



INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT FOR THE INTERNATIONAL CYANIDE MANAGEMENT CODE

JUNE 2021

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TRANSPORTATION SUMMARY AUDIT REPORT

Table of Contents

Introduction	iii
Instructions	iii
Operation General Information	1
Operation Location Detail and Description	1
Auditor’s Finding	2
Compliance Statement	2
Auditor Information	3
Auditor Attestation	4
Principles and Standards of Practice	5
Principle 1 TRANSPORT	5
Standard of Practice 1.1	5
Standard of Practice 1.2	5
Standard of Practice 1.3	5
Standard of Practice 1.4	6
Standard of Practice 1.5	6
Standard of Practice 1.6	6
Principle 2 INTERIM STORAGE	7
Standard of Practice 2.1	7
Principle 3 EMERGENCY RESPONSE	7
Standard of Practice 3.1	7
Standard of Practice 3.2	7
Standard of Practice 3.3	8
Standard of Practice 3.4	8
Standard of Practice 3.5	8



TRANSPORTATION SUMMARY AUDIT REPORT

The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.



TRANSPORTATION SUMMARY AUDIT REPORT

Introduction

This document provides the framework for the information that an auditor must include in the Summary Audit Report prepared for a Cyanide Code Certification Audit conducted for a cyanide transportation operation and serves as a general template for presenting the required information.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audit is complete, it posts the Summary Audit Report on the Cyanide Code website.

Instructions

- 1) The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in this Summary Audit Report. The Summary Audit Report is intended to provide a summary of the information included in the Detailed Audit Findings Report prepared for the certification audit; and therefore, should include only information that is presented in the Detailed Audit Findings Report.
- 2) The name of the cyanide transportation operation, the Lead Auditor’s signature, and the submittal date of the final report must be included at the bottom of each page of the Summary Audit Report.
- 3) An operation found in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
- 4) The Summary Audit Report, the Detailed Audit Findings Report, and any necessary Corrective Action Plan with all required signatures must be submitted in electronic format to ICMI within 90 days of completion of the site inspection portion of the audit. An electronic copy of a letter from the owner or authorized representative of the audited operation granting ICMI permission to post the Summary Audit Report and Corrective Action Plan (if one is necessary) on the Cyanide Code website must also be submitted, along with both an electronic copy and a hard copy of a completed Auditor Credentials Form. The Lead Auditor’s signature on the Auditor Credentials Form must be certified by notarization or equivalent. Electronic documents should be submitted to the Institute via email at:

audits@cyanidecode.org



TRANSPORTATION SUMMARY AUDIT REPORT

The hard copy of the notarized Auditor Credentials Form should be sent to:

International Cyanide Management Institute
1400 I Street, NW, Suite 550
Washington, DC 20005, USA

- 5) The Summary Audit Report should include a description of the transport operation indicating key operational components that provide context to the reader ahead of the audit findings. For Transport Supply Chains, the report should include an overall description of the supply chain, and listing of entities participating in the supply chain and included within the scope of the audit, such as the consigner, trucking companies, ports, shipping lines, rail operations, and warehouses (any changes to a certified supply chain made since its previous audit should also be noted, such as additions or removals of ports, marine carriers, or trucking companies, along with the date the change was made). The description of the operation should include sufficient information to describe the scope and complexity of the transportation operation.



TRANSPORTATION SUMMARY AUDIT REPORT

Operation General Information

Name of Transport Operation:	Arizona Logística Ltda
Name of Facility Owner:	Arizona Logística Ltda
Name of Facility Operator:	Arizona Logística Ltda
Name of Responsible Manager:	Cláudio Ribeiro Cardoso
Main Address Audited:	Av. Coronel Jovi Soares, 707, Inconfidentes, CEP 32260- 477
State / Province:	Minas Gerais
Others Site Visited:	Rua Rio Reno 1388, Contagem, Minas Gerais, Brasil and and Rodovia BR 163 km1184 Morais Almeida, Pará, Brasil – CEP 68189-000 (interim warehouse)
Country:	Brazil
Telephone:	+55 31 33112808
Fax:	+55 31 33112808
Email:	alisson.rogerio@arizonagrupo.com.br

Operation Location Detail and Description

Provide a description of the cyanide transport operation (see Item 5 in the Instructions, above).

