

SAVAR AGENTES DE ADUANA S.A.

***Transport Operation
Lima, Peru***

***Summary Audit Report
for the
International Cyanide Management Code***

January 2020

This report was written by:

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Signature of Lead Auditor

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Name of Cyanide Transport Operation:	Savar Agentes de Aduana S.A.	
Name of the Company Ownership	Savar Agentes de Aduana S.A.	
Name of Operating Company:	Savar Agentes de Aduana S.A.	
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Location and Description of the Operation

Savar Agentes de Aduana S.A. (Savar) is a Peruvian corporation with 39 years of experience operating in the market, providing integral logistics and participating in national and international supply chains. Savar offers comprehensive logistics service, from storage, transport and customs agency.

Savar serves various sectors such as retail, agriculture, mining and infrastructure. It has around 1,000 employees and a fleet of more than 200 trucks. Among others, Savar transports sea containers in semi-trailers (tracts with bulk and mining hoppers), oversized cargo and hazardous materials.

The scope of this audit is the cyanide transport operation between Callao to mining clients. Solid sodium cyanide is transported in 20-foot sea containers packed in 1-ton Intermediate Bulk Containers (IBC) and 50 kg metal cylinder. IBCs and drums are placed in a way to prevent lateral movement within the container. Containers are received locked and tagged.

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Auditor's Finding

This operation is

- in full compliance
- in substantial compliance
- not in 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. The operation has not experienced any significant cyanide incidents, releases, or exposures during this period.

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Transportation Technical Auditor:	Maria del Pilar Arrese	Sign: 
Date(s) of Audit	January 7 – 8, 2020	

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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Detailed Audit Report

Principle 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 Transport Practice 1.1
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Savar has a process to identify hazards and evaluate risks of transport routes by mean of a spreadsheet, as required in the document *TRA-1 Emergency Plan for Hazardous Materials Terrestrial Transport* (Emergency Response Plan). During this process Savar identifies the road infrastructure, construction and conditions, social conflicts and potential for natural disasters; several routes were selected for transporting hazardous materials to different mining operations, among others.

During the audit it could not be verified this process considers the aspects required by the Code, such as infrastructure of the road, pitch, prevalence and proximity of bodies of water and fog. Savar reviewed this process and implemented the new spreadsheet SF-268.01 *Route Recognition and Evaluation* dated from March 3, 2020. The evaluations reviewed were following the Code, no additional information was required.

As required in the Emergency Response Plan, the carrier evaluates the risks of selected cyanide transport routes and take the measures necessary to manage these risks. Savar has the procedure *SP-126 Route Evaluation v01* dated from July 4, 2017 to assess the risks of the transport routes. The auditor reviewed several examples of risk evaluations performed for the cyanide transport routes, where the necessary measures were taken to manage the risks identified. Controls measures are documented in the roadmap assessments. Evaluations involve the Mining Manager, the Convoy Leader or the HSE Supervisor.

The procedure *Control of Documented Information* procedure indicates the documents and records, among others, must be updated at least annually. The route recognition and evaluation record indicates an effective date of 1 year. The Emergency Response Plan Contingency Plan states the roadmap is updated when relevant changes or conditions that may represent a risk in transportation are recorded and that a periodic tour must be

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made to update the roadmap. In addition, drivers on route report via WhatsApp application, images regarding the conditions of the route where cyanide is transferred, in order to provide feedback with everyone involved. The auditor reviewed examples of routes being reevaluated during the recertification period, finding it in compliance.

The transporter documents the measures taken to address risks identified with the selected routes in the same route evaluation sheet, the carrier indicates the control measures necessary to manage the route risks. Additionally, the control measures are established in the work procedure *Charge, Transport and Discharge of Sodium Cyanide*.

During the audit it was not possible to confirm the transporter, during the selection of routes, had seek input from stakeholders, excepting from its mining clients. Savar evaluates the route to be taken, which has been previously assessed by the mine personnel. After the audit, Savar incorporated into their Route Questionnaire fields to collect comments from the communities, other interested parties and government agencies, about risks inherent in the area. The auditor reviewed the routes assessment performed in March finding them in compliance with the Code.

