

SUMMARY AUDIT REPORT

Empresa de Transportes N&V S.A.C.

Transport Operation

***For The
International Cyanide Management Code***

June 2021



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Information on the audited operation

Name and location of Supply Chain Empresa de Transportes N&V S.A.C.
Consignor

Name of Facility Owner: Empresa de Transportes N&V S.A.C.

Name of Facility Operator: Empresa de Transportes N&V S.A.C.

Name of Responsible Manager: Carola Villar - Gerencia de Operaciones

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Location detail and description of operation

Empresa de Transportes N&V S.A.C. (N&V) is a transport trucking company with 25 years’ experience in the Peruvian territory, specialist in transportation of hazardous materials, critical controlled inputs and merchandise products, for the different industrial sectors in Peru, mainly the mining sector. They are certified in ISO 9001, OHSAS 18001, ISO 14001, ISO 28000, ISO 39001 and the Cyanide Code.

N&V has appropriate units appropriate to all ground conditions of Peru: Volvo, International, Freightliner, Mercedes and Mack. Their new generation of vehicles increases driving performance, as well as it favors the environment, for the routes on which they travel (coast, mountains, jungle). They currently have a fleet of 50 trailer units, also semi-trailers with different conformations as vans, platforms, tankers, lower beds and containers holders, which adapt to the transfer in the diversity of products that client needs.

The transporter currently operates various ground transport routes for cyanide from Lima warehouses to mine sites in the south and north of the country. N&V truck trailers transport solid sodium cyanide packed in 1 ton Intermediate Bulk Containers (IBC) and in 30 kg barrels in 20 and 40 foot sea containers. All containers are received locked and tagged. These tags are removed only at the destination site. Cyanide is delivered in convoys with escort.

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Auditor's Finding

This operation is

- in full compliance with _____ with the International Cyanide Management Code
- in substantial compliance with _____
- not in compliance with _____

This operation is in full compliance with the International Cyanide Management Code.

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle. This operation has experienced zero significant cyanide incidents during this 3-year recertification audit cycle.

Audit Company:	BP Cyanide Auditors SAC
Audit Team Leader and Technical auditor Email:	Bruno Pizzorni bpizzorni@cyanideauditor.com
Dates of Audit:	June 15 – 16, 2021

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 ICMI Cyanide Transportation Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

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Verification Protocol

PRINCIPLE 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 Transport Practice 1.1
 in substantial compliance with
 not in compliance with

Empresa de Transportes N&V S.A.C. (N&V) has developed and implemented the procedure NV-SSMA-P-014 Route Evaluation Procedure to minimize the potential for accident and releases during transport.

Among the objectives described in the procedure, is to determines the necessary parameters for the approval of routes for the transport of hazardous materials and to define systems of permanent updating in order to minimize the risk of accidents due to bad conditions and characteristics of the roads.

According to the procedure, for routes evaluations, the company takes into account the following:

- All transport routes for hazardous material must be authorized for this purpose by the Peruvian Ministry of Transport and Communications (MTC).
- Type of road: in accordance with local regulations on the weight, dimensions and capacity of transport vehicles transiting on roads and bridges, the type of roads that make up the route must be defined, that is to say there may be sections that are motorways of 1 or more lanes or sections of land, for which the roads are defined as Interprovincial, urban or secondary road.
- Length: Refers to the distance between the origin and destination (door to door), this can be determined by using existing tabs on the different road maps, however, it is advisable to determine it by taking the reading of the odometer at the beginning and end of the trip.
- Transit time allowed: The transit time is determined by the maximum working day per day which shall be 12 hours; every 4.5 hours of travel, the driver must stop the vehicle and rest for 25 minutes and take active breaks; after 12 hours of travel, the driver must rest 8 hours; and the schedule of travel shall be made only during daytime hours.
- Route description: this is the core part of the evaluation of a route since it details the locations of the following aspects:
 - dangerous curves;
 - steep climbs and descents
 - population density
 - resting places

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- major cities and/or municipalities
- communications services and blackout areas
- police stations and hospital services
- significant bridges
- railway crossings
- landslide and fog zones
- Areas with ice, snow or water
- Environmentally sensitive areas
- Areas at high risk of theft

The auditor reviewed reports of the annual routes evaluations performed for the cyanide transport operation between Lima warehouses the mine sites finding them in compliance.

