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INTERNATIONAL CYANIDE MANAGEMENT CODE

APM TERMINALS, BASE TRANSPORTATION, CALLAO, PERU

SUMMARY AUDIT REPORT

AUGUST 2014

Lifting Global Trade.
APM TERMINALS

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Operations Summary Audit Report

For The International Cyanide Management Code and APM TERMINALS – Callao – Callao – Peru

Verification Protocol

www.cyanidecode.org
August 2014

LIMA, PERU

RIO DE JANEIRO, BRASIL

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INTRODUCTION

Information on the audited operation

Name of Cyanide Transportation Facility: APM TERMINALS INLAND SERVICES S.A.
Name of Facility Owner: APM TERMINALS INLAND SERVICES S.A
Name of Facility Operator: APM TERMINALS INLAND SERVICES S.A
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Aspects of the location and description of the operation:

APM TERMINALS INLAND SERVICES SA (Here in after APM) is a member company of the Danish group AP Moller - MAERSK, and as such, are located within the business scope of APM TERMINALS, for Division INLAND SERVICES ie cargo services in the portion of land.

This business area serves the inland transport services, in Lima, Callao. To use these services personnel and qualified team.

APM's mission is to provide logistics, innovative solutions, creating value for our customers and shareholders by promoting a culture of high performance in a safe and motivating work.

The APM Transport Division has a fleet of 40 units (20 units Scania P400, P310 10 items, 10 items International Fleet Heavy) for transporting containers. Strict compliance, with the existing provisions of the Ministry of Transport and Communications of Peru - (MTC).

APM transports sodium cyanide in wooden presentation boxes for 1TM. APM operation includes management control of Transportation from the port of Callao, in its interim warehouse located in Callao (where it is stored until its nationalization) and then transport to warehouse of the Client. These activities are carried out 2 years ago with ZERO (0) accidents.

SUMMARY AUDIT REPORT

FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.

2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.

3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.

4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

International Cyanide Management Institute (ICMI)

1400 I Street, NW, Suite 550

Washington, DC 20005, USA

5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.

6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.

7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.

Auditor's Finding

This Operation is:

X in full compliance

□ in substantial compliance

□ not in compliance

The International Cyanide Management Code

with the International Cyanide Management Code.

No significant cyanide incidents or exposures and releases were note as occurring during the audit period.

Audit Company: ISOSURE SAC | JMAQ

Audit Team Leader: Julio C. M. Monteiro

Auditing Assistance: Carlo Vargas

E-mail: jmaq@ig.com.br / auditoria@iso-sure.com

Date(s) of Audit: August 2014

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

I attest that this Summary Audit Report accurately describes the findings of the verification audit.

I further attest that the verification audit was conduct in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Name and Signatures of ICMI Lead Auditor

Julio Monteiro

Lead Auditor Signature

1 TRANSPORT

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

1.1 TRANSPORT PRACTICE 1.1

SELECT CYANIDE TRANSPORT ROUTES TO MINIMIZE THE POTENTIAL FOR ACCIDENTS AND RELEASES.

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

Summarize the basis for this Finding / Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 1.1 requiring an operation Select cyanide transport routes to minimize the potential for accidents and releases.

APM implemented the route evaluation process identified as PER-APMT-TRK-PR-00016 Cyanide Transport which describes the items to be assessed during the route analysis in accordance with the ones pointed in the International Cyanide Management Code.

PER-APMT-TRK-PC-00006 Emergency Response Plan has been implemented for the route related to the cyanide transportation

PER-APMT-TRK-FT-00011 Study of route, in the route evaluation report the major risks were identified as the urban areas, the high traffic, the speeding vehicles, the whole body vibration, the rain, vehicle noise, the sinuous road (road with curves), the combustion gases, the transport of dangerous.

Also, after making the PER-APMT-TRK-FT-00011 Study of route it shall be analyzed the risks based on the instructions PER-APMT-TRK-PR-00016 Cyanide Transport and PER-APMT-TRK-WI-00014 Evaluation and Study of route, Risk Assessment and Determination of Controls.

The revised assessment procedure specifies that the route will be reviewed prior to the first transport to a client or on an annual basis by the Head of Security. The evaluation of the route will be regularly updated by APM in order to find new significant hazards or risks in the trip report to be presented at the end of each customer service.

