

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation

Summary Audit Report Form

***For The
International Cyanide Management Code***

TRANSALTISA SA – Lima, Peru

1st. Recertification Audit dates: February 19th ~ 23th, 2013

Auditor: Julio Monteiro (LA)

JMAQ – Julio Monteiro Auditores da Qualidade – Rio de Janeiro, Brazil

Name of Cyanide Transportation Facility: Transaltisa S.A.
Name of Facility Owner: Transaltisa S.A.
Name of Facility Operator: Transaltisa S.A.
Name of Responsible Manager: Transaltisa S.A.
Address: Eduardo Lopez de Romaña s/n – Parque Industrial Arequipa
State/Province: Lima Country: Peru
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Location detail and description of Operation:

Transaltisa S. A. (Transaltisa) The Head Office is situated in Arequipa Industrial Park, however the site certificate refers to the operations carried out in Lima, Peru Calle 6, Mz Lot 5 - Urb.Industrial Oquendo - Callao in Lima.

Transaltisa is a Company dedicated to the transport of hazardous materials with operations in Peru. Transaltisa is part of the Corporation Cervesur. It provides integral logistics services and it is focused in the mining industry and long term contracts. Currently, Transaltisa transports sodium cyanide in solid state (pellets) and Iso-tanks on behalf of Orica from El Callao Port to the gold Mine Company Minera Yanacocha (Yanacocha Mine) located in Cajamarca Peru. Adding to that it can also transport to other Mining operations in different ways under either Iso-tank or container.

The charging of the product is made the day before of the actual departure of the convoy or the same day. This is made by the producer (Orica). Drivers must check daily if the PPE (Personal Protection Equipment), VPE (Vehicular Protection Equipment) and his unit. The Driver follows a driving route pre established and must fulfill it. The discharging is made by the mining operation (Minera Yanacocha) that verifies if the seals are unpolluted, therefore the drivers aren't allowed to stay in the cabin.

Transaltisa has implemented an integrated management system for quality and safety based on ISO 9001, ISO 14001 and OHSAS 18001. This system considers the safety requirements during the preparation of the bidding documents and service design and requires developing client/project specific safety procedures and emergency response plans. Its focus on long term contracts has allowed them acquiring transportation units especially for the project.

Other products transported by Transaltisa in Peru include: Sulfuric Acid, LP Gas, Heavy Machinery, Minerals and Explosives.

This Audit comprises the ground transportation operations in Peru based in the integrated management system documents and the current transport operation performed from the



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El Callao Port to the gold mine Company Minera Yanacocha, (Yanacocha Mine). Transaltisa formally started the implementation of the Cyanide Code in September 2009, and has incorporated the Code in its integrated management system. Transaltisa was certified the Cyanide Code in February 2010, so this is the 1st. Recertification. See www.cyanidecode.org.



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**Auditor's
Finding**

This Operation is

X in full compliance

in substantial compliance *(see below)

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”

Audit Company: Transaltisa SA

Audit Team Leader: Julio C. M. Monteiro - email: jmaq@ig.com.br

Other Auditors:.....

Date(s) of Audit: 19th. ~ 21th. February 2013

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code

Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the Audit Team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this 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 environment audits.

Lead Auditor Signature:

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 **X in full compliance with** in substantial compliance with Transport Practice 1.1
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Transaltisa has the procedure TRN-PRO-017 (version 10 February 2013) for service design which includes in section 5.3.1.b) the evaluation and selection of the route which consist of an inspection trip performed by the leaders of the Operations, Technical, and EHS Departments. A series of items of the procedure have been modified showing the improvements that have been made. The route and the potential alternatives are first identified using the road maps issued by the Peru's Transport and Communication Ministry (MTC, Ministerio de Transporte y Comunicacion) on its web site (www.mtc.gob.pe), using as well Google Earth to select the route. Transaltisa is aware of the risks presented when driving nearby communities (possibility of accidents) and the possible impact on the environment, that's why it's taken in consideration when selecting the appropriate route (the Ciudad de Dios – Minera Yanacocha section). The route is divided in sections, and for those sections where there is more than one potential trajectory the following criteria are assessed.

