



INTERNATIONAL CYANIDE MANAGEMENT CODE

TRANSALTISA S.A.

SUMMARY AUDIT REPORT	CODIGO	20100228191
BASE TRANSPORTATION, LIMA, LIMA, PERU	VERSION	01. 2
	FECHA	10/05/2016

In collaboration with:



INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Operations Summary Audit Report



For The
International Cyanide Management Code
and Transaltisa S.A. – Lima – Lima – Peru

Verification Protocol

www.cyanidecode.org
May 2016



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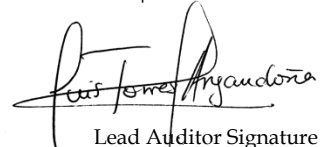

Lead Auditor Signature

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INTRODUCTION

Information on the audited operation

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: Rafael Centeno
Address: Eduardo Lopez de Romaña s/n – Parque Industrial Arequipa
State/Province/Country: Lima/ Peru
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E-mail: llezamay@transaltisa.com.pe

Aspects of the location and description of the 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 unpoluted, 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 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 recertified the Cyanide Code in 2013, so this is the 2nd. Recertification. See www.cyanidecode.org. These activities are carried out 3 years ago with ZERO (0) accidents.



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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

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.

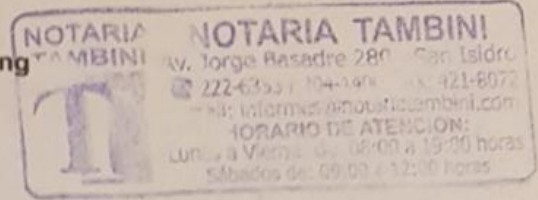


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Lead Auditor Signature

Auditor's Finding



This Operation is:

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

The International Cyanide Management Code

with the International Cyanide Management Code.

No significant cyanide incidents or exposures and releases were note as occurring during the audit period.

Audit Company: ISOSURE SAC | CIANURO INCORPORATED EIRL

Audit Team Leader: Luis Torres Argandoña

E-mail: auditoria@iso-sure.com

Date(s) of Audit: 02 and 03 May 2016

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 conduct 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.

Name and Signatures of Other Auditors

Name	Position	Signature	Date
Luis Torres Argandoña	Lead Auditor and Transportation Technical	<i>Luis Torres Argandoña</i>	04 May 2016
Carlo Vargas	Transportation Technical	<i>[Signature]</i>	04 May 2016

CERTIFICO: QUE LA FIRMA QUE SE ENCUENTRA EN EL ANVERSO CORRESPONDE A: LUIS ALBERTO TORRES ARGANDOÑA, QUIEN SE IDENTIFICO CON D.N.I Nº 09993105. DEJO CONSTANCIA QUE NO ASUMO RESPONSABILIDAD POR EL CONTENIDO DE ESTE DOCUMENTO. LIMA, 3 DE MAYO DE 2016. -afp



NOTARIA TAMBINI
MÓNICA TAMBINI PARLA
Abogada - Notaria de Lima



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Luis Torres Argandoña
Lead Auditor Signature

Verification Protocol

TRANSPORT

Transport cyanide in a manner that minimizes the potential for accidents and releases.

1.1 TRANSPORT PRACTICE 1.1

SELECT CYANIDE TRANSPORT ROUTES TO MINIMIZE THE POTENTIAL FOR ACCIDENTS AND RELEASES.

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.1 requiring an operation Select cyanide transport routes to minimize the potential for accidents and releases.

TRANSALTISA implemented the route evaluation process identified as “TRN-PRO-017 v.12 Process Design, Planning and Project Development”, Cyanide Transport which describes the items to be assessed during the route analysis in accordance with the ones pointed in the International Cyanide Management Code.

“Emergency Response Plan”, has been implemented for the route related to the cyanide transportation.

