

Submitted to:

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

1400 I Street, NW – Suite 550
Washington, DC 20005, USA



Avenida Argentina N° 2833 Callao
Departamento de Callao, Callao/ Perú
Transportation Company
Three year cycle recertification audit



Submitted by:



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RANSA COMERCIAL, S.A.C.
Name of Facility

A handwritten signature in blue ink, appearing to read "Jorge Chong".

Signature of Lead Auditor
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CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

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A- Information of the audited operation

Name of Cyanide Transportation Facility: RANSA COMERCIAL S.A.C. (RANSA)

Name of Facility Owner: RANSA COMERCIAL S.A.C. (RANSA)

Name of Facility Operator: RANSA COMERCIAL S.A.C. (RANSA)

Name of Responsible Manager: Francisco Reyes Clavijo

Address: Av. Argentina N° 2833 Callao

State/Province/Country: Callao/Callao/ Peru

Telephone: +511 3136000 + Fax: ---

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B- Description of the transport operation:

The ICMI's Auditor Guidance for Use of the Transportation Verification Protocol (Auditor Guidance), published June 2021, was used as a reference in evaluating compliance measures for Transportation Practices.

Since 1939, RANSA COMERCIAL, S.A.C. (hereinafter RANSA) is the leading logistics operator in Peru with more than 7,000 highly trained and specialized collaborators to meet the specific requirements of our clients in each economic sector, becoming strategic partners in the logistics of our clients.

RANSA identifies the total costs of logistics activity, simplifies operations, and optimizes resources, improving the efficiency of the supply chain, allowing them to focus on the core of the business.

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Auditor’s Finding

This operation is

- ✓ in full compliance with the International Cyanide Management Code.

“This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.”

Auditor Information

Audit Company: Geosoluciones Panamá, S.A.

Lead Auditor: Jorge Efrén Chong Pérez

Lead Auditor Email: geosoluciones@cwpanama.net

Auditor 1: **Jorge Efrén Chong Pérez, Lead Auditor**
Name


Signature

Dates of Audit: March 15-17th, 2022

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Certification Auditors.


I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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Principles and Standards of Practice

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.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ITRAS-0029 procedure establishes the way to carry out route evaluations, by performing a respective risk analysis for each route. This procedure, which dates to 2017, remains in force. The format FTRANS-0080 "IPER EN RUTA (IPER EN ROUTE)" is associated with this procedure.


Each hazard and risk assessment report for each route is accompanied by a Route Study, which contains 11 parts: introduction, the scope of service, objectives, preliminary information, route evaluation methodology, regulations and parameters, field inspection carried out, evaluation of the sections of the route, critical sectors, conclusions, and recommendations; and appendices.

The auditor reviewed the hazard report and route evaluation (IPER, by its Spanish acronym) of the RANSA Vencedor and Mina ANTAMINA routes. This report includes the sections to be traveled by the transport units, the speeds at which they must circulate, aerial drinking water pipes, pedestrian crossings and their heights, road characteristics such as curves, school zone, railway crossings, slopes, bridges, tunnels, landslide risks, presence of bridges and proximity to drainage. For each section to be covered, the estimate of the level of risk is established.

The auditor reviewed the Ransa San Agustin – Yanacocha Route Study (Compañía Minera Antamina S.A.), located in the San Marcos District, Huari Province, Ancash Department. The study was carried out for the diverse and oversized cargo transport service to describe the main restrictions for its execution of the process of transport and/or transfer of materials. Field visits to the road and discussions between interdisciplinary specialists were carried out.

The ITRAS-0029 procedure, in section 3.7, establishes that the route supervisor will timely inform all involved parts of the changes that could occur in the routes, to update them with the support of those responsible for health, safety, and environment.

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Additionally, section 5.9 establishes the obligation to review the route annually, either by indication of the supervisor or due to the occurrence of an accident.

In the RANSA Route Study, route risks are verified, and the measures to be adopted for the transportation of diverse cargo are established, taking into account national vehicle regulations. D.S 007 – 2016 MTC Law No. 27181 – General Law of Transportation and land traffic (D.S 007 – 2016 MTC Ley No. 27181 –Ley General de Transporte y tránsito terrestre).

