

*VÍCTOR MASSON TRANSPORTES CRUZ DEL SUR S.A. DE C.V.*

# *Cyanide Code Principle 2 Transportation Summary Audit Report*

*PROJECT NO. 209467*

*FEBRUARY 2014*

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# 1 GENERAL SUMMARY

## 1.1 INFORMATION ON THE AUDITED OPERATION

Name of Cyanide Transportation Facility: Victor Masson Transportes Cruz del Sur S.A. (CDS)

Name of Facility Owner: Victor Masson Transportes Cruz Del Sur

Name of Facility Operator: Victor Masson Transportes Cruz Del Sur

Name of Responsible Manager: Mr. Carlos Cafora

Address: Au Riccheri y Boulogne Sur Mer, Nave D3, Tapiales

State/Province: Buenos Aires Country: Argentina

Telephone (054)4480-6666 E-Mail: ccafora@cruzdelsur.com

Victor Masson Transportes Cruz Del Sur S.A. (CDS) is a sodium cyanide transporter in Argentina. Currently, CDS transports cyanide to the mines located in Argentina.

CDS receives the cyanide at the Buenos Aires Port. CDS responsibility starts when the Port Authority releases the container by placing it on a CDS's platform. The cyanide is transported directly to the mine, without the intervention of secondary storage facilities.

**This audit comprises the ground transportation operations from the moment the Port Authority releases the cyanide to its delivery at the client's facility. CDS was first certified in 2010; records were reviewed from the date of the previous audit to October 2013.**

Although Argentina infrastructure would allow for alternative routes, the national regulations indicate that hazardous materials must be transported only through road controlled by the national police, leaving only one possible transport route from Buenos Aires Port to these mines. CDS procedures would be applied in case they increase their operations from other Argentinean ports.

Currently CDS transports cyanide produced by DuPont, AGR, and Orica. Cyanide is packaged by the producers in the following way: primary packaging in a poly propylene super-sack filled up to 1 ton. The super-sack is then placed in a polyethylene bag to protect the material from water and humidity; finally the packaged material is placed in a wooden box. No less than 20 boxes are placed in standard 20-foot shipping containers (the containers); the exact number of boxes is to prevent lateral movement of the boxes within the container. To further prevent movement a block and brace is applied consisting of placing wood beams between the last box and the container's door. Prior to shipping, the manufacturers seal the container with a tag with serial number at the production facility to prevent material losses. These seals are only removed at the mine.

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**1.2 OVERALL AUDITOR'S FINDING**

This operation is

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

with the International Cyanide Management Code.

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

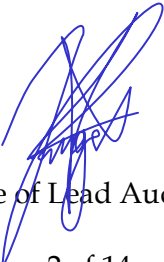
This operation has not experienced compliance problems, cyanide related incidents, exposures or releases during the previous three-year audit cycle

Audit Company: ERM Mexico, S. A. de C. V.  
Audit Team Leader: Juan Carlos Rangel Lopez E-mail: juancarlos.rangel@erm.com  
Date(s) of Audit: 23 October 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 environmental audits.

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## 2 VICTOR MASSON TRANSPORTES CRUZ DEL SUR

This operation is

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

with the International Cyanide Management Code.

### 2.1 **TRANSPORT PRACTICE 1: TRANSPORT CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTS AND RELEASES**

#### 2.1.1 **Transport Practice 1.1: Select cyanide transport routes to minimize the potential for accidents and releases.**

The operation is

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

Transport Practice 1.1

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

CDS has the following procedures:

- IT-MIN03-02 "Instructive to Assess the Risk and Approve Routes" (latest revision October 2013).
- PG-MIN03-01 "Sodium Cyanide Transport" (latest revision October 2013, hereafter the transport procedure).

The instructive to assess risk and approve routes establishes the first step in the route assessment is to describe and the following safety criteria must be identified:

- Dangerous turns
- Steep slopes
- Main cities and population density
- Bridges
- Slides zones
- Intersection with rail roads
- Fog, ice, and snow areas
- Water bodies
- Environmentally sensitive areas
- Areas with high robbery risk
- Areas where driver could rest
- Any other conditions that may represent a risk.

