INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Auditor Credentials Form

For The International Cyanide Management Code

www.cyanidecode.org

December 2016

The International Cyanide Management Code (hereinafter "the Code"), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from one 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.

Auditor Credentials Form

Facilit	v Audited:	Action Resources,	Inc. Pasadena Terminal	Date: Ju	une 29, 2018

Lead Auditor Credentials

Lead Auditor:

John B. McVaugh

Auditor Certification Nunber: <u>52554 (Environmental Management Systems)</u>

Auditor Certification Nunber: 52554 (Responsible Care Management Systems®)

Certifying Organization: Name: Exemplar Global. Telephone Number: (414) 272-3937

Address: P.O. Box 602, Milwaukee, WI 53201-0602 Website Address: http://exemplarglobal.org

Minimum experience: 3 audits in past 7 years as Lead Auditor

Year	Type of Facility, Type of Audit Led	Country & State/Province
2009-	Trimac Transportation Inc, Headquarters and 8 terminals, RCMS [®]	USA. Texas, Louisiana,
2016	registration	Florida, Alabama
2010-	Schneider National Bulk Carriers, 2 terminals, RCMS® registration	USA. Texas, Louisiana
2016		
2008-	Slay Transportation Company, Inc., Headquarters and 6 terminals,	USA. Missouri, Illinois, Texas,
2016	RCMS [®] registration	North Carolina, South Carolina
2009-	Chevron Phillips Chemical Co, Olefins Manufacturing Plant and	USA. Texas
2013	High Density Polyethylene. RCMS® registration (4 facilities)	
2009-	Merichem Chemicals & Refinery Services, Headquarters and	USA. Texas, Alabama
2016	Naphthenate chemical manufacturing plant RCMS® registration	
2004-	Goodyear Chemical Plants, Synthetic rubber and rubber chemicals,	USA. Texas, New York
2012	ISO 14001 registration (4 facilities)	
2007 &	U S Borax Co., Open pit mine and ore processing plant, ISO 14001	USA. California
2010	registration.	
2007	Searles Valley Minerals, Solution mining and minerals processing	USA. California
	plant, RCMS [®] registration.	
2009-	Monsanto. Phosphate ore processing and manufacturing of elemental	USA. Idaho
2016	phosphorus, RC14001® certification.	
2003-	BP Amoco Chemical Co., Para-xylene, Meta-xylene and Purified	USA. Alabama, South Carolina,
2016	Terephthallic Acid manufacturing plants, ISO 14001 registration.	Texas
2011 &	Miller Transporters Inc. ICMI Transportation Code Recertification	USA, Tennessee
2014	Audit	
2013	Addendum to the Cyanco Global Ocean Supply Chain to Pre-	USA, Texas
	Operationally assess Action Resources, Inc. as an alternative truck	}
	transportation company	
2014	Addendum to the Cyanco Global Ocean Supply Chain to Post-	USA, Texas
	Operationally assess Action Resources, Inc. as an alternative truck	
	transportation company	
2014	Addendum to the E. I. DuPont de Nemours and Company, Inc.	USA, Washington
	US/Canada Rail/Barge Supply Chain to include a verification audit	
	of the dray carrier, Seattle Freight Service, Inc.	
2016	Haukes N.V. ICMI Transportation Code Certification Audit	Suriname. Wanica
2017	Chemours (formerly E. I. DuPont de Nemours and Company).	USA. Delaware
	US/Canada Rail/Barge Supply Chain Reverification audit	
2017	Chemours (formerly E. I. DuPont de Nemours and Company).	USA. Delaware
İ	Global Ocean Supply Chain Reverification audit	

2017	Chemours (formerly E. I. DuPont de Nemours and Company).	Mexico. Mexico City
	Mexico Supply Chain Reverification audit	
2017	Chemours (formerly E. I. DuPont de Nemours and Company).	Mexico. San Luis Potosi &
	Production Facility Reverification audit (2 Facilities)	Sonora

Cyanide-related Operations Experience

Each auditor must have at least 3 years; at least one auditor must have at least 7 years experience.

Auditor	Yrs.	Relevant Position Titles	Types of Operations
John B McVaugh	14	Akzo Nobel Chemicals, Chicago, IL	Held positions that provided experience and
		& Pasadena, TX	familiarity with chemical production
		Manager, Environmental Affairs	facilities (those belonging to my employer as
		Commercial Development Mgr	well as to its suppliers and customers), and
		Senior Purchasing Agent	familiarity with transport of hazardous
		Purchasing and Logistics Manager	materials (products, raw materials and
			industrial wastes)
John B McVaugh	22	Environmental Technology &	Environmental, health and safety
		Management	management consulting, including regulatory
		Principal	compliance and management system
			development for clients including Criterion
			Catalysts, Akzo Nobel Chemicals, Conoco
			Phillips, Dow Chemical, Honeywell
			Electronic Chemicals, D B Western Co-
			Texas, Nalco Chemical Co, Polimeri Europa
			and Petrochemical Industries Corporation
			(Kuwait).
John B McVaugh	21	Environmental Technology &	Performing ISO 14001, OHSAS 18001 and
		Management	Responsible Care Management System audits
		Lead Auditor under contract with	under contract with two registrars. Among
		registrars NSF-ISR and ABS-QE	mining and chemical companies audited were
			facilities of BP Chemicals (2), Chevron
			Phillips, Ciba Corp, DuPont, Goodyear
			Chemicals, Honeywell, Merichem,
			Monsanto, Searles Valley Minerals, U S
			Borax and W R Grace.
John B McVaugh	12	Environmental Technology &	Performing Responsible Care Management
		Management	System audits under contract with two
		Lead Auditor under contract with	registrars. Among the transportation related
		registrars NSF-ISR and ABS-QE	companies audited were Interstar Global
			Logistics, Logistics Management Resources,
•			Miller Transporters, Odfjell Terminal,
			Quality Distribution, Logistics Management
			Solutions, Schneider National Bulk Carriers,
			Slay Transportation and Trimac
			Transportation Inc.

Statement of No Conflict

I certify that I have not audited any component of this facility for which I was responsible for design or development; nor have I within the past year been an employee of the facility, its parent company, or associated affiliates. Excluding audits, assessments or reviews I have not derived more than 30% of my income within the past 5 years from the facility, its parent, or associated affiliates. I have not participated in more than two consecutive Cyanide Code audits of this facility. I have participated in at least 3 health, safety, and/or environmental audits assessments or reviews in the past 7 years and am familiar with standard audit procedures as well as with the protocols developed by the International Cyanide Management Institute for implementation of the Code.

Signed,	Name	Signature ,	Date
Lead Auditor*	John B. McVaugh	John B. McVaryl	9/24/18
Auditor 1			

Use additional pages if necessary

*The lead auditor's signature must be certified by notarization or equivalent.

CHIARA SERRANO
NOTARY PUBLIC STATE OF TEXAS
MY COMM. EXP. 11/24/2019
NOTARY ID 13045286-5