

***Cyanide Transportation
Summary Audit Report
For The
International Cyanide Management Code and
Niquini Logística e Administração Ltda / Brazil***

www.cyanidecode.org

April 2020

The International Cyanide Management Code (hereinafter “the Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.

RECERTIFICATION SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

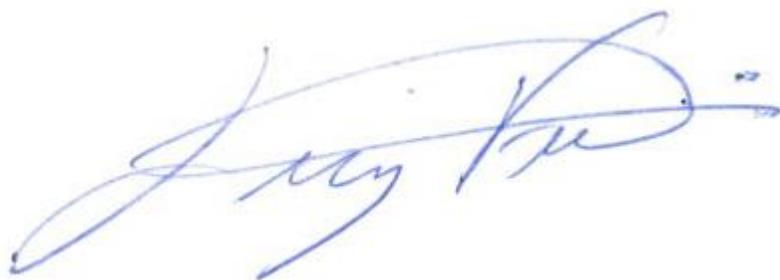
1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.
3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:
International Cyanide Management Institute (ICMI)
1400 I Street, NW, Suite 550.
Washington, DC 20005, USA
Tel: +1-202-495-4020
5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.
7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.

RECERTIFICATION SUMMARY AUDIT REPORT

Name of Cyanide Transportation Facility: Niquini Logística e Administração Ltda
Name of Facility Owner: Niquini Logística e Administração Ltda
Name of Facility Operator: Niquini Logística e Administração Ltda
Name of Responsible Manager: Dário de Souza Niquini
Address: Rodovia Fernando Dias km 482 s.n (Betim)
State/Province: Minas Gerais
Country: Brazil
Telephone: (55+31) 35399400
Fax: (55+31) 35399503
E-Mail: niquini@niquini.com.br and diretoria@niquini.com.br

Location detail and description of operation:

The Niquini Logística e Administração Ltda operation is focused on the road transportation of cyanide for gold mining operations, without interim storage. The operation is located at Betim town a city located in Minas Gerais, in southeast Brazil. It is 30 kilometers far from Belo Horizonte the capital of the state of Minas Gerais. The access is by a very good-asphalted road. Niquini Logística e Administração Ltda transports solid cyanide from the plants of Proquigel located on Camaçari and Candeias cities (both of them at Bahia State) which are Brazilian cyanide producers certified under Cyanide Code.to gold mines such as Kinross located at Paracatú in Minas Gerais, and from Santos port in São Paulo to Anglo Gold Ashant (Queiroz and Santa Bárbara plants) in Minas Gerais. The operation has a SHEQ management system certified in accordance to SASSMAQ protocol, established by ABIQUIM - the Brazilian Chemical Industry Association. Evidenced Conformity Certificate number 167.046.19 in which ABNT (Brazilian Technical Standards) grants the Certificate of Conformity Assessment System of Health Environmental and Safety Quality to Niquini Logística e Administração Ltda implemented for the following activity - Road Transportation of dangerous chemical products evidenced in the unity located in Rodovia Fernao Dias km 482 – Jardim Piemonte Norte ZIP Code 32689-898 – Betim MG meeting the requirements of the Standard Manual SASSMAQ 2014 first concession dated on December 18, 2015 and with validity period from September 13, 2019 to September 13, 2021.



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Auditor's Finding

This operation is:

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

During the previous three years certification cycle, Transportes NIQUINI Ltda. did not experience any significant cyanide related incidents nor any compliance problems related to cyanide transportation management.

- * For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Auditing Company: Ferreira & Cerqueira Ltda.

Audit Team Leader: Luiz Eduardo Ferreira (ICMI qualified lead auditor and transportation qualified TEA (technical expert auditor)).

