

***Cyanide Transportation
Summary Audit Report
For The
International Cyanide Management Code and
CONCÓRDIA TRANSPORTES
RODOVIÁRIOS./Brazil***

www.cyanidecode.org

December 2016

The International Cyanide Management Code (hereinafter “the 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 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.

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: Concórdia Transportes Rodoviários.

Name of Facility Owner: Concórdia Transportes Rodoviários.

Name of Facility Operator: Concórdia Transportes Rodoviários.

Name of Responsible Manager Benedito Teles and Rogério Leodegário

Address: Avenida Raul Seixas 141, Loteamento Jardim Imperial, Dias d'Ávila,
State/Province: Bahia

Country: Brazil

Telephone: (55+71) 32657400

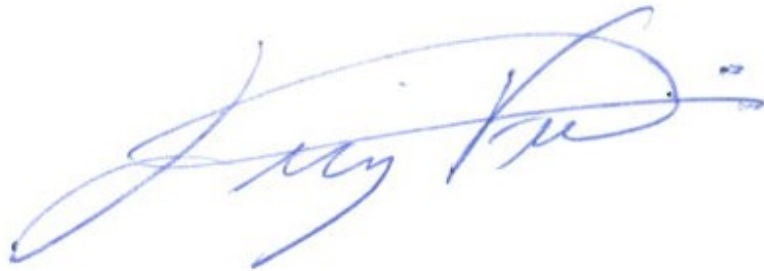
Fax: (55+71) 36251076

E-Mail: leandra@concordiatransportes.com.br

Location detail and description of operation:

The Concordia Transportes Rodoviários Ltda. (Concórdia) focus on the road transportation of cyanide for gold mining operations, without interim storage. The operation is located at Dias d'Ávila town a city located in Bahia State, in northeast Brazil. It is 46 kilometers far from Salvador the capital of the state of Bahia. The access is by a very good-asphalted road. Concordia transports both cyanide solution and briquettes (since October 03, 2018 until nowadays Concordia only transported cyanide briquettes), from the plants of Proquigel located on Camaçari and Candeias cities which are cyanide code producers to several gold mines.

Evidenced for its unity located in Avenida Raul Seixas, 141, Loteamento Jardim Imperial, Dias d'Ávila, Bahia, Brazil: Highway SASSMAQ Conformity Certificate for Road Transportation of Chemical Products meeting the requirements of the Standard Manual SASSMAQ 2014 validity period from August 07, 2020 to August 06, 2022.



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Auditor's Finding

This operation is:

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

with the International Cyanide Management Code.

During the previous three years certification cycle, Concórdia. did not experience any 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: Ferreira & Cerqueira Ltda.

Audit Team Leader: Luiz Eduardo Ferreira (ICMI qualified lead auditor and transportation qualified TEA (technical expert auditor)).

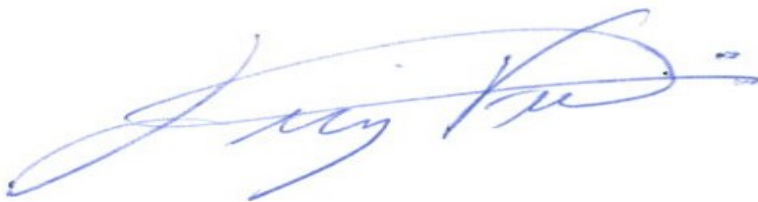
E-mail: luizeferreira2015@gmail.com

Names and Signatures of Other Auditors: not applicable

Date(s) of Audit: 24.08.2021 ~ 26.08.2021 (on-site) and 24.09.2021 (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 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.