Arizona Logística Ltda. (hereinafter “Arizona” or “the operation”) is focused on the road transport of hazardous goods and chemicals including sodium cyanide. Arizona has been operating in the market for over twenty years providing feasibility studies for project implementation, inbound and outbound logistics, general, fractional, and chemical cargo, using road and waterways, with emphasis on the North and Northeast of Brazil with extensive experience in transporting cargo destined for the following segments: Mining, Energy and Capital Goods. With real-time tracking technology, loads are monitored by own team, which allows customers to track the location of their loads. The operation is located at Contagem town a city located in Minas Gerais, in southeastern Brazil. It is 17 kilometers far from Belo Horizonte the capital of the state of Minas Gerais. The access is by very good-asphalted roads such as [MG-060](#), [MG-050](#), [BR-381](#), [BR-040](#) and [BR-262](#). The operation has a SHEQ ((Safety, Health, Environmental and Quality) management system certificated in accordance with SASSMAQ protocol, established by Brazilian Chemical Industry Association (ABIQUIM) under # 167036 - 22 Evidenced Conformity Certificate valid until September, 19, 2024 in which ABNT (Brazilian Technical Standards) grants the Certificate of Conformity Assessment System of Health Environmental, Safety and Quality for the following activity - Road Transportation of Dangerous Chemical Products. The operation’s drivers are qualified, based on the Brazilian legislation, to transport hazardous chemical products by road. Arizona does not sub-contract any service related to the transportation of hazardous chemical products.



TRANSPORTATION SUMMARY AUDIT REPORT

For the current transport of sodium cyanide Arizona carries out the loading at Santos's Port at São Paulo State where the goods arrive, the contract provides for the loading of six isotanks, where it is loaded onto three road trains. The destination of the products is in the region of Moraes Almeida at Pará State, where due for local road safety reasons, the three vehicles go to the Arizona base to uncouple the trailers and thus, delivery is carried individually. This process is necessary to fully guarantee the safety of the community, people and the environment.

The unhitching process is carried out by a trained team following safety procedures; one trailer is unhitched at a time and placed in a safe, closed, duly identified location with restricted access. For uncoupled transport, the vehicles only go with the supervision of a properly trained school and supplied with giroflex, where radios communicate via frequency. It is important to highlight that Arizona has its own sector with professionals who analyze the incompatibilities, hazards and risks of each product as well as the adequate management of the transport routes of dangerous products.

Auditor's Finding

This operation is

- X in full compliance ** (See below)
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

** The Corrective Action Plan to bring an operation found in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The operation must fully implement the plan within one year of the date of this audit.*

Compliance Statement

"This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle."



TRANSPORTATION SUMMARY AUDIT REPORT

Auditor Information

Audit Company: Ferreira&Cerqueira Ltda

Lead Auditor: Luiz Eduardo Ferreira

Lead Auditor Email: luizeferreira2015@gmail.com

Names and Signatures of Other Auditors:

Auditor 1: _____
Name (Print/Type) Signature

Auditor 2: _____
Name (Print/Type) Signature

Auditor 3: _____
Name (Print/Type) Signature

Dates of Audit: 06/10~06/14 and 06/18~06/21/2024 (on-site)
09/02~09/03/2024 (off-site)



TRANSPORTATION SUMMARY AUDIT REPORT

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Arizona Logística



09/20/2024

Name of Operation

Signature of Lead Auditor

Date



TRANSPORTATION SUMMARY AUDIT REPORT

Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of 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 Standard of Practice 1.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Yes. Evidenced that Arizona defined, documented, established, implemented and maintains internal documented procedure POP SSMA 22 - Route Planning that provides methodology to identify and select appropriate and safer routes to transport the cyanide as well as provides methodology to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. Noted that Arizona selects transportation routes considering parameters such as the population density, the infrastructure (asphalt, double or single speedway, gas stations, police stations, emergency stations, hospitals, communication, shadow areas for communication), the condition of the route (under maintenance, holes, without asphalt), weather conditions (such as fog, fire, rain) and surface waters (rivers, creeks, lakes). Noted that critical points on the route are clearly identified on the rootogram, such as areas without signage, dangerous curves, sections without shoulders, interchanges, accident history, vulnerable areas, environmental conservation units, indigenous lands, proximity to water bodies, and emergency support points. , emergency room, clinics, hospitals, firefighters, highway police, communities, fuel supply points, stopping and overnight stays, service bases, communication shadow areas.as well as others specific items. Records of selected routes evidence that the identification and selection of routes were performed as defined in the above-mentioned documented procedure. Evidenced duly implemented. Evidenced that for each location on the rotogram, information is provided on communication system signals, shadow areas, permitted speed, stopping points, overnight stops, traceability system, road condition (single or double), critical and dangerous points, support points on the route, emergency contact, ups and downs, winding track, sharp curves to the right or left, side openings, slippery track, depression in the track, bridges, areas of fog or mist, communities, infrastructure, proximity to bodies

