

TAMSE, S.A.C.

Cyanide Code Principle 2

Transportation Audit

Summary Audit Report

PROJECT No. 0107731

FEB 2011

Name of Cyanide Transportation Facility: <u>Tamse Consultores Asociados</u>, S.A.C. Name of Facility Owner: Tamse Consultores Asociados, S.A.C. Name of Facility Operator: <u>Tamse Consultores Asociados</u>, S.A.C.

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Location detail and description of operation:

TAMSE S. A. C. (TAMSE) is a company dedicated to the transport of hazardous materials with operations in Peru.

Currently, TAMSE transports sodium cyanide in solid state (pellets) on behalf of Innova Andina and Oxyquim Peru from el Callao Port (where the suppliers have their storage facilities) to, among others, the following mines:

- Minera Quicay Chancadora Centauro;
- Minera Colquijirca Sociedad Minera El Brocal;
- Minera Casapalca;
- Minera Aurex;
- Minera Corihuarmi Minera IRL S.A.;
- Minera Cerro Lindo Cia Minera Milpo S.A.A.;
- Minera El Paraiso;
- Minera Planta Belen Titan del Peru SA;
- Yauricocha Sociedad Minera Corona;
- Minera Pucamarca Minsur SA;
- Minera Arasi Arasi SAC
- Minera Tukari- Aruntani SAC
- Minera Anabi Anabi SAC

This audit comprises the ground transportation operations from the moment the storage facilities release the cyanide for its delivery in the client facility

TAMSE has implemented an integrated management system for ground transportation of hazardous materials based on ISO-9001 and OSHAS-18001.

TAMSE formally started the implementation of the Cyanide Code in August 2009, and has incorporated the Code in its integrated management system.

As previously mentioned, TAMSE transports sodium cyanide (cyanide) in solid state. TAE KWANG, represented in Peru by Oxiquim Peru and Innova Andina S.A., and AGR, represented in Peru by Innova Andina S.A.) are the manufacturers of the cyanide transported by TAMSE. Cyanide is packaged by the manufacturer in the following way:

0	Containers: primary packaging in a poly propylene super-sack filled up to 1 ton. The super-
	Containers: primary packaging in a poly propylene super-sack filled up to 1 ton. The super-sack is then placed in a wooden box. No less than 10 (or 20 boxes in a two box stack) are

Tamse Consultores Asociados

22 and 23 February 2010

placed in standard 20-feet containers and exactly 20 boxes in a 40-feet containers; the exact number of boxes is to prevent lateral movement of the boxes within the container.

TAMSE receives the container in the supplier facilities. The suppliers are responsible for the loading operations.

Tamse Consultores Asociados

Name of Facility

Signature of

22 and 23 February 2010

Date

Auditor's Finding

Tuditoi o i intanta				
This operation is				
 √ in full compliance □ in substantial compliance *(see below) □ not in compliance 				
with the International Cyanide Management Code.				
* For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.				
Audit Company: ERM Mexico, S. A. de C. V.				
Audit Team Leader: <u>Juan Carlos Rangel Lopez</u> E-mail: <u>juancarlos.rangel@erm.com</u> Names and Signatures of Other Auditors: <u>none</u>				
Date(s) of Audit: 22-23 February 2010				
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 conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.				
Tamse Consultores Asociados 22 and 23 February 2010				

Page 4 of 17

Signature of Lead Auditor

Date

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

TRANSPORT PRACTICE 1.1: SELECT CYANIDE TRANSPORT ROUTES TO MINIMIZE THE POTENTIAL FOR ACCIDENTS AND RELEASES.

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

Summarize the basis for this Finding/Deficiencies Identified:

Procedure PO-02 for the identification of hazards and risk assessment (dated 20 July 2009 rev 1) requires assessing the risk in the route. TAMSE has implemented this procedure by performing a route inspection and a literature review. The literature review includes weather conditions, social aspects, environmental (hydrology, physiography, seismicity, biodiversity). This added to the route inspection where the main route characteristics are recorded related to the route millage marker (e.g. location of bridges, closed curves, railroad crossing), traffic conditions, telephone services, cellular phone coverage, and pedestrian presence. A portion of the reports is used for the risk assessment (attached in the contingency plan).