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It establishes that a physical inspection of the route must be performed by the convoy leader. During this inspection the scheduled stops and rest are selected, the communication services available, emergency numbers, gas station, police offices, sensitive areas, and communities are also identified. The areas where accidents are most likely to take place must also be identified.

Based on the route inspection, a risk assessment has been performed. The assessment was documented in a route assessment matrix (the matrix) where the transportation route is divided in sections considering crossings of urban areas, intersections with other roads, and other key points (e.g. mine check point). Each section was assessed for each of the route safety criteria mentioned and, based on these, a risk ranking is used (A for areas where incident risk is high to D where the risk is low).

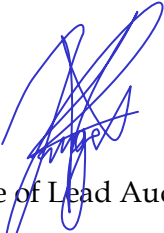
Based on the mentioned matrix general preventive measures have been established in the transport procedure including: limiting the transportation activities to day-time only, a minimum 8 hr. driver-rest period prior to starting a cyanide transportation operation, mandatory 10 minutes brakes approximately every two hours in pre-selected stop points during cyanide transportation operations, all shipments performed in convoys with at least one safety escort vehicle and a convoy leader. The transport procedures allow the convoy leader to stop the operations (in a pre-selected point) when the route conditions are unsafe (e.g. due to weather conditions).

The route assessment procedure establishes that the route must be updated at whenever it is required. To assess the need of updating the route assessment, a committee meets after each transport operation and reviews the convoy leader report. Based on the report the committee defines if the rout needs to be updated. The conclusion of the committee is recorded in a format developed by CDS for this purpose.

In November 2012 CDS organized forums regarding cyanide transport and invited relevant institutions. Additionally, in April and January 2013 has provided training on emergency response to the Mining Ministry and mining companies. According to CDS representatives, these activities will be repeated on an annual basis.

CDS distributed in November 2011 and August 2012 copies of the sodium cyanide material safety datasheet to hospitals that are located along the route.

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**Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.**

The operation is

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

Transport Practice 1.2

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

The transport procedures establish the following requirements for drivers:

- To be healthy
- To have the legally required driving license
- To be trained by CDS in sodium cyanide handling and emergency response.

To obtain the driving license for hazardous materials in Argentina, the driver must attend a training course about hazardous materials transport and a general goods transport (which includes defensive driving). The training is provided by a government agency. Additionally, CDS provides a two hour training prior to each operation about cyanide and emergency response; a test is applied to the drivers to reinforce the training. The tests are kept as records and are included in the operation file.

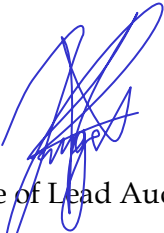
The procedure also establishes that the driver must have at least one rest day per week, must have rested at least 8 hours prior starting the trip, that a 10 minutes break must be taken approximately every two hours, and that the maximum work journey for the driver is 12 hours.

Additionally, CDS has developed a training matrix that includes the frequency (from annual to every 2 years) for the following topics:

- Cyanide Transport
- Cyanide Emergency response
- First aids during cyanide transport
- Dangerous goods with emphasis in cyanide
- Defensive driving
- Alcohol and drugs prevention policy
- Chemical handling safety

CDS does not subcontract the cyanide transport.

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

The operation is

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

Transport Practice 1.3

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

The transport procedure establishes the characteristics required for vehicles to be used for cyanide transportation including:

- A preventive maintenance program
- Permits required by the local authorities

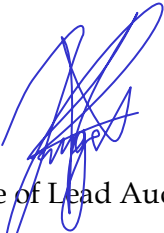
The convoy supervisor reviews the truck and platform documents, the platform load capacity is included in the circulation permit. The load capacity of the platforms used by CDS is 28.5 tons and larger; the gross weight of an ocean container fully loaded with cyanide is approximately 24 tons.

CDS has the Preventive Fleet Maintenance Program (Annex 1 of the IT-MIN03-01). This program includes the types of maintenance for trucks (three types of services M1, M2 and M3) and for platforms (two types of services M1 and M2).