The Head of Safety is responsible for the development of the PER-APMT-TRK-FT-00011 Study of route and must consider the following issues during the evaluation:

- Route data: start/end
- Sections of road: description of the section in km.
- Total kilometers traveled by section
- Maximum speed limit on the section
- Altitude (m.s.n.m.)
- Road type and conditions/speed limits for:
  - Paved or motorized driveways
  - Direction of the road
  - Tilts
  - Curves
  - Slopes
  - Landslide zones
  - Pedestrian crosswalks
  - Tunnels
  - Bridges
  - Haze areas
  - Areas of rain and precipitation (hail)
  - Infrastructure: Crossings, railway, port, airport runways, heliports
  - Proximity to water bodies, river, lake, sea
  - High and low temperatures
  - Places to buy/sell fuel
  - Presence of men working (road repair)
- Level: intense, medium, low
- Population Centers
- Blind spots (areas of very low signal or no signal for mobile phones and radio)

NOTE: In case check blind spots are verified in the route analysis, they will be assessed as a danger to the safety and to the driver will be provided the communications equipment necessary to maintain communications throughout the route.

APM stops, fire stations, PNP and hospitals or medical centers in the area, as well as phones and contacts.

APM implement the procedure PER-APMT-TRK-FT-00011 Study of route Shall it be Analyzed the Risks based on the instructions PER-APMT-TRK-PR-00016 Cyanide Transport and PER-APMT-TRK-WI-00014 Evaluation and Study of route, Risk Assessment and Determination of Controls. APM document the measures taken to address risks identified with the selected routes.

APM identified the main bridges, tolls, fuel stops and technical stop points.

There was verified the existence of letters sent to firefighters and medical centers to communicate with them in case of any emergency and open communication channels between APM and emergency support centers. These were sealed by each of the support centers considered in the PER-APMT-TRK-PC-00006 Emergency Response Plan.

For the transportation of hazardous materials (including sodium cyanide), APM has a control room at the base of Callao, where the GPS system provides continuous positioning of each of the vehicles at all times, as well as continuous monitoring of the velocity at each point of the route from the starting point to the end point, then this information is delivered in printed form to the Security Chief or upon request.

APM also established through the PER-APMT-TRK-PR-00016 Cyanide Transport the specifications of use of escort trucks during the sodium cyanide transportation, which should be ONE (01) escort truck for every THREE (03) or less units of cargo transportation. This requirement applies to all customers of APM.

There can only be charged ONE (01) container per platform and each wagon can only drag one chassis. The convoy may include one or more escort vehicles at the client's request. The travel of the convoy will depend on weather conditions, the Convoy Leader shall evaluate the safety of the route in each case, being able to stop the convoy if he considers the conditions do not allow safe transit.

APM has provided information (MSDS, emergency and product information) to support emergency centers (health centers and fire companies) along the routes mentioned, and a signed and received letter with such information. This activity is carried out so that external support centers could be prepared for emergencies. In addition, comments are asked to external support centers to manage risk as a way to query and obtain feedback.

When APM transports hazardous materials (including sodium cyanide), the control room at the APM base in Callao with geocell system continuously provides the positioning of each of the vehicles all the time as well as continuous monitoring of the velocity at each point of the route. This control is done through geofences which indicate the minimum and maximum speed of the train each way along the route based on information provided by the roadmap.

APM does not outsource other companies for the transportation of sodium cyanide.

1.2 TRANSPORT PRACTICE 1.2

ENSURE THAT PERSONNEL OPERATING CYANIDE HANDLING AND TRANSPORT EQUIPMENT CAN PERFORM THEIR JOBS WITH MINIMUM RISK TO COMMUNITIES AND THE ENVIRONMENT.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 1.2

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 1.2 requiring an operation Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The APM procedure establishes minimum requirements for drivers: health, legal, defensive driving training, response training on sodium cyanide emergencies (spills and poisoning prevention).

A review of the criteria used for the evaluation of the route for: traffic density, cities, bridges, channels, road conditions, route design (curves, berms, number of lanes), the altitude, intersections, detours, weather and socio-political conditions was made by the auditors. As a result of the audit it was proven that APM only uses trained, qualified and licensed operators to operate their vehicles.

Records were verified and all staff operating the transport equipment was set to perform their work in a manner that minimizes the possibility of cyanide releases and exposures, these trainings include safe handling of cyanide both as emergency and poisoning, fire fighting, first aid.

APM selects the most specialized drivers to transport sodium cyanide who are mentioned in the following image.