According to the information provided by TAMSE, must the mines served by them are along the same route (center of Peru), with the Chancadora mine as the one located at the more distant point. The report includes the bibliographical information obtained a tables with summary of the risk identified. This has also been used in a new project for a new route to be attended (Anabi project). Given the age of the systems implemented by TAMSE (approximately six months) at the time of the audit, updating the routes assessment had not been required.

The risk assessment for the route to the mines in the center of Peru is also documented in the contingency plan and includes mitigation measures (e.g. speed controls, sending the escort vehicle in to the front of the convoy to assess the route conditions). Additionally, TAMSE has the procedure PT-02 for Service Planning, which requires reviewing the weather forecast and other information sources (e.g. news about civil demonstrations). It also requires reviewing previous operation reports to identify potential conditions in the route.

A planning report, where the name of the product, the amount of material, the personnel and equipment to be use, a forecast of the progress, critical route points (including communication service availability and weather conditions, and the list of key contacts (internal, the client, and emergency responders) is issued and included in the operation report.

Additionally, the operation reports include the following checklists:

Supervisor' vehicle documents and PPE

o Truck documents and driver's PPE

First response kit

Tamse Consultores Asociados

Name of Facility

Signature of Lead Auditor

<u>22 and 23 February 2010</u>

Date

- Escort vehicle inspection checklist
- o Progress report
- SCBA equipment and extinguishers inspection
- Container inspection
- Truck and trailer inspection checklists.
- Hazards report for the transport operation

Several operation reports were reviewed and consistently contained these checklists and the planning report. The interviewed supervisors were familiar with the content of the checklists and their responsibilities related to the same.

Procedure PO-02 establishes that the risk assessment must be continuously reviewed and updated, especially when:

- New equipment is acquired
- The operation system changes
- Accidents take place
- When new areas are used for work.

The update and review must be performed by an Operations Safety and Security Committee.

Additionally, procedures PT-05 establishes that an operation report must be completed in the format PT-05-01 in which the current conditions of the road must be reported. The report describes if a risky condition was found and how it was solved.

During the literature review that TAMSE prepares for the route assessment, the Critical Sectors Map for the National Road Network, published by the Transports and Communications Ministry (MTC) is reviewed to identify the areas where MTC has reported risks. Additionally, prior to a new route to be assessed TAMSE request information to the mines for potential alternative routes (e.g. the new Anabi project where the mine provided information on the potential route and TAMSE was in charge of the risk assessment for the route and the selection of the route to be used.

Procedure PT-02 (dated 20 July 2009 rev1) establishes that all shipments are performed in convoys with an emergency response escort; this practice was confirmed by the reviewed operation reports.

According to available communications records, TAMSE informed the Health Ministry and the head of the national firefighters about their operations and the expected support in March 2010 and the different firefighter departments, police offices, and hospitals in May 2010.

Tamse Consultores AsociadosManagement22 and 23 February 2010Name of FacilitySignature of Lead AuditorDate

Page 6 of 17

TAMSE does not subcontract other companies for the sodium cyanide transportation.

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.

	RISK TO COMMUNITIES AND THE ENVIRONM	IENT.				
Th	The operation is √ in full compliance with □ in substantial compliance with Transport □ not in compliance with	rt Practice 1.2				
Su	Summarize the basis for this Finding/Deficiencies Identified:					
an inc	Contingency Plan (dated March 2010 rev2) indicates that is TAMSE reand qualified personnel in hazardous materials handle. In addition, tindicates that is responsibility of the transportation division coordinates supervisors and drivers. TAMSE has determined the following profile	he Contingency also tor to train constantly				
0	o From 26 to 55 years old					
0	o 5 years of experience as driver	5 years of experience as driver				
0	o 4 years of experience driving the central Peru road	4 years of experience driving the central Peru road				
0	o 3 years of experience transporting materials for mines	3 years of experience transporting materials for mines				
0	Knowledgeable about hazardous materials, emergency response, and the use of firefight equipment.					
0	Defensive driving					
0	o Knowledgeable about identification of hazards	Knowledgeable about identification of hazards				
Fo	For the safety supervisors (convoy leaders):					
0	o From 23 to 50 years old					
0	 High school completed 					
0	Special materials transportation management					
0	o To have paramedic experience					
0	o Knowledgeable on risks prevention					
0	o Ability as instructor					
0	Two years of experience					
Ta	Tamse Consultores Asociados	22 and 23 February 2010				

