



INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT FOR THE INTERNATIONAL CYANIDE MANAGEMENT CODE

JUNE 2021

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE
1400 I Street, NW, Suite 550, Washington, DC 20005, USA
Tel +1.202.495.4020 | Fax +1.202.835.0155 | Email info@cyanidecode.org | Web CYANIDECODE.ORG

TRANSPORTATION SUMMARY AUDIT REPORT

Table of Contents

Introduction	iii
Instructions	iii
Operation General Information	1
Operation Location Detail and Description	1
Auditor's Finding	2
Compliance Statement	2
Auditor Information	3
Auditor Attestation	4
Principles and Standards of Practice	5
Principle 1 TRANSPORT	5
Standard of Practice 1.1	5
Standard of Practice 1.2	5
Standard of Practice 1.3	5
Standard of Practice 1.4	6
Standard of Practice 1.5	6
Standard of Practice 1.6	6
Principle 2 INTERIM STORAGE	7
Standard of Practice 2.1	7
Principle 3 EMERGENCY RESPONSE	7
Standard of Practice 3.1	7
Standard of Practice 3.2	7
Standard of Practice 3.3	8
Standard of Practice 3.4	8
Standard of Practice 3.5	8

TRANSPORTATION SUMMARY AUDIT REPORT

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.

TRANSPORTATION SUMMARY AUDIT REPORT

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

TRANSPORTATION SUMMARY AUDIT REPORT

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

Email gerencia@enlog.com.br

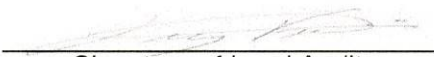
Operation Location Detail and Description

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 sodium cyanide, sulfuric acid, ethyl benzene, sodium hydroxide (solid and in solution), styrene, ammonium nitrate, 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 (Safety, Health, Environmental and Quality (SHEQ) management system certified in accordance to Health, Safety, Environment and Quality Assessment System (SASSMAQ) protocol, established by Brazilian Chemical Industry Association (ABIQUIM). Evidenced Conformity Certificate 09999 valid until November 25, 2024 issued by Fação Bauer in which the Brazilian Technical Standards (ABNT) grants the Certificate of Conformity Assessment System of Health Environmental, Safety and Quality (SHEQ) 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 has been transporting cyanide for gold mining operations without interim storage

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

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.

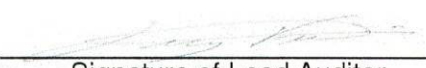
* The Corrective Action Plan to bring an operation found in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The operation must fully implement the plan within one year of the date of this audit.

Compliance Statement

Being a certification operational audit the cyanide transport operation has been certified in accordance with Cyanide Code requirements dated on June, 2021.

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

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: November 29, 2023 ~ December 01, 2023

Enlog S/A
Name of Operation


Signature of Lead Auditor

06/17/2024
Date

TRANSPORTATION SUMMARY AUDIT REPORT

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.

06/17/2024

Name of Operation

Signature of Lead Auditor

Date

Enlog S/A

Name of Operation

Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

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.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

Yes. Evidenced that Enlog defined, documented, implemented and maintains internal documented procedure PCIGC 02 – Route Planning revision 1 dated on November 11, 2022 which provides methodology to selecting transport routes that minimizes the potential for accidents and releases or the potential impacts of accidents and releases that considers population density, infrastructure (roadway, rail, port) construction and condition, pitch and grade as well as prevalence and proximity of water bodies and fog, 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 were as performed as defined in the above- mentioned documented procedure. Evidenced that Enlog transported solid cyanide from Proquigel (Candeias and Camaçari plants located at Bahia State, Brazil. The auditor reviewed the listing of certified cyanide production facilities on the ICMI website to confirm that the cyanide was, in fact, produced by a certified operation and concluded that Proquigel (both Camaçari and Candeias plants) are certified as being in compliance with the Code (see <https://cyanidecode.org/sig-directory-type/proquigel-quimica-s-a-brazil/>). The process of updating of selected transport routes is defined that shall be performed in maximum frequency annually or when necessary based on the results of the critical analysis of the drivers' trip reports. Evidenced that Enlog defines two possible routes (one main and one alternate) and select one that minimizes both the potential for accidents and releases and the potential impacts of such accidents and releases if they do occur. All drivers receive prior training in the routes that they must follow for cyanide transportation. The auditor concluded that the results of the selection process is consistent based on the requirements previously