In order to select the appropriate route a series of criteria has been reviewed, such as:

Density: High (3) Medium (2) Low (1)

Hills: Steep hill (3) Mild hill (2) No hills (1)

Infrastructure: Dirt road (3) Two-Way Road (2) Highway (1)

Closeness to water sources: Ocean, wild rivers (3) Seasonal river (2) No water source (1)

The qualification obtained for each criteria of the alternative route will sum up and the lowest score will be chosen as the safest alternative route. Once these criteria have been applied and a risk ranking has been given and the weights applied, the trajectory is selected based on the alternatives with the smaller score. This is recorded in a specific format derived of the procedure. It's been evidenced that Transaltisa has made and evaluation on March 2011 and has the format for it by filling TRN-FOR-232 (V. 01 dated November 2009) Route Evaluation dated 15 of March 2011 and December 1st of 2009. Transaltisa has the procedure TRN PRO-28 (version 06 dated November 2010) Used to the identification of hazards and risk assessment. This procedure establishes that the responsible for the operation must assess the risk with the help of his team and with the



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support from the EHS department. According to this procedure, the hazards identification is performed asking question for each task performed. The responsibility of assigning the risk level is of the SSMA Department who also define the exposure and consequences related to injuries, health, occupational diseases and material damage. The integrated management system manual establishes in section 5.4.2 that the IPER (Hazardous and Risks Identification and Evaluation) must be reviewed on annual basis. Additionally, the procedure TRN-PRO-28 (version 6 November 2010) for the identification of hazards and risk assessment requires the IPER to be reviewed. Furthermore, a convoy report (Route Trace) is prepared for every trip, where the travel times are recorded and where the Convoy Supervisors report any delays and the reasons for them. Additionally there accident investigation procedure TNR PRO-029, dated February 2013, version 15 where it is established that all incidents and substandard conditions must be reported. Changes in the route are considered as substandard conditions and are reported through the Incident report (TNR-FOR-055). Other preventive measures derived from the IPER defensive driving training, speed controls, rest periods, preventive maintenance for the unit (including Heating Ventilation and Air -Conditioning system for the cabin), use of the route sheets (establishes maximum speeds for the different sections, resting periods, and scheduled stops/breaks). Additionally, the incident reports previously mentioned, includes the actions to be taken (immediate corrective action, corrective action, preventive action) includes the responsible for the implementation and the due date. These actions are followed up using an electronic database, where the action plan is recorded including the actions, the responsible person, the deadline and the status (open or closed) among other data. As previously noted, Transaltisa looks at the roads maps issued by the MTC Communication and Transportation Minister of Peru, additionally the route is agreed with the client (the Mine). The existing roads infrastructure in Peru does not allow for an entire alternative route only in small sections. MTC has received and approved Transaltisa Emergency Response Plan. Additionally, Transaltisa has an agreement with the Roads Police department to have one officer escorting the convoys. In this case, Transaltisa has notified the Operation mine and Orica when changes in sections of the route have been implemented to improve safety.

Transaltisa has implemented a Sodium Cyanide Procedure (TRN-PRO-027 version 10 November 2012) that establishes that the transportation must be performed following the Transportation Technical Sheet TRN-DAT-023 (the route sheet) for Sodium Cyanide. Transaltisa contacted the different Road Police Departments, Firefighters, and Health Centers distributed in 4 different zones reunited in the same radio action. This communication was established during February 2013. A summary of the Contingency Plan was provided to these external responders.

Additionally Transaltisa gives medical attention using the National Health System by hiring also particular clinics all this included in the Civil Responsibility Insurance.

Transaltisa does not subcontract the cyanide transport and does not handle cyanide. All vehicles used for the transport of Sodium Cyanide are property of Transaltisa Transportes



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and the products handling is made by the Producer of Cyanide (Orica) during the product loading in Callao Port. When it arrives at the destination all ground Operations are done by the Customer (Operation Mine).

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 **X in full compliance with** in substantial compliance with Transport Practice 1.2
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Transaltisa has developed a profile for the Trucks Drivers - TRN-PT-031 (Version 08 dated February 2013).

Some of the Job requirements are: Male Driver, under 50 years old, must have a "All drivers license (that allows the driving of trucks with hazardous materials) for over three (03) years, availability to travel continuously according to schedule, even if the journeys take place over 4000 msl and over three (03) years of expertise in driving trucks.

Specifically: knowledge of the National Driving Regulation, certification of the Ministry of Transport, knowledge in handling hazardous materials, knowledge in first aid emergency responses.