The procedure NV-SSMA-P-014 Route Evaluation Procedure includes a procedure to identify hazards and to evaluate the routes, requiring that control measures must be established to control the risks identified.

The evaluation of routes must be done physically, that is to say by means of a route of the same, for which the formats of Roadmap and Route Analysis are used; the review must be done observing all the relevant security measures, as well as the precepts of the "defensive management". This evaluation is be done in conjunction with the cyanide distributor, as well as with the client if required by the same.

The evaluation of routes in N&V is mainly in charge of the owner of the company who is who in turn a very experienced truck driver, who knows the routes as is a local from the area where their vehicles operate.

Risks identification on route is carried out on the basis of the population density, condition of road infrastructure, long slopes, curves, bridges and uneven steps, areas under repair, exits, roads or gaps where they could divert the unit. Also considers estimated travel, if on the way there are hospitals, schools, or places of concentration of people. Considers transit through water concentration zones such as rivers, lakes, lagoons, swamps, and fog zones. Identifies presence of authorities and Civil Protection, phone and GPS coverage during the journey.

Measures are also taken to treat risks identified as high or intolerable in order to minimize the possibility of these occurring. The annual route evaluation reviewed by the auditor included these risk analysis, finding them it in compliance with the Code requirements.

The transporter procedure for Route Evaluation Procedure, states the routes reevaluation will be performed under the same initial analysis methodology and its updating will be carried out annually or as needed.

The procedure also states that drivers must inform of any situation that may cause risk or deviation on the route, whether temporary or definitive. All personnel involved in transport of hazardous material, including cyanide, uses the WhatsApp application to report immediately about any incidence along the transport route. Based on the feedback received the traffic monitor officer monitor reports toe the Operations Manager and the Health and Safety (H&S) Supervisor Monitoring who review of the

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information to manage the situation and to update the route risks evaluation if necessary following the criteria set out in this procedure, and inform the parties involved. The auditor confirmed this is implemented by review of the route reevaluations performed during the recertification period.

Based on the route assessment, measures are taken to treat risks identified as high or intolerable in order to minimize the possibility of them occurring. The Specific Procedure for Safe Work (PET) NV-OPE-P-001 Cyanide Procedure for Loading Transport and Unloading, address the measures to take for the risks identified with the selected routes. The procedure takes into account the risks evaluation, the information collected during the trip and the specifications made by the customer for the transits of units such as authorized driving hours, schedule restriction, overnight time, food, sanitary and personal grooming, brief description of the route, road sections and road type indicating risk levels, speed controls, authorized stops, fuel loading places, specifications or special indications for the operator and the map of the path to follow, among other control measures.

The transporter seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. During the routes evaluation, the transporter establishes ties of friendship in the restaurants where he stops and inquiries about safety for the route, to park their vehicles, meals, lodging and for refuel the vehicles. When transiting through critical areas of social unrest, they communicate to the police stations, firefighters of the hospitals that they transport dangerous materials.

As required in the procedure for routes evaluations, during the route assessment process, the evaluators should consult with the necessary communities, stakeholders and government agencies in order to obtain feedback that allows N&V to assess possible routes more accurately, this consultation and comments should be supported by the necessary evidence, be it a minute, memorandum.