SUMMARY AUDIT REPORT

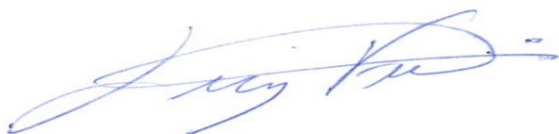
1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

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

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

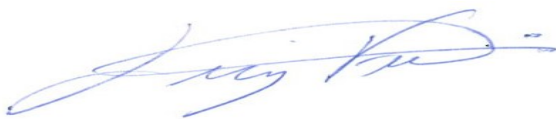
Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Concórdia defined, documented and implemented internal documented procedure NA 012 – “Elaboração de rotograma e controle de kms rodados” that provides methodology to identify and select appropriate and safer routes to transport the cyanide from Proquigel Unities located in Camaçari and Candeias, both of them in Bahia State until gold mining operations. Evidenced that Concórdia has been selected two possible routes (one main and one alternate) between Proquigel Units and the above-mentioned gold mining sites. Noted that the selection of route process considered parameters such as the population density along the route, 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). Records of selected routes evidence that the selection of routes was performed in accordance with ICMI requirements as well as Brazilian legislation. The process of updating of selected transport routes is performed in maximum frequency annually. Concórdia documented and maintained internal documented procedure NA 38 – Avaliação de Riscos in order to identify, evaluate and established controls to mitigate hazards and risks to environmental, safety and occupational health. Concórdia identified and evaluated all the hazards and risks related to the selected routes considering parameters such as: 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.



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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 SAS CAR System, limited traveling time in accordance with Brazilian Law 13.103 dated on March 02, 2015.were implemented by Concórdia in order to mitigate the risks related to the selected routes. Evidenced duly implemented in accordance with ICMÍ Cyanide Code Principles. Concórdia reevaluates the conditions of the selected routes for cyanide deliveries as stated in item 7 of internal documented procedure NA 38 – Avaliacao de Riscos. Besides, in the end of each travel, the driver records on appropriated record his perceptions about the route conditions. 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, 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. The travel plan identifies all existing risks at the routes. Evidenced that Concórdia defined and documented travel plans which identify risks along the selected routes both for driver training and as a reference. Evidenced through reviewing pertinent records of training, that drivers are trained in that travel plans. and consequently in cyanide transport routes risks. Evidenced during the audit field that drivers have in their vehicles copies of updated versions of transport routes. Noted that before each travel, the drivers have to prepare the record identified as “ Check list de equipamentos de segurança veicular obrigatória para transporte de produtos perigosos in accordance with Brazilian regulations - 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 truck, safety placards, personal protective equipment (PPE), capacity truck, UNO number, emergency kits, safety equipment, driver data, product vendor data, observations and signature of the responsible. Concórdia, when necessary, contacts the Brazilian Federal Road Policy, the tracking contractor (SASCAR), the risk management with high-end technology (BUONNY which is the largest independent transportation risk management business in Brazil and its mission is to improve the security of cargo, anticipating security measures to detect and prevent risks in logistics and transportation) as well as the road administration contacts in order to define the route and avoid potential problems along the selected route. Concórdia has a 24 hours monitoring of trucks by SASCAR System.



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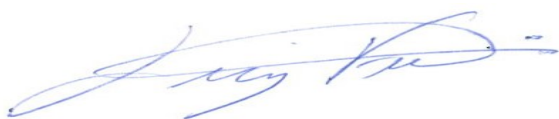
Due to good road transportation conditions it is not used convoys since the risk analysis indicates that is not necessary this type of control. Concórdia communicated the Brazilian Federal Road Policy, the road administration authorities, the insurance company and the emergency responders (Ambipar Response) .All the cyanide transport activity is performed by the operation own drivers and trucks.

