



INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT TEMPLATE FOR THE INTERNATIONAL CYANIDE MANAGEMENT CODE

JUNE 2021

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE
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The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide 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 or silver 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.



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Introduction

This document provides the framework for the information that an auditor must include in the Summary Audit Report prepared for a Cyanide Code Certification Audit conducted for a cyanide transportation operation and serves as a general template for presenting the required information.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audit is complete, it posts the Summary Audit Report on the Cyanide Code website.

Instructions

- 1) The basis for the finding and/or statement of deficiencies for each Standard of Practice should be summarized in this Summary Audit Report. The Summary Audit Report is intended to provide a summary of the information included in the Detailed Audit Findings Report prepared for the certification audit; and therefore, should include only information that is presented in the Detailed Audit Findings Report.
- 2) The name of the cyanide transportation operation, the Lead Auditor’s signature, and the submittal date of the final report must be included at the bottom of each page of the Summary Audit Report.
- 3) An operation found in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
- 4) The Summary Audit Report, the Detailed Audit Findings Report, and any necessary Corrective Action Plan with all required signatures must be submitted in electronic format to ICMI within 90 days of completion of the site inspection portion of the audit. An electronic copy of a letter from the owner or authorized representative of the audited operation granting ICMI permission to post the Summary Audit Report and Corrective Action Plan (if one is necessary) on the Cyanide Code website must also be submitted, along with both an electronic copy and a hard copy of a completed Auditor Credentials Form. The Lead Auditor’s signature on the Auditor Credentials Form must be certified by notarization or equivalent. Electronic documents should be submitted to the Institute via email at:

audits@cyanidecode.org



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The hard copy of the notarized Auditor Credentials Form should be sent to:

International Cyanide Management Institute
1400 I Street, NW, Suite 550
Washington, DC 20005, USA

- 5) The Summary Audit Report should include a description of the transport operation indicating key operational components that provide context to the reader ahead of the audit findings. For Transport Supply Chains, the report should include an overall description of the supply chain, and listing of entities participating in the supply chain and included within the scope of the audit, such as the consigner, trucking companies, ports, shipping lines, rail operations, and warehouses (any changes to a certified supply chain made since its previous audit should also be noted, such as additions or removals of ports, marine carriers, or trucking companies, along with the date the change was made). The description of the operation should include sufficient information to describe the scope and complexity of the transportation operation.



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Operation General Information

Name of Transport Operation: ENLOG S.A

Name of Facility Owner: ENLOG S.A

Name of Facility Operator: ENLOG S.A

Name of Responsible Manager: Marcos Jardim

Address Rua Cecilia Julia do Prado, N° 155, sala 202 –

State / Province Betim/Minas Gerais

Country Brasil

Telephone +553135399400

Fax +553135399401

Operation Location Detail and Description

Provide a description of the cyanide transport operation (see Item 5 in the Instructions, above).

ENLOG S.A (hereinafter ‘ENLOG’, “Enlog” or “the operation”) is focused on the road transport of hazardous goods and chemicals (for instance sulfuric acid, ethyl benzene, sodium hydroxide (solid and in solution), styrene, ammonium nitrate, xanthanes, oleum 22 (105% fuming sulfuric acid) and others. without interim storage. The operation is located at Betim town a city located in Minas Gerais, in southeast Brazil. It is 30 kilometers far from Belo Horizonte the capital of the state of Minas Gerais. The access is by very good-asphalted roads such as MG-060, MG-050, BR-381, BR-040 and BR-262. The operation has a SHEQ ((Safety, Health, Environmental and Quality) management system certified in accordance to SASSMAQ protocol, established by ABIQUIM (Brazilian Chemical Industry Association). Evidenced Conformity Certificate valid until November 25, 2024 in which ABNT (Brazilian Technical Standards) grants the Certificate of Conformity Assessment System of Health Environmental, Safety and Quality for the following activity - Road Transportation of dangerous chemical products

The operation’s drivers are qualified, based on the Brazilian legislation, to transport hazardous chemical products by road. Enlog does not sub-contract any service related to the transportation of hazardous chemical products

Enlog intends transport cyanide for gold mining operations without interim storage



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Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

- * The Corrective Action Plan to bring an operation found in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The operation must fully implement the plan within one year of the date of this audit.