Enlog S/A
Name of Operation


Signature of Lead Auditor


06/17/2024
Date

TRANSPORTATION SUMMARY AUDIT REPORT

defined in internal documented procedure PCIGC 02 – Route Planning revision 1 dated on November 11, 2022 and the evidences recorded in the respective rotograms Drivers always carry their respective rotogram with them. Evidenced that Enlog defined, documented and implemented and maintains internal documented procedure defining methodology to identify, to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks establishing controls to mitigate hazards and risks to environmental, safety and occupational health Observed that Enlog identifies and evaluates all the hazards and risks related to the selected routes , Sampled examples were: Population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, police stations, emergency stations, communication, hospitals, 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), fog formation trend, number and length of bridges, saw snippets, amount and scope of dangerous curves, ease or difficulty to meet in an emergency which were clearly identified in the route record. 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 OnixSat (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. Reviewing pertinent records evidenced that all trucks used for cyanide transportation are equipped with tachograph. Reviewing pertinent training records Evidenced that all cyanide drivers are duly qualified for cyanide transportation asrequired. Evidenced that trucks that transport cyanide submitted to preventive maintenance as required for theirs suppliers. Reviewing internal documented procedure PCIGC 02 – Route Planning revision 1 dated on November 11, 2022 the auditor noted that the risks of selected routes are evaluated. Evidenced that Enlog constantly reevaluates the conditions of the selected routes as required by internal documented procedure. Besides.In the end of each travel of cyanide transportation, the driver records on “Occurrence Book” his perceptions about the route conditions. This travel report is reviewed by the Operations Manager as well as by the Environmental, Health and Safety (EHS) Manager and, when necessary, the related rotogram is updated and the risks re-evaluated and the operation controls are defined for mitigating the news risks as well as all drivers are informed aboutthis fact. During the field audit evidenced that drivers are aware of this matter. Track traffic conditions, points allowed to stop and overnight, authorized supply points, places with sharp curves, places with winding track uphill and steep slopes, bridges and rivers, risk ofaccidents, checkpoints, locations requiring special permits for transit, allowed speed for trucks, pedestrian crossing sites, local animal risk on track, emergency telephones of theplaces, population data are considered.to select pertinent routes.. Responsibilities and authorities are clearly defined, documented and implemented. Besides, the process of updating of selected transport routes is performed in maximum frequency annually. Evidenced duly implemented. The travel plan identifies all existing risks at the routes Noted that internal documented procedure PCIGC 02 addresses

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

risks along the selected routes both for driver training and as a reference. Reviewing training records evidenced noted that cyanide drivers have been training in internal documented procedure PCIGC 02 as required. Sampled examples were: Record of training of the drivers Jurcelino Gualberto Miranda; Djalma Fontes de Santana; Josino Ricardo Romão Filho; Aurilson Benites Graeff and Adilson Moreira de Souza, Eduardo Souza Neves. Josino Ricardo Romão Filho; Felix Gomes de Paula; Djalma Fontes de Santana; Mário Paulo Fontana. Noted that drivers have been issued a record named Check list of mandatory vehicle safety equipment for dangerous products transportation in accordance with Brazilian laws such as Decreto Federal 96044 dated on May 18, 1998; "Decreto Federal 11086 dated on November 05, 2019; Resolução 5232 dated on December 14, 2016 from ANTT and Resolução Conselho Nacional de Trânsito (CONTRAN) 168 dated on December 14, 2004. Noted that the above-mentioned check list includes items related to: trucks documentation, of drivers documentation, internal documented procedures including Driver's Manual, Emergency Plans, identification and number of truck, safety placards, personal protective equipment (PPE), capacity truck, United Nations Organization (UNO) number, emergency kits, safety equipment, driver data, product vendor data, observations and signature of the responsible. Reviewing internal documented procedure, PCIGC 02 the auditor observed that it addresses management of risks along the route. 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. Noted that when necessary Enlog contacts the Brazilian Federal Road Policy, the tracking contractor Onix Sat (the GPS signal provider) the road administration contact (BR 116, Via Dutra, Auto Pista Fernão Dias, Ecovias Anchieta Imigrantes, Concessionaria BR 040), Civil Defense, Bahia State Road Police, Minas Gerais State Road Police, São Paulo State Road Police, Goiás State Road Police, Minas Gerais State Civil Defense, São Paulo State Civil Defense, , Goiás State, Bahia State Firefighters, Minas Gerais State Firefighters, São Paulo State Firefighters, Goiás State Firefighters, Betim Municipality, Camaçari Municipality, Candeias Municipality, Nova Lima Municipality, Betim Hospital, Santos Hospital, Belo Horizonte Hospital. Reviewing Enlog's records the auditor evidenced the existence that input has been sought and acted on such as appropriate. Enlog has a 24 hours monitoring of trucks provided 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 has a 24 hours monitoring of trucks provided 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.

