

**ICMC SUMMARY AUDIT REPORT
N.V. VSH TRANSPORT
AT MOENGO PORT, SURINAME
2017**

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SUMMARY AUDIT REPORT

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October 17, 2017

Name of the Facility

Signature of Lead Auditor

Date

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Information on the Audited Operation

Name of Cyanide Transportation Facility:	N.V. VSH Transport at Moengo port, Suriname		
Name of Transportation Operation Owner:	N.V. VSH Transport		
Name of Facility Operator:	N.V. VSH Transport		
Name of Responsible Manager:	Sjoerd Poort, VSH Transport Assistant Managing Director		
Address:	Van 't Hogerhuysstraat 9-11 Paramaribo		
State/Province:	N/A	Country:	Suriname
Telephone:	+ 597-402-558 ext. 2243		
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Location Detail and Description of Operation:

Moengo port is a private port approximately 96 nautical miles, or 100 km by road from Paramaribo, up the Cottica river, a navigable tributary of the Commewijne, in Eastern Suriname. With a depth of 4.3 m at low tide and 6.10 m at high tide, the Cottica river is the republic of Suriname's deepest river. It was surveyed by the Maritime Authority of Suriname (MAS) and to increase the accessibility of the Commewijne river, the MAS is frequently dredging the entrance for the draft of the vessels coming to and from Moengo. The port is accessible for large vessels.

For at least 3 decades Moengo was the center of the mining activities of Suralco, who constructed the Moengo dock for the export of bauxite and the import of several other goods.

In 2004, Traymore N.V. bought the dock of Moengo. The dock was rehabilitated and certified to be able to facilitate current and future activities in the Moengo area.

The port 100% owned by Traymore N.V, was officially opened on April 19, 2008 and since the reopening of Moengo Port, actions are taken to transform this former bauxite port into a general port operation. The port is ISO-9001 certified port and the International Ship and Port Facility Security Code (ISPS). Traymore N.V. leases out facilities for cargo and container handling.

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N.V. VSH Transport (VSH) performs stevedoring activities at Moengo port, handling 20 feet containers with solid cyanide, among other products. VSH unloads from the vessels solid cyanide in 20 feet containers and in ISO tanks and directly loads them into trucks. No cyanide is stored at the port. VSH is a subsidiary company of VSH United, a group of companies established in 1958 and headquartered in Paramaribo, Suriname.

N.V. VSH Transport (VSH) was founded 1965 and since November 5, 2013 is certified with the standards ISO 9001:2015, ISO 14001: 2015 and OHSAS 18001.

The port is completely fenced, has 24/7 surveillance cameras, security guards, parking area, loading and unloading of equipment and bunkering services. Has 2 docks to accommodate vessels up to 400 ft long, the docking areas have concrete slabs.

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Auditor's Finding

This operation is

- in full compliance**
- in substantial compliance
- not in compliance with

with the International Cyanide Management Code.

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

Audit Company: Bruno A. Pizzorni

Audit Team Leader: Bruno A. Pizzorni E-mail: bpizzorni73@gmail.com

Names and Signatures of
Other Auditors:

Transport Technical Auditor: Bruno A. Pizzorni



Date(s) of Audit: July 26 -27, 2017

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 Transport Operations and using and accepted practices for health, safety and environmental audits.

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

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

Full Compliance

The operation is in substantial compliance with Transport Practice 1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

N.V. VSH Transport (VSH) performs stevedoring operations at the dock area at Moengo port. Solid cyanide in 20-foot sea containers and ISO tanks, is directly transferred from the ship's hold to Haukes transporter trucks. Traymore N.V, the port owner, has defined the transportation routes of all trucks that move in the port area. VSH has developed and implemented the guidelines "Transport Driving and Road Safety Tips", to minimize the potential for accidents and releases and considers the presence of workers in the area, the port infrastructure, access road to the docking area and the proximity of the river.

The VSH's guidelines "Transport Driving and Road Safety Tips" area developed based on a risk analysis which considers the flow of trucks transiting, the surrounding infrastructure, and workers path in the port. Prior to every stevedoring operation at Moengo port, VSH crew develop a risk analysis considering the factors that could affect the operation.

The guidelines "Transport Driving and Road Safety Tips" are updated annually or when needed. VSH has periodically meetings with the Traymore N.V, the port operator, and the truck drivers, where they can have feedback on improvement opportunities regarding port access, visibility and traffic congestions. There are route maps published and traffic signs are visible between the entrance gate and the docking area.

Risk mitigation measures are noted on the route documentation, where applicable. The dispatch orders indicate the routes. Risk mitigation measures focus primarily on the avoidance of traffic congestion and adequate visibility.