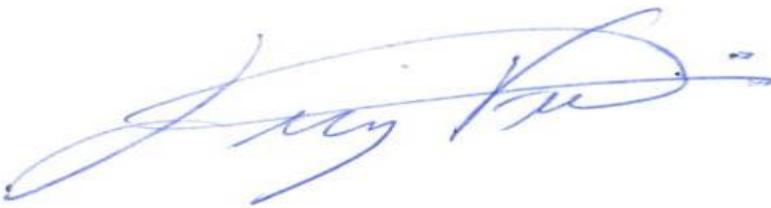
E-mail: luizeferreira2015@gmail.com

Names and Signatures of Other Auditors: not applicable

Date(s) of Audit: 11.03.2020 ~ 13.03.2020 (on-site) and 14.04.2020 (off-site).

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

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



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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/Deficiencies Identified:

Evidenced that Niquini Logística e Administração Ltda defined, documented, implemented and maintains internal documented procedure PST 01 – Avaliação de Riscos PO - 09 - Planejamento de rota which provides methodology to identify and select appropriate and safer routes to transport the cyanide considering parameters such as the population he route, the infrastructure (asphalt, double or single speedway, gas stations, police stations, emergency stations, hospitals, communication, shadow areas for communication), the condition of the route (under maintenance, holes, without asphalt), weather conditions (such as fog, fire, rain) and surface waters (rivers, creeks, lakes). Records of selected routes evidence that the selection of routes were performed in accordance with ICMI's Principles. The process of updating of selected transport routes is performed in maximum frequency annually. Evidenced that Niquini Logística e Administração Ltda selected two possible routes (one main and one alternate). Documented procedure PST 01 – Avaliação de Riscos defines how to identify, evaluate and establish controls to mitigate hazards and risks to environmental, safety and occupational health. Several controls such as all vehicles are equipped with tachograph (speed limit), driver qualification and training, truck maintenance, pre-traveling brief with the driver, planned transport observations, full time monitoring of the truck from a remote station limited traveling time in accordance with Brazilian Law 13.103. The conditions of the selected routes are constantly evaluated since in the end of each travel, the driver records on a record named as Diário de Bordo his perceptions about the route conditions. This travel report is reviewed by the operations officer and, when necessary, the route plan is updated and the risks re-evaluated. Track traffic conditions, points allowed to stop and overnight, authorized supply points, places with sharp curves, places with winding track uphill and steep slopes, bridges and rivers, risk of accidents, checkpoints, locations requiring special permits for transit, allowed speed for trucks, pedestrian crossing sites, local animal risk on track, emergency telephones of the places, population data are considered to select pertinent routes. The travel plan identifies all existing risks at the routes.



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Noted that drivers issue a record named "Check list de equipamentos de segurança veicular obrigatórios para transporte de produtos perigosos in accordance with Brazilian regulations - Decreto Federal 96044.and Portaria 204. The above-mentioned check list includes items related to: documentation, of drivers, documented procedures such as Driver's manual, Emergency Plans, identification and number of truck, safety placards, personal protective equipment (PPE), capacity truck, United Nations Organization - UNO number, emergency kits, safety equipment, driver data, product vendor data, observations and signature of the responsible. Niquini Logística e Administração Ltda established, implemented and maintains internal documented procedure PO-31 – Route evaluation after each road cyanide transportation. Responsibilities and authorities are clearly defined. Evidenced duly implemented. And, when necessary,, contacts the Brazilian Federal Road Policy, the tracking contractor Onix Rasreadores (the GPS signal provider) , the roads administration contact in order to define the route and avoid potential problems along the selected route. Niquini Logística e Administração Ltda implements a 24 hours monitoring of trucks by Ambipar Due to good road transportation conditions it is not used convoys since the risk analysis indicates that is not necessary this type of control. Observed that the Company communicated the Brazilian Federal Road Policy as well as medical facilities, the road administration authorities, the insurance company and the emergency responders their roles in an emergency involving the cyanide transportation. All the cyanide transport activity is performed by the operation own drivers and trucks.

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/Deficiencies Identified:

Evidenced that Niquini Logística e Administração Ltda established, implemented and maintains internal documented procedure PRH 01– Training which defines how planning, providing and recording training. activities All new employee has to do an induction training being instructor The Work Safety technical. Besides all cyanide involved personnel has to be trained about risks related to cyanide before perform activities with this chemical product.

