

***Cyanide Transportation
Summary Audit Report
For The
International Cyanide Management Institute and
S&P International Logistics S.A (Burkina Faso).***

***Prepared by : NCABrasil Expert Auditors Ltd.
www.globalsheq.com***

www.cyanidecode.org

June 2021

The International Cyanide Management Code (hereinafter “the Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.

This report contains 13 pages.



SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.
3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

International Cyanide Management Institute (ICMI)
1400 I Street, NW, Suite 550.
Washington, DC 20005, USA
Tel: +1-202-495-4020
5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.
7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.



SUMMARY AUDIT REPORT (draft # 2)

Name of Cyanide Transportation Facility: S&P International Logistics S.A

Name of Facility Owner: S&P International Logistics S.A

Name of Facility Operator: S&P International Logistics S.A

Name of Responsible Manager: Pierre Catois

Address: 11 BP 1307 CMS, Ouagadougou 11, Burkina Faso.

State/Province: Ouagadougou.

Country: Burkina Faso

Telephone: 226 2537 5903

Fax: n.a

E-Mail: pc@sp-ilogistics.com

Location detail and description of operation:

S&P Logistic is a transporter based in Burkina Faso, which transports solid cyanide from the port of Tema/Ghana, to mining operations in Burkina Faso, without interim storage. The company also transports solid cyanide to Nowata Burkina Faso Ltd., a solid cyanide distributor/ producer based in Burkina Faso, as well as cyanide contaminated solid waste to be incinerated at Nowata Burkina Faso Ltd., which has a specific environmental permit to perform such kind of environmental services in Burkina Faso. The operation does not contract third party transporters to perform these activities. All trucks and trailers belong to the operation, as well as all the drivers are S&P Logistics employees.



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Auditor's Finding

This operation is:

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

with the International Cyanide Management Code.

- * For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit (not applicable).

Auditing Company: NCABrasil Expert Auditors Ltd.

Audit Team Leader: Celso Sandt Pessoa (ICMI qualified lead auditor and transportation qualified TEA (technical expert auditor)), since 2006.

E-mail: celsopessoa@ncabrasil.com.br and celso@globalsheq.com

Website: www.globalsheq.com

Names and Signatures of Other Auditors: not applicable

Date(s) of Audit: 02,03 and 06/11/2023 and 01~02/02/2024 (off-site).

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

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



Celso Sandt Pessoa

SUMMARY AUDIT REPORT (draft # 2)

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation, designed, documented, implemented and maintains a management procedure for routes identification, evaluation and definition. It was evidenced that the organization performed a risk evaluation for road transportation of solid cyanide, in accordance with these procedures, related to route evaluation system, which includes periodic re-evaluation of the routes, including the driver's feedback.

Reviewed the route definition and risk evaluation for the following routes/ mining operations:

- Tema port/ Roxgold Sanu Gold Mine (Yaramoko facility)
- Tema port/ Nowata Ltd. Warehouse
- Tema port/ Somissa Gold Mine (Sabrado facility)

In all cases, the operation defined a main route and also an alternate route to deliver the solid cyanide to the clients.

The approved routes consider population density, road infrastructure, fauna and flora, surface waters, pitch and grade and weather conditions, among other aspects. All transportation routes were reviewed and approved by the Ghana and Burkina Faso Authorities for Road Transportation of Dangerous Goods. Specific permits were granted, by the Ghana and Burkina Faso authorities, to S&P Logistics for this type of transportation. It was evidenced that the operation identified and evaluated all the risks related to the selected routes (above mentioned). Examples are: population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, police stations, emergency stations, communication infrastructure, shadow areas for communication, fauna and flora), the condition of the route (under maintenance, holes, bumpy, without asphalt), weather conditions (such as fog, fire and rain) and surface waters (rivers, creeks, lakes), fog formation trend, type of bridges, dangerous curves, environmental aspects (desert, mountain, forest) and security related places. Several controls such as speed limit, driver qualification and training, truck maintenance, pre-traveling brief with the driver, planned transport observations, full time monitoring of the truck from a remote station, communication protocols between the base and the drivers/ convoy leader, limited traveling time, were implemented by the operation in order to mitigate the risks related to the selected routes. The selected routes include the transport using national and state roads. It was evidenced that the operation, at least annually, re-evaluates the condition of the selected routes. In the end of each travel, the driver records on the traveling plan his perceptions about the route condition (truck logbook).