Compliance Statement

**** Being a pre operational audit The cyanide transport operation has been pre-operationally certified must notify ICMI of the date of its first production or transport of cyanide within 90 days and must have the site inspection portion of its certification audit completed within six months of that date**



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Auditor Information

Audit Company: Ferreira&Cerqueira Ltda

Lead Auditor: Luiz Eduardo Ferreira

Lead Auditor Email: luizeferreira2015@gmail.com

Names and Signatures of Other Auditors:

Auditor 1: _____
Name (Print/Type) Signature

Auditor 2: _____
Name (Print/Type) Signature

Auditor 3: _____
Name (Print/Type) Signature

Dates of Audit: _____



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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.

ENLOG S.A.



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Name of Operation

Signature of Lead Auditor

Date



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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.

Standard of Practice 1.1

Select cyanide transport routes to minimize the potential for accidents and releases.

X 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:

Enlog defined, and documented internal documented procedure PCIGC 02 – Route Planning which provides methodology to identify and select appropriate and safer routes to transport hazardous products including cyanide Routes are selected considering parameters such as the population density, the infrastructure (asphalt, double or single speedway, gas stations, policy stations, emergency stations, hospitals, communication, shadow areas for communication), the condition of the route (under maintenance, holes, without asphalt), weather conditions (such as fog, fire, rain) and surface waters (rivers, creeks, lakes). Records of selected routes evidence that the selection of routes was performed as defined in the above-mentioned documented procedure. The process of updating of selected transport routes is defined that shall be performed in maximum frequency annually. Evidenced that Enlog selects two possible routes (one main and one alternate)

All drivers receive prior training in the routes they must follow to transport dangerous goods. Drivers always carry their respective rotograms with them.

The process of updating the select transport route rotogram is carried out at a maximum annual frequency or when necessary based on the results of the critical analysis of the drivers' trip reports. Observed that Enlog identifies and evaluates all the hazards and risks related to the selected routes.

Several controls such as all vehicles are equipped with tachograph (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 named Onix Sat (the GPS signal provider), limited traveling time in accordance with Brazilian Law 13.103 dated on March 02, 2015.were implemented by Enlog in order to mitigate the risks related to the selected routes.

Enlog constantly reevaluates the conditions of the selected routes. In the end of each travel of dangerous products transportation, since the driver records on” Diario de Bordo”

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his perceptions about the route conditions. This travel report is reviewed by the Operations Manager as well as by the EHS Manager and, when necessary, the route plan is updated and the risks re-evaluated. The travel plan identifies all existing risks at the routes. Noted that internal documented procedure PCIGC 02 – “Planejamento de Rota” addresses risks along the selected routes both for driver training and as a reference. Evidenced through reviewing pertinent records of training, that drivers are trained in that procedure. Noted that drivers issue a record named “Check list of mandatory vehicle safety equipment for the transport of hazardous goods” in accordance with Brazilian regulations. Evidenced that Enlog defined and documented internal documented procedure PCIGC -04 ‘Stakeholders Engagement in Route Selection that defines methodology to seek input from applicable governmental agencies, communities and other stakeholders as necessary in the selection of routes and development of risk management measures. Evidenced duly implemented.

Enlog has a 24 hours monitoring of trucks by Onix Sat. Due to good road transportation conditions it is not used convoys since the risk analysis indicates that is not necessary this type of control.

Enlog does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Enlog employees and all trucks are Enlog owned.