The routes are evaluated:

Warehouse of Callao – Yanacocha

In case of contingency (El Niño, Natural Phenomenon), TRANSALTISA evaluates alternative routes. TRANSALTISA evaluated the alternate route for the transportation of sodium cyanide, TRUJILLO | Yanacocha and TRUJILLO | HUAMACHUCO | CAJAMARCA, the latter being dismissed by the company's high level of risk.

“TRN-PRO-017 v.12 Process Design, Planning and Project Development”, in the route evaluation report the major risks were identified as the urban areas, population density, road infrastructure, proximity to water bodies, presence of fog, likelihood of free fall.

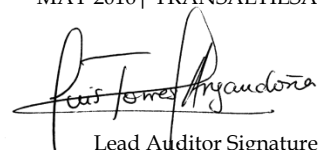
Risks associated to those characteristics include: vehicle crash, vehicle rollover, vehicle skid, load, loss, pedestrian accidents, product spill in water body, and water contamination, among others.

For each specific route, a risk assessment with a photographic log was developed in 2016. Risk management measures are listed for each portion of the routes based on the characteristics and risk level.

In case of contingency (El Niño, Natural Phenomenon), TRANSALTISA evaluates alternative routes. TRANSALTISA evaluated the alternate route for the transportation of sodium cyanide, TRUJILLO | Yanacocha and TRUJILLO | HUAMACHUCO | CAJAMARCA, the latter being dismissed by the company's high level of risk.



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According to “TRN DAT 099 v.15 Inspection Program”, routes are verified entirely once a year or to the first transport to a client by TRANSALTISA’s Control and Analysis team. In addition, for all cyanide transportation operations, the driver must present a travel log, in which the driver has to note if there were any changes on the route. If any changes are identified, these are reviewed and assessed; and if applicable, the route risk assessment is updated. Temporary changes, such as route diversions, are verbally informed to the driver prior to the departure of the convoy.

TRANSALTISA identified the fire stations, Police stations, technical support and hospitals and medical centers in the area, as well as phones and contacts.

As previously noted, the risk assessment of each routes describes the risks identified along them and the specific measures to be taken to address the risks.

TRANSALTISA identified the main bridges, tolls, fuel stops and technical stop points.

The evidenced auditor, the report views (photographs) at the following locations:

- Emergency Squad Pajjan
- Fire Company | Salvadora Trujillo No. 26
- Fire Company | Buenos Aires - Trujillo
- Police | Chicama
- Police | Ciudad de Dios
- Hospital | Chicama
- Hospital | Chocope

The same centers are included in the Emergency Response Plan of Transaltisa.

For the transportation of hazardous materials (including sodium cyanide), TRANSALTISA has a control room at the base of AREQUIPA and LIMA, Peru, where the GPS system provides continuous positioning of each of the vehicles at all times, as well as continuous monitoring of the velocity at each point of the route from the starting point to the end point.

TRANSALTISA also established through the “TRN PRO 027 Procedure for Transportation of Sodium Cyanide”, the specifications of use of escort trucks during the sodium cyanide transportation, which should be ONE (01) escort truck for every THREE (03) or less units of cargo transportation. A safety specialist, a policeman and one driver travel in the escort vehicle. This requirement applies to all customers of TRANSALTISA.

There can only be charged ONE (01) ISOTANKS per platform and each wagon can only drag one chassis. The convoy may include one or more escort vehicles at the client’s request. The travel of the convoy will depend on weather conditions; the Convoy Leader shall evaluate the safety of the route in each case, being able to stop the convoy if he considers the conditions do not allow safe transit.

TRANSALTISA has provided information (MSDS, emergency and product information, Emergency Response Plan) to support emergency centers (health centers, police and fire companies) along the routes mentioned, and a signed and received letter with such information. This activity is carried out so that external support centers could be prepared for emergencies. In addition, comments are asked to external support centers to manage risk as a way to query and obtain feedback. TRANSALTISA has contact specialized firms for emergency response if necessary (Engineering Services SAC | ESSAC). In In addition, TRANSALTISA has contacts with hospitals, police, fire company, Crane Service, Car Repair Workshops.