The norms of the National Highway System of Peru (SINAC, by its Spanish acronym) establish the maximum design speeds according to the hierarchy and classification of the roads.

For the vehicles to keep circulating safely, in a certain section of the road, the geometric characteristics must have a limitation of the geometric parameters, per the speed of circulation by the Ministry of Transport and Communications of Peru (MTC, by its Spanish acronym).

Generally, the landform is the element that determines the radius of the curves and the speed. These factors, in turn, control the visibility during the route of the road.

RANSA has implemented a program called PAÍS SEGURO (Safe Country) <https://www.ransa.biz/wp-content/uploads/2022/03/Logros-2021.pdf>, which aims to generate a culture of accident prevention and safety in the road network at the national level, through specialized training and awareness-raising for its drivers and/or third-party drivers. This program also includes authorities, support entities of the road system, and public-school students who are in the area of influence of the operations.


In the year 2020-2021, the program was suspended due to the pandemic, however, the program has been reactivated with the support of mining clients.

The program includes carrying out road campaigns in schools so that they learn about signage aspects. This program has a scope up to the committee of companies linked to transportation.

The corporate platform called RANSA TE CUIDA (RANSA takes care of you) has 4 axes of action, in which PAIS SEGURO (Safe Country), leads in terms of social impact and interaction with authorities and communities on transport routes.

RANSA uses escort vehicles for the transportation process, which is required in procedure ITRANS-0026, which establishes that:

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- The driver of the escort vehicle must have knowledge of the route through which it travels, its characteristics, and its risks.
- Each escort vehicle must be directed by a person specially prepared to direct the maneuver, with sufficient authority to allow him or her to make decisions in case of any unforeseen event.
- Escort vehicles must ensure that the driver coming in the opposite direction sees them and realizes that they are approaching a caravan so that they take the necessary preventive measures.
- The maximum distance allowed between the escort vehicle and the cargo vehicles that follow it will be between 80 and 100 meters, in such a way that it always maintains visual contact between them; except in those cases in which, due to the road, weather or traffic conditions, a greater distance is required.

For a convoy of 1 to 3 vehicles, one escort vehicle will be required, and for 4 to 9 transport vehicles, 2 escort vehicles will be required.

The auditor reviewed an escort vehicle checklist and inspected the contents of the escort vehicle. The presence of SCBA equipment, satellite radio, and components to deal with unforeseen cases of damage to equipment, such as incidents of spills and intoxications, was verified.

RANSA does not subcontract any of these cyanide transport operations.

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.

in full compliance with


The operation is in substantial compliance with Standard of Practice 1.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ITRANS-026 procedure includes training for personnel who transport hazardous materials, which are the responsibility of the HSE supervisor for transport.

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In section 5. e), it establishes that the education and training of drivers and supervisors must include the following topics:

First aid

Fire fighting

Safety in the transport of hazardous materials.

Interpretation of Hazardous Materials Safety Data Sheets (MSDS).

Required Personal Protection Equipment.

Training and coaching will take place at intervals no greater than 12 months.

Additionally, RANSA has implemented a training plan matrix in which the following topics are considered:

MSDS Interpretation (Sodium Cyanide).

Gas monitoring, calibration, and calibration verification.

First aid in case of cyanide poisoning.

Emergency plan in case of cyanide spilling.

Cyanide spill case drill.

Defensive driving.

Dangerous materials.

First aid.

In that same plan, month by month, the percentage of compliance with the proposed training topics is inserted. Due to the pandemic, 90% of the training sessions are virtual.

Additionally, each client could request specific training, which would be provided through coordination with Melissa Vigo, who was interviewed in this regard.


There are 12 authorized drivers with type A4 licenses for the transport of cyanide. RANSA maintains files with copies of all current licenses. Two random samples were reviewed.

