Cyanide Transportation

Summary Audit Report

For The
International Cyanide Management Institute and Consórcio CITSSA S.R.L/ Perú

Prepared by : NCABrasil Expert Auditors Ltd. www.globalsheq.com

www.cyanidecode.org

June 2021

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This report contains 14 pages.

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
Tel: +1-202-495-4020

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.

SUMMARY AUDIT REPORT

Name of Cyanide Transportation Facility: Consórcio CITSSA SRL.
Name of Facility Owner: Consórcio CITSSA SRL.
Name of Facility Operator: Consórcio CITSSA SRL.
Name of Responsible Manager: Mary Sara Lazarte
Address: Calle German Schreiber 276 – Urb. Santa Ana, San Borja, Lima, Perú.
State/Province: Lima
Country: Perú
Telephone: (51) 955 755 857
Fax: n.a
E-Mail: slazarte@consorciocitssa.com

Location detail and description of operation:

The Consórcio CITSSA operation is focused on the road transportation of cyanide for gold mining operations, without interim storage. The operation is located at Lima/ Peru and transports solid cyanide from (Mercantil S.A) or importers to gold mine operations located in Perú. Consórcio CITSSA S.A.C transports solid NaCN produced by Hebei Chengxin Co. Ltd, Chemours U.S.A, Cyanco International LLC and Orica Australia Pty. Ltd. Solid NaCN is transported in their original packages inside 20´ and/or 40´sea containers.
located at Callao, Monterrico y Ancón / Perú to gold mine operations located in Perú. The operation has a documented SHEQ (Safety, Health, Environmental and Quality) management system and is certified by ICMI since 2009. In the last three years the operation did not suffer no incident involving solid NaCN transportation. The operation trucks and trailers are, specifically designed to transport cyanide sea containers. They are remotely monitored (100% during the travel between the distributor and the final client) and equipped with an onboard computer and online GPS system, where text messages can be sent or received. The operation drivers are qualified, based on the Peruvian legislation, to transport hazardous chemical products by road.
Due to the legal norms that were implemented in Perú to control the use, commercialization and transport of chemical inputs, including sodium cyanide, which could be used in illegal activities, a unique registry has been implemented to authorize and control these activities.
In order to obtain this registration, it is necessary to comply with requirements that make it indispensable for each company that owns the units to hold its own registry. For this reason, Consórcio CITSSA carries out the sodium cyanide transportation operations under the authorization of CITSSA INVESTMENTS SAC and CITSSA LOGISTICS SAC, the companies that own the units and make-up Consórcio CITSSA.

Auditor's Finding

This operation is:

X in full compliance
□ in substantial compliance ***(see below)
□ not in compliance

with the International Cyanide Management Code.

During the previous three years certification cycle, Consórcio CITSSA S.R.L did not experience no significant cyanide related incidents, nor any compliance problems related to cyanide transportation management.

***** 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.

Auditing Company: NCABrasil Expert Auditors Ltd.
Audit Team Leader: Celso Sandt Pessoa (ICMI qualified lead auditor and transportation qualified TEA (technical expert auditor)), since 2006.
E-mail: celsopessoa@ncabrasil.com.br and celso@globalsheq.com
Website: www.globalsheq.com
Names and Signatures of Other Auditors: not applicable
Date(s) of Audit: 04/ May/ 2022 ~ 06/ May/ 2022 (on-site) and 01~02/ August/2022 (off-site).

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 certification audit. I further attest that the certification 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.

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

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

The operation is:
X in full compliance with
□ in substantial compliance with Transport Practice 1.1
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

There were no changes, in the last three years, in the management procedure for routes identification, evaluation and definition. It was evidenced that the organization performed a risk evaluation for road transportation of solid cyanide, in accordance with the procedures " Plan de Contingencia para transporte terrestre de materiales peligrosos (contingency plan for road transportation for hazardous materials (chapter 8/ dated 31/01/2022 and procedure PT-10, related to route evaluation system, which includes periodic re-evaluation of the routes, according to drivers feedback and PO-02, related to hazard identification and risk evaluation system. All proposed routes must be approved by the Ministry of Transportation and Communications (MTC), in accordance with the Peruvian legislation (Resolución Ministerial 350/2013/ MTC-02). Reviewed the transportation permit "Resolución Directoral # 855/ 2016/ MTC/ 16 (05/10/2016 (MTC approval of 36 routes defined by CITSSA Logistics)." The routes are divided in here groups: central routes, northern routes and southern routes.