The transport of cyanide in sea containers is carried out a supervised convoy mode and escorted throughout its outward journey to the mine by an authorized leader. The convoy mode is carried out with at least one escort van for every 3 transport units. In the event that one of the convoy's units fails, the leader will determine whether the others stay until repair or continue the journey. The best option will be determined according to the circumstances, but the driver cannot leave his place. Once the damaged unit has been repaired, the Convoy Leader shall verify the conformity of the unit's conditions and confirm the condition with the driver and available mechanical technical personnel. Only 1 container is transported per platform and each tractor can only haul one trailer. The movement of the convoy is only during daytime hours and dependent on weather conditions. The convoy leader assess the safety of the route in each case and may stop the convoy if in his opinion the conditions do not allow safe transit.

For safe stop on route, the site must meet the following requirements:

- Enough space to fit all trucks and escort vehicles.
- Away from populated centers and sensitive places.
- Feeding facilities for drivers and escorts.
- That they do not impede the free movement of other transport units.

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- Accesses free of obstacles.
- No products incompatible with cyanide (flammable, liquids, foodstuffs, etc.).
- Permanent custody.

The transporter do advises external responders, medical facilities and communities of their roles and mutual aid during an emergency response. The auditor reviewed records of communications to external responders as police, firefighters and hospitals in Trujillo city during the certification period.

The transporter does not subcontract any portion of their cyanide transportation operations. All transport vehicles are owned by N&V and the drivers are employees of the transport company.

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 Transport Practice 1.2
 in substantial compliance with
 not in compliance with

The transporter works with qualified and licensed drivers. To be able to qualify as a driver in N&V. they must pass the company's evaluation as for experience and test of driving, police records and medical examination, among others. The transport company only hires licensed drivers with driving license category A4 which refers to professional drivers for heavy vehicles. Also requires/provide training in first aids, hazardous materials, firefighting.

N&V has the NV-GTH-P-01 Procedure for Recruitment and Selection of Personnel and a manual with job profiles where the necessary requirements to hire drivers are specified. There are specific requirements for drivers who transported hazardous materials, including a theoretical and driving practical test that is in charge of the owner of the company, a very experienced truck driver of hazmat materials. They also must pass a test with an instructor from the commercial company providing the vehicle, who evaluates the drivers. Drivers are also request for police and criminal records and drivers' fines records. The transporter makes home visits to know driver's family environment. The auditor saw a series of documents kept on the staff of each driver documenting all of the above.

Once the drivers for hazardous materials are admitted to work, they have to receive training in training in first aids, hazardous materials, firefighting and defensive driving, according to local regulations.

Operational training on safe cyanide handling is given upon hire and there is a skills evaluation process to ensure that drivers are competent to perform their job and to drive the designated route prior to their first delivery. Safety related training is given at defined intervals to ensure that all personnel operating cyanide transportation equipment can perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

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The auditor reviewed training registers provided to the drivers during this recertification period. The records were found to be acceptable. The auditor also reviewed documents from 3 drivers kept on the personal file documenting all of the above.

Transport Practice 1.3

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 Transport Practice 1.3
 in substantial compliance with
 not in compliance with

1. Does the transport company only use equipment designed and maintained to operate within the loads it will be handling?

N&V vehicles are adequate and are maintained to operate within the loads to handle. The carrier has four types of vehicles in its truck fleet, Mack, Freightliner, Volvos and Mercedes Benz trucks, Class N3 for tractors and Class O4 for the trailers and according to the configuration that has been approved and certified by the MTC, as appears in the vehicle's ownership card in accordance with the vehicular configuration figure of the National Traffic Regulations. The commercial house that provides the vehicles trains the drivers. N&V maintains the vehicle's technical files that include the truck characteristics and record of the type of tires installed.

To assign these vehicles for the cyanide transport operation, the transporter performed a technical study to determine the characteristics of the vehicle needed, taking into account the engine power, haul and cargo capacity, torque and transmission capacity, among others. The auditor reviewed technical sheets of the vehicles verifying their power and towing capacity were adequate for the load bearing and the type of road to go.