According to transportation procedures, drivers must rest once a week and drive up to EIGHT (08) hours a day, with breaks of TWO (2) hours. Sleep at least EIGHT (08) hours before each trip, and one must not drive for more than TWELVE (12) hours per day. Also, this is regulated by the Peruvian government through the legal device Supreme Decree 009-2004-MTC Regulation of the Transport Administration Act.

For this reason APM has implemented a rest room for drivers which is of use only for drivers who travel with cyanide, thus being able to monitor their rest.

1.3 TRANSPORT PRACTICE 1.3

ENSURE THAT TRANSPORT EQUIPMENT IS SUITABLE FOR THE CYANIDE SHIPMENT.

X in full compliance with

The operation is ☐ in substantial compliance with Transport Practice 1.3

☐ not in compliance with

Summarize the basis for this Finding / Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 1.3 requiring an operation Ensure that transport equipment is suitable for the cyanide shipment.

APM establishes requirements for maintenance of the units carrying cyanide in the transport process, which comply with the provisions of the Peruvian law. In addition, the units are registered at the Ministry of Transport and Communications (MTC) for the transport of hazardous materials.

APM uses trucks, in addition, all shipment is dispatched within low platform trailers purchased with a maximum load capacity of 22 tons which are certified to transport sodium cyanide by the Peruvian government.

The trucks prior to loading and use are inspected by APM staff to highlight any deviation that may threaten the operation, basing the inspection on the format PER-APMT-TRK-FT-00004 Report Fallas – Tract and PER-APMT-TRK-FT-00005 Report Fallas - Platform, if any deviation is found, its solution must be done prior to the start of the operation.

After the load is fixed, APM made a record of the weights and measures to record the weight of the load and verify that it does not exceed the maximum set by Peruvian law by type of vehicle configuration.

Still, in all used routes, APM controls the weight and the size according to the Ministry of Transport and Communications, which gives significant sanctions in case of violations that can result in the confiscation of the cargo.

Before taking out the load, the carrier must have and fill out the following documents:

- Sender Reference Guide
- Carrier Reference Guide
- Tractor and semi-trailer Property Cards
- Proof of registration of the vehicle in the National Register of land transport and Hazardous Waste Materials issued by the Ministry of Transport and Communications – MTC (tractor and semi-trailer).
- MTC Circulation Card
- Driver's License of the driver
- MTC's Freight course
- National Identity Card
- Material Safety Data Sheet (MSDS)
- Technical Inspection Certificate to transport Hazardous Materials
- Insurance against all Risk

During the audit were demonstrated the plans and preventive maintenance records.

APM does not outsource other companies for the transportation of sodium cyanide.

1.4 TRANSPORT PRACTICE 1.4

DEVELOP AND IMPLEMENT A SAFETY PROGRAM FOR TRANSPORT OF CYANIDE.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 1.4

□ not in compliance with

Summarize the basis for this Finding / Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 1.4 requiring an operation Develop and implement a safety program for transport of cyanide.

APM established a transportation method avoiding disturbances during motion. For the transportation of hazardous materials (including sodium cyanide), APM has a control room at the base of Callao, where the GPS system provides continuous positioning of each of the vehicles at all times.

Before the trip, the three visible sides of the containers have the UN number, the NFPA and the DOT diamond. It fulfills the Peruvian law Supreme Decree 021-2008-MTC Regulations for the transport of hazardous materials/hazardous waste.

APM indicates the need for conformity with the Carrier Referral Guide, to ensure that the escort vehicles and transport vehicles are in optimal conditions. APM conducts vehicle inspections prior to each departure/shipment. During the audit process, records of inspections prior to each departure shipment are evidence.

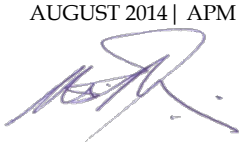
APM has a maintenance plan. The maintenance records were reviewed and the practice was confirmed during the observation of the vehicle and interview with the maintenance supervisor and drivers.

Drivers must rest at least 8 hours before a trip and must not drive more than 12 hours a day and the driving time is only during the day. It is noteworthy that Peruvian regulations set the same schedule for the transportation of hazardous materials "DS 009-2004-MTC Regulation of Transport Management Act".

APM states that the load of cyanide must travel in 20-foot containers, developing mechanisms to prevent its movement.

