

***INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE***

Cyanide Transportation

Summary Audit Report

For The

***International Cyanide Management Code and
CONFINS Transportes Ltda./Brazil.***

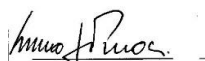
***Prepared by NCABrasil Expert Auditors Ltd.
(www.globalsheq.com)***

www.cyanidecode.org

June 2021

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.

***This audit report contains 12(twelve) pages.**

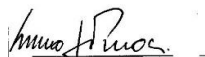


SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

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/ DRAFT # 2

Name of Cyanide Transportation Facility: CONFINS Transportes Ltda.
Name of Facility Owner: CONFINS Transportes Ltda.
Name of Facility Operator: CONFINS Transportes Ltda.
Name of Responsible Manager: Cristiane Pilar Albergaria
Address: Rua Palmeiras, 101 (Santo Antônio), 32864-170, Betim, MG, Brasil.
State/Province: Minas Gerais.
Country: Brazil
Telephone: (55+31) 2519-6458
E-Mail: cristiane.pilar@confins.com.br

Location detail and description of operation:

The CONFINS operation is focused on the road transportation of cyanide for gold mining operations, without interim storage. The operation is located at Betim town (Minas Gerais State, southwest of Brazil) and transports solid and liquid cyanide from the cyanide producer PROQUIGEL (Bahia State) to gold mine operations located in Brazil and to the Salvador port (to be exported). The operation implemented and maintains a SHEQ (Safety, Health, Environmental and Quality) management system certified in accordance to SASSMAQ protocol, established by the Brazilian Chemical Industry Association (ABIQUIM). The operation trucks, specifically designed and bought to transport cyanide containers, are remotely monitored (100% during the travel between the cyanide producer and the final client) and equipped with on board computer and tracking system. The operation drivers are qualified, based on the Brazilian legislation, to transport hazardous chemical products and also were trained by the cyanide producer. The transporter has an agreement with an emergency responder company AMBIPAR Response Brasil (belonging to Ambipar Group from Spain) as requested by the cyanide producer PROQUIGEL Química Ltda.



Celso Sandt Pessoa (Lead Auditor & TEA)

SUMMARY AUDIT REPORT/ DRAFT # 2

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, Confins Transportes Ltda. did not experience any significant cyanide related incident, 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.

Audit Company: NCABrasil Expert Auditors Ltd. (www.globalsheq.com)

Audit Team Leader: Celso Sandt Pessoa (ICMI qualified lead auditor and transportation qualified TEA (technical expert auditor)).

E-mail: celsopessoa@ncabrasil.com.br

Names and Signatures of Other Auditors: not applicable

Date(s) of Audit: 23~25/ October/ 2024 (on-site) and 27/March/ 2024 (off-site).

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Certification 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 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 quality, health, safety and environmental audits.



Celso Sandt Pessoa (Lead Auditor & TEA)

SUMMARY AUDIT REPORT/ DRAFT # 2

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:

1 The operation did design and implement a procedure to identify and select appropriate and safer routes to transport the cyanide from the cyanide producer PROQUIGEL (Candeias and Camaçari production plants/ cyanide producer based in Brazil, both plants are ICMI certified, according to the information available at ICMI website) until the gold mining operations. Evidenced that the operation selected possible routes, using mainly federal roads and state roads, between the cyanide producer and the gold mining operations. Evidenced that the selection of route process considered the population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, police stations, emergency stations, communication infrastructure, shadow areas for communication), the condition of the route (under maintenance, bumping, without asphalt), weather conditions (such as fog, fire, rain) and surface waters (rivers, creeks, lakes). All selected routes (e.g: to Salvador port, Jacobina, Riacho dos Machados, Caeté, Conceição do Pará, Paracatú) were found updated. According to internal procedures, all selected routes are kept updated through the drivers' feedback after each travel. All planned transport routes were updated in 2023. All the risks related to the selected routes above mentioned were identified by the operation and clearly identified in the route record (traveling plan). 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 and speed limits, were implemented by the operation in order to mitigate the risks related to the selected routes. The operation constantly evaluates 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 'coordinator and, when necessary, the route plan is updated, and the risks re-evaluated. Reviewed traveling reports issued between 2021 and 2024. As previously mentioned, the operation prepares, before each travel, the traveling plan (which is delivered to the driver and a briefing is performed), identifying all the risks and related controls that shall be observed by the driver, including allowed stations to stop, shadow zones for phone signal, speed limit, severe down hills, bridges, rivers, among other aspects. The operation always contacts the Brazilian Federal Road Policy, the tracking contractor, the road administration office in order to define the route and avoid potential problems along the selected route.