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024
Date

TRANSPORTATION SUMMARY AUDIT REPORT

water, population (type and characteristic), risk category (low, medium and high). Besides, Arizona issued a document named "Drivers' Manual for Cyanide transporting" that is document specific for cyanide drivers that is maintained with them in the truck during all cyanide transportation. This manual follows a review cycle at least annually and contains general information about: • Product Identification; • Rotogram; • Inspection before and after loading; • Required documentation, • Instructions for actions in case of emergency for drivers on board the vehicle; • Mandatory safety equipment and carrying; • Actions during transport, such as checking the vehicle and cargo if not show irregularities in the vehicle and merchandise, inspection of the control panels risk, • Loading and Unloading Procedure; • Operating/driving restrictions in bad weather conditions; • Actions to be taken in the event of a situation that could endanger the transport safety during travel; • Product compatibility and segregation. Evidenced that the above-mentioned Manual establishes in item 1.1.4 that for cyanide transportation Arizona prepared a rotogram of the route to be followed, which contains data such as: critical points on the route, areas without signage, dangerous curves, permitted stopping points, places to stay overnight, support points, among others. It is the driver's duty to follow the entire route, including permitted stopping points. The driver is prohibited to take another route and stop in places not allowed on the rotogram. The rotogram is handed over to the driver and it is his responsibility to keep it inside the vehicle to consult them during the journey, if he or she has any questions, shall contact the Operational Director and the fleet supervisor. Observed that Arizona identifies and evaluates all the hazards and risks related to the selected routes Sampled examples were: Population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, police stations, emergency stations, communication, hospitals, shadow areas for communication), the condition of the route (under maintenance, holes, without asphalt), weather conditions (such as fog, fire, rain) and surface waters (rivers, creeks, lakes), fog formation trend, number and length of bridges, saw snippets, amount and scope of dangerous curves, ease or difficulty to meet in an emergency which were clearly identified in the route record. Several controls such as all vehicles are equipped with tachograph (speed limit), driver qualification and training, truck maintenance, pre-traveling brief with the driver, planned transport observations, full time monitoring of the truck from a remote station named Gertran, limited traveling time in accordance with Brazilian Law 13.103 dated on March 02, 2015.were implemented by Arizona in order to mitigate the risks related to the selected routes. Evidenced duly implemented. Evidenced that Arizona constantly reevaluates the conditions of the selected routes. In the end of each travel of dangerous products transportation, since the driver report his perceptions about the route conditions. This travel report is reviewed by the Operations Manager as well as by the Quality Manager and, when necessary, the route plan is updated and the risks re-evaluated. Track traffic conditions, points allowed to stop and overnight, authorized supply points, places with sharp curves, places with winding track uphill and

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

steep slopes, bridges and rivers, risk of accidents, checkpoints, locations requiring special permits for transit, allowed speed for trucks, pedestrian crossing sites, local animal risk on track, emergency telephones of the places, population data are considered to select pertinent routes. Responsibilities and authorities are clearly defined, documented and implemented. Besides, the process of updating of selected transport routes is performed in maximum frequency annually. Evidenced duly implemented. The travel plan identifies all existing risks at the routes. Noted that internal documented procedure POP SSMA 22 - Route Planning" addresses risks along the selected routes both for driver training and as a reference. Reviewing pertinent records of training, evidenced that drivers have been trained in POP SSMA 22 - Route Planning POP SSMA 22 - Route Planning. Noted that drivers issue an inspection record when they receive the dangerous product to transport through using an appropriate check list in accordance with Avacorp maintenance management system as required by Brazilian regulations such as Decreto Federal 96044 and Portaria 204. The above-mentioned check list includes items related to: documentation, of drivers, documented procedures such as Driver's manual, Emergency Plans, identification and number of trucks, safety placards, personal protective equipment (PPE), capacity truck, United Nations Organization (UNO) number, emergency kits, safety equipment, driver data, product vendor data, observations. Evidenced duly implemented. Evidenced that Arizona defined and documented internal documented procedure POP SSMA 22 – "Route Planning" that defines methodology to seek input from applicable governmental agencies, communities and other stakeholders as necessary in the selection of routes and development of risk management measures. Noted that when necessary Arizona contacts governmental agencies, communities and others involved interested parties. Arizona has 24 hours monitoring of trucks by Gertran Due to good road transportation conditions from Santos Port to Arizona's Morais Almeida Base it is not used convoys since the risk analysis indicates that is not necessary this type of control. For cyanide transportation between Arizona's Morais Almeida Base and Brazauro Mine – Tocantinzinho Project at Itaituba it is used convoys since the risk analysis indicates that it is necessary this type of control. In this case the convoys are performed by own Arizona's equipments as well as duly qualified personnel. Arizona does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Arizona employees and all trucks are Arizona owned.