Standard of 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 not in compliance with Standard of Practice 1.2

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Enlog only uses trained, qualified and licensed drivers as required by the Brazilian applicable legislation for the road transport of hazardous products such as: Decreto Federal 96044 dated on May18, 1998; “Decreto Federal 11086 dated on November 05,2019; Resolução 5232 dated on December 14, 2016 from ANTT (“Agência Nacional de Transporte Terrestre”) and Resolução CONTRAN 168 dated on December 14, 2004. The above-mentioned Federal regulations establish that all hazardous products drivers shall have two kinds of permits such as type E- CNH (Carteira Nacional de Habilitação) and MOPP (Movimentação Operacional de Produtos Perigosos) Course). Evidenced that all Enlog’s drivers are duly trained, qualified and licensed as required. Beyond the legal requirements, Enlog established health requirements to the drivers, psychological evaluation, education requirements and experience. defensive driving) and provides annual refresh training, including first aid and emergency procedures related to

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cyanide and driver's operation manual. The occupational health certificate named ASO (Atestado de Saúde Ocupacional) were reviewed and found that are duly established.

Enlog established implemented and maintains internal documented procedure PCIGC 01 Training which defines methodology for planning, performing, recording and evaluating effectiveness of all trainings. All new employees have to do an induction training being instructor the Work Safety It is defined that all personnel operating cyanide shall be trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

Enlog does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Enlog employees and all trucks are Enlog owned.

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is X in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.3


Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Enlog only uses equipment designed and maintained to operate within the loads will be handling. During the field audit noted that the maximum load capacity of each truck is clearly identified. Evidenced that trucks have lockers, without wall and specific to transport containers. Truck licenses are updated as required. According to the Brazilian legislation all trucks used to transport chemical products shall be inspected by a public authority in order to be approved to transport such kind of products. Evidenced that all trucks are licensed as required through pertinent CIV (Certificado de Inspeção de Veículo). Records of periodic inspections were reviewed and through field audit provided evidence that Enlog only uses equipment designed and maintained to operate within the loads defined.

Enlog established internal documented procedure PCIGC 08 – Corrective and Preventive Maintenance of Vehicles and Equipment Noted that it defines the methodology for preventive maintenance. It is required that preventive maintenance is performed by mileage in accordance with the required by the truck manufacturer. Maintenance is performed by companies previously evaluated and qualified in accordance with Brazilian regulations. Evidenced preventive maintenance records of Enlog's trucks duly established, implemented and maintained.

During the field audit evidenced that all Enlog's trucks have been periodically inspected as stated and are in full compliance with the pertinent regulations.

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Enlog's Driver Manual item 6 page 24 establishes that before loading the driver shall review the transportation documentation in order to verify the cargo weight and confirm that the truck is capable to transport and record in the Preloading Check List. Reviewing pertinent records evidenced that drivers have implemented this methodology to prevent overloading of the transport vehicle being used for handling dangerous product.

Enlog does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Enlog employees and all trucks are Enlog owned.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is X in full compliance with
 in substantial compliance with Standard of Practice 1.4
 not in compliance with


Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Enlog has handling and inspection procedures as necessary to ensure that the hazardous products including cyanide are handled and transported in a manner that maintains the integrity of the producer's packaging. Driver manual establishes that all trucks shall be inspected before loading dangerous products. Records of such inspections were reviewed and provided evidences that above-mentioned procedure is duly implemented. During the audit procedures were reviewed and it was found the proper implementation thereof. Inspection records were checked and provided evidence that such inspections were carried out as required. Drivers were interviewed and provided evidence of compliance with this provision. Besides, evidenced that ISO tanks have been inspected in accordance with Brazilian regulation. Records of such ISO tanks inspections were reviewed and provided evidences of duly implementation. All inspections performed and recorded in the above-mentioned report (Internal Inspection, External Inspection, Hydro Test, Fittings Inspection, Frame Inspection, Decals Inspection and Steam Coils Test Pressure (Bar) provided evidenced that Tank Container is in order as stated.

According to the Brazilian legislation, the truck shall have, in four sides, standard placards indicating the nature of the chemical product being transported. Enlog defined and documented that the driver shall verify the presences of such placards before each travel and the results are recorded in a specific checklist. Evidenced check list clearly recording that dangerous products vehicles are identified prior the travel as stated. Sampled examples were Check list issued by the drivers.