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 Transport Practice 1.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced Concórdia uses only trained, qualified and licensed (where required) operators to operate its transport vehicles. Evidenced that Concórdia established, implemented and maintained internal documented procedure PAT 2017 – Training which defines how identify training needs, planning, providing, recording and evaluating the effectiveness of training activities. All new employee has to do an induction training being instructor the Safety Technical. Besides all cyanide involved personnel has to be trained about risks related to cyanide before perform activities with this chemical product. The material used for training cyanide-involved personnel, is based on that issued by Proquigel (cyanide producer) that includes safety handling of cyanide, chemical and physical properties, first aids related to cyanide, protective Personnel Equipment – PPE, international labeling of cyanide, marine pollutant from cyanide, production of cyanide, HCN – hydro cyanidric, acid Stability of cyanide, Types of cyanides, Toxicology related to the cyanide, Exposition levels to HCN and consequences, first aids, how to treat areas cyanide- contaminated. Protective masks 3SE and filter BEK CO NO ST. Reviewing pertinent training records evidenced that Concórdia's drivers that conduct NaCN – sodium cyanide have a training identified as MOPP -_Operational Handling of Hazardous Products in accordance with Brazilian legislation. The occupational health certificate named ASO (Occupational Health Certificate) as well as AP- Psychological evaluation were reviewed and found to be duly established. The annual refresh trainings performed were implemented as stated. Evidenced the training effectiveness properly implemented. Noted that drivers received a specific training on the route that is used to transport cyanide. Concórdia only uses its own employees and trucks.



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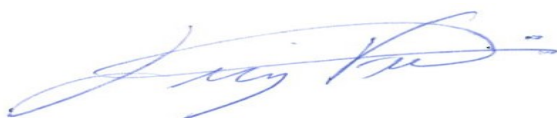
performing all cyanide transportation.

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 Transport Practice 1.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Concórdia only uses equipment designed and maintained to operate within the loads it will be handled. The methodology for planning, performing, recording, evaluating the results obtained as well as defining and implementing (when necessary) pertinent actions are clearly defined in documented procedures NA 11 – “Planejamento e controle das manutenções” and NA 13 “Inspection of equipment”. Each type of equipment has a specific preventive maintenance plan in accordance the instructions of the producer. Evidenced specific preventive maintenance plans duly established, implemented and maintained. Concordia uses three kinds of check lists named Mechanical Check list, Drivers Check list and Safety Area Check list. Records provided evidenced that they are duly implemented. Concórdia uses trucks for transportation of sodium cyanide which maximum load capacities are clearly identified. Trucks have lockers, with wall and specific to transport containers. Truck licenses are updated as required. During the field audit it was evidenced that drivers, maintenance and safety area personnel showed to be aware of the actions to be taken in order to assure that trucks are adequately maintained. The maximum load capacities of each truck is clearly identified in accordance with Brazilian legislation. According to the Brazilian legislation all trucks used to transport dangerous chemical products shall be inspected by a public authority in order to be approved to transport such kind of products. Evidenced that all trucks are licensed as required. During the field audit noted that drivers, maintenance and safety area personnel showed to be aware of the actions to be taken in order to assure that trucks are adequately maintained. Preventive maintenance and inspections are required to be carried out in accordance with the elapsed running mileage and following the recommendations of the respective truck manufacturers. Evidenced duly implemented. Before loading the cargo container, the driver reviews the transportation documentation in order to verify the cargo weight and confirm that the truck is capable to transport.



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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 an weight record that is brought to the company with the transport documentation.

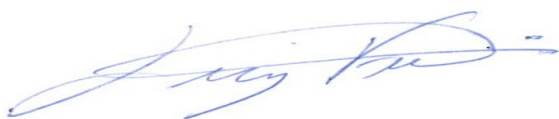
The operation uses its own drivers and equipments and do not subcontract nobody

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 Transport Practice 1.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Concórdia documented NA 13 - Inspection of equipment in order to ensure that cyanide is transported in a manner that maintains the integrity of the producer's packaging. It defines that all trucks shall be inspected before loading the cyanide. Records of such inspections were reviewed and provided evidences that above-mentioned procedure is duly implemented. Evidenced that Brazilian Invoice named NF - Nota Fiscal refers Check list issued by the driver also mention the Seal Number and the pertinent traceability is ensured. NF Nota Fiscal" and Check list Driver were reviewed and evidenced that cyanide is transported in a manner that maintains the integrity of the producer's packaging container. According to the Brazilian legislation, the truck shall have, in four sides, standard placards indicating the nature of the chemical product being transported. The presences of such placards are verified before each travel and the results are recorded in a specific checklist. Concórdia implemented a safety program for cyanide transportation that includes where applicable: Vehicle inspections prior to each departure/shipment; A preventive maintenance program; Limitations on operator or drivers' hours; Procedures to prevent loads from shifting; Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered; A drug abuse prevention program; Retention of records documenting that the above activities have been conducted. Besides the inspection of truck conditions it is verified 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 driver and cargo documentation.