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The Brazilian Federal Road Police is a governmental agency. The Brazilian Federal Environmental Protection Agency (EPA), IBAMA (Instituto Brasileiro do Meio Ambiente), who grants the operation the interstate road transportation permit of dangerous goods, is responsible to be in touch with local EPAs (state and municipality ones) that will obtain input from communities that could be potentially impacted by the transportation of cyanide. The operation will use escorts when the risk analysis indicates that this should be a control during the transport (safety and security). In the selected routes. Up to now, it was not necessary to use security escorts in the selected routes. All the cyanide transport activity is performed by the operation own drivers, trucks and trailers. There are no contractors.

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/Deficiencias Identified:

The operation employees only qualified drivers (in accordance to Brazilian legislation) to transport chemical products, including NaCN. The driver must have a specific driving license (CNH/ Carteira Nacional de Habilitação) type “E”. Beyond this legal requirement, the operation established health requirements to the drivers, psychological evaluation, education requirements and experience. The operation also applies a practical test to the new drivers, where the operation Master Driver evaluates the observed driver skills. Only after all these evaluations the driver is approved to drive for the operation (transportation of hazardous chemical products). The operation also requires specific training for its drivers, including MOPP training ((Movimento Operacional de Produtos Perigosos/ dangerous products operational movement /defensive driving) and NR-35 (Labor Ministry specification for Working at Heights) and provides annual refresh training, including first aid and emergency procedures related to cyanide and driver’s operation manual. The cyanide producer, Proquigel Química Ltda., also provides an annual initial or refresh training related to cyanide management and risks to the operation drivers. Reviewed the driver’s license, medical and psychological evaluation, drug consumption evaluation and training records for Irismar Cerqueira Martins, Edson Faria Bonfim, Joilson Santos de Oliveira, Crispim Aureliano da Silva and Cleidson Reis. The refresh training is divided in two phases, theoretical and practical. All attendees are evaluated through written tests and field observations. Records of initial and refresh training issued between 2021 and 2024 were reviewed in this opportunity. All cyanide transportation is performed by its own employees and trucks. There are no contractors.



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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:

The operation uses a specific and dedicated fleet (truck + trailer) in the transportation of cyanide. The trucks are DAF 480 (6x2), VOLVO FH 460 (6x2) and SCANIA Super (6x2) and all with up to 60 ton of load capacity and the trailers are RANDOM, PASTRE or FACCHINI, all with up to 35 ton of load capacity specifically designed to transport containers up to 35 ton (flat platform trailer with pin/ twist lockers, without wall and specific to transport sea containers and iso-containers). Reviewed truck + trailer licenses were: RNP-2J60 + RFJ-0G94, QUL-7231 + RFK-7D09 and RNG-8H45 + AUX-2G51. According to the Brazilian legislation all trucks used to transport chemical products shall be inspected by a public authority (accredited by INMETRO/ Instituto Nacional de Metrologia) in order to be approved to transport such kind of products. Reviewed annual inspection records (CIV/ Certificado de Inspeção Veicular) for the above-mentioned trucks and trailers. As previously mentioned, the operation uses a specifically designed truck to transport cargo containers up to 60 ton (flat platform trailer + truck). Before loading the cargo container or the iso-container, the driver reviews the transportation documentation in order to verify the cargo weight and confirm that the truck is capable to transport. According to Brazilian transport legislation, there is a maximum load capacity allowed per truck to transit in the federal and state roads. There are control points along the routes to verify the cargo weight (weight stations) and to review the cargo documentation. Before leaving the cyanide producer PROQUIGEL, the cargo weight is checked and recorded in the transportation documentation. The cargo weight is again checked in the arrival at the mining operation. Reviewed the following weight check records/ travel documentation (Proquigel DANFE, Inovar DACTE and Brazilian Army permit (issued for every transportation), issued between 2021 and 2024. As previously mentioned, the operation uses trucks designed to support up to 60 ton of weight. The cargo weight is verified before loading and the truck weight is controlled along the route by the public authorities (road administration). There are control points along the route where the truck weight is controlled (weight stations) and the cargo documentation is reviewed. The cargo weight is also controlled at the exit of Proquigel plants (cyanide producer) and at the arrival at the mining operation, as previously mentioned. the operation uses its own drivers and equipment and do not subcontract nobody.