As stated in work procedure for cyanide transportation, where routes present special safety or security concerns, or as required by the client, Savar trucks travel in convoy, with a pickup vehicle as escort to address the concern. Configuration of cyanide convoys are at least 3 trucks + 1 escort vehicles. The convoy may require one or more vehicles as an escort at the client's request.

The transporter has advised external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response. The auditor reviewed delivery documentation to the parties involved during the transport of Cyanide by means of letters delivering the Emergency Response Plan, stating they send the documentation of the emergency plan so that in any situation, they may have sufficient knowledge to support in case of a cyanide transport emergency. Deliveries have been made to firefighters, police and hospitals along the route.

Savar does not subcontracts any of the cyanide handling or transport operations. All operations are performed with the transporter trucks and drivers. The company does not outsource.

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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.

The operation is:

- in full compliance with Transport Practice 1.2
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Savar operates its transport vehicles with trained, qualified and licensed drivers. The company maintains documents demonstrating his drivers are qualified and have received adequate operational and safety training. Drivers are trained in firefighting, emergency response, defensive driving, first aids, hazards identification and risk evaluation.

Savar maintains records documenting that all personnel involved in the cyanide transport operation been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. Drivers have received adequate operational and safety training. Records were available to all current cyanide drivers to demonstrate that qualification and training requirements were met, including initial safety induction and training on cyanide the transportation procedure, among others.

Transport Practice 1.3:

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is:

- in full compliance with Transport Practice 1.3
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Savar vehicles are designed and maintained to operate within the loads to handle. Each vehicle transports one 20-foot intermodal sea container. The carrier works closely with its drivers to ensure that all equipment is suitable for the transport of cyanide. They use trailer loading checklists to ensure that trailers are suitable for transportation prior to loading any cargo and to ensure that loads are evenly loaded as well as blocked and braced. The tractors and trailers were found to be capable of carrying the loads for which they were being used.

Savar's procedure to assign the adequate vehicle starts when the cargo giver issues a record of weights and measures; Savar compares the load to receive against the official

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document "Table of Weights and Measures" issued by the Ministry of Transport and Communications, assigning according to this table and to the vehicle maintenance compliance, the appropriate vehicle to remove load. This procedure is managed through an own developed intranet application.

Savar has the procedure *Cargo Handling and Inspection Procedure* to ensure the vehicles are not loaded in excess of its design. It states for sodium cyanide only one 20-foot sea container can be loaded on a truck-semitrailer configuration. Drivers take 4 hours training in *Heavy Fleet Driver's Job Responsibilities* which also addresses measures to achieve this goal. The transporter retains records of this training, the auditor interviewed the drivers confirming the procedure has been implemented.

Transport Practice 1.4:

Develop and implement a safety program for transport of cyanide.

The operation is:

- in full compliance with Transport Practice 1.4
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Savar's procedure *Cargo Handling and Inspection Procedure* has instructions to ensure that the integrity of cyanide packaging is maintained during loading, shipment and unloading. The auditor reviewed this procedure, records of shipments inspections and interviewed the drivers confirming compliance with this provision. For security purposes and to maintain integrity of the packaging the shipping containers remain sealed. The seals are checked on the cargo departure, at the designated points during transportation and on arrival to the mine site storage.

Cyanide shipments are identified with the placards required by national regulations and to meet International Marine Dangerous Goods (IMDG) Code labelling requirements. This labelling is posted on each side of the container and includes identification of solid sodium cyanide by UN number (#1689) and the skull and crossbones marker used for Class 6.1 toxic substances, along with the Marine Pollutant marker. It is required in the *Cargo Handling and Inspection Procedure* that drivers conduct pre-trip vehicle safety checks prior to the truck departure.