Page 7 of 17

Date

TAMSE has two drivers designated for cyanide transportation and three supervisors. The review of their files confirmed that they comply with these requirements. They were interviewed and they were familiar with the cyanide characteristics, their roles during the emergency response, and the safety measures implemented by TAMSE. Additionally, TAMSE has a training program which includes the following courses on annual basis:

ba	sis:			
0	HAZMAT level III (for drivers and supervisors)			
0	TAMSE transport procedures			
0	Risk identification and assessment			
0	Accidents investigation			
0	Contingency plan			
0	Mock drills			
0	Defensive driving			
0	Environmental protection			
0	Operator training by the truck manufacturer			
0	Use of cyanide antidote			
0	Hazardous materials transport regulations			
0	General EHS training			
	cording to the reviewed records, these courses were provided in 2009 and there is a program provide them in 2010.			
	MSE does not subcontract other companies for the sodium cyanide transportation. This ement does not apply.			
Tr	ANSPORT PRACTICE 1.3: ENSURE THAT TRANSPORT EQUIPMENT IS SUITABLE FOR THE CYANIDE SHIPMENT.			
Th	e operation is √ in full compliance with □ in substantial compliance with Transport Practice 1.3 □ not in compliance with			
Su	mmarize the basis for this Finding/Deficiencies Identified:			

Page 8 of 17

22 and 23 February 2010

Date

Tamse Consultores Asociados

TAMSE owns trailers and truck manufactured in 2009. According to the production certificates, the trailers have 28 and 34 tons capacity respectively, while a fully loaded container has a maximum weight of less than 24 tons.

TAMSE has the truck maintenance procedure PV - 02 (rev 2 dated July 09); which is based on the manufacturer recommendations. It specifies the following level of maintenance for trucks;

- X2: to be performed every 15,000 km. It includes revision of 12 components: motor oil and its filters; magnetic cap; belts; lights and electrical system; suspension system; air system; lubrication; SDP3, EDC, OPC, ABS/EBS, APS, etc; and gear box.
- S2: to be performed every 30,000 km. It includes revision of 15 components: X2 components plus water separator filter, air dryer, breaks.
- L2: to be performed every 60,000 km. It includes revision of 14 components: most X2 components plus coolant's filter, air filter, refrigeration system, and windshield cleaners.
- AL2: to be performed every 180,000 km. It includes revision of 32 components.

Additionally, TAMSE has implemented the procedure PV-03 for the trailers preventive maintenance (rev. 1 dated 20 July 2009) which includes the following levels:

- o Inspection every day prior to start operations: fastening system, breaks and electrical system, purge air tank, tires fastening and pressure, and lubrication.
- o Every 5,000 km: break system, suspension system, axis alignment, and break shoe.
- o Every 40,000 km: break shoe, axis alignment, and bearings.
- o Every 100,000 km or per year (what ever is met first): full disassemble of the breaks system.

Maintenance records were reviewed and found consistent with these programs.

TAMSE has implemented the Procedure PT-03 (dated 20 July 2009 rev 1) for the convoy preparation. This requires using checklist to inspect the vehicles (escort vehicle, trucks, and trailers). It also requires reviewing the documents and the first response emergency kit. A total of four checklists are filled to complete this process. The checklists are part of the operation report. According to the procedure, and the most recent checklist, the operation is not started if any of the documents or equipment required by the checklist is not available. Several shipment reports were reviewed; the checklists were consistently filled. The interviewed drivers and supervisors confirmed the use of the checklist and were familiar with their content.

TAMSE receives the container already loaded, and only one of them is loaded in a trailer. TAMSE does not use the double trailer modality. TAMSE owns two trailers one with capacity of 28 tons and another with capacity of 34 tons. The weight of a fully loaded container is less than 24 tons. TAMSE personnel supervise the loading operation to ensure that no more than 20 tons of net weight is loaded in a container.

TRANSPORT PRACTICE 1.4:	DEVELOP AND IMPLEMENT A SAFETY PROGRAM FOR TRANSPORT OF
CY	ANIDE.

The operation is

in full compliance 🙀

Tamse Consultores Asociados

Name of Facility

Signature of Lead Auditor

22 and 23 February 2010

Date

Page 9 of 17

	in substantial compliance with Transport Practice 1.4 not in compliance with
Summarize the basis for this Fin	nding/Deficiencies Identified:

TAMSE receives the NaCN in 20-foot containers. TAMSE fixes the container to the trailer using twist locks and chains. TAMSE does not manipulate the packages as the containers are sealed by the NaCN distributor preventing, therefore, damages to the NaCN packaging. TAMSE personnel supervise the loading operation to ensure that the packaging is in good conditions. The use of the chains is recorded in one of the checklists mentioned in 2.1.3.