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT


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 and Resolução CONTRAN 168 dated on December 14, 2004. Observed that above-mentioned Federal regulations establish that all hazardous products drivers shall have two kinds of permits such as type E- Carteira Nacional de Habilitação (CNH) and Movimentação Operacional de Produtos Perigosos (MOPP) Course. The auditor assessed and reviewed training, qualification and license records of cyanide drivers and evidenced Enlog's drivers trained, qualified and licensed for cyanide transportation, as required. Evidenced that above mentioned Enlog's drivers have more than 20 years of experience in the road transport of dangerous goods, of which more than thirteen in the transport of sodium cyanide briquettes and in solution. 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 cyanide and driver's operation manual. The occupational health certificate named Atestado de Saúde Ocupacional (ASO) were reviewed and found that are duly established. The psychological evaluations (AP) - (Avaliação Psicológica) records were reviewed and found that drivers are in accordance with (CRP) - Conselho Regional de Psicologia Protocol. Cyanide driver does not operate forklifts and cranes. Evidenced that Enlog established implemented and maintains internal documented procedure PCIGC 01Training which defines methodology for planning, performing, recording and evaluating effectiveness of all trainings. All new employee have to do an induction training being instructor the SHEQ Manager (which also acts as Cyanide Code Manager) 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. Evidenced that. Enlog's SHEQ Manager trained by Proquigel's Health, Safety and Environment Manager as well Proquigel's Medicine Doctor (MD). The above-mentioned trainings performed at Proquigel's plants (Camaçari and Candeias both of them in Bahia State). During the audit evidenced that all future cyanide involved personnel trained about risks related to cyanide. Training materials about Driver's Manual were prepared by Enlog's SHEQ Manager and by Operational Manager. All drivers keep with them the Driver's Manual during their activities relating the transport of hazardous products including cyanide.

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

This Driver's Manual revision 01 dated on April 06, 2023 contains information in accordance Brazilian regulations, Cyanide Code and technical data provided by Proquigel (Brazilian cyanide producer which is certified by ICMI. It includes – safety handling of cyanide, chemical and physical properties, first aids related to cyanide, Protective Personnel Equipment (PPE), Packaging conditions of solid cyanide, international labeling of cyanide, marine pollutant from cyanide, production of cyanide, (HCN) – hydro cyanidric Acid Stability of cyanide, Types of cyanides, Toxicology related to the cyanide, Exposition levels to HCN and consequences, how to treat areas cyanide-contaminated and use of protective masks. Evidenced training records of cyanide drivers about Driver's Manual duly established and maintained as required. Procedures for loading and offloading their trucks are not part of their function since they are performed by cyanide producer and by gold mining operation. Enlog does not sub-contract any service related to cyanide transportation. 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 Standard of Practice 1.3
 not in compliance with