Reviewed the route definition and risk evaluation for the following routes:

- Monterrico/ Minera Titán (south).
- Monterrico/ Minera Yanaquihua (south).
- Monterrico/ Minera La Joya (south).
- Monterrico/ Minera Centauro (central).
- Callao/ Minera Aurax (central).
- Callao/ Minera IRL (central).
- Ancón/ Minera Luisa (north).
- Ancón/ Minera SanSimón (north).
- Ancón/ Minera Iscaycruz (north).

All the approved routes consider population density, road infrastructure, fauna and flora, surface waters, pitch and grade, weather conditions.

It was evidenced that Consórcio CITSSA identified and evaluated all the risks related to the mentioned selected routes. Examples are: Population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, policy stations, emergency stations, communication infrastructure, 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 (traveling plan), shadow communication spots. Several controls such as 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, limited traveling time, were implemented by Consórcio CITSSA in order to mitigate the risks related to the selected routes. There are three main roads in Perú (Panamericana Norte, Panamericana Sur and Carretera Central), and all the selected and approved routes uses one of these main roads and specific secondary routes to arrive at final clients, the gold mines. All shipments start at Callao, Monterrico or Ancón, where the approved cyanide distributors and importers are established.

It was evidenced that Consórcio CITSSA (documented procedure PT-10 defines the system) constantly evaluate the condition of the selected routes. In the end of each travel, the driver records on the traveling plan his perceptions about the route condition. This travel report is reviewed by the operations officer 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 steep slopes, bridges and rivers, risk of accidents, police 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, weather conditions, communication shadows are considered to select pertinent routes. All comments are reported at form PT-07-01 (final operation reports). Reviewed travel reports issued between 2019 and 2022. Relevant or major changes in the selected routes were not observed. As previously mentioned, it was evidenced that the organization performed a risk evaluation for road transportation of solid cyanide, in accordance with the procedures " Plan de Contingencia para transporte terrestre de materiales peligrosos (contingency plan for road transportation for hazardous materials (chapter 8/ dated 31/01/2022 and procedure PT-10, related to route evaluation system, which includes periodic re-evaluation of the routes, according to drivers feedback and PO-02, related to hazard identification and risk evaluation system. All proposed routes must be approved by the Ministrry of Transportation and Communications (MTC), in accordance with the Peruvian legislation (Resolución Ministerial 350/2013/ MTC-02). Reviewed the transportation permit "Resolucion Directoral # 855/ 2016/ MTC/ 16 (05/10/2016 (MTC approval of 36 routes defined by Consórcio CITSSA)." All transportation documentatión (hoja de rutas) addresses the hazards and related risks and defines the operational control measures to be taken by the qualified drivers and escort drivers/ supervisors also. All permits related to transportation routes were updated in 2021. Consórcio CITSSA, as a mandatory requirement defined by the Peruvian law, contacts public authorities (MTC and SUNAT), in other to obtain official permits from MTC and SUNAT, to transport solid cyanide in the proposed routes.

Consórcio CITSSA uses escorts and convoys, when the risk analysis indicates that this should be an operational control during the transport (safety and security). In the selected routes, it was identified that an escort car is 100% necessary (auxiliary car). Consórcio CITSSA does not contracts any other transporter to transport solid NaCN.

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

The operation is:
X in full compliance with
□ in substantial compliance with Transport Practice 1.2
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
It was evidenced that Consórcio CITSSA only uses trained and licensed drivers as required by the applicable legislation for the transport of dangerous products including solid sodium cyanide.
The driver must have a specific driving license type "A3C (AIIIC) or A3B (AIIIB)". Reviewed the driver license for:

- Luís Armando Zarate (H08162268/06/11/2022).
- Albino Walter Acevedo (Q10120537/19/07/2022).
- Alfredo Delgado Puente (Q10698132/30/06/2022)
- Lener Hipólito Chávez (Q40301536/ 30/06/2022).
- Arturo Acevedo (Q46674072/ 17/12/2024).
- Manuel Orellana (Q43294422/ 29/11/2022).