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This travel report is reviewed by the operations coordinator and, when necessary, the route plan is updated, and the risks re-evaluated. Track traffic conditions, points allowed to stop, authorized supply (fuel, food, accommodation) points, places with sharp curves, places with winding and slippery conditions, uphill and steep slopes, bridges and rivers, police checkpoints, locations requiring special permits for transit, allowed speed for trucks, pedestrian crossing sites, kettle and fauna related risks on track, emergency telephones of the places, population data, weather conditions, communication shadows are considered to select pertinent routes. All comments are reported at travel operation reports). Reviewed travel reports issued during 2023. As previously mentioned, it was evidenced that the organization performed a risk evaluation for road transportation of solid cyanide, in accordance with documented procedures. All transportation documentation addresses the hazards and related risks and defines the operational control measures to be taken by the qualified drivers. All permits related to transportation route are kept updated. S&P Logistics, as a mandatory requirement defined by the Ghana and Burkina Faso laws, contacts public authorities responsible for the road transportation of dangerous goods, the environmental protection agencies, road police and security agencies, in other to obtain official permits to transport solid cyanide in the proposed routes. The operation will use security escorts when the risk analysis indicates that this should be an operational control during the transport (safety and security). In the selected routes, it was identified that a security escort is not necessary. Related to the use of convoys, in all reviewed cases, convoys were used. The convoys are led by the safety escort car. S&P Logistics does not contract any other entity to transport cyanide, as previously mentioned.

Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The operation is: in full compliance with
 in substantial compliance with Transport Practice 1.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation employees trained, and licensed drivers as required by the applicable legislation for the transport of dangerous products, including solid sodium cyanide. The drivers must have a specific driving license, type "E" and "Safety at Work" training (16 hours), both in accordance with the Burkina Faso legislation (Burkina Faso driver permit is also accepted in Ghana and in other countries such as Mali and Ivory Coast). Reviewed the driver license for: Mamadou Traore, Moumouni Bakayoko, Abdul Aziz Tapsoba, Jean Konate and Mamadou Ouattara. All reviewed permits are valid and within the expiration date.



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It was evidenced that the operation defined, documented, implemented and maintains an annual training program for the operational team (truck drivers and operational personnel). The operation provided for its operational team drivers and co-drivers, initial and refresh trainings such as use of personal protective equipment, defensive driving (refresh), chemical hazards and risks, truck and trailer inspection activity, cardio-respiratory recovery with external auxiliary defibrillator, oxygen therapy, emergency response plan and solid NaCN properties and management (Material Safety Data Sheet). Records of such initial and refresh trainings are retained by the operation and were reviewed during this opportunity. The operation does not contract other entities to transport cyanide, as previously mentioned.

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

The operation is: in full compliance with
 in substantial compliance with Transport Practice 1.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that S&P Logistics has a fleet of five Iveco Tracker 420 (6x4) trucks, supporting loads up to 60 ton. In the same way, the related platforms are made by Komet Tunisia, all adequate to transport 20' sea containers, with load capacity up to 45 ton. The operation does not transport loads above 20 ton (one 20' sea container per flatbed platform). According to the Ghana and Burkina Faso laws, trucks and platforms must go through an annual technical inspection, which frequencies depends on the age of the truck and platforms. In this case, the technical inspection must be carried out annually or every six months. Reviewed the following technical inspection reports for the following trucks and platforms (pair/ couple): 4019-E2-03+4336-E2-03, 4027-E2-03+4206-E2-03, 4393-E2-03+4372-E2-03. The operation only transports 20' sea containers containing 20 NaCN boxes/ 1 ton each (but is able to transport 40' sea containers). The cargo weight to be transported is also recorded in the transportation documentation, as demanded by the Ghana and Burkina Faso laws. The cargo weight is verified in the departure of the of the convoy from Tema port/ Ghana, at the control post at the border between Ghana and Burkina Faso, along the routes (road police stations) and, in some cases, during the reception of the cargo at the mining operations. Reviewed transportation documentation issued during 2023. The operation does not contract other entities to transport cyanide, as previously mentioned.



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

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

Summarize the basis for this Finding/Deficiencies Identified:

All solid cyanide boxes are transported inside a 20'-sea container, that is sealed before departing from the cyanide seller premises (Draslovka). Before departing Tema port/ Ghana, all containers seals are inspected again in order to ensure that the containers were not violated. According to the Ghana and Burkina Faso laws, safety placards (UNO # 1689 and toxic (6.1) pictogram + Hommel diamond)) must be placed in the front of the truck and in the three sides of the sea container and in the three sides of the platform. Evidenced full compliance during the field audit. Before each departure the operation performs a general inspection, which includes the documentation inspection, cargo weight, emergency response resources, protective personal equipment, truck and platform, anti-shifting locks, communication resources, traceability system, safety signage, among other aspects (e.g: sea container before leaving Tema port/Ghana). The pre-departure inspection is based on an inspection checklist. This inspection is performed every day during the cyanide transportation Reviewed pre-departure and daily inspection records for transportations performed between during 2023. Trucks and flatbed platforms are maintained in accordance with a planned preventive maintenance program and performed internally or at approved maintenance dealers. Preventive maintenance program, for trucks and flatbed platforms, is based on the kilometers (km) used by the truck + flatbed platform. Preventive maintenance activities are performed every 15000 km. Reviewed preventive maintenance records for 4019-E2-03+4336-E2-03, 4027-E2-03+4206-E2-03, 4393-E2-03+4372-E2-03 (truck and flatbed platform, respectively), all performed between 2022 and 2023. All trucks and flatbed platforms must pass through an independent (third party) technical inspection in order to receive a permit to be used in road transportation of solid cyanide. Reviewed technical inspection reports issued between 2022 and 2023. According to the Burkina Faso laws and the operation policy, the daily work hours is from 5AM up to 6PM, where 11 hours is the maximum work shift within the mentioned range, with a 45' minutes rest every 4,0 hours driving. The drivers must have a 1.0 hour for lunch. Night travels are not allowed. Minimum rest time, between journeys, is 11 hours. Twist lockers are installed in all flatbed platforms. Evidenced such configurations during the field audit. Also evidenced that such anti-shifting systems are included in the preventive maintenance plan. Social turbulences, storm rain and wind, mud, are aspects that could impact the transportation plan, that could be modified or suspended.



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In the event of such unplanned events, the convoy coordinator has the authority to modify or suspend the transportation. A second layer of authority is the operations manager. The operation policy related to drug and alcohol use/ abuse is clear and accepted by all internal stakeholders. Monitoring is performed when the trucks are leaving the operation premises and along the route at defined checkpoints (for alcohol) and annually performed during the occupational health control (for other types of drugs). Reviewed records of monitoring performed between 2022 and 2023. All results were negative. The operation retains records of all above mentioned activities. The operation does not contract other entities to transport cyanide.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

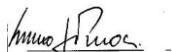
This transport practice is not applicable to the operation's scope. The operation scope is road transportation of solid cyanide.

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

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

Summarize the basis for this Finding/Deficiencies Identified: (Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided).

The trucks are provided with tracking systems (on board computer, text messages and cameras), using online GPS signal. The driver is also equipped with a mobile phone. Convoy leader also equipped with cell phone. Verified the monitoring system during the field audit. All communication resources are tested before departure from the operation base, time to time with the operation headquarter, with tracker system supplier. Evidenced and tested communication resources during the field audit. Blackout areas are not present in the selected routes.



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As previously mentioned, all trucks are provided with online GPS trackers, which was tested during the audit. The cyanide cargo documentation (bill of lading/ BoL) addresses the amount of solid cyanide being transported. The amount of solid cyanide being transported is controlled at the seller premise, during transportation (at weight control stations (Tema port/ Ghana) and police control stations) and, in some cases, in the reception at the mining operation. The cargo documentation (retained by the transporter) includes the following documents: bill of lading (producer and transporter), weight control records, border police control records and cyanide buyer reception control records. The MSDS (Material Safety Data Sheet) is part of the transportation documentation, but it is left at the mining operation. All reviewed transportation documentation clearly indicates the amount of cyanide being transported. The operation does not contract other entities to transport cyanide.

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

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

The operation is: in full compliance with
 in substantial compliance with Transport Practice 2.1
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:**

This principle is not applicable to the operation scope because the cyanide cargo is transported straight from Tema port/ Ghana, to its final destination, the mining operation. During the transport, the truck is monitored 100% of the time (online GPS) and stops, at night, only at pre-evaluated and approved stations along the route. It is possible to send/ receive text messages from the truck. Evidenced/ tested during the audit at operation headquarter.



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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation developed and documented (HSE-NOW/CT-001 (2), dated 08/09/2023) an emergency response plan. It was evidenced that the operation emergency response plan was developed for the specific circumstances and was verified that the emergency plans are appropriate to the specific cyanide (and solid waste) transportation routes, and transport practices. The risks associated to the selected routes were identified and evaluated and the emergency response plans are focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes. The operation emergency response plan is specific for solid NaCN (and cyanide contaminated solid waste) transportation by road. The emergency response plan is specific for solid cyanide transportation by road (truck + flatbed platform). The emergency response plan is specific to the routes (roads) defined to be used from Tema port/ Ghana to the cyanide buyer (the mining operation and Nowata Burkina Faso (NaCN distributor/ producer)) and from the mining operations to the environmental services supplier (incineration services (Nowata Burkina Faso) for the solid waste (wooden boxes and plastic bags). The emergency response plan is specific for the transportation resources (truck+ flatbed platform) used to transport solid cyanide from the seller to the buyer and solid waste from the mining operation to the incineration operation. It was evidenced that the emergency response plan describe the specific response actions that shall be applied to each emergency situation/ scenario, such as accident with fire, fall into a river, cyanide leakage on a rainy day, cyanide intoxication, among other specific emergency scenarios. It was evidenced that the emergency response plan describes the roles of several external stakeholders that should be involved in the emergency response, such as road policy, emergency responders (medical services) and firefighters, reference hospitals along the routes, and environmental and security authorities.