The trip will take place in convoy mode, the convoy leader is responsible for the assessment of climatic conditions and is empowered to suspend the transport convoy.

At the end of the trip, the leader of the operation and drivers must submit a report detailing the same road incidents, anticipated information, sensitive areas, and find relevant information to ensure the safety on future trips.



Lead Auditor Signature

It is prohibited the consumption of alcohol, drugs or any other substance that may impair or reduce the function of the driver or a member of the convoy in which prior to the start of each trip everyone must go through an alcotest test and periodical drug tests; the violation of this policy results in the separation of the worker from the organization.

The plans and procedures for compliance with the Code are reviewed annually and annual surveillance audits are developed to verify compliance with the APM standards.

APM does not outsource other companies for the transportation of sodium cyanide.

1.5 TRANSPORT PRACTICE 1.5:

FOLLOW INTERNATIONAL STANDARDS FOR TRANSPORTATION OF CYANIDE BY SEA AND AIR.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 1.5

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in NOT APPLICABLE whit Standard of Practice 1.5 requiring an operation Follow international standards for transportation of cyanide by sea and air.

APM not transported by sea transport and air transport within the territory of Peru.

1.6 TRANSPORT PRACTICE 1.6:

TRACK CYANIDE SHIPMENTS TO PREVENT LOSSES DURING TRANSPORT.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 1.6

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 1.6 requiring an operation Track cyanide shipments to prevent losses during transport.

APM uses a GPS system. They also have telephone service, radio and cell phones which ensures full coverage during movement and are completely connected to the

control room in their base in Callao. In addition to providing this system, they continually know the positioning each of the vehicles all the time.

The phone lines were operating at the time of the audit; and also an inspection was done to verify the operation of mobile equipment and it was found the payment of the phone, the GPS and the radio services providers in the last year.

Additional, AMP periodically test communication equipment to ensure it functions properly.

APM has identified areas without cellular and radio coverage, in such areas the convoy makes use of satellite equipment.

The GPS system has location actualizations in real time, in areas without GPS coverage it saves the information transmitted after the passing of vehicles.

The bill of lading and the reference guide are part of the shipping records of the amount transported; the Material Safety Data Sheet is checked before each trip and is available throughout the transportation.

In the sender reference guide is indicated the name of the product, the United Nations (UN) number, the transported amount of packages and weight of the load, and it is also necessary to indicate the product safety considerations. Upon the delivery of the sender reference guide, the provider delivers the Material Safety Data Sheet to the carrier. The absence of the sender reference guide and of the Material Safety Data Sheet during transportation is fine by the confiscation of the cargo by the Peruvian government that performs mandatory controls on all outbound tolls of the City of Lima. It is worth mentioning that the sender reference guide should be preserve and stored by the carrier for a period not less than FIVE (05) years.

APM does not outsource other companies for the transportation of sodium cyanide.

2 INTERIM STORAGE

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

2.1 TRANSPORT PRACTICE 2.1

STORE CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTAL RELEASES.

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 2.1 requiring an operation Store cyanide in a manner that minimizes the potential for accidental releases.

Was evident during the loading, storage and unloading has signs indicating the presence of cyanide between them this:

- No unauthorized personnel
- Prohibited Drinking and Food
- Prohibiting the use of water
- No Smoking
- No turn fire

Access to Warehouse for APM is restricted, is forbid to the public has a perimeter fence 6 feet tall and security based on four (04) security guards has a closed system of security cameras. Additionally, APM has certified under the standard BASC Business Alliance for Secure Commerce. The store has cyanide locks on all doors and signals prohibited from entering unauthorized personnel.

The area where the cyanide containers are stored is dedicated to dangerous goods taking into account the compatibility to store different chemicals. Per example it is not allowed to store flammable liquids or acids together Sodium Cyanide. The APM respects the separate storage according to the product class but also to the compatibility (reaction in case of an incident).

APM production processes not only makes storage boxes and cylinders with sodium cyanide. The failure or power outage does not affect the operation of APM nor cause a leak or spill.

A warning system to alert emergency personnel and hazmat squad to meet promptly any spill was evident.

The storage of cyanide is performe in 20 to 40 feet, which show no dents, or holes that allow the entry of water or liquids, for ventilation proceed to opening the container allowing the ventilation for a period of 15 minutes this operation is aware of the warehouse operators, which was verifiy after interviews on site.