The guidelines "Transport Driving and Road Safety Tips", item 24, encourages to report and warn other about unsafe conditions. Drivers are free to give input to managers when routes present special safety or security concerns. During VSH's periodically meetings with truck drivers, they provide feedback on improvement opportunities regarding port access, visibility and traffic congestions.

Extensive interaction occurs between VSH and the port authority, governmental agencies, mine customers and emergency response organisms as fire fighters and police, where they have opportunity to seek input regarding risks management.

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Although all routes within the port are short in length, security concerns are evaluated. VSH has a robust communication system in the port to interact with Traymore N.V. the port owner and operator, Haukes, the trucking company and Surgold (Newmont Surinam), the mining client. Once the truck arrives to the port, Traymore gate security personnel, drivers, control room operator, and stevedoring crew at the docking area are in permanent communication to ensure that different steps in the activities have occurred (e.g., entrance to the port, truck inspection, en-route to docking area, at loading the cargo, leaving the area and the exit gate.

VSH largely manages communications with local emergency responders. VSH has formal communications and periodically training with local emergency responders and with hospitals. Records from community interactions for 2016 and 2017 were reviewed and found to be acceptable.

VSH performs all stevedoring activities with his own personnel. All other parties in the port, as the port owner Traymore N.V., trucking companies, mooring and tugging contractors and ship's crew must comply with the port authority requirements.

1.2 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.

Full Compliance

The operation is in substantial compliance with Transport Practice 1.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

VSH use only trained, qualified and licensed operators to perform its activities. Every time is needed a stevedoring operation at Moengo port, VSH's crew arrives from Paramaribo port to perform the job. VSH personnel do not operates heavy equipment at Moengo, as cyanide containers are unloaded with the vessel's crane.

Operational training is given upon hire and there is a skills evaluation process to ensure that personnel is competent to perform their job and to operate the designated equipment before being allowed to work. Safety-related training is given at defined intervals to ensure that all personnel handling hazardous materials, including cyanide, can perform their jobs in a manner that minimizes the potential for releases and exposures.

All other third parties entering to the port, as trucking companies, mooring and tugging contractors and ship's crew must comply with the port authority requirements.

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

Full Compliance

The operation is in substantial compliance with Transport Practice 1.3

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

VSH only use equipment designed and maintained to operate within the loads it will be handling. The risk analysis they perform at Moengo port before the stevedoring activities, includes checking the vessel's crane load capacity with the MV (Motor Vessel) Inspection List, which includes equipment for rigging, loads lifting and cables.

Equipment inspections and preventive maintenance actions are performed regularly to ensure that the equipment is safe to operate with the loads for which is it designated. Rigging, cables and hand signaling elements are inspected in Paramaribo before departing the crew to Moengo port, looking for signs of wear to ensure there are no deviations that could affect the operation.

The maintenance program is well organized, defined checklists showing all necessary maintenance activities are used and records were available. Inspections are scheduled, tracked and documented. Each crane has its own file that is maintained.

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

Full Compliance

The operation is in substantial compliance with Transport Practice 1

not in compliance with

VSH handles solid cyanide in closed 20 feet containers and ISO tanks, transferring it directly from the vessel hold to the trucks, therefore there is no "packaging" other than the sea container or Isotank itself. Normal safe stevedoring procedures and loading procedures to the truck ensure that the shipment is not damaged during handling and transit.

The containers received in the port 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), the container's signal and the NFPA rhombus are displayed on all four sides of the sea containers. VSH visually inspects the containers prior to each movement. VSH procedures establishes that placards with cyanide's

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UN number and poison signs must be placed in the container; this is verified through checklists.

Before stevedoring operations with cyanide containers, VSH inspects Haukes's trucks - an ICMC certified trucking company. If they show signs of worn tires or defective lights, or other sub-standard conditions, will not be allowed to enter to the port and receive the cargo. VSH also inspects all other equipment involved in the stevedoring operation as vessel cranes, rigging, cables and hand signaling elements using the pre-use equipment check list (or Motor Vessel Inspection form). VSH personnel were interviewed and they demonstrated the process of performing pre-work inspections; pre-work inspection checklists were reviewed and found to be acceptable. Completed checklists are submitted into the office at the end of each day and were found to be filled out and signed.

VSH has a preventive maintenance plan, in this case applies to their rigging and cables elements, as they do not operate heavy equipment in Moengo port. Pre-defined checklists showing the required maintenance tasks are used to record actions. The incoming and outgoing condition of the equipment is recorded on the checklists and associated repair orders. Records were sampled and were found to be acceptable.

The vessel cranes are operated by VSH as the stevedoring company. The vessel is operated by Intermarine USA an ICMC signatory company. Haukes, the trucking company receiving the cyanide containers at the docking area, has a preventive maintenance plan and is certified under the ICMC.