Trucks and trailers were reviewed during the audit. All available tractors and trailers have been checked and were rated for weights that exceed maximum loaded weights. The load capacity of the platforms used by the transporter is larger than the gross weight of an ocean container fully loaded with cyanide.

The auditor reviewed the chassis loading capacity indicated in the plates attached to each chassis, indicating a maximum gross weight of 30 tons, also checked the manufacturer's specifications, finding them in conformance.

The cyanide transport procedure has the guidelines to verify the adequacy of the equipment for the load it must bear, which contains the minimum requirements of the company for terrestrial transportation both for receipt and deliver any kind of shipments. It describes the type of vehicle to use for the load it must bear and specifies the characteristics of the vehicle including load clamping mechanisms, tarps, floor,

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walls and ceilings, suspension, dimensions, equipment presentation and nominal load capable of transporting.

Prior to loading and use, trucks are inspected by the transporter to ensure there are no deviations that could affect the operation. They are guided by the load capacity of the equipment, also, the load weights are recorded before and during the trip.

The carrier's operations area assigns the vehicles according to the cargo requirements. Normally N&V transports cyanide in 20 foot sea with a gross load of 22 tons. According to local Traffic Regulations and the Table of Approved Weights and Measures, the carrier must use the indicated configuration which is an approved combination of the tractor and trailer indicating the load capacity of that vehicle configuration.

N&V has established that each chassis will be loaded with only one cyanide container and that each truck will haul one chassis (trailer). This is consistent with the information included in the inspection checklist and was confirmed during the interviews.

Records were checked against weight capacities and weight limit regulatory information. The equipment is capable of transporting loads more than the maximum loads shipped. The regulatory limits on truck weight are typically the limiting factor that dictates the maximum amount of cyanide that can be transported. Office personnel and driver showed awareness of weight capacities and regulatory requirements pertaining to maximum truck weight allowed.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

N&V transports only solid cyanide in sealed sea containers. Normal safe driving procedures and unloading procedures ensure that the truck and the trailer are not damaged during transit. The transport procedure establishes that the load cannot be altered during the transportation process. To ensure this, tags are placed in the ocean container's locks at the manufacturing facility. These tags can only be removed at the final destination. The containers received in the production facility are placed on platform trailers hauled by trucks without the need of changing the packaging. Per the interviewed personnel, the load is not removed from the container.

Appropriate placards showing UN 1689 (solid cyanide) are displayed on all four sides of the sea containers. Drivers visually inspect the containers prior to each movement. Equipment markings were found to be adequate and conformant.

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The transport procedure establishes that placards with cyanide's UN number and poison signs must be placed on the container; this is verified through the vehicle inspection checklist. Per the reviewed operation files, the presence of the placards was verified through the checklist.

N&V has a safety program for cyanide transport. Drivers conduct a pre-trip inspection before the vehicle departs to the port facility for loading (documented through the vehicle inspection checklist). Mechanical defects are called to the attention of the approved mechanics contractors. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site. Driver interviewed demonstrated knowledge of the process of performing pre-trip inspections. Pre-trip inspection checklists were reviewed and found to be acceptable.

The transporter has a Maintenance Program for their vehicles for preventive and corrective activities. The maintenance program was reviewed and found in compliance. Per interview with the maintenance supervisor, the trailers are maintained every six months according to the document Execution of Preventive maintenance of the Platform and Low Bed. Then, according to the brand of the tractor there are maintenance plans called M1, M2 and M3 controlled by means of an Excel worksheet which controls for mileage every 20,000 km according to manufacturer's specifications. This is monitored through the pre-preventive maintenance plan for units called Control of the Preventive Maintenance Plan for Transport Units. N&V is currently implementing a platform called ERP to manage the preventive maintenance of their units that will replace the worksheet system by Excel.