TRANSALTISA does not subcontract any of this cyanide transport operations.



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1.2 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.

X in full compliance with

The operation is in substantial compliance with Transport Practice 1.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.2 requiring an operation Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The TRANSALTISA procedure establishes minimum requirements for drivers: health, defensive driving training, response training on sodium cyanide emergencies (spills and poisoning prevention).

Drivers are legally required to hold an A4 license. In order to obtain this license, have completed high school, undergo a psychological evaluation and a psycho-technical assessment, and hold a certificate from Professional Driver School.

The auditor review the documentation:

- Mr. Herminio Guizado Sulca | Driver
- Mr. Casimiro Perca Tuya | Driver
- Mr. Luis Poma Salas | Driver
- Mr. Pablo Martin Castro Fernandez | Driver
- Mr. Paul López Villegas | Driver
- Mr. Uber Espejo Cerdado | Supervisor

A review of the criteria used for the evaluation of the route for: traffic density, cities, bridges, channels, road conditions, route design (curves, berms, number of lanes), the altitude, intersections, detours, weather and socio-political conditions was made by the auditors. As a result of the audit it was proven that TRANSALTISA only uses trained, qualified and licensed operators to operate their vehicles.

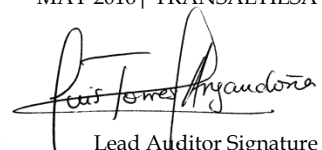
Records were verified and all staff operating the transport equipment was set to perform their work in a manner that minimizes the possibility of cyanide releases and exposures, these trainings include safe handling of cyanide both as emergency and poisoning, firefighting, first aid, defensive driving.

TRANSALTISA, has been working on a Program Management System Safety and Health at Work.

This program provides training related to leadership activities and management commitment, and Training, Hazard Analysis Working Procedures, Use of Personal Protective Equipment, Incident Investigation, Safety Inspections, Emergency Response, Drills, Environment Protection, Security, and Health Program.



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TRANSALTISA selects the most specialized drivers to transport sodium cyanide.

According to transportation procedures, drivers drive up to FIVE (05) continuously, with breaks of TWO (2) hours. Sleep at least EIGHT (08) hours before each trip, and one must not drive for more than TEN (10) hours per day.

In their Cyanide Emergency Response Plan, TRANSALTISA includes a training program that must be complemented by all drivers, consisting of the following:

- Introduction to the Company
- Basic Ricks Prevention and Use of Personal Protection Equipment (PPE)
- Hazardous Materials Handling and Transportation
- Emergency Response
- Mountain Defensive Driving

In addition, the following training courses are specific to drivers transporting cyanide shipments:

- Cyanide First Emergency Response
- General Information of Cyanide Product

According to Plan cyanide related training is refreshed once a year. During the audit, files of five drivers and one supervisor were reviewed, and all relevant training certificates were available.

1.3 TRANSPORT PRACTICE 1.3

ENSURE THAT TRANSPORT EQUIPMENT IS SUITABLE FOR THE CYANIDE SHIPMENT.

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.3 requiring an operation Ensure that transport equipment is suitable for the cyanide shipment.

TRANSALTISA establishes requirements for maintenance of the units carrying cyanide in the transport process, Which Comply with the Provisions of the law of Peru. In Addition, Transaltisa is registered at the Government of Peru for the transport of hazardous materials.

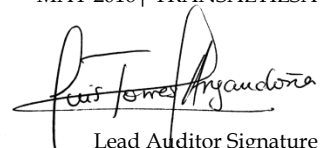
TRANSALTISA has its own maintenance shop, it was evident during the audit, the correct state of the facilities, technical training, operation of measuring equipment and calibration of the same. Finding maintenance activity in compliance.