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

Standard of 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 Standard of Practice 1.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Arizona only uses trained, qualified and licensed drivers as required by the Brazilian applicable legislation for the road transport of hazardous products which requires that all hazardous products drivers shall have two kinds of permits such as type E- type CNH (Carteira Nacional de Habilitação) and (Operational Movement of Dangerous Products (MOPP) Course). Evidenced that Arizona's drivers have been duly trained, qualified and licensed as required. Arizona established health requirements to the drivers, psychological evaluation, education requirements and experience. defensive driving) and provides annual refresh training, including first aid and emergency procedures related to cyanide and driver's operation manual. The occupational health certificate named Occupational Health Certificate (ASO) were reviewed and found that are duly established. The Psychological Assessment (AP) were reviewed and found that drivers are in accordance with Regional Psychology Council (CRP)) Protocol. Evidenced that Arizona established implemented and maintains internal documented procedure PPOP 7.2 – Training Management that establishes methodology for planning, performing, recording and evaluating effectiveness of all trainings. All new employee has to do an induction training being instructor the SHEQ manager. Defined that all personnel operating cyanide shall be trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. During the audit evidenced that all future cyanide involved personnel were trained about risks related to cyanide. Arizona defined that the Driver's Manual is distributed to drivers and that its content is a training requirement for all drivers who transport the cyanide. Training materials about Driver's Manual were prepared by Arizona's HESQ Manager. Evidenced that Driver's Manual includes cyanide informations such as safety handling of cyanide, chemical and physical properties, first aids, Personnel Protective Equipment (PPE), use of protective masks, international labeling, cyanide, marine pollutant, stability, toxicology exposition levels to hydrocyanic acid (HCN) and how to treat areas cyanide-contaminated. Arizona does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Arizona employees and all trucks are Arizona owned.

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is in full compliance with Standard of Practice 1.3
 in substantial compliance with
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Arizona only uses equipment designed and maintained to operate within the loads will be handling. Arizona defined, documented, implemented and maintains Driver's manual for cyanide transportation This manual follows an annual review cycle and contains general information on: • Product Identification; • Rotogram; • Inspection before and after loading; • Ordinary Documentation, • Instructions for actions in case of emergency for drivers on board the vehicle; • Mandatory safety equipment and carrying; • Actions during transport, such as checking the vehicle and cargo if not show irregularities in the vehicle and merchandise, inspection of the control panels risk, • Loading and Unloading Procedure; • Operating/driving restrictions in bad weather conditions; • Actions to be taken in the event of a situation that could endanger the transport safety during travel; • Compatibility and product segregation. Evidenced that Driver's Manual clearly define that Arizona shall only use equipment designed and maintained to operate within the loads it will be handling and in order to ensure this requirement Arizona defined an inspection activity to check. Reviewing inspection records evidenced that is duly implemented. According to the Brazilian legislation all trucks used to transport chemical products shall be inspected by a public authority in order to be approved to transport such kind of products. Reviewing pertinent inspection records evidenced that all sampled trucks licensed as required through pertinent records named Vehicle Inspection Certificate (CIV) and Inspection Certificate for the Transport of Dangerous Products (CIPP). Defined that both CIV and CIPP inspections shall be done yearly. Noted that Arizona's trucks are with CIV and CIPP duly updated. Evidenced that Arizona defined, documented, implemented and maintains procedures to verify the adequacy of the equipment for the load it must bear. Evidenced that Driver's Manual clearly define that Arizona shall inspect trucks before transportation in order to verify the adequacy of the equipment for the load it must bear. Evidenced duly implemented. Sampled examples were trucks used for cyanide transportation Evidenced that Arizona defined, documented, implemented and maintains procedures in place to prevent overloading of the transport vehicle being used for handling dangerous products (i.e., overloading a truck, ferry, barge, etc. Evidenced that Driver's Manual clearly define that Arizona shall inspect trucks before transportation in order to prevent overloading of the transport vehicle being used for handling dangerous products (i.e., overloading a truck,

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

ferry, barge, etc. since before loading the driver shall review the transportation documentation in order to verify the cargo weight and confirm that the truck is capable to transport it and record in the pertinent record. Reviewing pertinent records evidenced that drivers have implemented this methodology to prevent overloading of the transport vehicle. Evidenced duly implemented. According to Brazilian transport legislation, there is a maximum load capacity allowed per truck to transit in the roads. There are control points along the route to verify the cargo weight (weight stations) and to review the cargo documentation. Control points along the roads issue a weight record that is brought to the company with the transport documentation, Arizona does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Arizona employees and all trucks are Arizona owned.