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The operation only uses trained and licensed drivers as required by the applicable legislation for the road transport of dangerous products including sodium cyanide. The Drivers's Manual contains several kinds of information such as Brazilian regulations, Cyanide Code and technical data provided by Proquigel (Brazilian cyanide producer which is certified by ICMI. It includes – safety handling of cyanide, chemical and physical properties, first aids related to cyanide, protective Personnel Equipment – PPE, Packaging conditions of solid cyanide, international labeling of cyanide, marine pollutant from cyanide, production of cyanide, Stability of cyanide, Types of cyanides, Toxicology related to the cyanide, Exposition levels to HCN and consequences, , how to treat areas cyanide-contaminated. Protective masks 3SE and filter ABEK CO NO ST, Evidenced that all drivers were trained about Driver's Manual. Besides noted that all drivers have a specific driving license type " E". Beyond this legal requirement, Niquini Logística e Administração Ltda established health requirements to the drivers, psychological evaluation, education requirements and experience. defensive driving) and provides annual refresh training, including first aid and emergency procedures related to cyanide and driver's operation manual. The occupational health certificate named ASO (occupational health certificate) were reviewed and found that are duly established. Also evidenced that the drivers received a specific training on the routes that are used to transport cyanide. All the cyanide transport activity is performed by the operation own drivers and trucks.

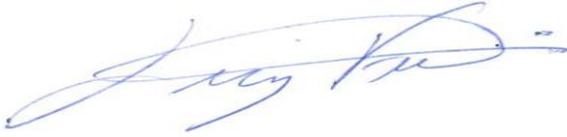
Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

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/Deficiencies Identified:

Evidenced that Niquini Logística e Administração Ltda uses twenty-five trucks for transportation of sodium cyanide. During the field audit noted that the maximum load capacity of each truck is clearly identified. Evidenced that trucks have lockers, without wall and specific to transport containers. Truck licenses are updated as required. .According to the Brazilian legislation all trucks used to transport chemical products shall be inspected by a public authority in order to be approved to transport such kind of products.

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Evidenced that all trucks are licensed as required through pertinent CIV – Certificado de Inspeção de Veículo. This inspection shall be done yearly and was observed that Niquini's trucks are with CIP duly updated. Records of periodic inspections were reviewed and through field audit provided evidence that Niquini Logística e Administração Ltda only uses equipment designed and maintained to operate within the loads defined. Evidenced that Niquini Logística e Administração Ltda established internal documented procedure PO -8- "Manutenção corretiva e preventiva dos veículos e equipamentos". Noted that it defines the methodology for preventive maintenance. It is required that preventive maintenance are performed by mileage in accordance with the required by the truck manufacturer. Maintenance are performed by companies previously evaluated and qualified in accordance with Brazilian regulations. Before loading the cargo container, the driver reviews the transportation documentation in order to verify the cargo weight and confirm that the truck is capable to transport. According to Brazilian transport legislation, there is a maximum load capacity allowed per truck to transit in the roads. There are control points along the route to verify the cargo weight (weight stations) and to review the cargo documentation. Control points along the roads issue an weight record that is brought to the company with the transport documentation. All the cyanide transport activity is performed by the operation own drivers and trucks.

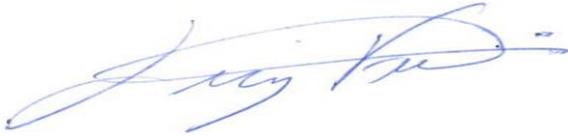
Transport Practice 1.4: *Develop and implement a safety program for transport of cyanide.*

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/Deficiencies Identified:

Evidenced that Niquini Logística e Administração Ltda have handling and inspection procedures as necessary to ensure that the cyanide is handled and transported in a manner that maintains the integrity of the producer's packaging. Internal documented procedure PO 10 – Inspecoes veiculares establishes that all trucks shall be inspected before loading the cyanide. Records of such inspections were reviewed and provided evidences that above-mentioned procedure is duly implemented. Drivers were interviewed and provided evidence of compliance with this provision.