A report is issue on the condition of the equipment that is delivered to operations and after each trip in case of any damage, corrective maintenance would be done. To count the kilometers traveled by the vehicles, it is updated through weekly calls to the driver where Indicates the odometer information and also by the travel report and also by the control of the guardhouse that read the mileage at the entrance and exit of the vehicles to N&V headquarters. Preventive maintenance for new vehicles is generally done by the supplier during the first year for free. The auditor reviewed examples of preventive maintenance records performed where the mechanic signs to confirm that it has been done , it also indicates the list of spare parts that have been used. N&V also generates maintenance indicators for the mines reviews.

The procedure for cyanide transportation requires transit time must be determined by the maximum working day per day which shall be 12 hours; every 4.5 hours of travel, the driver must stop the vehicle and rest for 25 minutes and take active breaks; after 12 hours of travel, the driver must rest 8 hours; and the schedule of travel shall be made only during daytime hours.

To prevent loads from shifting the cyanide transport procedure requires drivers to inspect their units after loading the sea container and after every stop on route, to ensure the trailer's pins are correctly embedded preventing it from shifting. Cyanide travels in sealed containers, which are secured to the platform safely, eliminating the possibility of displacement during transport.

According to the sodium cyanide transport procedure the transport can continue only if the leader of the convoy has provided the relevant conditions. The supervisor of the convoy informs the state of progress of the operation and any event in each one of the points indicated in its itinerary, and any event requiring

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stopping the convoy. If conditions are not favorable to allow the convoy to reach its destination, it will be parked in an appropriate place.

Before each trip, the employee must undergo alcohol testing and periodically through a drug test. Violation of this policy has resulted in the separation of the worker from the organization.

Records were available to demonstrate that the requirements of each of the above mentioned controls had been fulfilled. Records are maintained in electronic and hard copy at the office for a period.

Transport Practice 1.5:

Follow international standards for transportation of cyanide by sea and air.

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

The transporter does not ship cyanide by sea or by air. This section of the ICMC does not apply to the operation.

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

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

the transport vehicles have means to communicate with the transport company with the mining client with the cyanide distributor and also with the emergency responders. Th escort vehicle has cell phones and satellite phone. All vehicles have radio base used to communicate with the mining client and also especially to communicate between the convoy vehicles, they have 5 channels in the radio bases to communicate with the clients. Drivers personal cell phones are collected at the beginning of the convoy driving day and delivered to the convoy leader. The auditor reviewed the cell phone delivery formats before each drive. Communications during driving is done by radio between the convoy participants.

All personnel involved in the cyanide transport operation have a communication group via WhatsApp, which involves drivers, cyanide transport operation personnel, the cyanide destination at the mine, the cyanide distributor including N&V the safety personnel. The convoy leader reports at departing from the distributor warehouse, reports any stop to rest or for lunch, and upon arriving and delivering the cyanide shipping. Any incident in the road is communicated via this group.

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Cyanide shipments are tracked using a GPS tracking system from Tracklog GPS provider, that is monitored by the transporter, GPS provider and the mine site, when required. Through this system the drivers have the option to action the panic button who will notify directly to the transport supervision and in case of needed will call the emergency responders.

According to the cyanide transport procedure GPS must be tested to ensure it functions properly checked before delivering the cyanide shipment: that the GPS it is working properly, that the audio system in the cabin works, and the remote shutdown system of the vehicle works.

Areas without communications coverage on transport routes have been verified, establishing in the monitoring system the expected time to the signal to be recovered and keep tracking of this. N&V GPS tracking system has set geofences identifying this places and they expect to recover communication with the convoy after an established time.

The transporter has GPS tracking system which allows continuously monitoring of the location of the convoy. The convoy leader communicates by cellphone or radio to its base upon dispatch, upon arrival at the mine site, and after unloading is complete. Personnel responsible for tracking shipment status from the transporter were interviewed, the GPS system was demonstrated, and logs showing that shipment status was being recorded were reviewed and were found to be complete.