Enlog defined and documented Driver's Manual which defines a safety program for vehicle inspection prior to each departure of dangerous products. So, a vehicle inspection program of the truck before each journey, including the inspection of the truck, the inspection of the

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emergency resources, the inspection of the communication and tracking system, the inspection of the tachograph, the inspections of the PPE- Personnel Protective Equipment, the verification of the vehicle, driver and cargo documentation. Evidenced inspection records as state.

Verified that Enlog implemented an effective preventive maintenance program for its trucks in accordance with truck producer's requirements. The preventive maintenance is performed by qualified companies.

Enlog defined and documented at Driver's Manual item 4.5.3 page 13 a driver's daily working hours which is based on Brazilian Federal Law 13103 dated on March 02, 2015. The operation defined a maximum driving time of ten hours, including one hour for lunch and a thirty minutes rest every four hours of driving. The driver is not allowed to drive at night. The working hours is controlled through the remote tracking station. Evidenced during the field audit that this procedure is duly implemented.

The Enlog's trucks are specifically designed to transport containers and they have pin lockers that are inspected by the driver before each journey, and prevent the containers from shifting. Evidenced during the field audit duly implemented.

Noted that In accordance with Enlog's safety policies as well as Driver's Manual it is clearly defined that in the event of stormy or hard rain, wind conditions, ice rain or civil arrest the transport activity shall be stopped or even not allowed to begin.

Enlog designed and implemented a drug & alcohol policy, accepted by all employees including all the drivers in which all the drivers before the beginning of a journey pass through an alcohol detection test. Evidenced records of alcohol test duly implemented as required.

Evidenced that Enlog defined and implemented a process to manage all records related to its activities which defines methodology to identify, collect, access, index, archive, store and maintain them. The retention times of the records are clearly defined and documented. Evidenced that assessed records were promptly retrievable and adequately maintained by the operation, as previously mentioned.


Enlog does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Enlog employees and all trucks are Enlog owned.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is X in full compliance with in substantial compliance with Standard of Practice 1.5

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not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

This clause is not applicable to the operation due to the fact that Enlog transports dangerous products only by truck (road transportation).

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

X 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 transport vehicle is provided with tracking systems (on board computer), using GPS signal.

The communication system (GPS, mobile phone, radio, is periodically tested to ensure it functions properly. Sampled examples were Check list of drivers

The tracking system has no blackout areas. Evidenced during the field audit and through interviews with the drivers.

As previously mentioned, the truck is monitored 100% of the time, by a remote control station, by the operation headquarters and the tracker provider. The transport vehicle is provided with tracking systems (on board computer), using GPS signal.

Enlog defined and implemented a chain of custody records management, according to the Brazilian laws. The documentation is verified prior the transportation and before the unloading at the Customer. The documentation includes NFe (Eletronic Invoice), DANFE (Auxiliary Document of the Eletronic Invoice), CTe (Eletronic Bill of Transport), DACTE (Auxiliary Document of Bill of Transport) issued by Enlog. During field audit evidenced duly implemented.

Evidenced that Enlog's shipping records indicate the amount of dangerous products in transit in accordance Brazilian Laws such as NFe (Eletronic Invoice), DANFE (Auxiliary Document of the Eletronic Invoice), CTe (Eletronic Bill of Transport), and DACTE (Auxiliary Document of Bill of Transport) as well as pertinent FISPQ – Ficha de Informação de Segurança de Produto Químico are available during the transport. Evidenced SDS – Safety Data Sheet for Sodium Cyanide Solution version 07 dated on December 04, 2021 SDS – Safety Data Sheet for. Sodium Cyanide powder or briquette version 11 dated on December 04, 2021 both of them issued by Unigel Proquigel (Brazilian sodium cyanide producer that is certified by The Cyanide Code). Evidenced that the above mentioned SDS – Safety Data Sheet include information related to identification of the product, hazard identification (corrosive to metals, acute toxicity, skin corrosion/irritation, serious eye damage/eye irritation, hazardous to the aquatic environment, adequate labeling



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elements (pictograms, signal word, hazard statements, precautionary statement, first aid measures, fire-fighting measures, accidental releases measures, handling and storage, exposure controls, personal protection and physical and chemical properties.