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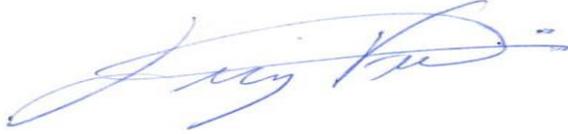


Besides, evidenced that ISO tanks have been inspected in accordance with Brazilian regulation. Records of such ISO tanks inspections were reviewed and provided evidences of duly implementation. According to the Brazilian legislation, the truck shall have, in four sides, standard placards indicating the nature of the chemical product being transported. The presence of such placards are verified before each travel and the results are recorded in a specific checklist. Evidenced during the field audit that the trucks have the required placards (signage). Niquini Logística e Administração Ltda defined and documented PO 10 - A vehicle inspection program of the truck before each journey, including the inspection of the truck, the inspection of the emergency resources, the inspection of the communication and tracking system, the inspection of the tachograph, the inspections of the PPE- personnel protective equipment, the verification of the driver and cargo documentation. Evidenced inspection records as stated. Verified that Niquini Logística e Administração Ltda implemented a effective preventive maintenance program for its trucks in accordance with truck producers requirements. The operation defined a maximum driving time of 10 hours, including one hour for lunch and a 30 minutes rest every 4.5 hours of driving. The driver is not allowed to drive at night. The working hours is controlled through the remote tracking station. The truck is specifically designed to transport containers and it has pin lockers, that are inspected by the driver before each journey, and prevent the containers from shifting. Evidenced during the field audit duly implemented. In accordance to the operation safety policies and the driver's operation manual, in the event of stormy or hard rain, wind conditions, ice rain, the transport activity shall be stopped or even not allowed to begin. The operation designed and implement a drug & alcohol policy, accepted by all drivers, in which all the drivers before the beginning of a journey pass through an alcohol detection test and annually, during the occupational health-monitoring program, the drivers pass through a drug detection test. Evidenced records of alcohol test duly implemented as required. Evidenced that Niquini Logística e Administração Ltda defined and implemented a process to manage all records related to its activities. All requested records were promptly retrievable and are adequately maintained by the operation, as previously mentioned. The truck is specifically designed to transport containers and it has pin lockers, that are inspected by the driver. before each journey, and prevent the containers from shifting. In the middle of the year 2017, Niquini performed a test with Unigel transport of liquid cyanide in ISO tanks, they had two incidents for failure in the structure of one of semi-trailer equipment and they were forced to stop with the tests, adjusted the equipment and returned to transport in the middle of 2018

All the cyanide transport activity is performed by the operation own drivers and

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trucks.



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/Deficiencies Identified:

This transport practice is not applicable to the operation scope. The operation scope is road transportation.

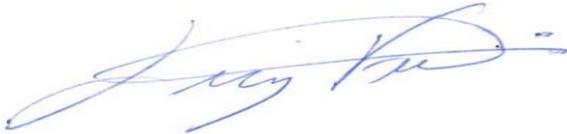
Transport Practice 1.6: *Track cyanide shipments to prevent losses during transport.*

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/Deficiencies Identified: (Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided).

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The transport vehicle is provided with tracking systems (on board computer), using GPS signal (supplied and managed by Onix Sat Rastreadores The driver is also equipped with a fast dialing mobile phone. Evidenced during the field audit duly implemented. The communication system (GPS, mobile phone, radio, pager is periodically tested to ensure it functions properly. The tracking system has no blackout areas. Evidenced during the field audit and through interviews with the drivers. As previously mentioned, the truck is monitored 100% of the time, by a remote control station, by the operation headquarters and the tracker provider.