The list of trainings given was reviewed and Adriana Alessandra Palsa Mori, the transportation safety supervisor, was interviewed. In this interview, topics such as hazardous materials, defensive driving, first aid, firefighting, and fatigue – drowsiness were addressed.

The subject of "Fatigue and Drowsiness" is more than a training subject, since RANSA has provided drivers with technology to prevent accidents by assigning them watches that monitor sleep hours. RANSA has an application in which drivers interact, at the end of certain periods statistics of rest hours are published on the safety wall.

RANSA does not subcontract any of this cyanide transport operations.

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Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.3

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

RANSA has an internal procedure for verifying the load capacities (weights and measures), prepared by the transportation coordinator Ronald Jesús Torres.

Before carrying out the transportation process, the units go through a scale to verify the available load of each vehicle, which is required by Supreme Decree No. 058-2003-MTC, modified by D.S. N° 006-2008, ANNEX IV: WEIGHTS AND MEASURES, Article 37.

All of the equipment (the tractor and the trailer) comes with the manufacturer's specifications, which must also be indicated on the property card issued by the Peruvian government. 90% of the fleet destined to transport cyanide is Mercedes Benz, of which six units are new.

All coupled trailers have manufacturer identification with load and weight specifications. Additionally, RANSA in its maintenance records includes the inspection of their integrity.

Each RANSA transport process is accompanied by a record of the weight of the cargo documented in "CONSTANCE OF VERIFICATION OF WEIGHTS AND MEASURES". RANSA has two calibrated scales enabled to reliably measure the weights of the load, before departure.

RANSA does not subcontract any of these cyanide transport operations.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with


The operation is in substantial compliance with Standard of Practice 1.4

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

During the route, the stops for inspection of the merchandise during the product delivery trip are documented in the FTRANS-0011 form, as well as when returning from the transport process. Driver Henry Jesús Vigo was interviewed, who confirmed the implementation of this procedure.

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RANSA has a department called CARGO ASSURANCE AREA, in which it is verified that the packaging maintains its integrity during the transportation process.

In the ITRANS-0026 procedure, it is established that the cargo insurance supervisor supervises that the cargo to be dispatched is properly stowed and secured and verifies the safety equipment and regulatory signage of the transport unit are compliant with local regulations.

In section 5.5 of procedure ITRANS-0031 (cargo securing instructions and signage), the responsibilities for the implementation of the placement of the appropriate signage for each load of hazardous materials are established. Additionally, the driver must ensure that the load he transports in his vehicle has the appropriate signage.

- a) Form ITRANS-0078 indicates the checklist for the inspection of transport units before carrying out the transport process. This form was revised for the first time in 2021, from its original 2017 version. The ITRANS-0021 form (rigging procedure) was eliminated, including this information in form ITRANS-0031 instead.
- b) RANSA has a systematized preventive maintenance program for both tractors and trailers, including new units, which are attended by the manufacturer's representative in Peru.
- c) In the RANSA form FTRANS-0011, it must be documented that drivers must have daytime driving hours of a maximum of 5 hours, and night shifts of no more than 4 hours of continuous driving, in compliance with Supreme Decree No. 009- 2004 of the Ministry of Transport and Communications of Peru, Article 121.


Additionally, drivers are recommended to make active stops every two hours of driving. They are not allowed to drive more than twelve hours in a 24-hour period.

- d) The PTRANS 002 procedure establishes the Securing Supervisor as responsible for securing the cargo in the transport unit.

After the merchandise is stowed, the Warehouse staff delivers the Referral Guide (Sender) to the Driver. The driver then goes with the loaded transport unit to the cargo securing zone or lashing area for its final securing.

In the case of hazardous material, chemical supplies, and controlled goods, the process is carried out according to ITRANS-0026- Transportation of Hazardous Materials - IQBF. For oversized transport, procedure IMIN-0004 Transport of Oversized Goods is followed.