The transport procedure establishes that each platform will be loaded with only one container and that each truck can only haul one platform trailer. This is consistent with the information included in the inspection checklist and was confirmed during the interview with the convoy leaders and drivers.

CDS does not subcontract the cyanide transport.

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

The operation is

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

Transport Practice 1.4

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

The transport procedure establishes that the load cannot be altered during the transportation process. To ensure this, tags are placed in the ocean container's locks at the manufacturing facility. These tags can only be removed at the mine. The containers received in the port are placed on platform trailers hauled by trucks without the need of changing the packaging. According to the interviewed convoy leader, the load is not removed from the container.

The transport procedure establishes that placards with cyanide's UN number and poison signs must be placed in the container; this is verified through the vehicle inspection checklist. The convoy leader has additional placards in case the container is missing one or more.

The transport procedure establishes that:

- Inspections are performed prior the vehicle departs to the port facility for loading (documented through the vehicle inspection checklist)
- the truck and the platform must have a preventive maintenance program, which is controlled by a software system (*Sistema de Mantenimiento de Recursos* – Resources Maintenance System)
- Operators rest at least 8 hrs. prior to trip, should not drive for over 12 consecutive hours, and take a 10 min break approximately every two hours at pre-selected stops points where the risk has been assessed and ranked as low; the convoy leader ensures that these are the only programmed stops. The fulfillment of these requirements was confirmed through the operation logs, the operation files, and interviews with the drivers and the convoy leaders.
- Prior to departure, the convoy leader assesses the weather conditions and gets information about political issues on the road; if he deems it necessary he can postpone the trip and this decision is informed to the mine and the cyanide provider; this is recorded in the convoy control and follow format included in the operation file.
- Prior to departure of every shipment the drivers are tested for alcohol levels (blow tests documented in the convoy leader report).
- Load shifting within the container is not considered possible as all containers are filled with 20 boxes and block and brace is applied to prevent load movement.
- Container rollovers in different conditions (during the rainy season, crossing a river, in a curve, or crash) are considered and preventive measures are included in the Emergency Response Plan (e.g. speed limits).

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CDS has implemented the following preventive maintenance routines for trucks and platforms which are based on the manufacturer recommendations.

The preventive maintenance includes the following programs:

Type of Service	Iveco Stralis*	Iveco Trucker**	Scania 340***
M1 every 40,000 km	<ul style="list-style-type: none"> <li>- Oil and hydraulic oil changes</li> <li>- Oil filter replacement</li> <li>- General lubrication</li> <li>- Fuel filter and pre-filter replacement</li> <li>- Air filter replacement</li> </ul>		
M2 every 80,000 km	<ul style="list-style-type: none"> <li>- Gear box oil change</li> <li>- Visual inspection of Oil and hydraulic oil</li> <li>- Breaks system inspection</li> <li>- Control and change belts, if applicable</li> <li>- Steering system</li> </ul>		
M3 every 120,000 km	<ul style="list-style-type: none"> <li>- Injectors control</li> <li>- Breaks system replacement</li> <li>- General inspection of electrical system</li> <li>- Air ducts verification</li> <li>- Gear box oil change</li> <li>- Oil and hydraulic oil changes</li> <li>- General lubrication</li> <li>- Air filter change</li> <li>- Steering fluid filter replacement</li> <li>- Suspension system inspection</li> <li>- Humidity filter replacement (compressed air system)</li> </ul>		

\* Annex 2, Annex 3, Annex 4

\*\* Annex 5, Annex 6, Annex 7

\*\*\* Annex 8, Annex 9, Annex 10

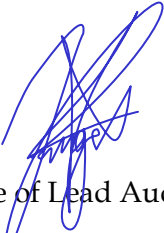
In addition, the following parameters are periodically inspected:

- Belts inspections
- Break shoes inspection
- Set-back alarms
- Lights
- Tires

The platforms must be inspected every 6 months (M1) as follows:

- Lights and electric system
- Breaks system
- General aspect (paint, signals, etc.)
- Air system

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- Tires
- Lubrication
- Suspension
- Physical integrity of the chassis
- Pneumatic axis

Lastly, since 2012, the platforms must be change the hook bolt every 24 months (M2).