According to through the the "TRN PRO 027 Procedure for transportation of sodium cyanide", TRANSALTISA a driver have to check the trucks and trailers completing a checklist per vehicle prior to the departure of the convoy. The checklist requires reviewing:

- Origin and destination of the load



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- Names of the driver and supervisor
- Shipment documentation (insurance, current technical inspection, circulation permit, among others)
- Driver’s documentation (license and ID card, and appropriate training certificates)
- PPE (safety hat, goggles, safety boots, vest, gloves, harness, and thermal wear)
- Vehicle safety equipment (cell phone and radio, safety belts, first aid kit, reflective triangles, cones, flash light, horn, fire extinguishers, Jack, snow chains, mirrors, alarms, Wheel wrench, wedges, windshield, among others)
- Lights (blinking, turns, large, stops, among others)
- Placards
- Tires (trucks and spare tires)
- Load verification (braces and twists lock of the semitrailer. Reportedly, this is verified again after loading the container, although it is not registered)

During the audit, ten (10) bundles of travel records who met the provisions of the “TRN PRO 027 Procedure for transportation of sodium cyanide”, is evidenced.

During the audit were demonstrated the plans and preventive maintenance records. The maintenance of the units is done by TRANSALTISA, the parts are original and technicians are specialized for the type of vehicle.

According to the “TRN PRO 027 Procedure for transportation of sodium cyanide”, TRANSALTISA has procedures in place to prevent overloading of the transport vehicles, one container of cyanide can be loaded on the vehicle.

TRANSALTISA does not subcontract any of this cyanide transport operations.

1.4 TRANSPORT PRACTICE 1.4

DEVELOP AND IMPLEMENT A SAFETY PROGRAM FOR TRANSPORT OF CYANIDE.

X in full compliance with

- The operation is in substantial compliance with Transport Practice 1.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.4 requiring an operation Develop and implement a safety program for transport of cyanide.

TRANSALTISA established a transportation method avoiding disturbances during motion.

For the transportation of hazardous materials (including sodium cyanide), TRANSALTISA has a control room at the base of AREQUIPA and LIMA, Peru, where the GPS system provides continuous positioning of each of the vehicles at all times.

According to the “TRN PRO 025 Procedure of the Monitoring”, TRANSALTISA describe the handling and inspection procedures, to ensure that the integrity of cyanide ISOTANKS is maintained during shipment.

TRANSALTISA requires inspection of cartels load information (DOT, UN and NFPA) verification of the truck. Signage is provided in order to comply with local regulations, which are based on the UN Recommendations



on the Transport of Dangerous Goods. Copies of the placards are included in the Emergency Response Plan.

TRANSALTISA indicates the need for conformity of the client, to ensure that the escort vehicles and transport vehicles are in optimal conditions.

TRANSALTISA conducts vehicle inspections prior to each departure/shipment

During the audit process, records of inspections prior to each departure shipment are evidence.

TRANSALTISA has a maintenance plan. The maintenance records were reviewed and the practice was confirmed during the observation of the vehicle and interview with the maintenance supervisor and drivers.

Drivers must rest at least 5 hours before a trip and must not drive more than 10 hours a day and the driving time is only during the day. It is noteworthy that Regulations of Peru set the same schedule for the transportation of hazardous. And according to the "TRN PRO 027 Procedure for transportation of sodium cyanide", drivers can drive up hours, and stops are designated prior to the departure of the convoy. Facilities where the convoys stop are fenced and have 24 hour security guards.

TRANSALTISA states that the load of cyanide must travel in 20-foot ISOTANKS, developing mechanisms to prevent its movement.

According to the "TRN PRO 027 Procedure for transportation of sodium cyanide", TRANSALTISA has anchoring mechanisms for the container and lashing system for cyanide in the container.

The trip will take place in convoy mode; the convoy leader is responsible for the assessment of climatic conditions and is empowered to suspend the transport convoy.

At the end of the trip, the leader of the operation and drivers must submit a report detailing the same road incidents, anticipated information, sensitive areas, and find relevant information to ensure the safety on future trips.