APM does not undertake any filling tanks. APM makes storing solid sodium cyanide, if cyanide spill has equipment to respond to the emergency. During handling of containers with sodium cyanide, APM near the work area by working procedure. Also, the Emergency Response Plan describes the actions to prevent the spread of sodium cyanide as cover spill area with a plastic blanket and make a dike around. After they start the process gather material and dispose the waste.

3 EMERGENCY RESPONSE:

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

3.1 TRANSPORT PRACTICE 3.1:

PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.1

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 3.1 requiring an operation Prepare detailed emergency response plans for potential cyanide releases.

APM has an emergency response plan for transportation approved by Supreme Decree 021-2008-MTC which has approve the plan for emergency response by Directorial Resolution 031-2011-MTC. Information on road conditions is defined in the Roadmap document. The Emergency Plan describes the response actions for anticipated emergency situations. These were verified during the audit.

APM has an emergency response plan for the storage of sodium cyanide. The Emergency Plan describes the response actions for anticipated emergency situations. These were verified during the audit.

The Emergency Response Plans for transportation is suitable for the selected transport route, based on the hazards and risk assessment after the completion of the ROADMAP.

The Emergency Response Plans for storage is suitable for the operation, based on the hazards and risk assessment for the warehouse.

The Emergency Response Plan is suitable for the selected transport route and for the warehouse, taking into account the physical and chemical form of cyanide clearly based on the Safety Data Sheet of the Product "Sodium Cyanide".

APM indicates the use of trucks to transport sodium cyanide taking into account the characteristics of the equipment and assesses the structural condition of the road where the transportation sodium cyanide is done.

APM indicates that the storage is done in 20 "(20 tons), and the containers are stacked up to 6 levels high, which are stacked by a stacking of containers. During the audit process, the correct status was evident stacking of containers, and the containers.

Information on road conditions are defined in the Roadmap document. The Emergency Plan describes the response actions for anticipated emergency situations.These were verified during the audit.

It also establishes the logical line of action to be taken by the convoy leader and drivers in case irregularities arise during transportation of sodium cyanide, including civil commotion, adverse conditions, adverse weather, traffic congestion and unplanned stops.

APM consider storage conditions (containers) for risk analysis and processing procedures. Also, the warehouse supervisor should find adverse situations for the operation of storage and cargo handling can stop or prohibit such operations.

APM uses trucks, in addition, all shipment is dispatched within low platform trailers purchased with a maximum load capacity of 22 tons which are certified to transport sodium cyanide by the Peruvian government.

APM evaluates the state of the storage containers cyanide sodium prior to use.

APM sets action if incidents occur on the route which is described below.

- Incident with no injuries/the journey continues
- Mechanical problems/does not continue
- Rollover with spill
- Rollover with no spill
- Fire in the truck
- Crash with injuries/no injuries
- Water spill, cleaning and decontamination
- Social conflicts
- Adverse Weather Conditions
- Vehicular Congestion

Awareness on the part of drivers and supervisors of the actions in each case was evidenced after interview with the staff.

APM sets action if incidents occur on the warehouse which is described below.

Incident with no injuries/the operation continues

Mechanical problems/does not continue

Accident with spill

Accident with no spill

Fire in the warehouse

Crash with injuries/no injuries

Water spill, cleaning and decontamination

Social conflicts

- Adverse Weather Conditions

Awareness on the part of operators and supervisors of the actions in each case was evidenced after interview with the staff.

APM establishes two levels of emergency response for the transportation or storage:

Level 1: Dry accident with cyanide up to 20 tons

Organizations

- APM first response
- Local contractor/consultant second response

Resources:

- Places of APM and the product's provider property
- Places of contractors/industry/government property
- Other companies' teams.

Level 2: Accident with cyanide in water course and more than 20 tons

Organizations

- Governmental response teams (Civil Defense and Fire Brigade).
- External contractors.

Resources

- Other companies' teams.

It also sets the limit of 20 tons between Level 1 and Level 2 is, of course, arbitrary and the circumstances decide when Level 2 is required.

Within each level, there may be interaction between own response teams own and/or third parties and governmental ones, both in terms of control and resources, indicating this interaction in the Emergency Response Plan.

3.2 TRANSPORT PRACTICE 3.2:

DESIGNATE APPROPRIATE RESPONSE PERSONNEL AND COMMIT NECESSARY RESOURCES FOR EMERGENCY RESPONSE.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.2

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 3.2 requiring an operation Designate appropriate response personnel and commit necessary resources for emergency response.