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

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


Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation provided initial and refresh emergency training for drivers, emergency coordinators, emergency response members, in accordance with the Burkina Faso laws. The operational team receives theoretical training related to emergencies and practical ones during planned emergency drills. All training records address the training scope, the trainee names, the instructor name, the training date and the performance of each trainee. All duties and responsibilities, for each identified scenario, are addressed in the operational & emergency management procedures, that are part of the approved emergency plan. The required emergency response resources master list is part of the traveling documentation and checked before each travel. Usual emergency hardware to be available at the truck is: safety glasses, helmets, rubber gloves, ear protectors, masks for powder (P3 type) and HCN (ABEK1 type), Tychem type overall, fire extinguishers (dry chemical powder/ 9 kg), plastic bags, plastic shovel and brush, and antidotes (medicinal oxygen). First aid instructions are available for the convoy leader and for each driver. Two kits of Cyanokit are available at the escort car, inside a foam box, within the expiration date and preserved in accordance with the producer directions. If necessary, Cyanokit will be applied only by medical professionals which will attend the emergency scenario. As previously mentioned, (TP 3.2.3), there is an emergency kit for the truck driver (which includes the PPEs) and the emergency response resources, transported in the truck and in the escort car. All emergency response resources are inspected before each departure, as well as the driver's emergency kit. Records of such pre-departure inspections are retained by the operation and were reviewed during this opportunity. The operation does not contract any other entity to conduct the activities required in this transport practice.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

All the necessary contact information with stakeholders (e.g: the NaCN seller, the operation headquarters, the mining operations, road police, environmental protection agencies, West Africa Relief Association, Ghana Water Resources Commission)) is addressed at the Emergency Plan. 

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As previously mentioned, the operation's contact master list address stakeholders contacts based in Burkina Faso and Ghana. All protocols related to emergency notification and reporting are kept updated and the critical stakeholders to be notified are clearly identified. All information related to stakeholders contact master list is update, at least, on a yearly basis. In the event of any change (e.g: new client) in such contacts, the master list is promptly updated. There were no emergencies related to cyanide transportation between 2022 and 2023. ICMI is one external stakeholder addressed at the contact master list that will be promptly communicated in the event of a cyanide related emergency. There were no real or potential incidents involving cyanide transportation in the last twelve months.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Main emergency scenarios are the impact of solid NaCN (and solid waste) on soil (dry and wet) and on the surface waters and fire situations on the truck/ flatbed platform. Emergency protocols for these situations clearly defines the neutralization process to be used in the event of NaCN impact on the soil, using CaO or MgO powder, removal of neutralized soil (into plastic bags) and final disposition at the mining operation. Monitoring soil samples will be taken to confirm the neutralization process effectiveness. For surface water, in the event of any impact caused by solid NaCN briquettes, these shall be removed (if possible), neutralized with CaO/ MgO powder, collected in plastic bags and disposed at the mining operation. An emergency environmental monitoring plan will be implemented to collect and analyze the extent of the contamination plume. No chemical products are allowed to be used to neutralize cyanide in surface water. Suck kinds of products are not included in the truck emergency resources.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan is kept updated by the operation through the feedback of real emergencies (did not occur between 2022 and 2023), emergencies occurred with other transporters, after the realization of mock emergency drills.



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Last updated was performed in September 2023. Two mock drills were performed in 2023. Mock drills are planned and performed on a yearly basis. The scope of the mentioned performed drills included the release of solid NaCN briquettes in wet soil and fire in the truck and intoxication of one person. The reports related to the above-mentioned mock drills were reviewed in this opportunity. Every mock drill has defined planned objectives to be achieved. After the drill, it is reviewed, and conclusions are defined in order to confirm (or not) if the planned objectives were reached or not. Improvement actions plans are defined and implemented, resulting in the update of the Emergency Response Plan. The Emergency Response Plan was found updated at revision dated 08/09/2023.

Audit team conclusions:

Based on the sampled evidences, the physical conditions of the site (installations) and the trucks/ flatbed platforms, in the interviewed personnel and in the reviewed documentation, the audit team concludes that the SHEQ management system is FULLY implemented and maintained in accordance with the International Cyanide Management Protocol for Transporters (June 2021) for cyanide transport operations (principles 1.5 and 2.1 are not applicable to the operation transport scope). The operation does not subcontract transporters to transport the cyanide (and solid waste).



Celso Sandt Pessoa (Rio de Janeiro, Brazil,04/May/2024)

Mechanical Engineer (55611D/ Brazilian Engineering Council)

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