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- e) Section 2.3.4 of the Emergency Response Plan addresses the actions to be taken in the event of social conflicts such as protests, road closures, acts of violence, and natural emergencies such as earthquakes, rock falls, floods, electrical storms, and landslides of debris or mud (“huaycos” in Peru).
- f) During en-route transportation, the Route Supervisor may carry out breathalyzer tests on Drivers of own and third-party units based on the ITRANS-0022 Driver Alcotest Control. The results of these tests will be recorded in the FTRANS-0086 Alcotest Registry.

Additionally, the Route Supervisor will randomly carry out inspections of the Transport Units during their journey and at the exit of Authorized Depots (in the case of exports). The findings of these inspections are recorded on the FTRANS-0084 Tract and Highway Road Inspection Check List and/or on the client's form.

- g) Upon return of the transport units, the driver delivers the FTRANS-0011 Roadmap to the Documentary Control Coordinator and/or Assistant for subsequent delivery to the Fleet Control area.

The Shipper's Referral Guide and Referral Guide (Sender) are controlled according to ITRANS-0028 Follow-up of Concluded Trips Referral Guides.

Once the service provided by RANSA has ended, the Documentary Control Coordinator and/or Assistant performs the settlement of the trips made according to ITRANS-0027 "Settlement and Payment of Third-Party Travel" and proceeds to bill the service provided.

RANSA does not subcontract any cyanide transportation operations.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.5


not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

This provision does not apply to the transportation of cyanide by truck.

“RANSA” does not transport by sea.

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Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.6

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The RANSA emergency response plan section 6.3, page 64 requires that all units have telephone and radio communication. This requirement is also included in the checklist for transport and escort vehicles.

During the inspection of an escort vehicle, a satellite phone with a portable charging accessory was found, compliant with the emergency response plan.

The escort van checklist form FTRANS 0085 (Rev.2) requires that all communication equipment, including the satellite telephone, be tested before starting the transportation process. RANSA has systematized the verification process so that each driver does it digitally, and all the responses are automatically consolidated in a database.

Henry García, an escort vehicle driver, stated that on some routes there are sporadic blind areas. However, all drivers always carry a satellite phone with enough power in case communication is required.


Juan Carlos Piccone, transport fleet maintenance manager, gave a presentation to the auditor on how transport units are monitored in real-time using a GPS positioning system.

RANSA implements the FMIN 0003 form in which a checklist regarding documentation must be fulfilled. This documentation includes the sender's referral guide, the MSDS safety sheets; as well as the comparison of the amount sent and the amount delivered at the final destination.

In the verification list of the FMIN 0003 form, the amounts of cyanide in transit are indicated, and the MSDS safety sheets are included. Keeping shipment records is very important, since the Peruvian government, through the National Superintendency of Customs and Tax Administration (SUNAT), maintains checkpoints for documentation and cargo on national highways.

RANSA does not subcontract any cyanide transportation operations.

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Principle 2 | INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Transport Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental releases.

in full compliance with

The operation is in substantial compliance with Standard of Practice 2.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in NOT APPLICABLE with Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

RANSA Comercial, S.A.C. has no stores or warehouses in Peruvian territory.

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.

in full compliance with

The operation is in substantial compliance with Standard of Practice 3.1


not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

RANSA has an Emergency Response Plan (hereinafter the Plan) which is up to date as of March 2022, which contains six chapters, and was approved by the Ministry of Transport and Communications through Official Letter No. 1394-2019-MTC/16, on June 19, 2019.

The plan is appropriate for ground transportation routes since it is shared among the parties involved in the transportation process, taking into account the responsibilities before, during, and after an incident has occurred. Possible emergencies that may arise, such as fires, spills/leaks, property damage, natural events, and the corresponding responses for each type of emergency that could arise are considered.

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RANSA has prepared an EMERGENCY CARD FOR THE MANAGEMENT OF CYANIDE INCIDENTS in which the physical and chemical properties of cyanide are indicated.

The Plan includes the land transport process carried out by RANSA in Peruvian territory, considering the distances between the cyanide dispatch center and the mining units, the type of existing roads, and the specifications of the transport vehicles.

RANSA considers the transportation infrastructure, which is reflected in each route analysis evaluated for clients.