Enlog does not sub-contract any service related to the transportation of hazardous chemical products. All drivers are Enlog employees and all trucks are Enlog owned.

Principle 2 | INTERIM STORAGE

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

Standard of Practice 2.1

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

The operation is X in full compliance with
 in substantial compliance with Standard of Practice 2.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

This principle is not applicable to the operation scope since Enlog does not practice interim storage. During the transport, the truck is monitored 100% of the time and stops, at night, only allowed at pre-evaluated and approved stations along the route. The tracking system also blocks (remote turn-off) the truck engine if something different from the planned script (travel plan) occurs. Verified the track system records as well as the tachograph records duly implemented.

Principle 3 | EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is X in full compliance with
 in substantial compliance with Standard of Practice 3.1
 not in compliance with

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Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Enlog has two Emergency Plans. The first one was defined and issued by Enlog and is named as “ Enlog’s Emergency Plans for Cyanide Transportation” which contains specific actions related to cyanide transportation and that use guidelines provided by Proquigel (Brazilian cyanide producer) and Uny Brasil which clearly defines several matters such as Objectives, Characterization of Enlog, Routes characterizations (main and alternate routes), Scope of Emergency Plan, Organizational Structure, Human Resources, Materials Resources, Communication systems, Updating PAE, Training activities, Dangerous products classification. Evidenced that Enlog’s Emergency Plans for Cyanide Transportation” address The Code requirements for the transportation of cyanide edition June, 2021.

The other named UnyBrasil Emergencia Ambiental’s PAE hereinafter called PAE UnyBrasil dated on August 30, 2022 and valid until August 30, 2023 (contract # 291276 revision 0) was developed by UnyBrasil in conjunction with Enlog.

The PAE UnyBrasil aims to provide a set of guidelines, data and information based on rules, legislation and good practices that provide the necessary conditions for training in technical and administrative procedures, in order to provide a quick and efficient response in emergency situations. UnyBrasil has emergency support bases strategically distributed and its Support Center works 24 hours per day, uninterruptedly. The emergency response plan includes several response action scenarios for anticipated emergencies. The plans clearly identify and document the roles of external responders and medical facilities in response to emergencies. Evidenced that the plans clearly describe the nature of the response actions to be taken for the types of emergency situations identified.

Enlog’s Emergency Plans for Cyanide Transportation were developed for the specific circumstances and was verified that they are appropriate to the specific cyanide transportation, the risk analysis performed for the selected routes, transport practices, they are specific for the road transportation of cyanide by truck configuration being used for cyanide transportation as well as they consider the physical and chemical form of the cyanide.


Evidenced that 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.

Evidenced that emergency response procedures consider the design of the transport vehicle, such as truck and trailer carrying shipping containers and/or ISO tanks.

Enlog’s Emergency Plans for Cyanide Transportation describe the specific response actions that shall be applied to each emergency situation, such as accident with fire, fall into a river, cyanide leakage on a rainy day, among other specific emergency scenarios

Enlog’s Emergency Plans for Cyanide Transportation describe the roles of several stakeholders that should be involved in the emergency response, such as road policy, emergency responders and rescuers, first aid stations along the route, reference hospitals,

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civil defense and environmental authorities.
Interim storage is not practiced by Enlog.

Standard of Practice 3.2

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

The operation is X in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

Internal documented procedure PCIGC 01 Training defines methodology for providing initial and refresher response training to appropriate personnel. Evidenced that Enlog provided emergency training for drivers, emergency coordinators, and emergency response members. Evidenced records of emergency response trainings duly established and maintained. Sampled examples were: Training record in Enlog's Emergency Plans for Cyanide Transportation and in UnyBrasil PAE – Plano de Atendimento a Emergência issued by UnyBrasil Emergencia Ambiental related to contract # 291276 dated on September 05, 2022 for the drivers and others involved personnel.

Evidenced that both above mentioned plans include and clearly define the specific emergency response duties and responsibilities of involved personnel. Sampled examples were: Enlog's Drivers, Enlog's Main PAE Coordinator, Enlog's Substitute PAE Coordinator, Enlog's Support Representative, UnyBrasil's Emergency Team Technical Manager, UnyBrasil's Emergency Coordinator and UnyBrasil's Emergency Operational Team, Civil Defense, Road Federal Police, Firefighters, Civil Police, Federal Police, Environmental Agencies, Municipality Health Services, Municipality Transit Services, Municipality Agency Water Resources.