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 field audit evidenced Enlog's trucks manufactured by Scania, Mercedes Benz and DAF (Van Doorne's Automobiël Fabriek). During the field audit noted that the maximum load capacity of each truck is clearly self-identified. Noted that trucks have lockers, without wall. Specific licenses updated as required to transport containers. Reviewing pertinent records evidenced truck's licenses updated as well as trucks inspected by a public authority in accordance with Brazilian legislation. Evidenced all trucks licensed as required through pertinent Vehicle Inspection Certificate (CIV). This inspection is done yearly and noted Enlog's trucks are with CIV duly updated. Records of periodic inspections were reviewed and through field audit provided evidenced Enlog only use equipment designed and maintained to operate within the loads defined. Evidenced that 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,

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

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 such as Resolução 210/06 and 211/06 from (CONTRAN) (Brazilian Traffic Council) and Portaria __63/2009 do DENATRAN (Brazilian Department of Traffic). Evidenced preventive maintenance and inspection records provide adequacy of the truck for the load it must bear. Appropriate personnel interviewed showed to be aware of this matter. 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 such as Resolução 210/06 and 211/06 from (CONTRAN) (Brazilian Traffic Council) and Portaria 63/2009 from Brazilian Department of Traffic ((DENATRAN). Enlog's Driver Manual 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 for handling dangerous product. Including cyanide transportation. Sampled examples were Preloading Check List dated on August 2023; September 2023, July 2023 and June 2023. According to Brazilian transport legislation, there is a maximum load capacity allowed per truck to transit in the roads. There are control points along the route to verify the cargo weight (weight stations) and to review the cargo documentation. Control points along the roads issue a weight record that is brought to the company with the transport documentation. Enlog does not sub-contract any service related to the transportation of hazardous chemical products. Interviewed drivers provided evidences the procedure is duly implemented. 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 Standard of Practice 1.4
 in substantial compliance with
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Enlog defined, documented, implemented and maintains procedures related to inspection activities to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. Driver's Manual establishes that all trucks shall be inspected before cyanide loading. Records of such inspections were reviewed and provided evidences that above-mentioned procedure is duly implemented. Sampled examples were Pre loading inspection records issued by the cyanide drivers. During the audit, procedures reviewed and found the proper implementation thereof. Inspection records were checked and provided evidence that such inspections carried out as required. Interviewed drivers provided evidence of compliance with this provision. According to the Brazilian legislation, the truck shall

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024


Date

TRANSPORTATION SUMMARY AUDIT REPORT

have, in four sides, standard placards indicating the nature of the chemical product transported. Driver's Manual defined and documented that the driver shall verify the presences of such placards before each travel and the results recorded in a specific checklist. Evidenced checklist clearly recording that cyanide vehicles are identified prior the travel as stated. Sampled examples were Checklists issued by the cyanide drivers. During the field audit, noted that the trucks have the required placards (signage).as they are in accordance with Brazilian Standard NBR 7500 - Identification of vehicles for road transport of dangerous products. The auditor inspected the placards used to identify the presence of cyanide and concluded that it is compliance the legal requirements. Enlog defined and documented Driver's Manual that defines a safety program for vehicle inspection prior to each departure of dangerous products including cyanide. So, a vehicle inspection program of the truck before each journey, including the inspection of the truck, the inspection of the 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 stated. Evidenced that Enlog defined, documented, implemented and maintains procedure PCIGC05 - Corrective and Preventive Maintenance of Vehicles and Equipment that clearly defines methodology for planning, performing and recording preventive maintenance activities. Reviewing above-mentioned documented procedure evidenced that preventive maintenance for Enlog's trucks are performed in accordance with truck producers requirements in previously qualified companies. Besides, responsibilities and authorities are clearly defined. The auditor reviewed preventive maintenance records and evidenced that Enlog has been performed preventive maintenance as stated. Sampled examples were. Preventive maintenance records of performed by: For Scania trucks - BR-381, Rodovia. Fernão Dias, 4000 - Riacho das Pedras, Contagem - MG, 32280-680 ; For Mercedes - Benz trucks – Minas Máquinas - BR 381 Rodovia. Fernão Dias, Km 02 N° 2.211 Bairro Bandeirantes - Contagem/MG CEP 32240-090; For DAF trucks - Via Trucks - Rodovia BR 381, nº 2200 - Bairro: - Riacho das Pedras, Contagem - MG, 32280-680. During the audit is was noted that Enlog maintains trailers as stated. Evidenced preventive maintenance records of Enlog's trucks duly established, implemented and maintained. Enlog defined and documented at Driver's Manual item