Standard of 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 Standard of Practice 1.4

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Arizona has handling and inspection procedures as necessary to ensure cyanide is handled and transported in a manner that maintains the integrity of the producer's packaging. Arizona Driver's Manual Driver establishes that all trucks shall be inspected before loading dangerous products. Records of such inspections were reviewed and provided evidences that it is duly implemented. Inspection records were reviewed and provided evidence that such inspections were carried out as required. Drivers were interviewed and provided evidence of compliance with this provision. According to the Brazilian legislation, the truck shall have, in four sides, standard placards indicating the nature of the chemical product being transported. Arizona Driver's Manual defined and documented that the driver shall verify the presences of such placards before each travel and the results are recorded in a specific checklist. Evidenced checklist clearly recording that dangerous products vehicles are identified prior the travel as stated. Evidenced during the field audit that the trucks have the required placards (signage).as they are in accordance with Brazilian Standards. The used checklist is a document of exclusive responsibility for completing the driver. before starting each trip and at each restart of the trip (after staying overnight. When filling out the checklist, several topics must be checked, In addition to the inspection carried out on the vehicle, the driver must check the mandatory

Arizona Logística
Name of Operation



Lead Auditor Signature


September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

documents for each trip and the Emergency Kit and Routine Kit. At the end of each trip, the driver must deliver the documents to the responsible for the management system where specific inspections will be carried out to audit the correct completion of the checklist by the driver. The vehicle inspection program of the truck before each journey, including the inspection of the truck, the inspection of the emergency resources, the inspection of the communication and tracking system, the inspection of the tachograph, the inspections of the PPE- Personnel Protective Equipment, the verification of the vehicle, driver and cargo documentation. Evidenced inspection records as stated. Arizona defined, documented, implemented and maintains internal documented procedure POP-OP-07 - Corrective and preventive fleet maintenance. Verified that Arizona implemented an effective preventive maintenance program for its trucks in accordance with truck producer's requirements. Preventive maintenance aims to reduce or prevent failures in vehicle performance. contributing to transport safety. All vehicles in the fleet follow the preventive maintenance plan, which is registered in the Avacorp system using the criteria as follows: For each maintenance item, an average mileage rating for the item is recorded. New vehicles following the manufacturer's mileage guidance. Vehicles purchased used and without a manual must be defined by the maintenance manager in agreement with the gravity that will be used. Vehicles that run in greater severity have reduced maintenance time. The system contains a record of the last date it was carried out and the mileage of the change, thus generating the next date for the service to be performed. Mileages are updated through the supply system and are therefore maintained always regular. When the vehicle arrives at Arizona's garage at the end of a trip, a report of the pending maintenance of this vehicle for the deadline and service. Maintenance items are highlighted in yellow and red. All items will be selected and if they can be rescheduled, they will be rescheduled with the survival allowed and authorized by the maintenance manager. After defining the services to be performed, the flow continues as a Service Order in the system. The preventive maintenance is performed by qualified companies. Evidenced that preventive maintenance is performed by mileage in accordance with the required by the truck manufacturer. Evidenced duly implemented. Evidenced that Arizona defined and documented at Driver's Manual a driver's daily working hours which is based on Brazilian Federal Law 13103 dated on March 02, 2015. The operation defined a maximum driving time of ten hours, including one hour for lunch and thirty minutes rest every four hours of driving. The driver is not allowed to drive at night. The working hours is controlled through the remote tracking station Arizona's trucks are specifically designed to transport containers and they have pin lockers that are inspected by the driver before each journey, and prevent the containers from shifting. Evidenced during the field audit duly implemented; Noted that in accordance with Arizona's safety policies as well as Driver's Manual it is clearly defined that in the event of stormy or hard rain, wind conditions, ice rain or civil arrest the transport activity shall be stopped or even not allowed to begin. Arizona designed and implemented a drug & alcohol policy, accepted by all employees

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

including all the drivers in which all the drivers before the beginning of a journey pass through an alcohol detection test. Evidenced records of alcohol test duly implemented as required. Evidenced that Arizona defined and implemented a process to manage all records related to its activities which defines methodology to identify, collect, access, index, archive, store and maintain them. The retention times of the records are clearly defined and documented. Evidenced that assessed records were promptly retrievable and adequately maintained by the operation, as previously mentioned. Arizona does not subcontract any service related to the transportation of hazardous chemical products. All drivers are Arizona employees and all trucks are Arizona owned.

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Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.5

Summarize the basis for this Finding/Deficiencies Identified:

This clause (1.5) is not applicable to the operation due to the fact that Arizona transports cyanide only by truck (road transportation).