"TRN DAT 038 v.04 Alcohol and Drug Policy" It is prohibited the consumption of alcohol, drugs or any other substance that may impair or reduce the function of the driver or a member of the convoy in which prior to the start of each trip everyone must go through an alcotest and periodical drug tests; the violation of this policy results in the separation of the worker from the operation.

The plans and procedures for compliance with the Code are reviewed annually and annual surveillance audits are developed to verify compliance with the TRANSALTISA standards.

TRANSALTISA does not subcontract any of this cyanide transport operations.

1.5 TRANSPORT PRACTICE 1.5:

FOLLOW INTERNATIONAL STANDARDS FOR TRANSPORTATION OF CYANIDE BY SEA AND AIR.

X in full compliance with

The operation is in substantial compliance with Transport Practice 1.5

not in compliance with



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Summarize the basis for this Finding/Deficiencies Identified:

The operation is in NOT APPLICABLE with Standard of Practice 1.5 requiring an operation Follow international standards for transportation of cyanide by sea and air.

TRANSALTISA not transported by sea transport and air transport within the territory of Peru.

1.6 TRANSPORT PRACTICE 1.6:

TRACK CYANIDE SHIPMENTS TO PREVENT LOSSES DURING TRANSPORT.

X in full compliance with

The operation is in substantial compliance with Transport Practice 1.6

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 1.6 requiring an operation Track cyanide shipments to prevent losses during transport.

TRANSALTISA uses a GPS system. They also have telephone service, radio and cell phones which ensure full coverage during movement and are completely connected to the control room in their base in AREQUIPA and LIMA, Peru. In addition to providing this system, they continually know the positioning each of the vehicles all the time and the safety escort vehicle carries a satellite phone. During the audit, the operability equipment was verified.

The phone lines were operating at the time of the audit; and also an inspection was done to verify the operation of mobile equipment and it was found the payment of the phone, the GPS, satellite phone and the radio services.

Additional, TRANSALTISA periodically test communication equipment to ensure it functions properly.

TRANSALTISA has identified areas without cellular and radio coverage; in such areas the convoy makes use of satellite equipment.

The GPS system has location actualizations in real time, in areas without GPS coverage it saves the information transmitted after the passing of vehicles.

The bill of lading and the shipment reference are part of the shipping records of the amount transported; the Material Safety Data Sheet is checked before each trip and is available throughout the transportation.

In the sender shipment reference is indicated the name of the product, the United Nations (UN) number, the transported amount of packages and weight of the load, and it is also necessary to indicate the product safety considerations. Upon the delivery of the sender shipment reference, the provider delivers the Material Safety Data Sheet to the carrier. The absence of the sender reference guide and of the Material Safety Data Sheet during transportation is fine by the confiscation of the cargo by the government of Peru. It is worth mentioning that the sender shipment reference should be preserved and stored by the carrier for a period not less than FIVE (05) years.



TRANSALTISA does not subcontract any of this cyanide transport operations.



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INTERIM STORAGE

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

2.1 TRANSPORT PRACTICE 2.1

STORE CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTAL RELEASES.

X in full compliance with

The operation is in substantial compliance with Transport Practice 2.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in NOT APPLICABLE with Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

LCF has no stores or warehouses in territory of Peru.

EMERGENCY RESPONSE:

Protect communities and the environment through the development of emergency response strategies and capabilities.

3.1 TRANSPORT PRACTICE 3.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is in substantial compliance with Transport Practice 3.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.1 requiring an operation Prepare detailed emergency response plans for potential cyanide releases.

TRANSALTISA has an emergency response plan (TRN PLA 010 EMERGENCY RESPONSE PLAN FOR CYANIDE TRANSPORTATION). Information on road conditions is defined in the Roadmap document. The Emergency Plan describes the response actions for anticipated emergency situations. These were verified during the audit. The emergency response plan is approved by the ministry of transport and communication by the Peruvian government as oficio N° 1043-2016-MTC/16 (14/04/2016)

The Emergency Response Plans for transportation is suitable for the selected transport route, based on the hazards and risk assessment after the completion of the ROADMAP.