The transport documents shows the amount of cyanide delivered. This paperwork is used to document the chain of custody and is signed upon delivery of the product to the customer. The amount of cyanide delivered is carefully monitored by the driver and remotely through the transport and the cyanide production facility dispatch office.

Additionally, the containers are locked are tagged at the manufacturer's facilities and these tags are only removed at the final destination. The auditor reviewed the trucks cyanide shipment bill of ladings matching the production facility and port scale reports, coinciding the weights always.

The transport document, the Safety Data Sheets (SDS), and emergency response information are carried by each driver. The drivers have an on-board file that includes copies of its, licenses, and the cyanide SDS.

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PRINCIPLE 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

The operation is

<input checked="" type="checkbox"/>	in full compliance with	Transport Practice 2.1
<input type="checkbox"/>	in substantial compliance with	
<input type="checkbox"/>	not in compliance with	

N&V does not operate any cyanide trans-shipping depots and interim storage sites. Transport Practice do not apply to the transporter.

PRINCIPLE 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

<input checked="" type="checkbox"/>	in full compliance with	Transport Practice 3.1
<input type="checkbox"/>	in substantial compliance with	
<input type="checkbox"/>	not in compliance with	

N&V maintains the NV-SSMA-PDC-007 Emergency Preparedness and Response Plan for Sodium Cyanide Transport (ERP or Plan), with the aim of establishing the actions to mitigate road accidents with potential releases and exposures during the transport of sodium cyanide. The ERP is appropriate for all transportation incidents. The transporter personnel were interviewed, leadership understanding and responsibilities was good. Personnel demonstrated a high level of commitment to ensuring that cyanide shipments are made in compliance with ICMC requirements.

The Plan is appropriate for the specific circumstances of the operation. The Plan reflects specific issues that could arise during the transportation route from the distributor warehouse to the mine sites. The Plan identifies possible emergency situations as sodium cyanide release to road, land, surface water and robbery during transportation. The transporter do not operates an interim storage facility.

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As stated en N&V's ERP, they are a company dedicated to the service of transport of products and hazardous materials mainly for the industrial and mining sector and is subject to the probability that an incident will arise which could end in loss (lives human, goods, business opportunities, community, etc.) regardless of whether it is develop preventive policies aimed at mitigating the occurrence of this type of event. Also states the Plan is one of the most important elements of the responses to an accident with cyanide. The plan provides a set of guidelines that will be used to direct and coordinate all aspects of preparing a response to an accident during transport and a response to an emergency. States that the Plan well used, will serve people involved in a cyanide accident, in such a way that they respond effectively to the situation, in order to reduce the negative effects on human health and the environment, and to minimize the cost of cleaning. In addition to providing equipment inventories, lists of teams of people and contacts, the Plan has several broader features to maximize its effectiveness.

The Plan considers the physical and chemical form of the cyanide toxic white solid in the form of briquets or granules. The only form of cyanide to be shipped using this supply chain is solid sodium cyanide. Emergency response procedures address actions to be taken in response to a solid sodium cyanide spill. The Plan includes the sodium cyanide SDS where is defined the physical and chemical form of cyanide: solid white granular cyanide and specific information regarding the hazardous material to be transported.

The transport method is specified in the Plan. States that cyanide transportation is made in convoy by trucks with one semi-trailers type for container chassis according to a stablished configuration. No other methods of transport are used in this trucking company. The Plan considers the transport of cyanide in its own trucks and appropriately addresses the emergency response actions.

The Plan considers all parts of the transportation infrastructures, as it was identified in the route risk analysis, including the condition of road infrastructure, long slopes, curves, bridges and uneven steps, areas under repair, exits, roads or gaps where they could divert the unit. Considers transit through water concentration zones such as rivers, lakes, lagoons, swamps, fog zones and danger of landslides on the route, among others. Identifies phone and GPS coverage during the travel journey. The Plan addresses the emergency response to events that occur in relation to these risks and hazards.