When a new Driver is hired, it is subject to an induction process, which takes approximately 80 hrs and three test trips. Currently Transaltisa has 17 Drivers assigned to the transport of sodium cyanide. A random sample of 4 has been taken.

Since 2009, Drug Test is performed randomly to currently working employees twice per year, and as an entry test to all new employees. Transaltisa has an Alcohol and Drugs Politic (TRN-DAT-038 version 03 July 2011). Medical test include: review of habits (alcohol), visual capacity, weight, size, revision of air ways, ears, reflexes, blood chemistry, muscles force and flexibility, spine, mobility and pain, Epworth test, audiometric test, electrocardiogram, dental review, abdomen echo-graph, thorax-X-ray, urine test, and as previously noted, random drug test. The medical exams are conducted by authorized clinics and approved by the clients.

A sample of three Drivers and one Convoy Supervisor that were in the base at the time of the audit revealed that they were aware of the cyanide characteristics, the PPE use procedures, and their role during emergency response. They were also familiar with the procedures and checklist described in this report. Courses are repeated once per year, additionally, when the main documents (e.g. IPER, Emergency Response Plan) are changed or updated training is provided to the employees. The Annual Training Program 2012 was evidenced, verifying Walter Huayhuas, Enio Herrera, Luis Muñoz all Drivers and Jorge Venegas, Operation Supervisor, programs specially the Dangerous Material



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Transportation course. The 3 Drivers and the Operation Supervisor was interviewed by the Auditor during this recertification audit.

Transaltisa does not subcontract the cyanide transport and does not handle cyanide. All vehicles used for the transport of Sodium Cyanide are property of Transaltisa Transportes and the products handling is made by the Producer of Cyanide (Orica) during the product loading in Callao Port. When it arrives at the destination all ground Operations are done by the Customer (Operation Mine).

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

The operation is	X in full compliance with	in substantial compliance with	Transport Practice 1.3
		not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Transaltisa designs the trailer-structure to bear the load required by the project and contracts a company that produces superstructures to build the trailer. Transaltisa keeps in files the design and construction memory for each trailer. The units assigned to the transport of cyanide have a loading capacity from 30 to 36 tons, but the containers carry up to 20 tons or Iso-tanks 22.70 tons each. All units were manufactured between 2010 and 2012, noticing that the float has been renovated. Transaltisa has a Maintenance Procedure (TNR-PRO-024 version 11 dated June 2012) that specifies the following level of maintenance for trucks. Corrective Maintenance Orders are generated based on the issues included in the trip report that must be prepared by the driver. Critical failure include the break system, steering system and structure, the unit cannot start a new trip until critical failures are fixed. A sample of three trucks and trailers files was reviewed and they had the Corrective Maintenance and Preventive Maintenance Records according to the above described procedure. Prior to drive to the loading area within the port and every day before starting the journey, the Operator performs a vehicle, trailer, and container inspection using the checklist TRN-FOR-082. A sample of 20 checklists was reviewed and they seem correctly filled. This inspection was confirmed during the interview to Drivers and Convoy Supervisors.

Transaltisa receives the Iso-tank or Container already loaded, and only one of them is loaded in a trailer. Transaltisa do not use the Double Trailer modality.

two important processes are: Charging Process and Discharging Process.

Drivers aren't responsible neither participate directly in the discharge of the product therefore they aren't allowed for them to stay inside the cabin. The actual responsibility goes to the Logistic Department of the mining operation. If an accident happens inside of the mining operation the Supervisors must inform the Chief of the Logistic Department of



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the mining operation. All the information related to the Iso-tanks must be filled in the Unload Sparge Check List by the Driver.

After unload the Iso-tanks are labeled according to the Route Sheet - Orica TRN-DAT-042. The containers return without any label.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Transaltisa receives the NaCN in 20 foot-containers or Iso-tanks (both referred herein after as containers) Transaltisa fixes the container to the trailer using twist locks. Transaltisa does not manipulate the packages as the containers are sealed by Orica in the Port Operation and checked in the Mining Operation when it discharges.

Transaltisa has developed the Sodium Cyanide Transportation Procedure (TRN-PRO-27 version 10 dated November 2012), and the written safety procedure for NaCN transport TRN-PET-021 (version 10 dated December 2012). The first procedure requires the Driver to review the seals in the containers. According to Cyanide Transportation Procedure (TRN-PRO-27) the operator must fill a checklist daily (TRN-FOR-082, version 8 dated September 2012) at the beginning of the journey. This checklist requires reviewing that plate carts with the UN number and DOT classification are placed in the truck and container (four in total). This requirement is included in the procedure in November 2012 and according to the subsequent checklist was correctly implemented.