The Emergency Response Plan is suitable for the selected transport route, taking into account the physical and chemical form of cyanide clearly based on the Safety Data Sheet of the Product "Sodium Cyanide". TRANSALTISA is a transporter of sodium cyanide supply in solid state (briquettes).

TRANSALTISA indicates the use of trucks to transport sodium cyanide taking into account the characteristics of the equipment and assesses the structural condition of the road where the transportation sodium cyanide is done.

Information on road conditions is defined in the Roadmap document. The Emergency Response Plan describes the response actions for anticipated emergency situations. These were verified during the audit.

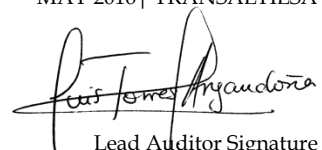
It also establishes the logical line of action to be taken by the convoy leader and drivers in case irregularities arise during transportation of sodium cyanide.

TRANSALTISA uses trucks; in addition, all shipment is dispatched within low platform trailers purchased with a maximum load capacity of 30 tons which are certified to transport sodium cyanide by the government of Peru.

TRANSALTISA sets action if incidents occur on the route which is described below.



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- Mechanical problems/does not continue
- Rollover with spill
- Rollover with no spill
- Fire in the truck
- Crash with injuries/no injuries
- Water spill, cleaning and decontamination
- Spill with rain (falling to the ground, Meltdown, the presence of others, railway, earrings)

Awareness on the part of drivers and supervisors of the actions in each case was evidenced after interview with the staff.

TRANSALTISA has defined three levels of emergency response. The Emergency Response Plan (Item 4.9) identify the roles of outside responders, medical facilities or communities in emergency response procedures

For 2do Response, TRANSALTISA subcontracts External Emergency Responder (ESSAC) and also contacts the Fire Department, Police, Maintenance Support, Service Cranes, and Emergency Medical Services.

During 2nd Response emergencies, the External Emergency Responder is in charge of the emergency response actions when they arrive (delimitation of the area, communication, and access and traffic control are performed by the drivers and the safety specialist while the External Emergency Responder arrives). However, when the National Fire Department arrives to the scene, they take control of the emergency, as established by local regulations. This is established in the Emergency Response Plan. Finally, specific roles of each outside responder are outlined in the Emergency Response Plan.

3.2 TRANSPORT PRACTICE 3.2:

DESIGNATE APPROPRIATE RESPONSE PERSONNEL AND COMMIT NECESSARY RESOURCES FOR EMERGENCY RESPONSE.

X in full compliance with

- The operation is in substantial compliance with Transport Practice 3.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.2 requiring an operation Designate appropriate response personnel and commit necessary resources for emergency response.

TRANSALTISA during the audit has show that Drivers, and Supervisors receive training in emergency response from appropriate personnel on the safe handling of cyanide (spill and intoxication) and others receive training courses in defensive driving, firefighting, first aid. These trainings are renewed annually complying with the training plan 2014, 2015 and 2016.

The Emergency Response Plan (Item 2.2), Drivers and Supervisors are responsible to respond in an emergency; they pass through medical tests to verify their good physical condition to perform these activities and have received the necessary training for efficient emergency response.



The Emergency Response Plan (Item 4.8), each truck has the necessary amount of emergency response equipment and the safety escort also has a Response Kit for spills and poisoning (Amyl Nitrite), and personal protective equipment which must be verified before the trip, as well as the verification of courses prior to starting the travels and the periodic emergency response training.

TRANSALTISA has the necessary equipment for emergency response in the event of a major spill.

There were verified the records of the emergency response and inspection of equipment. The presence of such equipment in the convoy was verified. In the Emergency Plan indicates the functions of the staff in case of an emergency, and also the emergency equipment to be used in both the first and the second response. The Emergency Plan describes the specific functions of the emergency response and the staff responsibilities.