Savar has implemented the procedure *SP-219 Loading, Transportation and Discharge of Sodium Cyanide v2* addressing the elements for formal safety procedures on the receipt, load, transport, and unloading of solid cyanide. Roles and responsibilities are clearly defined.

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Maintenance for each vehicle is tracked through the own developed software NeoSav. Records for trucks and also for trailers were reviewed and Savar was able to demonstrate complete vehicle serving over the past three years.

According to procedures, cyanide transportation will only be carried out during daytime hours, in the same way, drivers must rest at least eight hours before the departure of the trip. The working day of drivers traveling with sodium cyanide may not exceed twelve hours a day discontinuous, allowing periodically stops for ten minutes or more for equipment review, feeding and active stops.

Savar's procedure *Cargo Handling and Inspection Procedure*, calls for the securing of the containers to the trailer bed using the clamping mechanisms that are part of the trailer itself. The integrity of the clamping mechanism and the attachment point on the container is checked during a pre-trip inspection prior to the departure of the truck or the cyanide convoy. There are specific locations on the trailer that will accept the container, thereby eliminating the possibility of an unbalanced load.

According to procedure *Loading, Transportation and Discharge of Sodium Cyanide*, the Convoy Leader is allowed to modify or suspend the cyanide transport if conditions such as severe weather or civil unrest are encountered. Weather conditions are constantly monitored, and deliveries are postponed if a route is considered to be unsafe. Drivers are empowered to stop a delivery if the conditions are considered to be unsafe.

Before each trip, Savar's drivers must undergo alcohol testing and periodically disclose evidence of drug use. Violation of this policy will result in the separation of the worker from the organization. Savar maintains drug and alcohol abuse prevention policies, which were reviewed during the audit

Records documenting all the above are maintained in hard copy at the transporter's office for a period of time. The operation will retain records documenting its safety program over a three-year ICMC audit cycle.

Transport Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

The operation is:

- in full compliance with Transport Practice 1.5
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Savar do not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

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Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

The operation is:

- in full compliance with Transport Practice 1.6
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

All truck drivers and personnel involved in the cyanide transport operation are provided with cell phones and an Emergency Contact List to communicate with the transport company, the mining operation, and with emergency responders. The transport operators have a communication group via WhatsApp application where any novelty or alert in the operation is reported. All trucks are equipped with GPS that allows Savar to track their units at all times since loading operations, on route and on arrival to the mine site. When a cyanide cargo is on road, the client receives periodically emails about the cargo location.

According to Savar procedures, all communication equipment will be confirmed to be operational at the start of each trip. Personnel from the Monitoring Central ensures that the truck has a working GPS checking if it emits too much alerts or if it is not transmitting its position. Interviews were conducted to confirm that these practices are in place. Savar's communication system is part of the pre-work inspections and is maintained along with the formal preventive maintenance program. The system is used each day and correct operation of the system is confirmed at that time.

Communication blackout areas along the transport routes have been identified during the routes risk assessments. On approaching to these areas, the convoy leader communicates its position to the Monitoring Central. Trucks are continuously monitored along the route in real time, and any delay will be immediately noticed at the Monitoring Central. The auditor reviewed trip records and interviewed drivers and operators from the Monitoring Central, confirming that this procedure is implemented.

Savar tracks the progress of cyanide shipments through telephone communications and GPS system. The procedure for cyanide transportation requires periodic contact by mobile phone (WhatsApp) and through the use of global positioning systems. The convoy leader must report from checkpoints along the route. The auditor confirmed the implementation of these procedures by interview with drivers, operators of the Monitoring Central and through inspections of trip records.

Savar has systems in place to ensure that loads of cyanide arrive at their destination intact. A waybill accompanies the transportation which includes chain of custody data such as container numbers, the amount of cyanide delivered, waybill numbers, shipping

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documentation, Material Safety Data Sheet (MSDS), packing list, customs declarations and producer invoice. The container number and seal numbers are checked against the bill of lading and signed by the cargo dispatcher and the driver. The cyanide shipment is carefully monitored by the driver and remotely through the transporter headquarters office. After overnight stops, drivers and the convoy leader check the integrity of the container's locks on doors, as required in the procedure for cyanide transport. On arrival to the mining sites security guards check the seal integrity and container and seal numbers against shipping documents as the containers enter the compound.