As previously mentioned, Transaltisa has a maintenance procedure (TNR-PRO-024 v. 11 dated June 2012). The requirements established in this procedure are detailed in the element one of this practice. According to the Technical Sheet for NaCN Transport (TRN-DAT-023, the Driver must operate maximum 10 hrs per day according to Legal Regulation. with a 2 hours rest period every 5 hours, and must work only 5 days with one and a half rest day, leaving the other half day for training. According to the route sheet, the maximum driving time between two stops is three and a half hours.

The IPER (Hazard Identification and Evaluation and Control of Risks) and the PET (Written Work Procedure) identify the areas and scenarios where shifting may take place and indicate preventive measures (maximum speeds), additionally, the PET establishes daily checks for the twist locks.

The contingency plan (TRN-PLA-010 version 09 dated February 2013) includes in section 4.7.2 instruction according to the type of emergency (slides, earthquakes, fog) that could affect the road conditions. The instructions are to stop the vehicles in safe places and wait for clearance from the convoy supervisor or base. In case of fog the minimum visibility is 50 m, otherwise a safe place should be looked until visibility improves.



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According to Transaltisa personnel, the route area is not affected by severe storms, according to regional climate conditions.

The contingency plan includes the measures to be taken by the convoy leader in case of strikes, demonstrations, and closure of the road by civil unrest. These measures include looking for a safe parking space, not attempting to go through the protesters, notifying the supervisor as soon as possible, and following the instructions given by radio. If the vehicle would stop for prolonged period, the tires must be blocked and the safety reflectors and cones should be used.

According to the Alcohol and Drugs Police (version 03 dated July 2011) the Procedure TRN-PRO-027 (version 10 November 2012) before the trip starts, the Convoy Supervisors perform the alcohol test and record the information in the format TRN-FOR-028 (v. 04, March 2009)

Evidences were available where the test is performed before starting every journey and all Drivers have reported a reading of 0.0. Furthermore, since 2009 drug test are performed randomly to currently working Employees twice per year, and as an entry test to all new Employees. Evidences were available where the test is performed before starting every journey and all Drivers have reported a reading of 0.0. Furthermore, since 2009 drug test are performed randomly to currently working Employees twice per year, and as an entry test to all new Employees.

Transaltisa has a procedure according to the Integrated Management System that provides a documentary control by the TRN-PRO-001 (version 16 February 2013) and Registration Control TRN-PRO-002 (version 10 February 2013). Retention of records documenting is including in the Integrated Management System.

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

The operation is	X in full compliance with in substantial compliance with not in compliance with	Transport Practice 1.5
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Summarize the basis for this Finding/Deficiencias Identified:

Actually as described in Section 1, the scope of this audit was only for the ground transportation operations performed by Transaltisa from El Callao Port to the Gold Mine Operation, (Yanacocha Mine) located in Cajamarca Peru, and therefore, this practice does not apply.



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

The operation is **X 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.)

All Drivers have radio to communicate between them; the Convoy Escort has also a satellite phone. In the proximity of the mine the radios can communicate directly with the Mine Emergency Response Team. The functionality of the radio, mobile phone and satellite phone is tested on daily basis at the beginning of the journey; this is recorded in the Truck Inspection Checklist. Mobile phone coverage is available along the route in case there are service deficiencies (e.g. saturation) the convoy leader can use the satellite phone. Transaltisa has implemented a GPS tracking system based on the GPRS (cellular phone systems) which is controlled and monitored in the Lima operations center. The GPS updates every minute the vehicle's location and speed. It has audible and visual alarms for stops and excess of speed. The monitoring is based on the route sheet where maximum speeds and stops are scheduled.

Software has been implemented in order to control the velocity, stops, statistics data related to the compliance. This is evidenced in the TRN-PRO-025 v.04 August 2012 Route Control which applies to all the businesses of Transaltisa. It was also checked the TRN-DAT-042 Route Sheet (version 07 dated March 2012) where the critical points control are established. The local regulations such as regulatory rules and also technical rules are ruled by MTC, they require remission documents issued by the client where Transaltisa acknowledges receiving the container and/or Iso-tank. The containers are sealed. When the container and/or Iso-tank are delivered to the mine, it stamps of conformity the remission documents. Only the Mine can break the container and/or Iso-tank seals. Other information included in the remission document is the destination, packaging information, invoice, type and number of container, gross weight and the seal number.