APM during the audit has show that Drivers, operators of the warehouse and Supervisors receive training in emergency response from appropriate personnel on the safe handling of cyanide (spill and intoxication) and others receive training courses in defensive driving, fire fighting, first aid, level 1 and level 2 hazardous materials. These trainings are renewed annually complying with the training plan.

Drivers, operators of the warehouse and Supervisors are responsible to respond in an emergency; they pass through medical tests to verify their good physical condition to perform these activities and have received the necessary training for efficient emergency response.

Each truck has the necessary amount of emergency response equipment and the security convoy also has a Response Kit for spills and poisoning (antidote kit), and personal protective equipment which must be verified before the trip, as well as the verification of courses prior to starting the travels and the periodic emergency response training.

During the audit process was evident in the store the existence of spill response equipment and antidote for cyanide poisoning, as well as the verification of courses prior to starting the operation and the periodic emergency response training

APM has the necessary equipment for emergency response (trasnport or storage) in the event of a major spill.

There were verified the records of the emergency response and inspection of equipment. The presence of such equipment in the convoy was verified. In the Emergency Plan indicates the functions of the staff in case of an emergency, and also the emergency equipment to be used in both the first and the second response. The

Emergency Plan describes the specific functions of the emergency response and the staff responsibilities.

The operators of the storage receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan.

In the procedure for Cyanide Transport is specified the verification criteria of the units before each journey.

In the process of cyanide storage is mandatory inspection of emergency equipment prior to the start of handling and daily.

During the audit process, an inspection record was evident.

APM does not outsource other companies for the transportation of sodium cyanide.

3.3 TRANSPORT PRACTICE 3.3:

DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

X in full compliance with

The operation is ☐ in substantial compliance with Transport Practice 3.3

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 3.3 requiring an operation Develop procedures for internal and external emergency notification and reporting.

It was noticed that the contact information in case of emergency (transport or storage) is updated, in case of emergency it will be set and updated the Emergency Plan. The Emergency Plan indicates the current contact list which is reviewed and updated through every review of the Emergency Plan; through the completion of 04 calls to the numbers listed in the contact list it is evidenced the update of the contact numbers in case of emergency.

The Emergency Plan (transport or storage) includes an internal communication and external schema that specifies the call flow by the security personnel, the receptors, the regulatory agencies, external response providers, medical centers, fire departments, and communities potentially affected by an emergency.

3.4 TRANSPORT PRACTICE 3.4:

DEVELOP PROCEDURES FOR REMEDIATION OF RELEASES THAT RECOGNIZE THE ADDITIONAL HAZARDS OF CYANIDE TREATMENT CHEMICALS.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.4

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 3.4 requiring an operation develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

It was noticed in the Emergency Response Plan (transport or storage) the description of how to recover or neutralize the solids, the procedure of decontamination of soils or other contaminated medium and how to manage these wastes.

The Emergency Response Plan (transport or storage) prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released to surface waters.

3.5 TRANSPORT PRACTICE 3.5:

PERIODICALLY EVALUATE RESPONSE PROCEDURES AND CAPABILITIES AND REVISE THEM AS NEEDED.

X in full compliance with

The operation is □ in substantial compliance with Transport Practice 3.5

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE whit Standard of Practice 3.5 requiring an operation Periodically evaluate response procedures and capabilities and revise them as needed.

The period of review and evaluation of this Emergency Response Plan (transport or storage) is at least once a year.

The APM Management is responsible for requesting immediate changes to this Plan, in the event of serious incidents, by simulation results, results of audits or inspections by process improvement etc.

The Emergency Response Plan (transport or storage) and the Training Plan define the frequency of emergency drills. The document presents the schedule of emergency simulations.

The simulations are made by the Chief of Security who has an ANNUAL DRILL PROGRAM indicating the completion of ONE (01) practical simulation, for the purpose of evaluating the effectiveness of the Emergency Plan and correct what is indicated on it.

The purpose is to measure the efficiency of the response procedure to ensure that the staff involved in an emergency act according to the Emergency Response Plan (transport or storage).

The Chief of Safety takes into account the rapid preliminary compilation of the situation, gathering basic facts as they are known such as time the who, what, where, when, how and why of the situation, contacts the responsible person and broadcasts the obtained information, and continuously communicates with the Convoy Leader or warehouse supervisor and will meet the requirements of authorities.