All shipments of cyanide are accompanied by shipping papers including the amount of cyanide in the load and by the Material Safety Data Sheets that identifies the presence of cyanide and that describe the necessary handling precautions. Savar's procedure for cyanide transportation require that this information be available. The auditor confirmed its implementation by inspecting the shipping papers which clearly indicates the number of packages and amount of cyanide transported and interviewing the drivers.

Principle 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 Transport Practice 2.1
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Savar does not operate cyanide trans-shipping depots or interim storage sites in its transport operation. If a delivery is interrupted, loaded cyanide trucks would be stored in a secure location. The scope of this audit is for the ground transportation operations performed by Savar truck from Callao to mining clients within Peru without any interim storage. Therefore, this Transport Practice does not apply to the operation.

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Principle 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 Transport Practice 3.1
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

In occasion of the audit it was found that Savar's Emergency Response Plan *TRA-18 Emergency Plan for Hazardous Materials Terrestrial Transport* address response actions against accidents with hazardous materials, but do not address specific elements of cyanide emergencies. Savar was required to identify cyanide risk scenarios and develop specific responses to emergencies due to spills and generation of HCN gas. This condition resulting in substantial compliance did not present an immediate or substantial risk to health, safety or the environment while it was being corrected as Savar had an Emergency Response Plan, that although not specific for cyanide related emergencies, addressed the necessary response actions against accidents with hazardous materials.

After the audit, Savar submitted the document *Sodium Cyanide Transportation Contingency Plan*. This Plan includes details responsibilities, communications procedures, updated notification numbers for emergency responders and actions to take against different cyanide emergency scenarios as spills and exposures, among others. Once Savar proceeded to communicate this Emergency Response Plan to its personnel and presented the training attendance records to the auditor, no additional information was required by the auditor to find this protocol question in full compliance with the Code.

Savar's *Sodium Cyanide Transportation Contingency Plan* (Plan), is appropriate for the selected transportation routes. It addresses specific emergency circumstances that could arise during cyanide transportation. The document considers appropriate response actions for emergencies that could arise during cyanide transportation between Callao to the mining clients. The Plan was found to be appropriate for this solid sodium cyanide transport operation.

The Plan considers the physical and chemical form of the cyanide. The only form of cyanide to be shipped is solid sodium cyanide. Emergency response procedures address actions to be taken in response to a solid sodium cyanide spill. The Plan includes the sodium cyanide MSDS where is defined the physical and chemical form of cyanide: solid

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white granular cyanide and specific information regarding the hazardous material to be transported.

Savar's Plan considers transport by trucks configuration tractor-semitrailer carrying one 20-foot intermodal sea containers. The emergency response actions in the emergency plans are appropriate for this type of product and method of transportation.

The current Plan considers all parts of the transport infrastructures including conditions of the roads (highway, secondary and mine roads) and urban areas. The Plan considers existing water courses, bridges conditions and danger of landslides on the route, among others. The plans address the emergency response to events that could occur in relation to these risks and hazards.

The Plan considers in Chapter 9- Available Vehicles, the design of the transport vehicle. The document defines the appropriate trucks and chassis to use to transport cyanide. It states that must follow local regulation and that trailers must be of conventional type or of "low bed" (low profile) type. The description indicates cyanide will be transported in 20 feet sea containers.

Savar's include descriptions of response actions for cyanide exposure incidents, such as first aid and medical assistance, as appropriate for the anticipated emergency situation during transportation. It includes detailed response actions for each case, including spills in both current and standing open water bodies and for the other risks identified on the routes. The Plan consider a series of instructions covering the potential hazards that could occur during the loading, transportation and unloading of the cyanide cargo. It includes emergency response actions against collision or rollover, spillage of dry cargo to water sources, on the road and landslides.