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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:

The Proguigel solid cyanide boxes are transported into certified containers that are sealed after the loading activity at Proguigel installations, as well as the liquid cyanide is transported in certified iso-containers, specifically designed to transport cyanide solution. Both containers are unsealed when the cargo arrives at the mine operation. This procedure was verified during the field audit. According to the Brazilian legislation, the truck shall have, in four sides, standard placards indicating the nature of the chemical product being transported. Was evidenced during the field audit that the truck leaving to collect the cargo had that placards adequately installed. Also evidenced a truck/ trailer returning with an empty cyanide iso-container to the cyanide producer with all required placards and safety/ environmental signage (pictograms). The operation designed and implemented a robust inspection program of the truck / trailer before each journey, including the inspection of the truck + trailer, the inspection of the emergency resources, the inspection of the communication and tracking system, the inspection of the tachograph, the verification of the driver and cargo documentation. Evidenced inspection records issued between 2021 and 2024. The operation implemented a preventive maintenance program for its trucks in accordance with the OEM (Original Equipment Manufacturer) requirements. The preventive maintenance is performed by a qualified OEM dealers/ maintenance shop. Trailers are included in the preventive maintenance program, performed at the Confins' garage, by qualified personnel. Evidenced maintenance records for the following trucks and trailers: RNP-2J60 + RFJ-0G94, QUL-7231 + RFK-7D09 and RNG-8H45 + AUX-2G51. For trucks, the preventive maintenance program is based on the kilometers (km) worked by the truck. The usual maintenance frequency is every 30000 km (with a tolerance of 5000 km, depending on the truck brand). The trailer's maintenance program is also based on the kilometers worked by the trailer, which follows the truck maintenance frequency, because trucks and trailers work as a couple, in most of the cases. The operation is not responsible to maintain the sea-containers (solid NaCN) and the iso-containers (NaCN solution), that are maintained by the cyanide producer. The operation defined a maximum driving time of 12 hours, including one hour for lunch and a 30' rest every 6 hours of driving. The driver is not allowed to drive at night. The working hours is controlled / monitored through the remote tracking station. All in accordance with Brazilian legislation (law # 13103/ 2015, which defines a maximum of 44 hours per week, 8 hours per day, 2 extra hours per day and 4 extra hours per day (when agreed with the driver's union). Evidenced during the field audit and through the travel records. The truck + trailer couple is specifically designed to transport containers (sea and iso ones) and the trailers are equipped with pin/ twist lockers, that are inspected by the driver before each journey, and prevent the containers from shifting.



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The trailers are included in the preventive maintenance program. Evidenced during the field audit. 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. The operation designed and implement a drug & alcohol policy, accepted by all drivers, in which all the drivers before the beginning of a journey pass through an alcohol detection test and annually, during the occupational health monitoring program, the drivers pass through a drug detection test. Quarterly, a drug consumption control is also performed. Evidenced the alcohol test during the field audit and the annual drug detection test records. The operation defined and implemented a process to manage all records related to its activities. All requested records were promptly retrievable and are adequately retained/ maintained by the operation. the operation does not subcontract any handling or transport activities.