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is X in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.6

Summarize the basis for this Finding/Deficiencies Identified:

The transport vehicle is provided with tracking systems (on board computer), using GPS signal (supplied and managed by Gertran Gerenciamiento de Risco. The transport vehicle is provided with tracking systems (on board computer), using GPS signal (supplied and managed by Gertran Gerenciamiento de Risco. During the transport, the truck is monitored 100% of the time and stops, at night, only allowed at pre-evaluated and approved stations

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

along the route. The tracking system also blocks (remote turn-off) the truck engine if something different from the planned script (travel plan) occurs. Verified the track system records as well as the tachograph records duly implemented. The driver is also equipped with a fast dialing mobile phone. In the monitoring loads, technology's main function is to analyze loads over time, which is an advantage for both the company and the consumer. Therefore, it can be used to check routes taken, non-conditional stops, driver behavior in traffic and changes in loads. Cargo tracking's main function is to record occurrences along the cargo route. Therefore, the process targets the rawest data, such as some abnormalities that could be potential problems. In this way, the information obtained is passed on to the Operational Area, which will analyze the events and respond appropriately. During field, audit evidenced duly implemented. The communication system (GPS, mobile phone, radio, is periodically tested to ensure it functions properly. Sampled examples were Check lists issued by the drivers. The tracking system has no blackout areas. Evidenced during the field audit and through interviews with the drivers. Arizona defined and implemented a chain of custody records management, according to the Brazilian laws. The documentation is verified prior the transportation and before the unloading at the Customer. The documentation includes NFe (Eletronic Invoice), DANFE (Auxiliary Document of the Eletronic Invoice), CTe (Eletronic Bill of Transport), DACTE (Auxiliary Document of Bill of Transport) issued by Arizona. During field audit evidenced duly implemented. Evidenced that Arizona's shipping records indicate the amount of dangerous products in transit in accordance Brazilian Laws such as NFe (Eletronic Invoice), DANFE (Auxiliary Document of the Eletronic Invoice), CTe (Eletronic Bill of Transport) and DACTE (Auxiliary Document of Bill of Transport) as well as pertinent FISPQ – Ficha de Informação de Segurança de Produto Químico are available during the transport. Evidenced Cyanco Chemical Product Safety Data Sheet for Sodium Cyanide Powder or Briquettes Cyanco Chemical Product Safety Data Sheet for sodium cyanide solution, Evidenced that these documents include information related to identification of the product, hazard identification (corrosive to metals, acute toxicity, skin corrosion/irritation, serious eye damage/eye irritation, hazardous to the aquatic environment, adequate labeling elements (pictograms, signal word, hazard statements, precautionary statement, first aid measures, fire-fighting measures, accidental releases measures, handling and storage, exposure controls, personal protection and physical and chemical properties. Arizona does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Arizona employees and all trucks are Arizona owned.

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

Principle 2 | INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Standard of 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 Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

During field audit performed by the auditor evidenced that Arizona practices interim storage at Morais Almeida Base. It was evidenced that it has warning signs clearly alerting workers that cyanide is present; that smoking, open flames, eating and drinking are not allowed and what personal protective equipment must be worn. Additionally, it was observed that all involved personnel were using Protective personnel equipment as defined. The auditor verified the signage in and around the Arizona's interim storage facility and concluded that it is adequate. All interviewed site personnel were evidenced to be aware of these matters and provided objective evidences that of training programs with respect to cyanide safety was important in determining how the workforce has been alerted to the presence and risks of cyanide. During field audit performed by the auditor at Arizona' Morais Almeida Base it was evidenced that security measures in place to prevent unauthorized access to cyanide as stated. Sampled examples were double lockers in the entrance door which keys are with two operators. The auditor evaluated the adequacy of security measures through a site inspection and concluded that it is adequate. Arizona defined and documented that cyanide must be storage separated from incompatible materials such as acids, strong oxidizers and explosives. During field audit performed by the auditor at Arizona' Morais Almeida Base it was evidenced that Arizona only storages cyanide at the interim storage area. During field audit performed by the auditor at Arizona' Morais Almeida Base it was evidenced that Is cyanide stored in a manner designed to minimize the potential for contact of solid cyanidewith water since it is storage in iso containers provided by Cyanco (the cyanide supplier) inside Arizona's trucks. During field audit performed by the auditor at Arizona' Morais Almeida Base it was evidenced that Is cyanide stored in a manner designed to minimize the potential for contact of solid cyanidewith water since it is storage in iso containers provided by Cyanco (the cyanide supplier) inside Arizona's trucks. Water systems for potable use, safety showers or any other purpose are not present in cyanide storage areas and they are designed such

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

that leaks or other potential releases will not come in contact with cyanide containers. The auditor inspected the interim storage facility and evidenced it is in compliance with this provision. During field audit performed by the auditor at Arizona' Morais Almeida Base it was noted that cyanide is stored with adequate ventilation to prevent build-up of hydrogen cyanide gas and cyanide dust. The auditor inspected the interim storage facility and evidenced it is in compliance with this provision. During field audit at Arizona' Morais Almeida Base the auditor inspected the interim storage facilities and concluded that it is ensured that any cyanide released from its packaging would be contained.