4.5.3 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 named Onix Sat Evidenced during the field audit that this procedure is duly implemented.. Sampled examples were: Onix Sat records related to cyanide drivers. 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. Evidenced 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. Evidenced that Enlog defined, documented, implemented and maintained as

Enlog S/A
Name of Operation


Signature of Lead Auditor

06/17/2024
Date

TRANSPORTATION SUMMARY AUDIT REPORT

drug abuse prevention program its Drug & Alcohol Policy which was issued by Enlog's Director. Noted that Enlog's Drug & Alcohol Policy defines that was communicated and accepted for all employees including all drivers that defines that the drivers before the beginning of a journey pass through an alcohol detection test. Evidenced records of alcohol test duly implemented. Evidenced that Enlog defined ,documented, implemented and maintained 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. Sampled examples were Alcohol and Drugs Control, Calibration Record of Alcohol Meter, Attendance List, Preloading Check list, Travel Report, Onix Sat Records, Check list of equipment, Corrective Maintenance record, Preventive Maintenance record, CNH, ASO. 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 Enlog's safety program the auditor concluded that it is adequate to ensure the safe transport of cyanide considering the specific circumstances present by current transport route. Reviewing preventive maintenance records and interviews pertinente personnel the auditor concluded that preventive maintenance records have been performed in accordance with Brazilian regulations and Cyanide Code Principles. Evidenced that maintenance services activities have been provided by companies qualified by respective trucks manufacturer as well as inspected and approved by Enlog's personnel

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 not in compliance with Standard of Practice 1.5


Summarize the basis for this Finding/Deficiencies Identified:

This clause (1.5) is not applicable to the operation due to the fact that Enlog transports cyanide only by truck (road transportation).

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

Enlog S/A
Name of Operation


Signature of Lead Auditor

06/17/2024
Date

TRANSPORTATION SUMMARY AUDIT REPORT


The operation is X in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.6

Summarize the basis for this Finding/Deficiencies Identified:

The transport vehicle is provided with tracking systems (on board computer), using GPS signal (supplied and managed by Onix Sat which has several certifications such as from Agência Nacional de Telecomunicação (Anatel) and "Centro de Experimentação e Segurança Viária" (CESVI). The driver is also equipped with a fast dialing mobile phone. Evidenced during the field audit duly implemented. Sampled examples were Onix Sat records. Reviewing Drivers' Manual evidenced that it requires that shall be available in the cyanide truck the above-mentioned communications equipment, the required PPE, the rotogram, a list phone number for emergency notification of the appropriate individuals and organizations and entities along the route as necessary to mobilize the appropriate response capabilities such as Ambipar, hospitals, ambulance services, Civil Defense, Environmental agencies. Besides, it is required in the Driver's Manual that the drivers shall inspect them and record the result of the presence of such items prior the travelling. It is emphasized in the Driver's Manual that he can only begin transporting cyanide if all inspected items are in conformance with previously defined requirements. The Pre-travel inspection records evidenced adequate implementation. Furthermore, the auditor interviewed cyanide drivers who gained full knowledge of this subject as well as being duly made aware of the possible consequences of non-compliance with the procedure in relation to risks to health, safety and the environment. The communication system (GPS, mobile phone, radio, is periodically tested to ensure it functions properly. Sampled examples were Checklist of cyanide drivers. The tracking system has no blackout areas. Evidenced during the field audit and through interviews with cyanide 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 (Onix Sat).The transport vehicle is provided with tracking systems (on board computer), using GPS signal (supplied by Onix Sat.). .) During audit field as well as interviewing cyanide drivers evidenced is duly implemented. Evidenced duly implemented. Driver's Manual defines methodology so that Enlog has a system to ensure that cyanide shipments arrive intact at their destination through tools such as chain of custody, Inspection of locks or seals on cargo area doors. During field audit, evidenced that 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. Evidenced duly implemented. Enlog's shipping records indicate the transported