VSH has limitations on crane and equipment operator's hours. Crane operator are replaced every 4 hours due to company fatigue policy. Stevedoring crew can work a maximum of 12 hh. A stevedoring Supervisor was interviewed about these requirements and policies. Awareness and understanding of the requirements was excellent.

To prevent loads from shifting from the truck, VSH stevedoring crew coordinates with the crane operator to ensure the container fits into the trucks fixing cones located at the truck platform.

In conditions of severe weather conditions as rain, strong winds, electric storms or bad sea conditions, VSH's stevedoring Operation Manager, Traymore port operator or the ship's captain, upon their judgment, can stop the works.

VSH has an alcohol and drugs violation / abuse politics, dated April 18, 2017 which is communicated to all workers and contractors during the HSE induction.

VSH retains records documenting all the above activities.

Although VSH do not subcontracts any cyanide handling, they do check for Haukes trucks receiving the cargo to operate in safe conditions, as part of his safety program.

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1.5 Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.

Full Compliance

The operation is in substantial compliance with Transport Practice 1

not in compliance with

VSH does stevedoring activities at the port. Unloads Intermarine USA ships and in one operation transfer the cyanide to Haukes's trucks. Any way before unloading the vessels, VSH inspects that cyanide containers are following the standards of the Dangerous Goods Code of the International Maritime Organization (IMO). Any condition belows the required standard is reported to the maritime agency Intermarine USA transporting cyanide from Houston to Suriname ports. VSH does not transport cyanide by air.

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

Full Compliance

The operation is in substantial compliance with Transport Practice 1

not in compliance with

As soon as the shipping company communicates VSH about vessels arriving with cyanide shipments, VSH log into the system to follow up the vessels arriving date.

VSH has at the port all the necessary means to communicate with the shipping and the trucking companies, with the client and with the port operator. In case of emergency, Haukes will provide emergency respond, as they have all necessary emergency equipment for spills near the port. Police and a medical center are available at Moengo town, both within communications range.

All VSH terminal team leaders, vessel heavy equipment operators, Haukes drivers and the port operator Traymore, have held hand radios and cellphones as back up.

VSH stevedoring crew carries with them an emergency telephone contact list. The auditor noted another contact list published at Traymor's office, the port operator.

The communication and tracking equipment is properly maintained and is used daily. Communication systems is part of the pre-work inspections and is maintained along with the formal preventive maintenance program. The system is used each day and correct operation of the system is confirmed at that time.

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All areas in the port area covered with communications systems, as stated by the port Operations Manager. Anyway, VSH personnel has cellphone communications as back up to hand held radios in the port.

The guidelines “Transport Driving and Road Safety Tips”, describe communications inside the port. VSH personnel is in permanent communication with the truck drivers once the truck is inside the port area. Trucks in the port are continuously monitored by radio while approaching to the stevedoring area. After loading is complete, trucks position is monitored until its exit at the port gate.

The shipment documentation - bill of lading- issued for the shipment by the cyanide provider is delivered to VSH by the agent of the carrier. The transport document includes the number of containers or ISO tanks and net weight, among other useful information to maintain adequate control of the inventory. A copy is provided by the vessel. Haukes transporter upon receipt stamps the transport document which is used for invoicing.

The transport document 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. At the port, trucks are weighed when arriving and when dispatched to ensure proper chain of custody for all cyanide shipped.

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

Bill of lading paperwork 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 VSH. All necessary permits, MSDS information, and emergency contact information is VSH’s operation office always.

Although VSH do not subcontracts any cyanide handling, they do check for trucks entering to the port to operate in safe conditions and provide HSE induction to all people and contractor entering to the port, as part of his safety program, to ensure meeting elements 1 thru 6 of this Transport Practice.

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

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

The operation is Full Compliance
 in substantial compliance with Transport Practice 2.1

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not in compliance with

VSH do not stores cyanide at the port at any time, all shipments are transferred from the ship to the truck in one operation during the stevedoring activities. As an exception, if VSH would find a damage container or ISO tank, immediately will communicate it to all parties involved. Hauke's truck will take the container to an authorized area where Traymore, the port operator, will hold the damage container in an area for hazardous materials covered with an impermeable tarp and segregated from incompatible materials, until the administrative process is finished in the same day and the container is dispatched. In this case, which has not yet occurred, as stated by the port Stevedoring Operations Manager, warning signs will be posted alerting workers 1) that cyanide is present; 2) that smoking, open flames, eating and drinking are not allowed and 3) that personal protective equipment must be worn. The port is completed fenced and has 24/7 surveillance cameras and security guards to prevent unauthorized access

VSH's procedure Hazardous Material Guideline addresses in Section 1.5 that when selecting storage locations and methods for hazardous materials, to consider chemical compatibility, flammability and other risks associated with the materials.