The electronic records are kept in a computer system. CDS does not subcontract the cyanide transport.

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

The operation is

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

Transport Practice 1.5

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

The scope of this audit was only for the ground transportation operations performed by CDS from Buenos Aires port to mines in Argentina; therefore, this practice does not apply.

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

The operation is

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

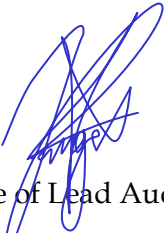
Transport Practice 1.6

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

The convoy leader is provided with a cellular phone and a satellite phone. The convoy leader has also a radio and he is responsible of communications with CDS in case of an emergency. Communication equipment is tested prior to the departure of the convoy and recorded in the vehicle inspection checklist.

According to the interviewed convoy leader, there are areas with no cellular coverage; however, the convoy leader carries a satellite phone which has coverage all along the route.

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The transport procedure establishes that the convoy leader must report the progress of the convoy at pre-selected points. The progress report is provided by phone to the base which informs the interested parties of the convoy progress by email. A tabular report is generated with the estimated and actual time of arrival to the selected stop points. Also, all incidents (e.g. mechanical failure) are reported immediately to CDS base and to the interested parties. Additionally, all the vehicles are equipped with a GPS which is tracked through an Internet site which provides on real time the convoy position. CDS base continuously monitors the location of the convoy.

The transport document (similar to a bill of lading) issued by the cyanide provider is carried by each driver and a copy is carried by the convoy leader. The transport document includes the number of container and net weight. The mine receipt stamps the transport document which is used for invoicing.

Additionally, the containers are locked and tagged at the manufacturer's facilities and these tags are only removed at the mine.

CDS does not subcontract the cyanide transport.

**2.2 INTERIM STORAGE: DESIGN, CONSTRUCT AND OPERATE CYANIDE TRANS-SHIPPING DEPOTS AND INTERIM STORAGE SITES TO PREVENT RELEASES AND EXPOSURES.**

**2.2.1 Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.**

The operation is:

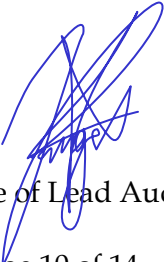
- in full compliance with
- in substantial compliance with
- not in compliance with

Transport Practice 2.1

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

The scope of this audit was only for the ground transportation operations performed by CDS from Buenos Aires port to mines in Argentina. There, transport is performed without the intervention of interim storage sites; therefore, this practice does not apply.

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**2.3 EMERGENCY RESPONSE: PROTECT COMMUNITIES AND THE ENVIRONMENT  
THROUGH THE DEVELOPMENT OF EMERGENCY RESPONSE  
STRATEGIES AND CAPABILITIES**

**2.3.1 Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.**

The operation is

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

Transport Practice 3.1

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

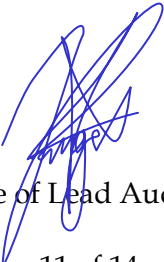
CDS has implemented the system IT-SHYMA04-01 Rev 5 "Emergency Response System for Ground Transport of Sodium Cyanide" (latest update October 2013).

The emergency scenarios, the general emergency response instruction, and the scenario-specific instructions consider the solid state of the cyanide.

All emergency scenarios developed are related to ground transportation of cyanide, including scenarios spilled cyanide in dry conditions and scenarios for spilled cyanide that gets in contact with water and with the presence of wind. All the scenarios are in relation with accidents of trucks hauling a platform trailer carrying a 20-ft container, which is the only transportation modality used by CDS.

The Annex 3 "Roles for the convoy crew" of the Emergency Response System establishes the roles for public emergency responders including the police departments, which would have to control; firefighters would help to rescue hurt people; and ambulance services, which would attend and transport, if necessary, hurt people to the hospitals. However, it recognizes that the firefighters and police, which by law are responsible of attending the emergency, may request to control the emergency, in which case, the emergency coordinator would pass the control of the emergency to them but will remain on site to provide advice and support, if necessary.

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

- √ in full compliance with
- in substantial compliance with
- not in compliance with

Transport Practice 3.2.