The vehicles meet specifications in accordance with the transported load. The float is comprised of six new Mercedes Benz units with cutting-edge technology.

In section 2.3.6 RANSA, the response actions are described by the characteristics of the operation. The phases of a contingency are divided into detection and notification, evaluation and initiation of the reaction, and control.

Detection and notification: when a contingency is detected during the development of project operations, the supervisor will inform the staff according to the flow of communications.

Evaluation and initiation of action: once the contingency has occurred and has been evaluated by the Safety Supervisor, control and containment measures will be initiated.

Control: the control of a contingency requires that the supervisory personnel be duly trained to act in an emergency. This control implies the participation of our personnel, as well as the hiring of specialized third parties, use of the elements, and provision of the necessary equipment to act as a consequence of the emergency.

RANSA has identified the possible risks during transportation, classifying the levels of response attention depending on the severity of the incident, which is addressed in Chapter III of the Plan.

LEVEL I EMERGENCY RESPONSE

When emergencies are controlled with resources that are available in the area by the personnel involved in the emergency at that time.


LEVEL II EMERGENCY RESPONSE

To control the emergency, resources from the organization are required, as well as support from other areas involved in the operation.

LEVEL III EMERGENCY RESPONSE

To control the emergency, support is required from external entities such as ambulances, firefighters, and specialized technical response.

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The RANSA Emergency Response Plan identifies the roles of the emergency entities, including their contact information and phone numbers, and the cases in which they must be contacted.

In the department of health, safety at work, and the environment; RANSA is in close contact with the Firefighters of Peru, the police, and medical care centers.

RANSA also has two complete second response stations for emergencies, capable of being on the routes considered in no more than 2 hours.

During the audit with the head of Safety of RANSA Francisco Reyes, we visited one of the main fire stations in the city of Lima, in which we were shown the logistics of emergency care, personnel, and response means.

Transport Practice 3.2

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

✓ in full compliance with

The operation is in substantial compliance with Standard of Practice 3.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The auditor reviewed training records for Hazardous Materials II and the assigned syllabus. Mr. Alejandro Solano, driver of the transport vehicle, and Mr. Henry García, the supervising driver of the escort vehicle, were interviewed.

RANSA has a regular annual training plan, which includes the following courses:

First aid course

Defensive Driving Course

Fire Fighting Course

Hazardous Materials Management Course

Additionally, supervisors and support officers receive regular training on:

Hazardous Materials - Technical level


Incident command

And other courses required by specific clients.

Specific duties and responsibilities of staff are listed in section 2.3 of the Plan:

Vehicle Driver

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When an emergency occurs, the response plan is activated, beginning with the flow of communication, providing first-hand information, and determining the level of the emergency. The driver acts as the first responder and his/her main actions are:

- ✓ Activate the communication flow.
- ✓ Secure the scene.
- ✓ Delimit and mark the perimeter.
- ✓ Keep the area restricted.
- ✓ Provide support to victims and injured according to their training and conditions.

Route Supervisor

Ensures that the information received about the accident is accurate and communicates the occurrence of the incident to the Head of Safety and deploys its emergency response organization. Assumes the coordination of the actions to be taken.

His/Her main actions are:

- ✓ Keep the Control Center informed of the accident.
- ✓ Inform and request possible collaboration from the CUSTOMER Supervision to define aspects of safety and protection of the Environment to be taken into account.
- ✓ Assume the direction at the accident site (make all the necessary coordination).
- ✓ Request external assistance if necessary (Contractors, Mutual Aid Organizations, etc.).

The Plan considers different organizational charts by levels of emergencies: an organization chart for level I low risk potential incidents; an organization chart for level II emergencies, for emergencies with medium risk potential; and an organization chart for high-risk potential emergencies.

There could also be the interaction of the Crisis Committee, which is the highest level support group of RANSA in charge of providing the necessary support to overcome a level II or III emergency.