Niquini Logística e Administração Ltda defined and implemented a chain of custody records management, according to the Brazilian law. The documentation is verified prior the transportation and before the unloading at the mine operation. Verified during the field audit duly implemented. The transport documentation clearly identifies the amount of cyanide being transported and the product MSDS is part of this documentation. All the cyanide transport activity is performed by the operation own drivers and trucks

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.*

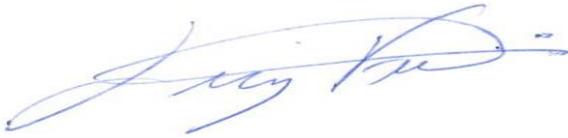
The operation is in full compliance with
 in substantial compliance with Transport Practice 2.1
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:**

This principle is not applicable to the operation scope because Interim storage is not practiced by Niquini Logística e Administração Ltda, During the transport, the truck is monitored 100% of the time and stops, at night, only allowed at pre-evaluated and approved stations along the route. The tracking system also blocks (remote turn-off) the truck engine if something different from the planned script (travel plan) occurs. Verified the track system records as well as the tachograph records duly implemented.

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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/Deficiencies Identified:

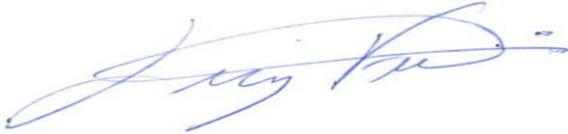
Evidenced that Niquini Logística e Administração Ltda has two Emergency Plans. The first one is named Ambipar's Emergency Action Plan - PAE valid until March 29, 2021. Ambipar's PAE include three pillars: prevention, preparation and response and it works 24 hours per day, seven days per week. The other Emergency Plan was defined and documented by Niquini Logística e Administração Ltda itself named as "Niquini's Emergency Plan for Cyanide Transportation" which contains specific actions related to cyanide transportation and that use guidelines provided by Proquigel (Brazilian cyanide producer) and Ambipar Response. Verified that it is specific for cyanide transportation routes, and transport practices, for the road transportation of cyanide as well as considers the physical and chemical form of the cyanide and specific for the truck configuration being used to for cyanide transportation. Evidenced that emergency response procedures consider the design of the transport vehicle, such as truck and trailer carrying shipping containers and/or ISO tanks. The plans describe the specific response actions that shall be applied to each emergency situation, such as accident with fire, fall into a river, cyanide leakage on a rainy day, among other specific emergency scenarios and describe the roles of several stakeholders that should be involved in the emergency response, such as road policy, emergency responders and rescuers, first aid stations along the route, reference hospitals, and environmental authorities.

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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/Deficiencies Identified:



Evidenced that Niquini Logística e Administração Ltda provided emergency training for Drivers, coordinators, emergency response members. Evidenced records of emergency response trainings duly established and maintained. Sampled examples of such trainings were: PAE – Plano de Atendimento a Emergência issued by Ambipar, Niquini 's Emergency Plan for Cyanide, Legislation on Road Transportation of Dangerous Products, Emergency Sheet and Transport Envelope, Drills, Defensive and/or Preventative Driving and Emergency Brigade. Evidenced that both above-mentioned plans include and clearly define the specific emergency response duties and responsibilities of involved personnel. All emergency related materials are listed in the Driver's Manual and are checked before each travel. The driver's manual defines the required emergency equipment that shall be available at the truck, such as face mask, gloves, flashlight, signage, fire extinguishers (ABC type), rubber boots, safety helmet and glasses, overall Tyvec, antidotes, brush, cords, MgO powder and plastic blankets. The emergency kit is inspected before each travel. The cyanide producer Proquigel (Candeias and Camaçari) provides the emergency kit to Niquini. It contains 10 ampoules of 25% sodium thiosulfate, 2 ampoules of 3% sodium nitrite, and 2 ampoules of 1% methylene blue. It is defined that sodium thiosulphate, amyl nitrite and methylene blue should only be used under medical supervision Evidenced records of emergency kit inspections duly established and maintained as required. Annually Niquini Logística e Administração Ltda provides initial and refresh training, as mentioned. The emergency kit is inspected before each travel. Evidenced records of emergency kit inspections duly established and maintained as required. All the cyanide transport activity is performed by the operation own drivers and trucks