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

Summarize the basis for this Finding/Deficiencies Identified:


This transport practice is not applicable to the operation scope. The operation scope is cyanide transportation by road (truck + trailer).

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 vehicles (trucks) are provided with tracking systems (on board computer and digital tablet), using GPS signal (SASCAR System). The driver is also equipped with a fast dialing mobile phone. Evidenced during the field audit. The communication system is tested before each travel, and periodically checked during the trip. Evidenced during the field audit. The blackout areas for mobile phones were identified and mitigated with the aid of different lines. Blackout areas for cell phones are not usual in the selected routes, only in small parts of the route, but they are mainly potential ones. The tracking system (SASCAR) has no blackout areas.



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Evidenced the communication system during the field audit. As previously mentioned, the truck is monitored 100% of the time, by a remote-control station, by the operation headquarters and the tracker provider (SASCAR System). Evidenced and tested the tracking system during the field audit. The operation 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. Reviewed the following custody records/ cargo documentation → Proquigel DANFE, Confins DACTE and Brazilian Army permit for each cyanide shipment issued between 2021 and 2024. Such documentation is kept on file due to legal obligation. The transport documentation (DANFE, DACTE and Brazilian Army permit) clearly identifies the amount of cyanide being transported and the product MSDS issued by PROQUIGEL (cyanide producer) is part of this documentation. Reviewed the following custody records/ cargo documentation: Proquigel DANFE, Confins DACTE and Brazilian Army permit for each cyanide shipment issued between 2021 and 2024. Such documentation is kept on file due to legal obligation. the operation does not subcontract any handling or transport activities.

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 the cyanide producer (Proquigel Brasil) to its final destination, the mining operation and to the Salvador port. During the transport, the truck is monitored 100% of the time and stops, at night, only at pre-evaluated and approved gas stations along the route. The tracking system also blocks (turn-off) the truck engine if something different from the planned script (travel plan) occurs. Verified the tachograph records.



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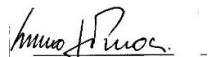
3. **EMERGENCY RESPONSE:** *Protect communities and the environment through the development of emergency response strategies and capabilities*

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:

The operation defined and documented two different emergency plans. The first one, PO-SSMA-009, was developed by the operation SHE officer and the operational team and is focused on emergency procedures that shall be observed by the truck driver and other involved stakeholders such as road policy, emergency rescuers, paramedic teams. It is based on the Proquigel MSDS (HIG-F-20 and HIG-F-28) and the Ambipar Response (an Ambipar Group company/ Spain/ Emergency Responders). The second one was developed by Ambipar Response company. Both emergency plans were updated in 2024. The emergency plans are appropriate to the specific cyanide transportation routes. As previously mentioned, the risks associated to the selected routes were identified and evaluated. The emergency response plans are focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes. The plans are specific for the transportation of solid and liquid cyanide. The plans are specific for the road transportation of cyanide, by truck. The plans considered 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 plans are focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes, as well as external stakeholder. The plan is specific for the truck configuration being used to transport the cyanide (flat platform trailer + truck, with pin/ twist lockers, specifically designed to transport metallic sea containers and iso-containers). The plan 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 emergency scenarios. The 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, environmental authorities.



SUMMARY AUDIT REPORT/ DRAFT # 2

Transport 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:

Was evidenced that the operation provided emergency training for drivers, emergency coordinators, emergency response members. Evidenced the following emergency related trainings, provided between 2021 and 2024 (initial and refresh ones):

PO-SSMA-009 + Ambipar Emergency Plan for the drivers Irismar Martins (refresh), Adilson Andrade (initial), Carlos Lima (initial) and Ronaldo Silva (initial). These trainings were complemented by a set of emergency response drills (practical).

First aid procedures provided by Proquigel Química Ltda. (mandatory training for all operation drivers).