Principle 3 | EMERGENCY RESPONSE

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

Standard of 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 Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Arizona has two Emergency Plans. The first one was defined and documented by Arizona and identified as Arizona's Emergency Response Plan (PAI) for Cyanide Transportation" which contains specific actions, related to cyanide transportation. which aims to • Guide people and teams responsible for responding to cyanide emergencies, defining the first actions to be taken, and the human and material resources available; • Establish technical and administrative procedures, based on Brazilian Legislation and Standards, covering all phases of cyanide accidents that may eventually occur;; • Act, in an organized and effective manner, in emergencies related to cyanide so that a counter-revolution strategy can neutralize the effects of the spill or minimize its consequences; • Identification, control and extinction of emergency situations, in the shortest possible time; • Avoid or minimize the negative impacts of cyanide accidents on the population of the affected area, the environment and third-party equipment and facilities. The other identified as Ambipar's Emergency Response Plan (PAE) for Dangerous Products Transportation issued by Ambipar Response on behalf of Arizona (contract # 26845) that includes items such as applicable legislation, responsibilities and authorities, emergency scenarios, plan activation, emergency care structure, control and

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024
Date

TRANSPORTATION SUMMARY AUDIT REPORT

emergency actions (evaluation, isolation, approach, combat, vacating areas, contact with the media), post-emergency procedures (evaluation of consequences areas, recovery of impacted areas, decontamination of vehicles and equipment, waste management, reporting, communication with IBAMA. Ambipar is specialized in Crisis Management and emergency response, focused on firefighting, oil spills, natural disasters, environmental and hazardous materials emergencies. With a Centralized Command Center (CCO) and its own facilities for training its employees, Ambipar supports and manages operations in a simultaneous, scalable and standardized manner, following the technical guidelines of the National Fire Protection Agency (NFPA) such as Crisis Management, Business Continuity, 24 hour Emergency Call Center, 24/7 Response, Hazardous Material (Hazmat), Oil Spill, Fire Fighter, Rescue, Crane Rescue, Grants Management, Decontamination, Planning / Assessment, High Angle and Training / Exercises. Ambipar's call center is staffed 24-hours a day with qualified personnel ready to provide emergency response and incident mitigation information to first responders, State or Federal agencies responding to or investigating an incident, members of the supply chain, and end users. Ambipar has emergency support bases strategically distributed. The emergency response plan includes several response action scenarios for anticipated emergencies. The plans clearly identify and document the roles of external responders and medical facilities in response to emergencies. Evidenced that the plans clearly describe the nature of the response actions to be taken for the types of emergencies identified. Evidenced that Arizona's PAI for Cyanide Transportation developed for the specific circumstances and verified that it is appropriate to the specific cyanide transportation routes, and transport practices. Evidenced that the risks associated to the selected routes identified and evaluated and the emergency response plans are focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes. Interim storage is not practiced by Arizona. Evidenced that the Arizona's PAI for Cyanide Transportation is specific for the transportation of cyanide and consider the physical and chemical form of the cyanide. Noted that Arizona's PAI for Cyanide Transportation" is specific for the road transportation of cyanide by truck. Evidenced that Arizona's PAI for Cyanide Transportation considers the specific conditions of the selected routes and the risk analysis performed for the selected routes. As previously mentioned, the risks associated to the selected routes were identified and evaluated. The emergency response plan is focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes. Arizona's PAI for Cyanide Transportation is specific for the truck configuration used for cyanide transportation. Evidenced that emergency response procedures consider the design of the transport vehicle, such as truck and trailer carrying shipping containers and/or ISO tanks. Arizona's PAI for Cyanide Transportation describes the specific response actions that shall be applied to each emergency situation, such as accident with fire, fall into a river, cyanide leakage on a rainy day, among other specific emergency scenarios. Evidenced that the

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

Arizona's PAI for Cyanide Transportation describes the roles of several stakeholders that should be involved in the emergency response, such as road policy, emergency responders and rescuers, first aid stations along the route, reference hospitals, civil defense and environmental authorities