The ERP considers the trucks design of the transport vehicles. It describes the appropriate trucks and chassis to use to transport cyanide, also indicates cyanide is transported in sea containers. Each truck hauls one trailers with a sea container. Cyanide is received from the distributor warehouse in 20 or 40 foot sealed sea containers transporting Intermediate Bulk Containers (IBC) of 1,000 kg each one and also 30 kg metallic barrels. For cyanide transportation the transport vehicles are described as articulated truck, with one trailer chassis for sea containers.

The Plan specifically considers response actions that may be needed for emergency situations during transportation. The Plan includes detailed response actions for each case, including spills in both current and open water bodies and for the other risks identified on the routes. The Plan considers a series of instructions covering the potential hazards that could occur during the loading, transportation and unloading of the cyanide cargo. It includes emergency response actions against collision or rollover, spillage

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of dry cargo to water sources, on the road and landslides. The Plan describe detailed response actions for cases vehicle collisions with and without spillage, vehicle rollover with and without exposure and intoxication, spillage of the product and contact of this with streams, rivers, fire and robbery.

The Plan, also establishes the logical line of actions that drivers must take when irregularities arise during transport of sodium cyanide, including civil commotion, adverse conditions, bad weather and unplanned stops.

The roles of police and firefighters are clearly identified in the Plan. The roles of outside responders in the emergency response procedures are clearly established for the police, firefighters, medical facilities and INDECI (National Institute for Civil Defense). The police will provide support and safety to the transport units during the passage through cities and towns medical facilities and will take control of traffic routes in case of an accident. Second response will be in charge of N&V emergency response brigades on arriving to the site, with the help of the mine client. Contractor CASSMA will be in charge of removing the contaminated material for its final proper final disposal.

Transport Practice 3.2

Designate appropriate response personnel and commit necessary resources for emergency response.

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

Training on emergency response is given periodically to drivers, and supervisors. They are trained in emergency response in safe cyanide management for spills, firefighting), hazardous materials. Training is provided by internal staff and external companies as workouts which are renewed annually complying with the training plan and verifying compliance with specific skills.

Drivers were interviewed and awareness of emergency procedures and documentation was confirmed. Training records were reviewed in emergency response with hazardous materials (sodium cyanide), safe handling of cyanide among others.

The carrier provides cyanide first aid training to its personnel with designated responsibility for responding to emergencies during cyanide transport. Training was provided face to face by an external contractor. The auditor reviewed the assistance records, the training material and pictures.

The ERP has detailed descriptions of the specific emergency response duties and responsibilities before, during and after an incident / accident or an emergency of situation for the general manager, operations manager, operations and H&S supervisors (convoy leaders), hazardous material supervisor, drivers, crisis committee, police, INDECI and Peruvian Ministry of Health.

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The Plan describes the responsibilities of the Terrestrial Transport Manager, the Safety Transport Supervisor, the driver, the monitoring personnel, N&V emergency response team and the external emergency responders.

The transporter has defined in the ERP the materials and equipment required for emergency response during transportation along the route including spill response equipment. Appendix 3 of the Plan, List of First Emergency Response Equipment and Personal Protection, describes the equipment available for first respond in the convoy of units which have been distributed in four categories:

- Personal protective equipment (PPE) for the execution of daily tasks.
- Vehicular protective equipment, for minor incidents and damages unit mechanics.
- Vehicle first response team, for vehicular emergencies related to the product.
- Escort first response equipment for the care of emergencies.

These implements are checked on each cyanide shipment through a check list. This activity is performed by the Route Supervisor.

The list includes a cyanide antidote kit containing amyl nitrite, sodium nitrite, sodium thiosulfate and medicinal oxygen. Instructions on how to administer antidotes is in Spanish, the workforce language. The list of PPEs includes HCN detector, disposable respirators, Tyvec suits, chemical and leather gloves, rubber safety boots, full face cover, goggles and HCN detector among others. Also includes materials and tools to recover any cyanide spill as isolating tape rolls, shovels, sweeps, polyethylene bags, empty containers and lime.