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

cyanide amount in accordance with 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 Chemical Product Safety Data Sheet (FISPQ) for Sodium Cyanide Solution version 07 dated on December 04, 2021 SDS – Safety Data Sheet for Sodium Cyanide powder or briquette both of them issued by Proquigel (Brazilian sodium cyanide producer that is certified by The Cyanide Code). Evidenced that the above mentioned Chemical Product Safety Data Sheet (FISPQ) includes 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 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. Interviewed personnel showed to be aware of this matter. Evidenced duly implemented. 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 not in compliance with Standard of Practice 2.1

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

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

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

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Enlog has two Emergency Plans. The first one defined and documented by Enlog and is identified as "Enlog's Emergency Plans for Cyanide Transportation" (PAE) that contains specific actions related to cyanide transportation and that use guidelines provided by Proquigel (Brazilian cyanide producer) which clearly defines several matters such as 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 PAE address The Cyanide Code requirements for the transportation of cyanide. Edition 01 dated on April 07, 2023. The other named Ambipar Emergency Resonse hereinafter called Ambipar PAE dated on Aril 06, 2023 and valid until March 17, 2024 (contract #23656 revision 1) was developed by Ambipar in conjunction with Enlog. Several professionals, such as engineers, biologists, geologists, firefighters and many others, form Ambipar team. These areas integrate and complement themselves, allowing them to offer a better performance in their services. The qualification of their employees is continuous, reinforcing the paths that must be followed for constant environmental preservation. Planning and awareness are the basis for preventing pollution and any type of aggression to nature. The PAE Ambipar 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 emergencies. Ambipar 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 emergencies identified. Evidenced that Enlog's Emergency Plans for Cyanide Transportation were developed for the specific circumstances and verified that they are appropriate to the specific cyanide transportation routes, and transport practices. 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

Enlog S/A
Name of Operation


Signature of Lead Auditor

06/17/2024
Date

TRANSPORTATION SUMMARY AUDIT REPORT

available infrastructure and resources available in the selected routes. Enlog does not practice interim storage. Evidenced that the Enlog's Emergency Plans for Cyanide Transportation are specific for the transportation of cyanide and consider the physical and chemical form of the cyanide. Noted that Enlog's Emergency Plans for Cyanide Transportation" are specific for the road transportation of cyanide by truck. Reviewing Enlog's Emergency Plans for Cyanide Transportation the auditor evidenced that it considers all requirements defined at the specific conditions of the selected routes and the risk analysis performed for the selected routes. As previously mentioned, the risks associated to the selected routes were identified and evaluated. The emergency response plan is focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes. Enlog's Emergency Plans for Cyanide Transportation are specific for the truck configuration used for cyanide transportation. 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, such as accident with fire, fall into a river, cyanide leakage on a rainy day, among other specific emergency scenarios. Reviewing above-mentioned Plan the auditor evidenced that it describes the specific applicable response actions to be taken for the types of potential release scenarios previously identified. Evidenced that the 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, ambulance services, civil defense and environmental authorities. During the audit it was assessed documentation advising external responders of their roles and evidenced that they were available and in accordance of required by this item. Reviewing Enlog's Plan the auditor concluded that it is consistent for responding to emergencies that may occur during its cyanide transport activities as well as verified that it considers all factors defined by Cyanide Code in identifying potential emergency scenarios and necessary response actions.