There are shipping records for each day where data such as the name and driving information of the truck drivers and truck and merchandise information is registered. Besides that, a remission document that indicates the number of containers and net weight is attached. Also, the MSDS of the Sodium Cyanide, that is given by the manufacturer where is specified the Material Identification and composition and General Information of the manufacturer. Also the danger identification is made, as well as the first aid steps in case of any type of accident and other legal information.



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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.

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

Summarize the basis for this Finding/Deficiencies Identified:

As described in Section 1, the scope of this audit was only for the ground transportation operations performed by Transaltisa from El Callao Port to the gold mine operation, (Yanacocha mine) located in Cajamarca Peru and therefore, this practice does not apply.

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 **X in full compliance with** in substantial compliance with Transport Practice 3.1
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Integrated Management System Manual TNR-MAN-01 (version 13, dated January 2013) establishes in section 7.5.7 that an Emergency Response Plan must be prepared for every business where the actions and responsibilities are to be established in case of incidents and emergency situations. All the possible situations are approached in 4.7.2 TRN-PLA-010). It also establishes that the plans must be assessed by performing drills according to an annual drills program. The emergency response plans must be reviewed on an annual basis and whenever an incident or emergency situation takes place. In Chapter III establishes that the IPER must be prepared and that there must be specific contingency plans for the identified emergency scenarios. Additionally Transaltisa has implemented service design procedure (TRN-PRO-017 version 10 dated February 2013), which establishes that the EHS department is responsible of preparing the contingency plan, identify the required PPE and vehicle protection equipment (VPE), and the emergency kit associated with the service.



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Transaltisa has developed a Contingency Plan for the Transport of Sodium Cyanide (TRN-PLA-010 version 09 dated February 2013) for Orica and Mine Operation. The last version has been presented to the MTC and its waiting for the Official Authorities approval. Additionally, the plan has as an annex the list of internal and external contact information for emergency response.

The Emergency Plan TRN-PLA-010 (version 09 dated February 2013) in the item 4.7.2 are formally presented the specific instructions according to emergency type where it establishes the prohibition to use chemical substances such as NaCl, Fe₂SO₃ and hydrogen peroxide for the cyanide treatment when spilled in water.

Orica produces NaCN in small pallets, the response procedures for NaCN releases take this into account and the materials available for the control of solid material releases (sweeps, shove, bags, and empty containers). Additionally, the PPE includes level C and A suites, SCUBA's, latex gloves. Additionally the plan includes in section 4.4.1 information regarding the characteristics and health effects of NaCN.

Chemical and physical properties of NaCN are defined in the MSDS sheet – Code UN 1689. As previously mention, the plan was prepared based on the IPER, which is the hazards identification during the truck transportation. Additionally, the plan includes a summary of the operations (section 1.5).

The IPER is based on the characteristics of both types of container (20 feet container and Iso-tank); in general the 20 feet container was considered to be the less resistant and to pose the higher risks. Additionally, the emergency response provides information on the characteristics of the Iso - tanks. The plan includes specific response actions for the following scenarios. These scenarios were identified by the IPER and presented in the Emergency Plan (4.7.2).

The Scenarios are:

- a) Product withdrawal and transfer on roads and highways
- b) Lightning
- c) A serious illness of operator
- d) Third accident help
- e) Maintenance of roads
- f) In the case of protests / strikes / conflicts with roads close
- g) In case of terrorist acts and / or theft on the road
- h) In case of vehicle damages
- i) In case of truck lifting operations
- j) Pedestrian's run over
- k) Electric shortage in vehicles
- l) Truck's ignition
- m) In case of natural disasters
- n) Driving accident near water source



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- o) Driving accident on rainy weather
- p) Driving accident with spill of the product on dry road
- q) Driving accident without any spill of the product
- r) Accident during loading or unloading

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

The operation is **X in full compliance with** in substantial compliance with Transport Practice 3.2
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Convoy Supervisors receive 40 hrs training on annual basis as Technician on Hazmat (Hazmat III CFR1910.120 (q) (6) (i) (A) and NFPA 472. Additionally, all the operators receive training on basic operations with hazardous materials. The operators and the convoy supervisors are also trained on annual basis on the emergency response procedures, and refreshments are given when changes in the IPER or the plan are implemented.