It was evidenced that the operation defined, documented, implemented and maintains an annual training program for the operational team (truck and escort drivers and support personnel). In the last three years the operation provided for its operational team initial and refresh trainings such as MATPEL (Hazardous Materials, divided in five modules (around 100 hours of training)), defensive driving (refresh), emergency response plan (refresh), solid NaCN properties and management, incident reporting and investigation. Records of such initial and refresh trainings are retained by the operation and were reviewed during this opportunity. The operation does not contract other transporters to transport solid NaCN.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Consórcio CITSSA operates two Scania trucks (model G380, 6x4 configuration, load limit 32 ton). The operation has four platforms/trolleys (3 axis, load limit 32 ton). The operation only transports 40´sea containers with 20 solid NaCN boxes within. According to the Peruvian law (MTC), trucks and platforms must go through a technical (CITV- Certificado de Inspección Técnica Vehicular) every six months, at MTC qualified inspection stations, beyond the vehicle permit (CdH/certificado de habilitación). Reviewed technical inspection records for truck D2M-714 (CdH # 15MRP21005452E and CITV # C2021013160023720), platforms A80-974 (CdH # 15MRP21005454E and CITV # C2022155242001410) and F0G-999 (CdH # 15MRP21005456E and CITV # C2022155242003708). The operation only transports 40`sea containers containing 20 NaCN boxes/ 1 ton each). The cargo to be transported is also recorded in the transportation documentation, demanded by the Peruvian law. The cargo weight is verified along the routes (weight control stations) and, in some cases, during the reception of the cargo at the mining operations. Reviewed the following cargo documentation: cargo orders 292/19, 278/19, 285/19, guia de operación # 1452 (Minera Laytaruma/ 2020) y 13281 (Minera Laytaruma/2021), guia de remisión electronica # G00100007120 (Minera IRL/ 2021), guia de remisión electronica (bién fiscalizado) # G0001-00000003/2021, declaración jurada de registro de operación (SUNAT) # 345838, 345842 y 345844).

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All solid cyanide boxes are transported inside a 40´sea container, that is sealed before deporting from the cyanide seller premises. According to the Peruvian law, safety placards (UNO # 1609, Rommel Diamond and toxic (6) pictogram) must be placed in the front of the truck and in the three sides of the sea container.

Evidenced full compliance during the field audit. Before each departure the operation performs a general inspection, which includes the documentation inspection, cargo weight, emergency response resources, protective personal equipment, sea container, truck and platform, communication resources, traceability system, safety signage, among other aspects.
The pre-departure inspection is based on an inspection checklist (PF-03-01). Reviewed pre-departure inspection records for operations (travels) 292, 363, 285, 278, 368 y 391, all performed between 2019 and 2022.Trucks and platforms are maintained in accordance with a Scania preventive maintenance program and performed at a Scania authorized dealer. Reviewed preventive maintenance records for trucks D0L-813, D2M-714, F0G-999 and A8O-975, all performed between 2019 and 2022. Records were issued by Scania Perú S.A (Huachipa, Lima, Perú). All trucks and platforms must pass through an independent (third party) technical inspection in order to receive a permit to be used in road transportation of solid cyanide, as previously mentioned. According to the Peruvian law and the operation policy, the daily work hours is nine hours, with a 15´minutes rest every 4.5 hours driving. The drivers must have a 45´for lunch. Night travels are not allowed. Work shift is from 6AM to 6PM.Twice a week, the work journey may be of 10 hours. Minimum rest time is 11 hours. Twist lockers are installed in all platforms. Beyond that, the sea container is also handled by chains, in the front and in the rear part. Evidenced during the field audit. Also evidenced that suck twist-lockers systems are included in the preventive maintenance plan. Social turbulences, snow, storm wind and rain, are aspects that could impact the transportation plan, that could be modified or suspended. These aspects are documented in an operational procedure and the transportation will be detained/ suspended in accordance with the Transport Coordinator evaluation and decision. The operation policy related to drug and alcohol use/ abuse is clear and accepted by all internal stakeholders. Monitoring are randomly performed and annually performed during the occupational health control. Reviewed records (PF-09-01) of monitoring performed between 2018 and 2022. All results were negative. The operation retains records of all above mentioned activities. Consórcio CITSSA does not subcontract any solid cyanide transportation services.

<u>Transport Practice 1.5</u>:Follow international standards for transportation of cyanide by sea.

The operation is:
- □ in full compliance with
- □ in substantial compliance with Transport Practice 1.5
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

This transport practice is not applicable to the operation's scope. The operation scope is road transportation of solid cyanide.