All emergency related materials are listed in the Driver's Manual and are checked before each travel. During the field audit evidenced duly implemented.

The driver's manual defines the required emergency equipment that shall be available at the truck, such as face mask, gloves, flashlight, signage, fire extinguishers (ABC type), rubber boots, safety helmet and glasses, overall Tyvec, antidotes, brush, cords, magnesium oxide powder and plastic blankets. The emergency kit is inspected before

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each travel as already mentioned. Evidenced records of emergency kit inspections for dangerous products transport duly established and maintained as required.

As already mentioned Enlog contracted UnyBrasil to conduct response activities. Evidenced that Enlog clearly delineated its role and responsibilities and those of UnyBrasil. All informations are included in the UnyBrasil PAE. Others parties involved in the emergency response such as Federal Road Police, State Road Police, Firefighters, Civil Police, Federal Police, Environmental Agencies, Municipality Health Services, Municipality Transit Services, Municipality Agency Water Resources have the same treatment.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is X in full compliance with
 in substantial compliance with Standard of Practice 3.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Driver's Manual issued by Enlog defines the methodology for notification appropriate parties / stakeholders such as the cyanide producer, the customer, regulatory agencies, external response providers (UnyBrasil), medical facilities and potentially affected communities of an emergency. Emergency Response Plans are available to all entities that may need to use them, and therefore they are included in the Emergency Response Plan – PAE. The entities requiring notification are clearly identified in the Emergency Response Plan – PAE as having designated roles in the response such as road policy, the dangerous product producers and buyers UnyBrasil, Onix Sat, hospitals, first aid stations along the route, environmental agencies, emergency responders, Brazilian chemical association. Emergency contact information is also available at the truck doors and chassis by stickers. This information is kept updated.

During the field audit was verified for proper implementation and updating of information related to emergency notification. Reviewed PAE – Plano de Atendimento a Emergência issued by UnyBrasil as well as Enlog's Emergency Plan for Cyanide Transportation and both of them are updated and in accordance with Brazilian regulations as well as Cyanide Code Principles.

Enlog defined and documented procedure PCIGC 06 which defines methodology for notifying ICMI of any significant incidents, as defined in ICMI's Definitions and Acronyms Document. Evidenced that personnel involved with PCIGC 06 such as the Board, Operational Manager, Administrative Manager, Cyanide Code Manager, Work Safety Technician and Administrative Supervisor were properly trained in this procedure.



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Interviewed people demonstrated knowledge of their respective activities and were duly aware of the relevance of their roles and responsibilities.

Standard of Practice 3.4

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

The operation is X in full compliance with
 in substantial compliance with Standard of Practice 3.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Emergency Plans as well as Driver's Manual issued by Enlog clearly define the remediation procedures that shall be applied in the event of cyanide related emergencies. The disposition of contaminated residues is defined in accordance Brazilian Environmental Laws. Enlog has contract with Uny Brasil chemical remediation company to provide this service to the transporter which is clearly identified in Enlog's Emergency Plan for Cyanide Transportation and Uny Brasil can be activated as soon as necessary. During the audit evidenced that Uny Brasil defined and documented remediation activities to provide for safe and environmentally sound remediation and disposal waste materials such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. Noted that the above mentioned methodology is in accordance with Brazilian regulations as well as The Cyanide Code. Evidenced that Emergency Plans as well as Driver's Manual clearly define that chemical products, such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide, are prohibited to be used in the event of solid cyanide releases in surface waters along the route. Evidenced UnyBrasil's PAE also includes the same prohibition. During the field audit and through interviews with driver's and UnyBrasil's personnel evidenced in full compliance as stated


Standard of Practice 3.5

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

The operation is X in full compliance with
 in substantial compliance with Standard of Practice 3.5
 not in compliance with

ENLOG S.A.

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