The files for all Supervisors were reviewed and these include training as HAZMAT III for all of them. A sample of five operators was reviewed and all the HAZMAT training was completed, additionally the in-house training records indicated that all the drivers and supervisors have received the refreshments and the annual training. The plan includes a checklist of the emergency response kit in 4.9 Assigned Resources for the Medical Attention during the Cyanide Transportation which includes:

The cyanide transport procedure states that the trip cannot start unless all the Emergency Kit is complete. According to the Cyanide Transportation Procedure (TRN-PRO-027) if at the moment of the unit inspection before the journey starts any item it's not completely ok (according to the Unit Checklist of Orica TRN-FOR-082) it must be informed immediately to the Convoy Supervisor in order to manage the situation and take the appropriate measures so the unit can depart. According to the route sheet each escort truck has a complete emergency kit. One of the truck was at the operation base at the time of the audit, the Emergency Kit was inspected a found complete. During a previous internal audit, it was detected the transport operation were performed even when one of the emergency kits was not complete. As a corrective action, the transport procedure was modified banning transport operations unless the emergency kit was complete was implemented. According to the checklist completed after the procedure modification, the Emergency Kit has been complete for the subsequent trips. As previously noted the inspection checklist includes verifying the Drivers (Personal Protective Equipment) PPE.



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

The operation is **X in full compliance with** in substantial compliance with Transport Practice 3.3
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Section 4.6 of the Emergency Response Plan includes a communication flow diagram establishing that, when the emergency cannot be handled by the convoy personnel, the Convoy Supervisor notifies to the operations base and the mine about any incident and that the Operation Mine is responsible for contacting external emergency response providers, and agencies. In any case, there is an officer of the Roads Police Department to facilitate communication with local Police Departments. Section 4.6.1 establishes the requirements for the internal communications flow, including the implementation of a crisis committee and designation of a spokesperson that must be on site. Section 4.6.2 addresses the Client Communication.

The frequency of revision for each document is shown in the following table:

DOCUMENT	RESPONSIBLE	REVISION	APPROVAL	ACTUALIZATION FREQUENCY
Emergency Response Plan	EHS Department	Operations / EHS Department	CEO	3 times per year or after an emergency
Emergency Drill Plan	Operations Department	Operations / EHS Department	Operations Department	Before the performance of the drill
Emergency Drill Report	Chief Project	-	EHS Department	-
Emergency Phone Address	Chief Project	Operations / EHS Department	Chief Project	3 times per year or after an emergency

This is presented in the Emergency Plan coded TRN-PLA-010_V9 (4.11).

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

The operation is **X 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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As previously mentioned, the plan includes specific instruction for scenarios according Section 4.7.2 presented in the emergency plan TRN-PLA-010.

And in Section 4.8 there's the detailed Procedure for Cleaning and Neutralization and in Section 6.12 there's the Complete List of the Companies that provide those kinds of Services.

Section 4.7.2 of the Emergency Response Plan includes the instructions to attend a spill reaching a water body and includes the prohibition of using any chemical substance such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide in water bodies.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The Integrated Management System Manual TNR-MAN-001 (Management Guide) establishes in section 7.5.7 Preparation and Emergency Response that the emergency plans must be assessed by performing drills according to an annual drills program made by the HSE Department. It was evidenced the Drill Program for the 25th of July 2012, according to the Schedule and Evaluation of Drills format TRN-FOR-071 (version 02 dated October 2009) where there's a detailed description of the scenario, resources, materials, critical matters, hazard and risks identification and control measures. As previously mentioned, the Integrated Management System Manual establishes that drills must be performed at least once per year.

It was evidenced the Drill Program for the 25th of July 2012, according to the Schedule and Evaluation of Drills format TRN-FOR-071 (version 02 dated October 2009) where there's a detailed description of the scenario, resources, materials, critical matters, hazard and risks identification and control measures.

The Mining Operation made as well an evaluation of the drill in the actual location. The scenario was: Impact with a small vehicle with material loss, personal injuries without spill. It's stated that all documentation is reviewed after any emergency or drill, as shown in the Emergency Plan coded TRN-PLA-010 version 9 (4.11).



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