



INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Operations Summary Audit Report

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



Verification Protocol

www.cyanidecode.org

April 2019

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Lead Auditor Signature

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
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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, Av Nicolas Ayllon 2683- El Agustino- 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 are not 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, 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, Chemical Products, Steel Bolls and Minerals. 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 2016, so this is the 3 rd. Recertification. See www.cyanidecode.org.

These activities are carried out 3 years ago with ZERO (0) accidents.



**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.



Lead Auditor Signature

Auditor's Finding

This Operation is:

X 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: Julio Monteiro Auditores da Qualidade Ltda.

Audit Team Leader: Julio C. M. Monteiro

Auditor: Maria del Pillar Arrese

E-mail: monteirojulio790@gmail.com; jmaq@iq.com.br

Date(s) of Audit: April 26, 2019

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.

Signatures of Audit Team Leader

Julio C. M. Monteiro



APRIL 2019 TRANSALTILSA

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 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.

Warehouse of Callao – Yanacocha have the route defined in the Yanacocha procedure. Only one route to customer demand is maintained. In this route analysis it is considered: Population density, Infrastructure (road), condition, Inclination and slope, Prevalence and proximity of water masses and fog.

Emergency Response Plan has been implemented for the route related to the cyanide transportation. The routes are evaluated: LEAF ROUTE LIMA-YANACOCCHA-LIMA TRANSPORT CN SODIO ORICA TRN-ORI-IYD-RUT-001. Version 01 of date Nov 2018 in which a trip of 5 days is shown with cargo leaving Base de El Agustino and arriving at Mina on the 5th day. Respect your speeds.

“TRN-PRO-017 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 2019. 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 | Huamacucho | Cajamarca, the latter being dismissed by the company's high level of risk.

According to “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 must 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 route describes the risks identified along with 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 external agents that are part of the route followed by the cyanide to Cajamarca have been identified. 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 - PERU that centralizes all the movement of the national fleet, where the GPS system provides a continuous positioning of each one of them. vehicles always, as well as continuous monitoring of vehicles. Speed at each point of the route from the starting point to the end point. All units have internal and external cameras, which give a real time view of the events on the route of any road in Peru. Additionally, the status of the chambers and their operation are checked before departure according to the Check List of Orica Units for the Transport of Sodium Cyanide dated April 2019, signed by the supervisor of operations in compliance signal, it is verified in plates: F6M-870, F6M-814, FGL-851. TRANSALTISA also established through the "Procedure TRN ORI OP 001 for the transport of sodium cyanide" in its latest version, the specifications of use of escort trucks during the transport of sodium cyanide, which must be UN (01) truck escort for every THREE (03) or less cargo units. transport. A security specialist, a policeman and a driver travel in the escort vehicle. This requirement applies to all TRANSALTISA customers. Only ONE (01) ISO TANK can be loaded per platform and each car can only drag one chassis. The convoy may include one or more escort vehicles at the request of the client. The trip of the convoy will depend on the climatic conditions; The convoy leader will evaluate the safety of the route in each case, being able to stop the convoy if it considers that 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) on the mentioned routes, and a letter signed and received with This information is mentioned in detail in points 3 and 4. This activity is carried out so that external support centers can prepare for emergencies. In addition, comments are requested from external support centers to manage risk to consult and obtain comments. TRANSALTISA has contact with specialized firms for emergency response if necessary (Engineering Services SAC | ESSAC). In addition, TRANSALTISA maintains agreements with Consortium of Cranes, Heavy Machinery and Transport (Cranes of 60Tons.), Triple A (Cranes 50Tons) and C & M Cajamarca Services and luminaires companies and heavy machinery rental.

TRANSALTISA does not subcontract any of this cyanide transport operations.

All the documents made are in their latest version and Records are maintained according to Transaltisa Management System implemented.



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 of several Drivers and consider to be satisfactory.

As a result of the audit it was proven that TRANSALTISA only uses trained, qualified and licensed Drivers 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.

TRANSALTISA selects the most specialized Drivers to transport sodium cyanide.

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



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.

It is transported on conditioned platforms for loading the container, Semi – trailer platform brand RMB Sateci. The technical specifications with load capacity of 33TN are evidenced by DS 058-2003-MTC. There are 20 units with the same characteristics for the transport of cyanide.