The Plans also establishes the logical line of actions that the leader and convoy drivers must take when irregularities arise during transport of sodium cyanide, including civil commotion, adverse conditions, bad weather, traffic congestion and unplanned stops.

The Plan establishes the role of outside responders and medical facilities in emergency response procedures. The police will provide support and safety isolating the area and will take control of traffic routes in case of an accident. In case of fire, the firefighters on arrival, will take control of the emergency, advised by the trucking company personnel regarding not using water on cyanide. In the event of accidents on the route, the Emergency Response Plan establishes that the Convoy Leader must call an ambulance for medical assistance to attend immediately the victims and to transfer them to the nearest hospital with adequate capability to attend the victims. The Plan, at Section 9 Notification and Communication System, includes a list of hospitals available en route.

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Savar, as a hazardous material transporter, has an agreement with emergency response contractor *IFSEC* that will be in charge of remediation measures. **Transport Practice 3.2:**

Designate appropriate response personnel and commit necessary resources for emergency response.

The operation is:

- in full compliance with Transport Practice 3.2
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Savar has provided training to its personnel with designated responsibility for responding to emergencies during transport of cyanide. The training address all planned response activities, such as asking for assistance, the use of personal protective equipment, first aid against cyanide exposure and measures to stop the flow of cyanide from the transport vehicle. The elements of this training are documented in training materials, and records are kept covering the recertification period. The auditor reviewed this documentation and interviewed designated response personnel, including personnel from *IFSEC*'s emergency respond contractor.

Specific emergency response responsibilities and duties are described in the Plan, during and after an incident / accident or emergency. The roles and responsibilities of relevant internal and external personnel are described in the Plan.

Savar hires *IFSEC* services to provide escort to its cyanide convoys. *IFSEC* provides the Convoy Leader and an assistant as co-pilot, both are trained in HazMat, also provides a pick-up truck with all necessary response equipment, including oxygen and cyanide antidote. *IFSEC* personnel is trained to administer the amyl nitrite cyanide antidote; sodium thiosulfate and sodium nitrite will be administered by medical outside responders on arriving to the accident scene or at the hospital.

IFSEC's Convoy Leader is in charge of all inspections to the convoy previous to departing and take decisions during the route until arriving to destination. *IFSEC* personnel also provides training to Savar personnel in cyanide awareness.

Savar maintains a list of the emergency response equipment that must accompany the cyanide load along the transportation route. The list is within the Emergency Response Plan along with a verification check list to inventory equipment. The equipment was available through *IFSEC* for the auditor review and was found in compliance with the Code requirements.

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The equipment provided by IFSEC includes HCN gas detector, personal protection equipment (PPE) as 6 Tyvek suits, 2 type B suits and to type A Self Contained Breathing Air (SCBA) suits; leather and impermeable gloves, PVC boots, safety goggles, full face masks; materials as caulk, sodium hypochlorite, area isolating tape rolls, plastic shovels, sweeps, polyethylene red bags and empty containers. The equipment includes oxygen, Ambu (resuscitator), cyanide antidotes as amyl nitrite, sodium thiosulfate and sodium nitrite. Cyanide antidotes are stored during transport according to the manufacturer's recommendations; they are transported in a *technopor* box that provides thermal insulation. The equipment list confirms and documents that the necessary equipment is present for each shipment of cyanide. A checklist is used to verify that the emergency equipment it is available, and it is documented in the convoy report. The emergency kit must be inspected prior to every loading operation. The availability of this equipment was confirmed during the audit; all the equipment was available.

Savar truck drivers receive initial and annually refresher training on their responsibilities in the event of or exposure to cyanide leaks, including their role as indicated in the Emergency Response Plan. Documentation identifying the individuals trained and indicating the nature and dates of the training was available for the auditor's review. The auditor reviewed assistance records for emergency response training covering the recertification period.