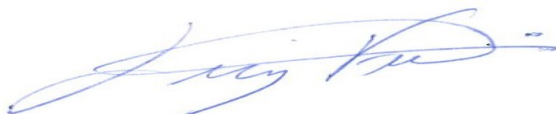
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The truck is specifically designed to transport containers and they have pin lockers, that are Inspected by the driver before each journey, and prevent the containers from shifting. In accordance to the operation safety policies and the driver's operation manual, in the event of stormy or hard rain, wind conditions, ice rain, the transport activity shall be stopped or even not allowed to begin. Concordia defined and documented an internal procedure NA 036 - Alcohol and drug use prevention program which is applicable not only to its drivers but to all its employees. The above-mentioned program consists of preventive and corrective actions. Preventive actions such as raising the awareness of newly hired employees of Concordia's Drug and Alcohol Prevention Program through a lecture given during the introductory training and promotion of training aimed at developing personal skills and competences as a necessary protective factor to better deal with life's difficulties, such as: Motivation and quality of life; Controlling stress and achieving relaxation; Interpersonal and family relationships and Financial indebtedness. Corrective actions are consequence policies clearly defined for drivers or any other employee who is driving equipment and vehicles and who obtain a positive result in a breathalyzer test and for employee (except drivers) who presents a positive result during the working day. Before the beginning of a journey, the employees pass through an alcohol detection test. Monthly 10 (ten) samples are collected randomly among the employees for laboratory tests for alcohol and drugs and annually, during the PCMSO - Medical Control and Occupational Health Program (a Brazilian Legal Requirement identified as NR 7 – Regulatory Standard). Concordia uses an alcoholmeter model Mark X series # 157196. Evidenced alcohol test records duly implemented. Evidenced calibration records of alcoholmeter duly established and maintained; All requested records were promptly retrievable and are adequately maintained by the operation.

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 Transport Practice 1.5
- not in compliance with



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Summarize the basis for this Finding/Deficiencies Identified:

This transport practice is not applicable to the operation scope. The operation scope is road transportation.

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

The operation is 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 transport vehicle is provided with tracking systems (on board computer), using GPS signal (supplied and managed by SASCAR System The driver is also equipped with a fast dialing mobile phone. The communication system (GPS, mobile phone, radio, is periodically tested to ensure it functions properly. The tracking system has no blackout areas. Evidenced during the field audit and through interviews with the drivers. Concórdia defined and implemented a chain of custody records management, according to the Brazilian law. The documentation is verified prior the transportation and before the unloading at the mine operation. Verified during the field audit duly implemented. The transport documentation clearly identifies the amount of cyanide being transported and the product MSDS is part of this documentation.

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



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*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 the the manufacture of cyanide (Unities of Proquigel located at Camaçari and Candeias) to its final destination, the gold mines operations During the transport, the truck is monitored 100% of the time 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.

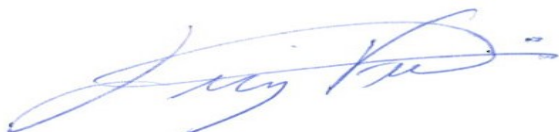
3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities

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

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Concórdia has two main plans for emergency preparedness and response. “The first one named Emergency Attendance Plan – PAE - Plano de Atendimento Emergencial para o Transporte de Produtos Perigosos”. This plan was jointly developed by the companies Concórdia Transportes and Ambipar Response (Concórdia’s subcontracted specialized in crisis management and emergency response) . The other one was defined and documented by Concórdia and identified as NA 028 – SISPAE Concórdia