According to Procedure PT-04 for the loading operation, the supervisor ensures that placards are placed in the container and this is also recorded in one of the checklists mentioned in 2.1.3.

As previously mentioned, TAMSE has implemented Procedure PT-03 for convoy preparation; which requires filling four checklist including PT-03-03 for truck control. This checklist requires reviewing the load documents (including bill of lading and MSDS among others), the truck accessories (e.g. mirrors, horn, windshield, etc), basic tool kit, first aid kit, the driver personnel protection equipment (PPE), the PPE for emergency response, uniform, load fastening, and container placards. Additionally TAMSE has implemented procedure PV-05 for the inspection of the container, which requires filling an inspection checklist prior to the departure of the convoy. The checklist is part of the operation report.

As previously mentioned, TAMSE has implemented procedure PV - 02 for truck maintenance and procedure PV-03 for the trailers preventive maintenance.

TAMSE has implemented the procedure PT-05 for cyanide transport; this procedure establishes that the operators cannot drive more than 10 hrs per day, that the driving hours are from 6:00 am to 6:00 pm, that technical stops of 5 to 10 minutes must take place every two hours. The operation reports include the shipment tracking report which confirmed that the transport is generally performed from 6:00 am to 6:00 pm and even for smaller periods of times and that the meal breaks take place. The interviewed personnel confirmed that the technical and meal breaks take place.

According to the loading procedure and the checklists, TAMSE fastens the containers to the trailer with twist locks and chains and no less than 10 boxes (or no less than 20 boxes in a two box stack) are placed in standard 20-feet containers and exactly 20 boxes in a 40-feet container to prevent lateral movements.

TAMSE has prepared the procedure PSIG-03-10 with instructions for the supervisor in case of unfavorable weather conditions and social unrest. According to the procedure, the supervisor must stop the operations, look for a safe parking area, call the base, and wait for the conditions to improve. In case of unfavorable weather, the route must be inspected to identify slippery areas and other risks. The interviewed supervisors were familiar with the procedure and informed that these situations have not been faced as the weather and social conditions are reviewed prior to start the transport as requested by procedure PT-02 for Service Planning.

TAMSE has implemented Procedure PT-09 for Drugs and Alcohol. It establishes that on semiannual basis an alcohol blow test will be pertormed to one of the convoy members and
semiannual basis an alcohol blow test will be pertormed to one of the convoy members and
The state of the s

Tamse Consultores Asociados		22 and 23 February 2010
Name of Facility	Signature of Lead Auditor	Date

drugs in blood test will be performed to another member. Any result other than zero is considered as severe fault. The results are kept in the employee file.

Operations reports were available from February 2009 to the audit date (these include the respective checklists). Maintenance records from 2009.

TRANSPORT PRACTICE 1.5:	FOLLOW INTERNATE CYANIDE BY SEA AND		FOR TRANSPORTATION OF
The operation is THIS	in substantial co	e with mpliance with Trans	
_	s only for the ground	d transportation op	erations performed by TAMSE erefore, this practice does not
-	•		erations performed by TAMSE erefore, this practice does not
TRANSPORT PRACTICE 1.6:	TRACK CYANIDE	SHIPMENTS TO PREV	ENT LOSSES DURING
The operation is	in substantial co	mpliance with Trans	sport Practice 1.6
Summarize the basis for this l	Finding/Deficiencies 1	dentified:	
	functionality of the	radio, mobile phon	phone; the convoy escort has e and satellite phone is tested tion checklists.
	d the intensity of the	e signal has also bee	vice is weak, the supervisor en assessed in the inspection at means (coins or pre-paid
			progress must be monitored. nvoy and contingencies that
Tamse Consultores Asocia Name of Facility	/	AND DEV	22 and 23 February 2010 Date

Page 11 of 17

have arisen, if any. The information provided by the supervisor is also immediately provided to the client. This notification is recorded in transport operation follow-up format (PT-05-01). This format is included in the operation report.