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

The operation is:
X in full compliance with
□ in substantial compliance with Transport Practice 1.6
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified: **(Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided).**

The trucks are provided with tracking systems (on board computer, text messages and photos transmission system), using online GPS signal (supplied and managed by GPS Scan S.A.C). The driver is also equipped with a fast dialing mobile phone. Evidenced/ tested during the audit through the localization of truck DOL-813. The escort car is equipped with communications equipment also (radio + fast dialing cell phone). All communication resources are tested before departure from the operation base, from the cyanide seller, time to time with the operation headquarter, with tracker system supplier. Evidenced and tested communication resources during the field audit. Before entering such areas (blackout areas), the convoy communicates with the operation headquarter and with the tracker base. After leaving such areas, the convoy communicate with them again. As previously mentioned, all trucks are provided with online GPS trackers, which was tested during the audit for truck D0L-813. The cyanide cargo documentation addresses the amount of solid cyanide being transported. The amount of solid cyanide being transported is controlled at the seller premise, during transportation (at weight control stations and tax control stations) and, in some cases, in the reception at the mining operation. The cargo documentation (retained by the transporter) includes the following documents: guia de remesa (seller), guia de remesa (transporter), weight control records, tax control records and cyanide buyer reception control records. The MSDS (Material Safety Data Sheet) is part of the transportation documentation, but it is left at the mining operation. All reviewed transportation documentation clearly indicates the amount of cyanide being transported. Typical amount is 20 ton (20 cyanide wooden boxes). Did not evidence any cargo weight above this value.

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

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

The operation is:
- □ in full compliance with
- □ in substantial compliance with Transport Practice 2.1
- □ not in compliance with

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

This principle is not applicable to the operation scope because the cyanide cargo is transported straight from distributors/ importers to its final destination, the mining operation. During the transport, the truck is monitored 100% of the time (online GPS) and stops, at night, only at pre-evaluated and approved stations along the route. The tracking system also blocks (remote turn-off) the truck engine if something different from the planned script (travel plan) occurs. It is possible to send/ receive text messages and photos from the truck and escort car. Evidenced/ tested during the audit at organization central office.

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities

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

The operation is:
- **X** in full compliance with
- □ in substantial compliance with Transport Practice 3.1
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that Consórcio CITSSA, designed, documented and implemented an emergency response plan (plan de contingencias), found at revision # 7, dated 01/05/2022. This plan was already submitted to the Peruvian authority (MTC) for approval. Previous revisions were formally reviewed and approved by the Peruvian authority responsible for the road transportation of hazardous products (MTC permit # 2934/2016/MTC/16 dated 07/10/2016). 20 (twenty) emergency scenarios were identified, and there is a response plan for each one. It was evidenced that Consórcio

CITSSA Emergency Response Plans were developed for the specific circumstances and was verified that the emergency plans are appropriate to the specific cyanide transportation routes, and transport practices. The risks associated to the selected routes were 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. It is important to report that the organization emergency plan (plan de contingencia) considered the directions addressed at the USA Department of Transportation Guide for emergency response involving hazardous materials (edition 2016). The operation emergency response plan is specific for solid NaCN transportation by road. The emergency response plan is specific for solid cyanide transportation by road (truck + platform). The emergency response plan is specific to the routes (roads) defined to be used from the seller to the buyer. The emergency response plan is specific for the transportation resources (truck+ platform+ escort car) used to transport solid cyanide from the seller to the buyer. It was evidenced that the emergency response plans describe the specific response actions that shall be applied to each emergency situation/ scenario, such as accident with fire, fall into a river, cyanide leakage on a rainy day, cyanide intoxication, among other specific emergency scenarios. It was evidenced that the emergency response plans describe the roles of several external stakeholders that should be involved in the emergency response, such as road policy (policía de carreteras), emergency responders and rescuers (that will act performing their typical emergency activities), first aid stations along the routes, reference hospitals, and environmental authorities.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that Consórcio CITSSA provided initial and refresh emergency training for drivers, emergency coordinators, emergency response members/ escort team, in accordance with the Peruvian law, as previously mentioned (refer to TP 1.2.1). The operational team receives theoretical training related to emergencies and practical ones during planned emergency drill, usually performed in conjunction with a gold mining operation. All duties and responsibilities, for each identified scenarios, are addressed in the operational & emergency management procedures, that are part of the approved emergency plan (plan de contigencias/ rev. 7/ dated 01/May/2022, in approval process) by the Peruvian Ministry of Transportation and Communications (MTC).