In the "TRN PRO 027 Procedure for Transportation of Sodium Cyanide", is specified the verification criteria of the units before each journey. "TRN DAT 099 Inspection Plan" The procedure specifies the frequency of inspections and the level of inspections of the operation as described below:

- Journal, Driver
- Monthly, Head of Business
- Semiannual, HSEC Manager | HSEC supervisor
- Semiannual, Management operations
- Annual, General Management (Emergency Equipment and Vehicle - Annual)

During the audit, inspection records were evident. (TRAN FOR 081 Inspection of emergency response equipment)

TRANSALTISA does not subcontract any of this cyanide transport operations.

3.3 TRANSPORT PRACTICE 3.3:

DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 3.3 requiring an operation Develop procedures for internal and external emergency notification and reporting.

It was noticed that the contact information in case of emergency is updated (Item 4.9 and Annex 7), in case of emergency it will be set and updated the Emergency Response Plan. The Emergency Response Plan indicates the current contact list which is reviewed and updated through every review of the Emergency Response Plan.

The Emergency Response Plan includes an internal communication and external schema that specifies the call flow by the safety personnel, the receptors, the regulatory agencies, external response providers, medical centers, fire departments, and communities potentially affected by an emergency.

For reporting incidents use it is made:

- TRN PRO 051 Incident Reporting Procedure.
- TRN FOR 054 Preliminary Incident Report
- TRN FOR 055 Incident Report

3.4 TRANSPORT PRACTICE 3.4:

DEVELOP PROCEDURES FOR REMEDIATION OF RELEASES THAT RECOGNIZE THE ADDITIONAL HAZARDS OF CYANIDE TREATMENT CHEMICALS.

X in full compliance with

The operation is in substantial compliance with Transport Practice 3.4

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.4 requiring an operation develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

It was noticed in the Emergency Response Plan (Item 4.6.2. R “Product Withdrawal and Transfer of Product in Public Roads and Highways”) the description of how to recover or neutralize the solids, the procedure of decontamination of soils or other contaminated medium and how to manage these wastes.

The Emergency Response Plan (Item 4.6.2. E) prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released to surface waters.

3.5 TRANSPORT PRACTICE 3.5:

PERIODICALLY EVALUATE RESPONSE PROCEDURES AND CAPABILITIES AND REVISE THEM AS NEEDED.

X in full compliance with

The operation is in substantial compliance with Transport Practice 3.5

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Standard of Practice 3.5 requiring an operation Periodically evaluate response procedures and capabilities and revise them as needed.

The period of review and evaluation of this Emergency Response Plan is at least once a year.



MAY 2016 | TRANSALTILSA

A handwritten signature in black ink, appearing to read 'Luis Jones', is written over a white background. Below the signature, the text 'Lead Auditor Signature' is printed in a black, sans-serif font.

The TRANSALTISA's Management is responsible for requesting immediate changes to this Plan, in the event of serious incidents, by simulation results, results of audits or inspections by process improvement etc.

During the audit, records spill drill evidenced, in 2014, 2015 and 2016.

The Emergency Response Plan and the Training Plan define the frequency of emergency drills. The document presents the schedule of emergency simulations.

The simulations are made by the Chief of Operation who has an ANNUAL DRILLS PROGRAM indicating the completion of THREE (03) practical simulation, for the purpose of evaluating the effectiveness of the Emergency Plan and correct what is indicated on it.

The purpose is to measure the efficiency of the response procedure to ensure that the staff involved in an emergency act according to the Emergency Response Plan.

The Chief of Operation takes into account the rapid preliminary compilation of the situation, gathering basic facts as they are known such as time the who, what, where, when, how and why of the situation, contacts the responsible person and broadcasts the obtained information, and continuously communicates with the Convoy Leader and will meet the requirements of authorities.



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