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

Enlog S/A
Name of Operation


Signature of Lead Auditor

06/17/2024
Date


TRANSPORTATION SUMMARY AUDIT REPORT

provided emergency training for drivers, emergency coordinators, and emergency response members. Noted that emergency response training includes Defensive and Preventive Driving. 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 PAE Ambipar. 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, Ambipar Emergency Team Technical Manager, Ambipar Emergency Coordinator and Ambipar Emergency Operational Team, Bahia State Civil Defense, Minas Gerais State Civil Defense, Mato Grosso State Civil Defense, São Paulo State Civil Defense, Road Federal Police, Minas Gerais State Road Police, Bahia State Road Police, Bahia State Firefighters, Minas Gerais State 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 Enlog's PAE as well as in the Driver's Manual and are checked before each travel. During the field audit and reviewing above-mentioned documentation evidenced that besides the list includes appropriate equipment for the activities that are called for in the emergency responses plan. 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 (Dried Chemical powder type), rubber boots, safety helmet and glasses, overall Tyvec, brush, cords, MgO (magnesium oxide) powder and plastic blankets. The emergency kit is inspected before each travel as already mentioned. Evidenced records of emergency kit inspections for dangerous products transport duly established and maintained as required. Sampled examples were Checklists issued by cyanide drivers. Interviewed personnel showed that they are aware of this matter. Evidenced duly implemented. Appropriated personnel interviewed demonstrated compliance with this provision and showed to be aware of. The emergency kit is inspected before each travel. Evidenced records of emergency kit inspections duly established and maintained as required. Sampled examples were checklists issued by cyanide drivers. During the field audit evidenced that emergency response equipment is available when required. As already mentioned Enlog contracted Ambipar to conduct response activities. Evidenced that Enlog clearly delineated its role, responsibilities, and those of Ambipar. All informations are included in the Ambipar 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, and Municipality Agency Water Resources have the same treatment. The auditor evidenced Enlog's documentation including advising Ambipar of their roles in a cyanide emergency as well as records of any oversight it conducts to ensure the contractor's compliance.

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 S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

Evidenced that 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 those 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. Interviewed people demonstrated knowledge of their respective activities and were duly aware of the relevance of their roles and responsibilities. It was not evidenced the occurrence of significant cyanide incidents.

Reviewing training records and mock emergency drills reports evidenced that cyanide drivers have been trained as required and participated of mock emergency drills on annual basis as stated on PAEs.

be involved in mock emergency drills that simulate transport-related cyanide exposures and releases so they are better prepared in the event that actual exposures and releases occur.

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 (Ambipar)), 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 cyanide producers and buyers, Onix Sat, hospitals, first aid stations along the route, environmental agencies, emergency responders such as Ambipar , Brazilian chemical association. Emergency contact information is also available at the truck doors and chassis by stickers. This information is kept updated. Sampled examples were Road Federal Police, Fire Brigade, Military Police, Civil Police, Federal Police, Civil Defense,

Enlog S/A

Name of Operation

Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

(ABIQUIM) - Associação Brasileira da Indústria Química), Proquigel (Cyanide producer), State Environmental Agencies such as (CETESB) - Companhia Ambiental do Estado de São Paulo), (FEAM) - (Fundação Estadual de Meio Ambiente), (INEA) - Instituto Estadual do Ambiente do Rio de Janeiro, (INEMA) - Instituto de Meio Ambiente e Recursos Hídricos da Bahia), IEMA (Instituto Estadual de Meio Ambiente e Recursos Hídricos do Espírito Santo, COFIC (Comitê de Fomento Industrial de Camaçari, Ecovias (Anchieta e Imigrantes Highways), CCR (Presidente Dutra Highways), Ecopistas (Ayrton Sena and Carvalho Pinto Highways) Via Bahia (Engenheiro Vasco Filho, Santos Dumont, BA 258 and BA 256 Highways), Pró Química (Commission for the Study and Prevention of Accidents in the Road Transport of Dangerous Products in the State of São Paulo.). The auditor reviewed Enlog's notifications records and verified its conformance as required. Besides noted that contact information is duly updated. During the audit, it was verified Enlog's notification as well as contact information and evidenced compliance with this requirement. 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 Ambipar 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. Evidenced that Enlog defined and documented procedure that defines methodology for notifying ICMI of any significant incidents, as defined in ICMI's Definitions and Acronyms Document. Evidenced that those involved with this requirement such as the Board, Operational Manager, Administrative Manager,