The TRN COR MTT PRO 001 Fleet Maintenance Procedure is evidenced in its latest version. In the preventive maintenance they review performance per kilometer every 10,000 kms, the monthly maintenance program of the units of the month of April 2019 is appreciated.

Evidence of non-destructive tests applied to semi-trailers responsible for transporting cyanide.

According to the Procedure for transportation of sodium cyanide, a Driver must check the trucks and trailers completing a checklist per vehicle prior to the departure of the convoy.

TRANSALTISA ensures the control of the weight of the cyanide charge, making a traceability between the Remission Guide of Orica and the Guide of Transmission of TRANSALTISA, the same ones that throughout the transport maintain the same weight until their arrival.

TRANSALTISA does not subcontract any of this cyanide transport operations.

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, Peru, where the GPS system always provides continuous positioning of each of the vehicles.

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.

The National Regulation is fulfilled based on the General Law of Land Transport and Traffic N ° 27181, Regulation DS 024-2004-MTC, SOAT Regulation, law that regulates the transport of materials and hazardous waste Law 28256 and its DS 021-2008-MTC and its amendment DS 030-208-MTC. DS 033-2009-MTC Regulation of the Superintendence of Land Transport - SUTRAN, Law of Control of Chemical Inputs and Inspected Products N ° 28305 and its regulation DS 053-205-PCM.

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

TRANSALTISA conducts vehicle inspections prior to each departure.

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.

According to transportation procedures and Lima-Yanacocha-Lima road maps Cod. TRN ORI IYD RUT 001 revised for Cyanide transport, Drivers drive up to four (04) continuous, with breaks of two (2) hours or 15 min to active pauses sleep at least eight (08) hours before each trip, and one must not drive for more than ten (10) hours per day.

According to the written procedure for the safe transport of sodium cyanide - Orica cod. TRN ORI OPE PETS 001 in its latest version, demonstrate the activity of Saturation and Lacing of the Isotank with chains, using personal protection equipment (helmet, lenses, steel toe boots, leather gloves and reflective vest), as well as equipment. of vehicular protection and emergency control.

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.

The Instructive of control of consumption of alcohol and drugs TRN INS 005; within its indications it is declared the realization of random controls to all personnel without distinction of roles or hierarchies to detect the presence of alcohol. If detected, it will be prohibited to enter their work.

The occupational doctor states that the policy exists, and based on that there are two Programs: Alcohol and Drug Prevention Program SBS RSST 006 and Fatigue and Drowsiness Prevention Program.

The schedule of activities for this 2019 has already been carried out with induction and training activities such as: dissemination of the policy, prevention of alcohol and drugs and their effects on the human being and symptoms of drug abstinence.

The Alcohol and Drug Policy of June 2018 v.02 is also evident; disseminated in staff training on 07-01-2019. 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.



1.4 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, Peru, where the GPS system always provides continuous positioning of each of the vehicles.

TRANSALTISA describe the handling and inspection procedures, to ensure that the integrity of cyanide Isotank 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.

The National Regulation is fulfilled based on the General Law of Land Transport and Traffic N ° 27181, Regulation DS 024-2004-MTC, SOAT Regulation, law that regulates the transport of materials and hazardous waste Law 28256 and its DS 021-2008-MTC and its amendment DS 030-208-MTC. DS 033-2009-MTC Regulation of the Superintendence of Land Transport - SUTRAN, Law of Control of Chemical Inputs and Inspected Products N ° 28305 and its regulation DS 053-205-PCM.

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

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

TRANSALTISA has a Preventive 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.

The TRN COR MTT PRO 001 Fleet Maintenance Procedure is evidenced in its latest version.

According to transportation procedures and Lima-Yanacocha-Lima road maps Cod. TRN ORI IYD RUT 001 revised for Cyanide transport, Drivers drive up to four (04) continuous, with breaks of two (2) hours or 15 min to active pauses sleep at least eight (08) hours before each trip, and one must not drive for more than ten (10) hours per day.



TRANSALTISA states that the load of cyanide must travel in 20-foot Isotank, 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.