It was evidenced that the operation emergency response plan, since revision # 3 (April 2016), is being updated and approved by the MTC. The required emergency response resources master list is part of the traveling documentation (orden de carga/ cargo order) and checked before each travel. Usual emergency hardware to be available at the convoy is: MSA autonomous breather, safety glasses, helmets, leather gloves, ear protectors, masks for powder, DuPont overall types A, B and C, fire extinguishers (dry chemical powder/ 9 kg), CaO powder (calcium oxide/ 20kg), plastic shovel and plastic brush and antidotes (oxygen bottle (4 kg)). Emergency response resources are transported by the escort car. As previously mentioned, there is an emergency kit for the truck driver (which includes the PPEs) and the emergency response resources, transported by the escort car. All emergency response resources are inspected before each departure, as well as the driver´s emergency kit. Related to oxygen bottles, that shall be used in the event of cyanide intoxication and to respond to PUNA (lack of oxygen in high altitudes) effects, the cylinders pressure and volume are checked before each travel. Records of such pre-departure inspections are retained by the operation and were reviewed during this opportunity.

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

The operation is:

X in full compliance with
□ in substantial compliance with Transport Practice 3.3
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All the contact information is addressed at the Emergency Plan (plan de contingencias/ revision 7/ May 2022) which was reviewed and approved by the Peruvian Authority MTC, back in April 2016. In the event of any major change, the plan must be promptly submitted to MTC for review and approval. Emergency Plan revision # 7 is now under approval by the MTC and did not suffer any major change comparing to revision # 3, previously approved but, according to the Peruvian law, the Emergency Response Plan must be submitted to MTC on a regular basis, for review and approval. Beyond that, in the transportation documentation, the contact information from the involved stakeholders is available for the driver and the convoy supervisor. All protocols related to emergency notification and reporting are kept updated and the critical stakeholders to be notified are clearly identified. There were no emergencies related to cyanide transportation in the last certification cycle. ICMI is one external stakeholder addressed at the contact master list that will be promptly communicated in the event of a cyanide related emergency.

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

The operation is:
X in full compliance with
□ in substantial compliance with Transport Practice 3.4
□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Two of emergency scenarios are the impact of solid NaCN on soil (dry and wet) and on the surface waters. Emergency protocols for these situations clearly defines the neutralization process to be used in the event of NaCN impact on the soil, using CaO powder, removal of neutralized soil (into plastic bags) and disposition at the mining operation. Monitoring soil samples will be taken to confirm the neutralization process effectiveness. For surface water, in the event of any impact caused by solid NaCN briquettes, these shall be removed (if possible), neutralized with CaO powder, collected in plastic bags and disposed at the mining operation. Oxidation through bubbles will be tried. An emergency environmental monitoring plan will be implemented to collect and analyze the extent of the contamination plume. No chemical products are allowed to be used to neutralize cyanide in surface water. Suck kinds of products are not included in the convoy emergency resources.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan is kept updated by the operation through the feedback of real emergencies (did not occur in the last certification cycle), emergencies occurred with other transporters in Perú, after the realization of mock emergency drills. Last updated was performed in May 2022. The operation plans and performs mock drills annually, in conjunction with the solid NaCN buyer (mining operation) and the seller (distributor). One mock drill was performed in 2019. In 2020, due to Covid 19 pandemic, no mock drills were performed. In 2021, two mock drills were performed. And for 2022, one mock drill is planned for November (it was not performed due to the unstable political situation that Perú is facing). The reports related to the mentioned mock drills were reviewed in this opportunity. Every mock drill has defined planned objectives to be achieved.

After the drill, it is reviewed, and conclusions are defined in order to confirm (or not) if the planned objectives were reached or not. Improvement actions plans are defined and implemented, resulting in the update of the Emergency Response Plan. The Emergency Response Plan was found at revision # 7, May 2022. The planned emergency drill for November 2022 was not performed as previously mentioned.

Audit team conclusions:

Based on the sampled evidences, the physical conditions of the site (installations) and the trucks/ trailers, in the interviewed personnel and in the reviewed documentation, the audit team concludes that the SHEQ (Safety, Health, Environmental and Quality) management system is FULLY implemented and maintained in accordance with the International Cyanide Management Protocol for Transporters (June 2021) for cyanide transport operations (principles 1.5 and 2.1 are not applicable to the operation transport scope). The operation does not subcontract transporters to transport the cyanide.

During the previous three years certification cycle, Consórcio CITSSA . did not experience any significant cyanide related incidents nor any compliance problems related to cyanide transportation management.