Standard of 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 Standard of Practice 3.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Internal documented procedure PPOP 7.2 - Training Management defines methodology for providing initial and refresher response training to appropriate personnel. Evidenced that Arizona provided emergency training for drivers, emergency coordinators, and emergency response members. Noted that emergency response training includes Defensive Driving and Preventive Driving. Evidenced records of emergency response trainings duly established and maintained. Evidenced that both above mentioned plans include and clearly define the specific emergency response duties and responsibilities of involved personnel. Sampled examples were: Arizona's Drivers, Arizona's Main PAI Coordinator, Arizona's Substitute PAI Coordinator, Arizona's Support Representative, Arizona's Emergency Team Technical Manager Ambipar's Emergency Coordinator and Ambipar's Emergency Operational Team, Civil Defense, Road Federal Police, Firefighters, Civil Police, Federal Police, Environmental Agencies, Municipality Health Services, Municipality Transit Services, Municipality Agency Water Resources. All emergency related materials are listed in the Driver's Manual and are checked before each travel. During the field audit evidenced duly implemented., The driver's manual defines the required emergency equipment that shall be available at the truck, such as face mask, gloves, flashlight, signage, fire extinguishers (ABC type), rubber boots, safety helmet and glasses, overall Tyvec, antidotes, brush, cords, magnesium oxide (MgO) powder and plastic blankets. The emergency kit is inspected before each travel as already mentioned. Evidenced records of emergency kit inspections for dangerous products transport duly established and maintained as required. The emergency kit is inspected before each travel. Evidenced records of emergency kit inspections duly established and maintained as required. As already mentioned Arizona contracted Ambipar I to conduct response

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

activities. Evidenced that Arizona clearly delineated its role and responsibilities and those of Ambipar All informations are included in the Ambipar PAE. Others parties involved in the emergency response such as Federal Road Police, State Road Police, Firefighters, Civil Police, Federal Police, Environmental Agencies, Municipality Health Services, Municipality Transit Services

Standard of 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 Standard of Practice 3.3

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Arizona's Driver's Manual issued by Arizona defines the methodology for notification appropriate parties / stakeholders such as the cyanide producer, the customer, regulatory agencies, external response providers (Ambipar), medical facilities and potentially affected communities of an emergency. Emergency Response Plans are available to all entities that may need to use them, and therefore they are included in the Emergency Response Plan – PAI.and PAE. The entities requiring notification are clearly identified in the Emergency Response Plan – PAE as having designated roles in the response such as road policy, the dangerous product producers and buyers Ambipar, SASCAR, hospitals, first aid stations along the route, environmental agencies, emergency responders, and Brazilian chemical association. Emergency contact information is also available at the truck doors and chassis by stickers. This information is kept updated. Sampled examples were Road Federal Police, Fire Brigade, Military Police, Civil Police, Federal Police, Civil Defense, Associação Brasileira da Indústria Química (ABIQUIM), , State Environmental agencies such as CETESB (Companhia Ambiental do Estado de São Paulo), FEAM (Fundação Estadual de Meio Ambiente), INEMA (Instituto de Meio Ambiente e Recursos Hídricos da Bahia), During the field audit was verified for proper implementation and updating of information related to emergency notification. Reviewed Arizona's PAI for Cyanide and Ambipar's PAE issued by Ambipar on behalf of Arizona and evidenced that both of them are updated and in accordance with Brazilian regulations as well as Cyanide Code Principles. Evidenced that Arizona defined and documented Arizona's PAI that defines at item 17 methodology for notifying ICMI of any significant incidents, as defined in ICMI's Definitions and Acronyms Document. Evidenced that those involved with PAI such as the Board, Operational Manager, Administrative Manager, Cyanide Code Manager, Work Safety Technician and Administrative Supervisor were

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

properly trained in this procedure. Interviewed people demonstrated knowledge of their respective activities and were duly aware of the relevance of their roles and responsibilities.

Standard of Practice 3.4

Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The operation is X in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.4

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Emergency Plans (PAE and PAI) issued by Arizona and Ambipar clearly define the remediation procedures that shall be applied in the event of cyanide related emergencies. The disposition of contaminated residues is defined in accordance Brazilian Environmental Laws. Arizona has contract with Ambipar chemical remediation company to provide this service to the transporter which is clearly identified in Arizona's Emergency Plan for Cyanide Transportation and Ambipar can be activated as soon as necessary. During the audit evidenced that Ambipar defined and documented remediation activities to provide for safe and environmentally sound remediation and disposal waste materials such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. Noted that the above-mentioned methodology is in accordance with Brazilian regulations as well as The Cyanide Code. Evidenced that internal documented procedure PAI clearly defines that chemical products, such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide, are prohibited to be used in the event of solid cyanide releases in surface waters along the route. During the field audit and through interviews pertinent personnel showed to be aware of this fact.

Arizona Logística
Name of Operation



Lead Auditor Signature

September 20, 2024

Date