In both emergency plans, the roles of each emergency responder are clearly defined and communicated. All emergency related materials are listed in the Driver's Manual and are checked before each travel, by a safety technician and the driver. Evidenced during the field audit. The driver's manual defines the required emergency equipment that shall be available at the truck, such as full-face mask, scape mask (provided by Proquigel), gloves, flashlight, signage, fire extinguishers (dry powder), rubber boots, safety helmet and glasses, overall Tyvec, antidotes (sodium thiosulphate 25%+ sodium nitrite 3%+ methylene blue/ provided by Proquigel), first aid protocol, brush, cords and plastic blankets. The antidotes will be applied only by medical personnel. Instructions on how to use the antidotes are available inside the antidotes box and are signed-off by the cyanide producer occupational health manager. As previously mentioned, the emergency kit is inspected before each travel. Evidenced inspection records issued between 2021 and 2024. The operation contracted Ambipar Response to respond to emergency situations involving solid and liquid NaCN transportation. Ambipar Response will play the main role in any emergency related to cyanide, mainly related to the mitigation of all the impacts caused by cyanide. As previously mentioned, the operation's drivers' documentation also addresses directions to other stakeholders, such as public entities (road administrator, road police, medical resources, firefighters, mining operation) that could attend the emergency. All these requirements are addressed in the contract between the operation and Ambipar Response.



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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:

The driver's operational manual and the emergency plans, previously mentioned, clearly address the emergency communication system, including contact information of all potentially involved stakeholders such as road police, the cyanide producer, the cyanide buyer, hospitals, first aid stations along the route, environmental agencies, emergency responders. Emergency contact information are also available at the truck doors (stickers) and at the truck chassis/ trailers (stickers also). All emergency contact and reporting information is kept updated by the operation. ICMI is one external stakeholder addressed at the contact master list that will be promptly communicated in the event of a cyanide related emergency. In the last three years there were no incidents (real or potential) related to cyanide transportation.

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:

The reviewed emergency plans clearly define the remediation procedures that shall be applied in the event of cyanide related emergencies, including the use of specific neutralizer for solid/ liquid cyanide spills in soil and the disposal of the neutralized media, first stored in plastic bags and then disposed adequately, by a local EPA (Environmental Protection Agency) certified supplier. No chemicals are allowed to mitigate impacts of cyanide on surface waters during transportation. The mentioned plans clearly define 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.



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

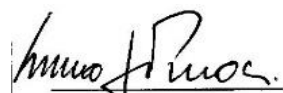
The operation is: in full compliance with
 in substantial compliance with Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation annually reviews and revise (if necessary) their emergency plans (including the specific one, provided by Ambipar Response). The operation also planned, on an yearly basis, simulation activities related to their emergency plans, including one specific exercise in conjunction with the emergency responder expert, Ambipar Response. It was evidenced that all emergency plans (Ambipar Response and Confins ones) were updated in 2024. As previously mentioned, the operation plans and implement mock emergency drills, related to its emergency plans and in conjunction with the emergency responder expert. Reviewed emergency drill plan for 2021, 2022, 2023 and 2024 (in conjunction with Ambipar Response and other external stakeholders). Reviewed emergency drill reports performed between 2021 and 2023 that were focused on the transfer of cyanide solution from one isotank to another one, the correct use of PPEs, area isolation procedures, first aid procedures, communication protocols with stakeholders, liquid cyanide spills and leakage and use of fire extinguishers. After the emergency drills, the operation team and Ambipar Response team review the drill result and, when applicable, the emergency plans are revised and updated. Evidenced that the emergency plans were revised and updated after the emergency drills performed during 2023.

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 management system is FULLY implemented and maintained in accordance with the International Cyanide Management Protocol for cyanide transport operations (principles 1.5 and 2.1 are not applicable to the operation transport scope). The operation does not contract transporters to transport the cyanide. The operation did not have any incident (real or potential) related to cyanide transportation between 2021 and 2024.



Celso Sandt Pessoa (Lead Auditor & TEA)
Rio de Janeiro, RJ, Brasil.
16/July/2024