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

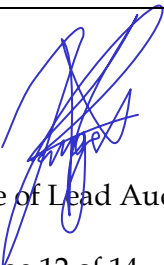
As mentioned in practice 1.2 the drivers and the convoy leader have been trained in the emergency response procedures. The emergency coordinator and the emergency response team have also received training in the emergency response procedures. Additionally, the plan has been agreed with the cyanide manufacturers.

The Emergency System Section 4 establishes the responsibilities for the members of the response team (convoy leader, operations base, traffic controller, and other internal roles during the emergency). The convoy leader is responsible for the control of the emergency while the Emergency Coordinator takes control over the emergency.

CDS has defined the following materials as the minimum required emergency response equipment.

Equipment	Pieces
Overall tyvek suits	8
Pairs of leather gloves	8
Pairs of PVC boots	8
Safety goggles	8
Pairs of impermeable gloves	8
Danger tape rolls	2
Flash lights	2
Ducting tapes	1
Cyanide gas detector	1
Water analysis kit	1
Disposable respirators 3M 8210	40
Oxygen tank	1
Shovels	4
Sweeps	4
Polyethylene bags	50
Lime	50 kg
Sodium hypochlorite	50 kg
Empty containers	2

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The transport procedures establish that the emergency equipment must be carried by the convoy leader. According to site management, the emergency equipment is transported in two wood boxes, one in the safety escort vehicle (including PPE, safety equipment, etc.) and in a one of the trucks (including Calcium carbonate bags and Sodium hypochlorite bags). In addition, the amyl nitrite shots and the cyanide gas detector are transported inside the safety escort vehicle. A checklist is used to verify that it is available and it is part in the operation files.

CDS does not subcontract the cyanide transport.

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

The operation is

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

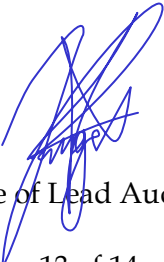
Transport Practice 3.3

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

The Emergency Response System Annex V includes a communications flow diagram which can be summarized as follows: the convoy leader must first inform CDS's Traffic Control who then informs the Emergency Coordinator (or its replacement), who notifies the client (who notifies the mine site), CDS Operations Manager (who notifies the CDS President), CDS management team, to CDS's Emergency Response Team Q66 (ERT Q66), the ERT is the one that notifies the external responders, if necessary. The derived procedures (one per mine) include the list of contact names and numbers for emergency information with each mine. The Annex IX includes the emergency numbers with external responders and the cyanide producers. A sample of the numbers was dialed and confirmed to be accurate.

The emergency notification and reporting procedures are included within the Emergency Response System. The System Section 5.6 establishes that it must be reviewed whenever modifications are required or, at least, once a year.

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

The operation is

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

Transport Practice 3.4

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

The general scenario for cyanide spill in dry conditions establishes the procedure to clean a spill and the decontamination of the area.

In case that the client defines that further assistance is required for a second response, CDS will contact the company RESTEC.

The general scenario for cyanide spill in wet conditions included in Annex III of the Emergency Response System establishes that chemicals should not be added to water bodies.

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

The operation is

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

Transport Practice 3.5

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

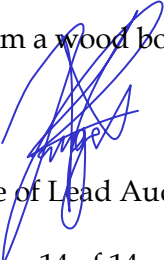
The Emergency Response System Section 5.6 establishes that it must be reviewed whenever modifications are required or, at least, once a year. The transport procedures establish that the convoy leader report must be used to update the assessment of the route. The Emergency Response System was last updated in October 2013.

The Emergency Response System Section 5.5 establishes that at least one emergency drills must be performed every year.

The following mocks were performed in the last years:

- May 2010, a spill of 500 kg of cyanide from a wood box due to a crash with another truck.
- December 2011, a spill of cyanide from a wood box due to a crash with a pickup truck.

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- November 2012, a crash with another truck.
- Mayo 2013, a spill of cyanide from the truck into an area with water due to it was raining.

Emergency Response System Section 5.5 establishes that it must be reviewed whenever modifications are required or, at least, once a year including the name and numbers of the emergency contacts and phone numbers of external responders.

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