SUMMARY AUDIT REPORT

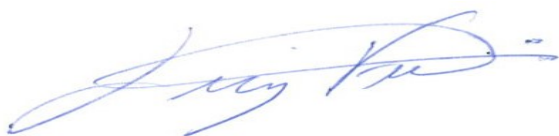
Emergency Attendance Plan – PAE clearly defines several matters such as: Routes characterizations (main and alternate routes), Scope of Emergency Plan, Organizational Structure, Human Resources, Materials Resources, Communication systems, Updating PAE, Training activities, Dangerous products classification. SISPAE Concórdia was developed for the specific circumstances and was verified that both 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. Evidenced that the plans are specific for the transportation of liquid and briquettes cyanide, for the road transportation of cyanide, by truck, consider the specific conditions of the selected routes and the risk analysis performed for the selected routes. The plans are specific for the truck configuration being used to transport the cyanide. The plans describe 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 emergency plans describe 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, and environmental authorities. Concórdia does not practice interim storage facility.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Brigade Leaders provide Brigade Members emergency and others functions training according to PAT - Annual Training Plan established in documented procedure NA.035 and aims to train brigade members to respond to emergencies; update the Brigade components regarding the resources of the vehicle of external service, recycle knowledge in the various techniques for combating emergencies, mitigation of impacts to all involved.



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Evidenced that the operation provided emergency training for drivers, emergency coordinators, emergency response members. Evidenced records of emergency response trainings duly established and maintained. Sampled examples were: Record training in “Plano de Emergencia SUATRANS and in SISPAE – Concórdia.

Evidenced that both above-mentioned plans include and clearly define the specific emergency response duties and responsibilities of involved personnel

All emergency related materials are listed in the Driver’s Manual and are checked before each travel.

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, MgO powder and plastic blankets. The emergency kit is inspected before each travel.

Evidenced records of emergency kit inspections duly established and maintained as required. Antidotes: Sodium nitrite and sodium thiosulphate.

Evidenced that annually Concórdia provides initial and refresh training.

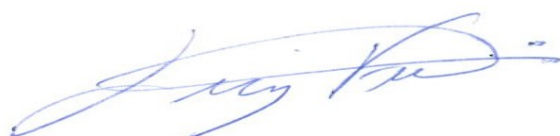
The operation does not subcontract any handling or transport activities

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 Transport Practice 3.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that “Manual do Motorista, PAE Nacional Ambipar – Plano de Atendimento a Emergência issued by Ambipar dated on August 10, 2021 for Concórdia as well as SISPAE CONCORDIA. define the methodology for notification of appropriate parties/ stakeholders in the event of a cyanide release or exposure during transport. It is available to all entities that may need to use them, and therefore they are included in the Emergency Response Plan – PAE. The entities requiring notification are clearly identified in the above mentioned Emergency Response Plan – PAE as having designated roles in the response such as road police, the cyanide producer, the cyanide buyer, hospitals, first aid stations along the route, environmental agencies, emergency responders, Brazilian chemical association. Emergency contact information are also available at the truck doors (stickers) and at the truck chassis (stickers also). This information is kept updated.



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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 Transport Practice 3.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Emergency Plans 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. CONCÓRDIA TRANSPORTES has contract with Ambipar a commercial chemical remediation company to provide this service to the transporter which is clearly identified in CONCÓRDIA Emergency Response Plan so Ambipar can be activated as soon as practical. Evidenced that in item 5.3.1 b of documented procedure NA 023 defines "Important - For cyanide leakage, the use of Ferrous Sulfate, Sodium Hypochlorite and Hydrogen Peroxide is PROHIBITED to neutralize the product on surfaces in contact with water.

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 Transport Practice 3.5
 not in compliance with



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Summarize the basis for this Finding/Deficiencies Identified:

Concórdia defined and documented that annually reviews and revises (when necessary) their emergency plans as well as also planned, on an yearly basis, several simulation activities related to their emergency plans, including one specific exercise in conjunction with the emergency responder expert, Ambipar. Evidenced that Concórdia plans and implement mock emergency drills, related to its emergency plans and in conjunction with the emergency responder expert. Reviewed emergency drill plans for 2018, 2019, 2020 and 2021(in conjunction with Ambipar). Including the participation of external stakeholders. Noted that Concórdia after the emergency drills, review the drill results and, when applicable, the emergency plan is revised and updated.