Each truck has the required emergency response equipment, as the auditor had the opportunity to inspect the vehicles on its arrival to the truck parking area in N&V headquarters. Each truck travels with gloves, apron and rubber boots, leather gloves, reflective vests, safety cones, half-face mask, with filter against HCN, shovel, peak, dry powder fire extinguisher, lantern with batteries, The escort van carries lime, HCN detector, cords, the cyanide first aid kit, black plastic bags, brush, goggles, absorbent material and repair tape. N&V has made arrangements to carry two oxygen bottles due to the length of the routes, which allows sufficient capacity to assist a victim due to exposure to cyanide for two hours. N&V have established the frequency of inspections for first aid kits, including oxygen is at least monthly and on the eve of a convoy departure.

N&V drivers receive an appropriate level of training to enable them to fulfill their role in emergency response. Formal training in cyanide is given periodically. Records were checked. Drivers were interviewed and awareness of emergency procedures was appropriate. The auditor reviewed training records in first aids for cyanide exposures, in the procedure for safe cyanide transportation and in the emergency response plan, this last training is given annually.

The Plan states to perform monthly inspections of emergency response equipment. Among the control measures to adopt for the transportation of hazardous materials, the ERP addresses to perform inspections

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to the emergency response equipment before loading the truck and also on returning from the transport operation. Also, the emergency equipment is inspected on a regular basis when vehicles trucks are brought in for maintenance and inspections. A checklist is used to verify that it is available, records are kept in the operation file. The availability of the material and inspection records was confirmed during the audit.

Transport Practice 3.3

Designate appropriate personnel and commit necessary equipment and resources for emergency response.

The operation is in full compliance with Transport Practice 3.3
 in substantial compliance with
 not in compliance with

The ERP has current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. The Plan has a detailed communications flowchart, stating that in case of a transport emergency the convoy leader should communicate with the Operations Supervisor or with the vehicles monitoring personnel, which will call the Operations Manager, who in turn will communicate with the client and other interested parties. A flowchart details the communications in case of any emergency.

N&V has included provisions on the update frequency of its contact list for internal and external emergency notifications as annually. During this activity, the phone numbers will be checked for accuracy to ensure that internal and external emergency notification contacts are kept current. Records were available to show that this is done.

Transport Practice 3.4

Develop procedures for internal and external emergency notification and reporting.

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

The Plan details all the required information regarding remediation procedures, such as recovery or neutralization of solutions or solids, are now described in the Plan. They will neutralize with lime. The Plan describes how the recovery will take or neutralize the solid, the decontamination of soils, or other contaminated media and how these wastes are managed. The Plan addresses the immediately actions to follow in case of spills, preventive measures to avoid, cleaning methods and how to treat waste. It includes measures in the event of spills, environmental precautions, methods and material for first containment.

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The convoy personnel will perform spill cleanup and cyanide neutralization in case of small cyanide spills. For a significant accident with cyanide spill, will call external responders and a specialized contractor to perform cleanup and remediation activities to ensure the land has been free of cyanide contamination.

The Plan prohibits the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. The ERP addresses that the use of these chemical substances in any incident for the treatment of solid sodium cyanide spilled in surface waters is prohibited.

Transport Practice 3.5

Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

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

The Plan states to be reviewed once each year. Records were available to show that this is done.

The Plan establishes that mock emergency drills must be carried out every year. The practices will be scheduled to keep the personnel permanently prepared for an emergency. The auditor reviewed the drills reports or the certification period, which included cyanide spillage and exposition.

The Plan establishes that after implementing the Plan and mock drills, an analysis of the observations or failures detected during it be carried out, for which it will have to prepare a schedule of actions and courses that must be received by the personnel to correct these observations and of that to complete the equipment or information needed. At the date of the audit, there had been no need to activate the Plan, so no revisions to it had been carried out for this reason.

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