VSH do not stores cyanide at the port at any time, all shipments are transferred from the ship to the truck in one operation during the stevedoring activities. If VSH would find a damage container or ISO tank, immediately will communicate it to Intermarine USA, and will cover the shipment with an impermeable tarp until the container is dispatched.

VSH's workers are trained and knowledgeable in material handling and storage, and in dangerous goods transportation requirements. As stated in Section 1.4 of the Hazardous Material Guideline, workers will direct or carry out the receiving and shipping of dangerous goods, including the shipment of hazardous wastes. They will ensure that all regulatory requirements for documentation, container labels, and vehicle placards are met.

VSH do not stores cyanide at the port at any time. If an exception would occur, the area for hazardous materials is an open well ventilated area.

The port docking areas are totally covered with a concrete slab in acceptable conditions which will provide waterproof barrier for cyanide spills. In case of any spilled cyanide material, VSH will coordinate for Haukes's emergency response equipment to contain it, as they always work together during the stevedoring operations. The spill response equipment and materials include Tychem suits, leather and impermeable gloves, PVC boots, HCN detector, safety goggles, area isolating tape rolls, disposable respirators, shovels, sweeps, polyethylene bags and empty containers, among others.

Section 1.7 of the Hazardous Material Guideline states that leaks and spills of hazardous materials must be contained and cleaned up, using methods that ensure the safety of workers involved. Immediate safety risks to people are a higher priority than stopping the spread of environmental contamination. All spills must be reported to the Health Safety Environment and Quality (HSEQ) Department accordingly.

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

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

Full Compliance

The operation is in substantial compliance with Transport Practice 3.1

not in compliance with

VSH has an Emergency Response Plan (ERP) called Emergency Response Plan Guideline to respond to potential emergencies during stevedoring activities in the port. VHS personnel were interviewed, leadership understanding and responsibilities was good. Personnel demonstrated a high level of commitment to ensuring that cyanide shipments are with the necessary care

The plan was reviewed and was found to be acceptable; it is appropriate for the potential incidents identified during stevedoring activities and include specific information to respond to emergencies within the port operations.

During the certification audit, the auditor observed the Plan needed to specify cyanide in solid form. Soon after the audit, VSH's HSEQ Coordinator reviewed the ERP, including the audit findings and communicated all VSH's personnel about the Plan's new version specifying the adding's and changes. The auditor reviewed this last version of the Plan and training assistance records, finding this question in compliance with the ICMC requirements. No further action was needed.

The ERP considers possible incidents during the stevedoring activities: unloading sealed 20 feet containers and ISO tanks from the vessel and directly transferring them to the trucks. No other methods of transport are used in this stevedoring activities.

The ERP reviewed specifically consider all aspects of responses that may be needed for emergency situations in the corresponding activities segment of VSH operations at the port. The plan considers all aspects of the port infrastructure.

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

The operation is Full Compliance

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in substantial compliance with Transport Practice 3.2

not in compliance with

VSH has the required emergency response equipment. In addition, the trucking company Haukes has a complete emergency response equipment, including personal protective equipment and spills containment kit.

VSH personnel receive an appropriate level of training to enable them to fulfill their role in emergency response. Formal training in cyanide is given periodically.

The emergency equipment is inspected on a regular basis through planned inspections. A checklist is used to verify that the response equipment is available.

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

Full Compliance

The operation is in substantial compliance with Transport Practice 3.3

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 notification call list is checked for accuracy periodically or annually, when the plan is reviewed and tested.

The ERP is reviewed every year, as stated in it. During this activity, the phone numbers are checked for accuracy to ensure that internal and external emergency notification contacts are kept current.

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

Full Compliance

The operation is in substantial compliance with Transport Practice 3.4

not in compliance with

The ERP includes procedures to recover hazardous material spills including cyanide, and management and disposal of spill clean-up debris. Remediation and decontamination of soils and other contaminated media will be performed by a specialized contractor.

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The ERP prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

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

Full Compliance

The operation is in substantial compliance with Transport Practice 3.5

not in compliance with

The ERP is reviewed once each year. Records were available to show that this is done. Interviews and written procedures confirmed that the plan would also be reviewed after any deployment of the plan. Any necessary changes would be made, as necessary.

The ERP address mock drills to be performed periodically and, when possible, that the practices will be scheduled in coordination with the trucking company. VSH conducts mock emergency drills, holds a drill critique, and evaluates the need for further training or adjustment to the emergency procedures. The auditor reviewed the drills reports finding to be effective.

The Plan establishes that after the mock drill, the analysis of the observations or failures detected during the exercise will 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 for a real case

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