Cyanide Code Manager, Work Safety Technician and Administrative Supervisor were properly trained in this procedure. Interviewed pertinent people demonstrated knowledge of their respective activities and were duly aware of the relevance of their roles and responsibilities. It was not evidenced the occurrence of significant cyanide incidents. Reviewing the above-mentioned procedure verified that it requires that incidents involving sodium cyanide whose consequences are serious in terms of the environment, occupational safety, health or which affect directly interested parties, Enlog shall communicate to International Cyanide Management Institute (ICMI). For this determination, "Significant incident with cyanide" is considered; any of the following confirmed events: a) Human exposure requiring action by a response team to emergencies, such as decontamination or treatment b) An unauthorized release or discharge that enters surface waters natural, on or off site; c) An unauthorized release that occurs off-site or migrates off-site local; d) An on-site release that requires action by an emergency response team emergencies; e) A transport incident requiring an emergency response due to release of cyanide into the environment; f) A multiple wildlife kill event in which it is known or believes that cyanide is the cause of death; It is g) Theft of cyanide. Communication with the Institute must be made through the following communication channel: 1400 I Street, NW, Suite 550 Washington, DC 20005, USA Telephone: +1-202-495-4020 Email: info@cyanidecode.org. IMPORTANT - It is worth noting that if there is

Enlog S/A

Name of Operation



Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

any doubt about whether or not the incident is significant, it should be communicated to ICMI. Initial notification is requested within 24 hours of its occurrence and must include the details and nature of the incident, and the name and contact information of a company representative to respond to transfers of information additional. Other relevant information, such as root cause, health, safety and environmental impacts, and any mitigation or remediation, must be provided within seven days of the incident Reviewing pertinent records as well as during the field audit, interviewing personnel of various levels and areas including cyanide drivers it was not evidenced that have occurred significant cyanide incidents.

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 not in compliance with Standard of Practice 3.4

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Emergency Plans (Enlog's PAE and Ambipar's PAE 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 Ambipar a chemical remediation company to provide this service to the transporter that is clearly identified in Enlog's Emergency Plan for Cyanide Transportation. Ambipar can be activated as soon as necessary. During the audit evidenced that Ambipar 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. Reviewing Enlog's PAE clearly define responsibilities and authorities related to Ambipar. Reviewing factors such as Ambipar's expertise about remediation activities, human resources, personnel available, materials resources, infrastructure, international experience the auditor concluded that it is consistent the contract agreed between Enlog and Ambipar to provide remediation services. The auditor reviewed Ambipar's documented procedures about remediation processes and concluded that they are adequate for safe and environmentally sound remediation and management and disposal of cyanide waste materials as well as that Ambipar's procedures are in

Enlog S/A

Name of Operation


Signature of Lead Auditor

06/17/2024

Date

TRANSPORTATION SUMMARY AUDIT REPORT

accordance with Brazilian regulations and Cyanide Code Principles. Evidenced that Emergency Plans (Enlog's PAE and Ambipar's PAE) 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 Ambipar's PAE also includes the same prohibition. During the field audit and through interviews with driver's and Ambipar's personnel evidenced in full compliance as stated. Interviewed drivers showed to be aware of this matter.

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.

Summarize the basis for this Finding/Deficiencies Identified:

Evidenced that Enlog's PAE defined and documented that in the maximum annual frequency Enlog shall review and revise (if necessary) their emergency plans. It is also defined that several simulation activities related to their emergency plans, including one specific exercise in conjunction with the emergency responder expert, Ambipar shall be performed and after them Enlog shall reviews the results and verify if the respective PAE must be revised. The auditor reviewed mock emergency drill records and concluded that this requirement is duly implemented. Interviewed pertinent personnel showed to be aware of this provision. Evidenced that Enlog's 'PAE requires planning and performing and implementing mock emergency drills, related to its scenarios mentioned at emergency plans and in conjunction with the Emergency Responder expert (Ambipar). Reviewed emergency drill planning for 2023, 2024 and 2025.(in conjunction with Ambipar. including the participation of external stakeholders, such as Brazilian Federal road policy, road administration rescue team, local firefighters, hospitals, civil defense and others parties as already mentioned. Evidenced duly implemented. Sampled examples were: Mock Emergency drill records performed on July 17, 2024, August 15, 2023, September 18, 2023; October 05, 2023. Evidenced that Enlog after the emergency drills, reviews the drill result and, when applicable, Enlog's PAE is revised and updated. Sampled examples were: Mock Emergency drillreports performed on July 17, 2024, August 15, 2023, September 18, 2023; October 05, 2023.

Enlog S/A
Name of Operation


Signature of Lead Auditor

06/17/2024
Date