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

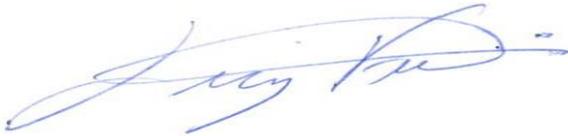
in full compliance with

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The operation is in substantial compliance with Transport Practice 3.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that “Manual do Motorista issued by Niquini Logística e Administração Ltda defines the methodology for notification of appropriate parties/ stakeholders in the event of a cyanide release or exposure during transport. It is available to all entities that may need to use them, and therefore they are included in the Emergency Response Plan – PAE.



The entities requiring notification are clearly identified in the Emergency Response Plan – PAE as having designated roles in the response such as road police, the cyanide producer, the cyanide buyer, Ambipar, Onix Rastreadores, hospitals, first aid stations along the route, environmental agencies, emergency responders, Brazilian chemical association. Emergency contact information are also available at the truck doors (stickers) and at the truck chassis (stickers also). This information is kept updated. During the field audit was verified for proper implementation and updating of information related to emergency notification. Reviewed PAE – Plano de Atendimento a Emergência issued by Ambipar and in Niquini 's Emergency Plan for Cyanide Transportation and both of them are updated and in accordance with Brazilian regulations as well as Cyanide Code Principles.

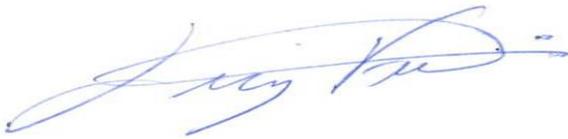
Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

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/Deficiencies Identified:

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Evidenced that Emergency Plans as well as “Manual do Motorista” –issued by NIQUINI clearly define the remediation procedures that shall be applied in the event of cyanide related emergencies. The disposition of contaminated residues is defined in accordance Brazilian Environmental Laws. Niquini Logística e Administração has contract with AMBIPAR RESPONSE chemical remediation company to provide this service to the transporter which is clearly identified in Niquini ‘s Emergency Plan for Cyanide Transportation so AMBIPAR can be activated as soon as practical. Evidenced that the mentioned plans clearly define that chemical products, such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide, are prohibited to be used in the event of solid cyanide releases in surface waters along the route



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/Deficiencies Identified:

Evidenced that Niquini Logística e Administração Ltda defined and documented that annually reviews and revise (if necessary) their emergency plans as well as also planned, on an yearly basis, several simulation activities related to their emergency plans, including one specific exercise in conjunction with the emergency responder expert, AMBIPAR RESPONSE,

Evidenced that Niquini Logística e Administração Ltda plans and implement mock emergency drills, related to its emergency plans and in conjunction with the emergency responder expert. Reviewed emergency drill plans for 2018, 2019 and 2020. (in

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conjunction with AMBIPAR. including the participation of external stakeholders, such as Brazilian Federal road policy, road administration rescue team, local firefighters)..

Evidenced that Niquini Logística e Administração Ltda after the emergency drills, review the drill result and, when applicable, the emergency plan is revised and updated. Sampled examples were: Emergency drill reports performed on May 22, 2018; April 24, 2019 and March 4, 2020.

During the previous three years certification cycle, Niquini Logística e Administração Ltda experienced four incidents related to cyanide transportation management that required emergency response by Niquini, Ambipar (external responder contracted), Proquigel (cyanide producer), police and SAMU (emergency medical service (this one only for the two last incidents). In all four incidents there was no leakage of cyanide. All incidents were duly investigated and determined the root cause analysis. Corrective actions were defined and implemented as stated. Procedures have been reviewed and revised. Training activities have been provided for all personnel related to the cyanide transportation.

It was not necessary revise neither Niquini nor Ambipar emergency response plan.