According to the written procedure for the safe transport of sodium cyanide - Orica cod. TRN ORI OPE PETS 001 in its latest version, demonstrate the activity of Saturation and Lacing of the Isotank with chains, using personal protection equipment (helmet, lenses, steel toe boots, leather gloves and reflective vest), as well as equipment of vehicular protection and emergency control.

Evidence in the transport of 10 of February 2019 in Convoy F6L-852, F6N-731, F6M-814. And from January 27, 2019: F6M-814, F6L-852 and F6N-731.

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.

The Instructive of control of consumption of alcohol and drugs TRN INS 005; within its indications it is declared the realization of random controls to all personnel without distinction of roles or hierarchies to detect the presence of alcohol. If detected, it will be prohibited to enter their work.

The occupational doctor states that the policy exists, and based on that there are two Programs: Alcohol and Drug Prevention Program SBS RSST 006 and Fatigue and Drowsiness Prevention Program.

The schedule of activities for this 2019 has already been carried out with induction and training activities such as: dissemination of the policy, prevention of alcohol and drugs and their effects on the human being and symptoms of drug abstinence.

Training in the prevention of drug use in driving, alcohol and the effects of drugs of 11-02-2019

Prevention bulletin in the use of drugs and alcohol.

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.

All the documents made are in their latest version and Records are maintained according to Transaltisa Management System implemented.

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

Summarize the basis for this Finding/Deficiencies Identified:

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Lead Auditor Signature

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 shipment 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, Peru. In addition to providing this system, Yanacocha continually know the positioning each of the vehicles all the time since they share the same access that TRANSALTISA to the control system GPS and the safety escort vehicle carries a satellite phone. During the audit, the operability equipment was verified.

The proof of service issued by TRACKLOG S.A.C. who provide the wireless monitoring and control service for all its units and complies with the requirements established in directive No. 001-2014-MTC / 15 issued according to DS 011-2013-MTC for compliance with the National Regulation of Transportation approved by DS 017-2009-MTC.

The phone lines were operating at the time of the audit; and, 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.

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.

In the Transportation Plan Document, within the resources assigned for the emergency in transport, it is indicated to carry the satellite telephone, which all the supervisors have, and the last unit of the convoy takes it.

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 Landing 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 number 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.

INTERIM STORAGE

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

Does not apply

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.



3. 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 for Cyanide Transportation - 2019. 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 Official Nr. 3564-2018-MTC/16 (Feb/23/2018).

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, considering 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 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.

- 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.

The external agents that are part of the route followed by the cyanide to Cajamarca have been identified. 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 shown 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 -2018/2019.

The Emergency Response Plan, 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 indicates that 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.

The transport vehicle Operators receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan. In the Emergency Plan indicates the functions of the staff in case of an emergency, and 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 "Emergency Response Equipment's and Organization Form", the items to be inspected are listed in the Emergency Kit box: Tyvek disposable costumes, Level A suits, SCBA, safety goggles, safety visual



protectors, water suits, boots, gloves, masks, flashlights, hazard tape rolls, bags, brooms, scissors, full face masks with gas filters cyanuric, lime, buckets and lamps.

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 with Standard of Practice 3.3 requiring an operation Develop procedures for internal and external emergency notification and reporting.

Effectively, the Communication Diagram is established to respond to an emergency on the road, previously designed with the Yanacocha client; and another flow to serve other clients.

It was noticed that the contact information in case of emergency is updated, 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.

From the procedure TRN COR SEG PRO 002 Analysis of accidents and near accidents the following incident reporting formats are born:

- TRN PRO 051 Declaration of the parties and witnesses
- TRN FOR 054 Preliminary Incident Report
- TRN FOR 055 Incident Report
- TRN FOR 056 Final report on incident analysis

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 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:

3.6 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 (suggested) or in case it changes to the legislation, the processes of the client or business, according to the procedure "Control of Documented Information" TRN COR SIG PRO 001. During the audit, records spill drill evidenced, in 2017, 2018 and 2019.

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 three Annual Drills Program of practical simulation, for the purpose of evaluating the effectiveness of the Emergency Plan and correct what is indicated on it. To be done in March, July and October 2019.

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.

