units and the transport units. SGSST-EST-002, SGSST-EST-003, SGSST-EST-004, SGSST-007 and SGSST-008 procedures updated on February 1, 2017 detail all required equipment in the transport units: spill and containment kit, first aid kit, personal protection equipment and communication equipment.

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SGSST-PR-006 procedure states that all transportation unit drivers and emergency response personnel are part of an initial induction to safety and the environment. They also receive regular reinforcement refreshers about cyanide spills and their responsibilities during an emergency, records from Emergency Control and Communication refreshers were verified

The SGSST-PR-052 procedure establishes an inspection and maintenance plan for the emergency response equipment, tools and accessories. Responsibilities are delimited within the plan which also includes a flowchart sequence of inspection in transport and escort vehicles and require the correction of defective equipment.

The emergency equipment standards were expanded and the inspection criterion divided in two rigor criteria which depend on how critical their use may be at any given emergency situation.

A new procedure to inspect and test satellite telephones, fire extinguishers and cyanide antidote was established.

A new procedure to register defective equipment was established.

The SGSST-EST-002 and SGSSST-003 updated standards establish all required emergency equipment for the transportation and escort units. Both procedures were updated.

EDEWIT, S.R. LTDA does not subcontract other companies to transport Sodium Cyanide.

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

This operation is

- In full compliance In full compliance
- In substantial compliance Transport Practice 3.3
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

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During an emergency notifications and flow actions are indicated in section 2.2 “Communication Diagram” in page 40/1103 of the Emergency Response Plan updated on November 1, 2016.

Section 2.1 establishes the Emergency Management Committee organization chart which lists the telephone numbers of every emergency response personnel including drivers and government institutions. In the communication route, the communities would follow guidelines indicated by the Civil Defense. All transport units have the list of all emergency telephone numbers of the support institutions.

Section 2.4 of the Emergency Response Plan establishes guidelines the Emergency Management Committee (EMC) including drivers must follow BEFORE an emergency happens, for example verify that communications are available. The EMC as Head of Safety, Health and Environment, is also responsible for keeping updated contact numbers of internal and external support personnel.

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

This operation is

- In full compliance
- In substantial compliance Transport Practice 3.4
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan, from Annex 4/PRE 14, page 685-688/1106 states the actions to be taken in case of cyanide spills caused by a driver or any other emergency response agent and describe how the recovery will take or neutralize the solid, the decontamination of soils or other contaminated media.

Emergency Response Plan updated on November 1st, 2016, Annex, page 688/1106, section 4.1.9.3, establishes: prohibit the use of chemicals to treat cyanide that has been released into surface water.

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

This operation is

- ✓ In full compliance
- In substantial compliance Transport Practice 3.5
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The period of review and evaluation of this Emergency Response Plan, is at least once a year. The Plan has been revised in 2014, 2015, 2016 and the next revision will be on November 1st, 2017.

Drills are performed to annually test the response systems and their procedures in order to verify effectiveness and propose improvements. They also help determine the need for greater understanding when managing ERP.

In order to test the ERP a drill must be performed at least once a year as stated in section 4.7 page 504/1103 of The Emergency Response Plan.

Drills must include all areas involved in the Plan. After it is finished a report must be issued including the development, performances and important recommendations. The findings and lessons learned due to significant incidents during the drill are used to improve the performance of the plan.

Several periodic drills were performed on July 20, 2014; May 28, 2016; and November 15, 2016.

The drill on July 20, 2014 was an overturned unit with sodium cyanide on a highway. The report showed strengths and weaknesses, as well as action plans to correct the findings.

The drill on May 28, 2016 was a big bag rupture during the discharge of cyanide.

The drill on November 15, 2016 was an overturned transport unit.

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