The local regulations require remission documents issued by the client where TAMSE acknowledges receiving the container. TAMSE generates it own remission document. The containers are sealed and tagged. When the container is delivered to the mine, it stamps of conformity the remission documents. Only the mine can break the container seals. Other information included in the remission document is the destination, packaging information, invoice, type and number of container, gross weight and the seal number.

According to the inspection checklist reviewed, the operator makes sure that that the remission document (which indicates the tag number and the net weight) and the MSDS are available in the truck cabin.

TAMSE does not subcontract other companies for the sodium cyanide transportation. This element does not apply.

Tamse Consultores Asociados

Name of Facility

Signature

22 and 23 February 2010 Date

2. INTERIM STORAGE: Design, construct and operate cyanide transshipping depots and interim storage sites to prevent releases and exposures. TRANSPORT PRACTICE 2.1: STORE CYANIDE IN A MANNER THAT MINIMIZES THE POTENTIAL FOR ACCIDENTAL RELEASES. The operation is: THIS PRACTICE DOES NOT APPLY TO THE OPERATION $\sqrt{}$ in full compliance with ☐ in substantial compliance with Transport Practice 2.1 \square not in compliance with Summarize the basis for this Finding/Deficiencies Identified: TAMSE does not operate interim storage facilities. This practice does not apply. 3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities TRANSPORT PRACTICE 3.1: PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES. The operation is $\sqrt{}$ in full compliance with ☐ in substantial compliance with Transport Practice 3.1 \square not in compliance with Summarize the basis for this Finding/Deficiencies Identified: TAMSE has prepared a Contingency plan for the transport of hazardous materials (last version dated March 2010). This is a 126 pages document that includes the following aspects responsibilities for TAMSE management team, description of the levels of emergency (level 1 or low for emergencies that can be easily controlled by the transport crew, level 2 or medium for emergencies that require support from the supplier and the mine, and level 3 for or high for emergencies that cannot be controlled by the transporter and the mine or the supplier must take control), transport operation description, risk identification, general description of the hazardous materials handled by the company (including sodium cyanide), preventive measures, emergency response team organization according to the emergency level, incidents reporting, among other elements.

Page 13 of 17

Signature

22 and 23 February 2010

Date

Tamse Consultores Asociados

The plan was prepared based on the hazards identification and the route assessment. The scenarios consider the possibility of a cyanide spill over stagnant water, wet soil and snow. Additionally, TAMSE procedures (e.g. Service Planning Procedure) would prevent them from providing the service if the weather forecast is unfavorable, and they have the instructions to stop the operations in case of adverse weather.

TAMSE transport NaCN in small pallets, the emergency response procedures for NaCN releases take this into account and the materials available for the control of solid material releases (sweeps, shove, bags, and empty containers). Additionally, the PPE includes level C and A suites, SCBAs, latex gloves. Additionally, TAMSE has a cyanide gas detector in its list of emergency response equipment and according to the checklist has been available during the transport operations.

Additionally the plan includes information regarding the characteristics and health effects of NaCN.

Although the vehicles characteristics are not mentioned in the contingency plan, the included scenarios are adequate for the type of truck and trailer used by TAMSE as well as for the packaging characteristics.

The plan includes specific response actions for the following scenarios

- Cyanide spill without the presence of water bodies or rain
- Incident without injured people and without spill
- Spill on wet soil, snow or stagnant water
- Incident with injured people and without spill
- Container fall to water bodies
- Container fall to ground
- Earthquake
- Fire
- Public unrest
- Assault

Section 4 of the Contingency Plan states the functions and responsibilities for the National Health Ministry and the hospitals (to coordinate with TAMSE for the attention of injured people), national police (provide support for injured people transport, support the control of hazardous materials transport, and provide support for the attention of the emergency to the firefighters), and the firefighters (to coordinate with TAMSE the control of the emergency).

Tamse Consultores Asociados
Name of Facility

Signature of L

22 and 23 February 2010

Date

Page 14 of 17

TRANSPORT PRACTICE 3.2: DESIGNATE APPROPRIATE RESPONSE PERSONNEL AND COMMIT NECESSARY RESOURCES FOR EMERGENCY RESPONSE.

 in full compliance with
in substantial compliance with Transport Practice 3.1
not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

According to the training program, all the personnel involved in the transport operation receive 40 hrs training on annual basis as Technician on HazMat (Hazmat III CFR1910.120(q)(6)(i)(A) y NFPA 472. The operators and the convoy supervisors are also trained on annual basis on the emergency response procedures and refreshments are provided when the emergency response procedures are modified.