Crisis Committee functions:

- ✓ Promote, support, and attend communication channels with people and public institutions of external support in an emergency.
- ✓ Support RANSA and the different institutions that are working in the emergency area, managing the materials, equipment, and services that are required.
- ✓ Analyze the effectiveness of the emergency control tasks and the remediation of the affected areas, having the necessary means to achieve maximum efficiency.

The crisis manager is the highest authority during an incident.

The safety coordinator reports to the crisis manager, as does the operations coordinator who determines training and education needs for emergencies and other needs during emergencies.

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The planning and logistics coordinators obtain resources and budgets.

All those responsible mentioned above have responsibilities BEFORE, DURING AND AFTER AN EMERGENCY OCCURS.

During the transportation process, RANSA keeps available a list of emergency response equipment described in section 6.3 of the Plan: firefighting equipment, a first aid kit for injuries, and a kit against spills of hydrocarbons and other chemicals.

Directive 002-2011 –SUTRAN/02 PROTOCOL FOR INTERVENTION IN THE FIELD CONTROL OF THE LAND TRANSPORTATION SERVICE FOR HAZARDOUS MATERIALS AND WASTE regulates the emergency teams that must accompany vehicles transporting hazardous materials.

For spill incidents involving cyanide, escort trucks must have self-contained breathing apparatus (SCBA), chemical-resistant Tyvek protective clothing, personal protective gear, waste collection bags, manual collection tools, 1 m³ oxygen cylinder tank, hydrocyanic gas, sodium hypochlorite, and lime.

The auditor interviewed escort vehicle driver Henry García Vigo who showed the equipment and described its use for emergency response, including personal protective equipment.

During the audit, the checklist for inspection of emergency response teams was reviewed. Compliance with the verification of the physical content of the list is the responsibility of the escort supervisors.

The RANSA transport process has a cargo assurance department, whose functions include securing the load and equipment of the unit before going out on the road.

RANSA has an extract from the ITRANS-0031 cargo insurance instructions. Per the flowchart, it is verified that the transport vehicles are subject to inspections, in which the following components are verified: cargo assurance elements, anti-spill kit, first aid kits, fire extinguishers, etc.


The auditor reviewed records from the last few months as a sample of the inspections carried out, both in trucks and escort vehicles, and concluded that these are sufficient to ensure their availability in case of emergencies.

Each driver of the transport vehicle and escort vehicle performs the verification of the emergency equipment present in their unit. The inspection is documented in a form available in an application on each driver's cell phone.

Visual inspection data on the cabin, exteriors, basic safety equipment, documentation, and observations are recorded on the form.

Each process of transporting hazardous materials is accompanied emergency equipment.

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To date, RANSA only has equipment inspection records for emergencies in Hazardous Materials loading processes, but not specific cyanide transport records, because it has yet to perform this service. However, if a transport process is carried out, the necessary equipment will be incorporated for the risks associated with the safe transport of cyanide, as established in the Emergency Response Plan.

RANSA does not subcontract any cyanide transportation operations.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is in substantial compliance with Standard of Practice 3.3

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

In section 4.2 of the Plan, RANSA establishes the communication flow starting from the driver or route supervisor to the Fleet Control Center.

If necessary, the Fleet Control Center handles external calls to the Ministry of Transport and Communications, the Fire Department, the Police, etc.


Depending on the severity of the incident, the Crisis Committee will be activated with the information received via a direct open line with the Route Supervisor. The RANSA Extractive Operations Fleet Control Center has the following telephone numbers:

On page 42 of section 4.2, the phone numbers of the people involved in the flow are indicated. Section 6.2 lists the phone numbers and physical addresses of external institutions for emergencies, including 24 hours: health care centers, police, and fire stations.

During each transport process, RANSA tests phone numbers regularly, which is the way to continuously ensure that phone numbers remain up to date. Additionally, the Emergency Response Plan is updated mainly through the suggestions from the personnel responsible for and involved in the standards and procedures included in the contingency plan.

In an interview with safety supervisor Roxana Mattos, she tells us that emergency notifications are kept up to date, every time drills are carried out as required by RANSA clients. Generally, about 15 to 20 drills are carried out every year.