Savar's Plan address inspections to the emergency response equipment and assure its availability when required. All emergency response equipment identified in the carrier's documentation are periodically inspected and evaluated by Savar and IFSEC personnel so that it is available and in good working order if required. Inspections are oriented to the service capacity of the equipment, in addition to their presence. The inspection program requires monthly inspections and also prior to the convoy cargo. Records were available for the auditor's review. The auditor reviewed several inspection records covering the recertification period.

Transport Practice 3.3:

Develop procedures for internal and external emergency notification and reporting.

The operation is:

- in full compliance with Transport Practice 3.3
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

The Plan includes notification procedures for notification of appropriate parties in the event of a cyanide release or exposure during transport. These procedures are available to all Savar personnel involved in the cyanide transport operation and therefore they are included in the Emergency Response Plan. The notifications procedures and the

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telephone contact list are also carried in the transport vehicle to be available as needed. The telephone list includes numbers for notifying regulatory agencies and potentially affected communities of an emergency. It lists current emergency numbers for local hospitals, ambulance, firefighters, police and environmental responders.

Savar procedures requires that emergency contact information to be updated every six months to ensure is kept current. Regarding emergency notification and reporting procedures included in the Plan, it states must be updated on a yearly basis or when there are changes in the background and form, in terms of procedures, persons, telephone numbers, routes, equipment, methods, or any other consideration that allows more efficiency and effectiveness. The auditor reviewed the procedures and confirmed its implementation through documentation and interviews.

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 Transport Practice 3.4
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

Savar's Emergency Response Plan describes the remediation procedures such as recovery and neutralization of solid cyanide and decontamination of soils and disposal of spill clean-up debris, as is planned the driver and the escort personnel will initiate the sanitation actions. Descriptions of necessary action steps depending on the incident scenario are outlined in the Plan.

The driver of the cyanide truck along with the escort personnel will provide the initial response to a transport related leak. If the release is only a small amount of material or can be easily contained, they will be able to immediately clean up the spill and prevent further contamination.

Final cleanup of leaks that occur during transportation will be outsourced to IFSEC a commercial chemical sanitation company identified in Savar's Emergency Response Plan, so it can be activated their action as soon as possible. All contaminated material and bags from the spill, will be sent to an authorized hazardous materials waste deposit for adequate final disposal. All contaminated clothes and PPE will be disposed by the contractor. Cleanup of leaks that occur once the cargo reaches the mining site would be done by the mine itself.

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The Plan specifically prohibits using chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide once it has entered surface water. The auditor reviewed the documentation.

Transport Practice 3.5:

Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is:

- in full compliance with Transport Practice 3.5
- in substantial compliance
- not in compliance

Discuss the basis for this Finding/Deficiencies Identified:

The Plan states to periodically review and to evaluate its adequacy. It is responsibility of the safety department to review the Plan annually, to train on the Plan all personnel involved in the operation, to carry out periodic practices for emergency response, to deliver all users the latest version of the Plan, and to keep it updated verifying that the information is truthful and is the necessary to respond to an emergency in an effective manner. The auditor confirmed the process has been implemented by reviewing previous version of the Plan during the recertification period and through interviews Savar's personnel.

The Plan establishes that mock emergency drills must be carried out at least once a year to keep the personnel permanently prepared for an emergency. As scheduled in Annex VIII - Drills Program of the Plan, Savar has an annual mock drill program, including cyanide related drills, to keep the personnel permanently prepared for an emergency. Drills are evaluated to determine if response procedures are adequate, if equipment is appropriate, and if personnel are trained. Documentation of these evaluations is retained. The auditor review the drills reports for cyanide spills with exposure to cyanide, requiring first aids response and recovery of cyanide actions, covering the recertification period and interviewed the personnel as proof of compliance with this provision.

The Plan states to review and evaluate it after any incident that results in its implementation. The Plan include commitments to such review and that the evaluation and any recommendations for modification of the Plan must be documented. Although the Plan had been periodically updated during this certification period, no evaluations were conducted due to incidents or emergencies as these events did not occur.

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