The files for all the personnel were reviewed and these include training on HAZMAT III during the last 12 months. Additionally, the in-house training records indicated that all the drivers and supervisors have received the refreshments and the annual training.

The supervisors and the operators were interviewed and they were familiar with their roles and responsibilities during an emergency.

These are described in Section 4 of the Contingency Plan and include instructions for TAMSE's management team, the on site response team (convoy supervisor, and operators). The interviewed personnel. The plan includes a checklist of the emergency response kit that must be carried in every operation

The convoy preparation procedure states that the trip cannot start unless all the emergency kit is complete.

According to the convoy preparation procedures, the completeness of the emergency response kit is reviewed by the supervisor. Additionally, each driver ensures it own personnel protection equipment is available. These actions are documented through the first response emergency kit checklist, and the truck checklist, respectively. These checklists are included in the operations report. According to the reviewed operations reports, the emergency response kit and the PPE have been available during the transport operations.

TAMSE does not subcontract other companies for the sodium cyanide transportation. This element does not apply.

TRANSPORT PRACTICE 3.3: DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

The operation is			
1	√ in f	ull compliance with	
	\Box in s	substantial compliance with Trans	sport Practice 3.3
		in compliance with /	
Tamse Consultores A	Asociados	A STATE OF THE STA	22 and 23 February 2010
Name of Facility		Signature of Lead Auditor	Date

Page 15 of 17

Summarize the basis for this Finding/Deficiencies Identified:

Annex 1 of the contingency plan includes a list of contacts with the mines, the hospitals, cyanide suppliers, police bases, and firefighters departments. A small sample of the phone numbers included in the list were dialed and confirmed to be accurate.

Section 6.9.1 has a diagram for the notification of the emergency, this establishes the communication plan for each emergency level (1, 2 or 3 as previously discussed). It establishes that the supervisor informs TAMSE's base and from the base all other notifications are issued.

Section 5 of the contingency plan establishes that it will be reviewed once per year and whenever a modification to the structure of the plan is required. The revision would be performed by the supervisors, the division coordinator, the operations manager, maintenance department, logistics and the EHS division.

	: DEVELOP PROCEDURES FOR REMEDIATION OF RELEASES THAT RECOGNIZE THE ADDITIONAL HAZARDS OF CYANIDE TREATMENT CHEMICALS.
J	 √ in full compliance with □ in substantial compliance with Transport Practice 3.4 □ not in compliance with
Summarize the basis for this Finding/Deficiencies Identified:	
the presence of rain during	contingency plan includes the scenarios of spill on stagnant water, for g the emergency, and for spill to water bodies, and spill on dry soil. The neutralization of the area with lime after the collection of the spilled
Section 5.2.3.2 of the emergency response plan includes the instructions to attend a spill reaching a water body and includes the prohibition of using any chemical substance such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide in water bodies.	
TRANSPORT PRACTICE 3.5: PERIODICALLY EVALUATE RESPONSE PROCEDURES AND CAPABILITIES AND REVISE THEM AS NEEDED.	
[√ in full compliance with □ in substantial compliance with Transport Practice 3.5 □ not in compliance with
Summarize the basis for this	Finding/Deficiencies Identified!
Tamse Consultores Asoci	ados 22 and 23 February 2010 Signature of Lead Auditor Date

As previously noted, Section 5 of the contingency plan establishes that it will be reviewed once per year and whenever a modification to the structure of the plan is required. The revision would be performed by the supervisors, the division coordinator, the operations manager, maintenance department, logistics and the EHS division.

The contingency plan establishes that the emergency response team must stay prepare to response to emergencies and that at least one drill will be performed in coordination with the clients. The most recent drill was performed on 9 November 2009, the scenario consisted in the collision of a front loader with a cyanide box (within the mine facility) releasing sodium cyanide in solid state. Additionally, practical trainings were provided in the application of antidote and in the use of class A suite an decontamination procedures (August 2009 and February 2010, respectively). Attendance list were kept as records for the trainings and a report was prepared for the drill.

As previously noted the plan is reviewed at least once per year. Revision 1 was dated October 2009, Revision 2 in March 2010, Revision 3 in March 2010.

Tamse Consultores Asociados

Name of Facility

Signature of Lead Auditor

22 and 23 February 2010 Date

Page 17 of 17