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CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

RANSA has prepared a document called EMERGENCY RESPONSE CARD, which indicates the actions to be followed in cases of significant incidents such as cyanide spills.

Pursuant to Section VI.A. of the process of certification and signing of the Code and as agreed by the signing company in the ICMI Signature Request Form, RANSA has established in the last section of the EMERGENCY RESPONSE CARD THAT:

The ICMI MUST be notified, within 24 hours after the significant incident occurred in the following communication channels:

Phone +1.202.495.4020

Email info@cyanidecode.org

Transport Practice 3.4

Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

in full compliance with

The operation is in substantial compliance with Standard of Practice 3.4

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Section 4.4 of the Emergency Response Plan establishes the final disposal procedure for hazardous materials and/or waste.

After having established all the immediate dangers, the Head of Safety must request the participation of a specialized team to clean up the spill, whether local or in the province, to absorb, neutralize or collect the concentrate.


FINAL DISPOSITION

The recovered product in plastic containers will be sent to a specialized plant for the final disposal of hazardous waste.

Contaminated soils will be removed and disposed of per the General Solid Waste Law, Law No. 27314, for which there are companies authorized by GENERAL DIRECTION OF ENVIRONMENTAL HEALTH "Dirección General de Salud Ambiental - DIGESA", as solid waste service providers (EPS-RS).

The confinement of these soils will be done in bags and plastic containers and their transfer will be done in closed containers.

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CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

Actions in case of spills are detailed in the CYANIDE EMERGENCY CARD, pages 5-7/10.

To collect the spilled solid material, contact of the product with water or humidity must be avoided, placing a waterproof blanket over the spilled material. All the product is recovered, placing it in an airtight container, and labeling it for its final disposal.

For chemical stabilization, if the collection of the solid material cannot be carried out immediately and it is necessary to slow down or stop any reaction of the product with elements in the environment that can generate hydrocyanic acid gases, elements that raise the pH of the medium (pH>10), such as calcium oxide or calcium hydroxide (quicklime, slaked lime), can be considered.

Chemical neutralization is required when after collecting the material some remnants cannot be collected, as in the case of spills on pavement. In this case, the last minor remnants can be destroyed by targeted neutralization with a solution of 10 and 12% calcium hypochlorite/sodium hypochlorite.

In the case of contaminated ponded water and contaminated land, the isolation distance is increased to avoid contact with the emanations of hydrocyanic gas. All stagnant or pooled water must be drained, as well as the wet earth beds, between 50 cm and 1 m from them

In the CYANIDE EMERGENCY CARD, page 8/10, it is indicated that for cases of spills in watercourses, operational risk channels, lakes and lagoons with current tributaries/streams, rivers with current, and the sea, sodium hypochlorite, ferrous sulfate, and hydrogen peroxide should not be used for the treatment of cyanide spilled.

Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is in substantial compliance with Standard of Practice 3.5

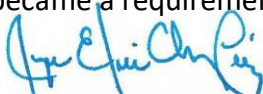
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan is up-to-date as of January 16, 2022. Since the initial audit of the Cyanide Code in 2017, it has been updated six times, in compliance with the provisions of section 2.2.1 of the Emergency Response Plan.

Similarly, the CYANIDE EMERGENCY CARD was updated for the last time on February 26, 2022, in which the Kit based on amyl nitrite was replaced by the Cyanokit (which contains the active ingredient hydroxocobalamin), and the use of full-face respirator with cartridges for cyanide concentrations between 10 ppm and 5 ppm became a requirement.

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CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

RANSA has established a drill plan with its clients: Cerro Verde, Bambas, Southern, Hudbay, Cal, Antamina, Minera Yanacocha, and Marcobre.

The emergency response plan, in section 2.3.3, page 21/83 requires that there be feedback meetings for the review of policies, and management systems; for the review of emergency plans and procedures.

Additionally, Article 90 of Supreme Decree 005-2012-TR requires “the review of the entire occupational health and safety management system, at least once a year. The scope is defined according to present needs and risks”.

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