ICMI Cyanide Code Consigner Supply Chain
Summary Audit Report

DuPont Global Ocean Transportation Supply Chain Certification Audit

2013 Report Revision:
Clarification of Supply Chain Scope Regarding Inclusion of Memphis Production Facility to U.S. Port Rail Segments

Submitted to:
The International Cyanide Management Institute
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USA

Original Report Date: May 10, 2010
Revised Report with Additional Ports Addendum Date: March 12, 2012
Revised Report with Scope Clarification Date: January 25, 2013

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Global Ocean Supply Chain Summary

Consignor Name & Contact Information

Name of Operation:	E.I. DuPont de Nemours and Company 2571 Fite Road Memphis, TN 38127 USA

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Operational and Audit Information – Global Ocean Supply Chain

E.I. duPont de Nemours and Company, Inc. (DuPont) is a science-based company operating in more than 70 countries. DuPont offers a wide range of products and services for markets including agriculture, nutrition, electronics, communications, safety and protection, home and construction, transportation and apparel. Solid sodium cyanide for use in the gold mining sector is manufactured at the Memphis, Tennessee plant, which is part of the DuPont Cyanides Business and Chemicals & Fluoroproducts Strategic Business Unit. The plant is located just outside of Memphis in Woodstock, Tennessee.

DuPont was one of the original 14 Cyanide Code signatory companies announced on November 3, 2005. As such, DuPont made the commitment to obtain Cyanide Code certification for its Memphis Solid Cyanide Plant and its packaging operations. DuPont was the first Cyanide Producer to achieve certification in June 2006. The operation was re-certified in 2009.

DuPont transportation supply chains are highly complex due to the global reach of its supply capabilities. After its initial certification in 2006, DuPont contracted ICMI-approved Code Transportation Auditors to perform non-certification audits for its supply chain in the U.S., Mexico, and throughout Central and South America. Audits were conducted of DuPont operations and trucking partners. Due Diligence Reviews were conducted for ocean carriers (including ports) and rail partners (including rail yards). The original audit of DuPont as a Consignor / Transporter and due diligence reviews of the ocean carriers (including ports) and rail partners (including rail yards) was done in February 2007. Now, three years later, similar auditing and due diligence investigation activities were performed again.

The verification audit of DuPont on February 9-10, 2010 was a combined audit of Consignor / Transporter management for global ocean transport and U.S./Canada rail and barge transport. This report contains information regarding the results of the DuPont consignor / transporter verification audit and the results of the ocean carrier and port due diligence investigations.

2013 Scope Clarification Statement:
DuPont contracts with Ocean Carriers to transport their products from the Memphis Plant to international ports. The Ocean Carriers determine the U.S. ports of departure, and manage and control all aspects of the rail movements from Memphis to the U.S. ports. Pursuant to their agreements with DuPont, the Ocean Carriers identified in this report select rail carriers that comply with applicable environmental, health, safety, and security regulations which were determined through Due Diligence evaluation to be equivalent to ICMI Cyanide Code requirements. The rail segments between Memphis and U.S. ports are therefore also included in the scope of this certification audit. U.S./Canada rail segments used by DuPont for routes other than those from its Memphis plant to U.S. ports are contracted and controlled directly by DuPont and are included in a separate supply chain and certification audit report.

The verification audit and due diligence investigations were conducted according to the 2009-adopted ICMI certification process that calls for consignors to become signatories and undergo transportation supply chain third-party verification audits.

2012 Addendum Information:
This 2012 Revised Report with Addendum contains the originally submitted 2010 information regarding DuPont Cyanide Transportation Ocean Supply Chain management and the new 2012 information regarding the Due Diligence Review of two additional ports: 1) Port of Antwerp in Belgium, 2) Port of Rio Haina in Bajos de Haina in the Dominican Republic.

Description of the Global Ocean Supply Chain:

DuPont has been producing and shipping sodium cyanide since 1953. In the United States, the solid sodium cyanide briquettes are packaged at the Memphis Plant, at the LSI Terminal directly adjacent to the plant and at the DuPont packaging terminal in Carlin, Nevada, USA. The Global Ocean Supply Chain is used for shipments from the Memphis Plant that go by rail and then by ocean carrier. The results of the rail and barge audit and due diligence evaluations are contained in a separate report. This evaluation included the following components:

Verification audit of DuPont ocean carrier and port supply chain management practices according to the requirements of the ICMI Transportation Protocol (2009 Revision).

Global Ocean Supply Chain – All global ocean moves of sodium cyanide that originate in the United States are within the scope of this verification audit of DuPont's processes used to manage the ocean transport of its products. The results of the due diligence evaluations of six (6)

ocean carriers are also contained within this report. The six ocean carriers for which due diligence investigations were performed are:

1. American President Lines (APL)
2. Hamburg Sued
3. Maersk Line Agency
4. Mediterranean Shipping Co. (MSC)
5. MITSUI O S K Lines LTD (MOL)
6. Seaboard Marine

The Due Diligence Investigations were also conducted for U.S. and international ports in use at the time of the audit. Records were sampled to confirm that DuPont had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by DuPont for hazardous material shipments. The following ports are used by DuPont for sodium cyanide shipments to gold mine customers:

Ports of Export	Ports of Import	Destination Countries
Jacksonville, FL	Antofagasta	Argentina
Long Beach, CA	Arica	Brazil
Los Angeles, CA	Balboa	Chile
Miami, FL	Belem	Colombia
New Orleans, LA	Buenos Aires	Dominican Republic
Seattle, WA	Callao	Ecuador
San Pedro, CA	Cartegena	Ghana
Savannah, GA	Caucedo	Guatemala
	Corinto	Honduras
	Guayaquil	Nicaragua
	Guatamala	Panama
	Montevido	Peru
	Puerto Angamos (Mejilliones)	Uruguay
	Puerto Cabello	Venezuela
	Puerto Chacabuco	
	Colon	
	Corinto	
	Puerto Cortes	
	Puerto Deseado	
	Puerto Quetzal	
	Rio De Janeiro	
	Salvador	
	San Antonio	
	Santos	
	Takoradi	

Ports of Export	Ports of Import	Destination Countries
	Valparaiso Vitoria	
	Ports added in 2012 Addendum	
Port of Antwerp	Port of Antwerp Port of Rio Haina	Belgium Dominican Republic

Global Ocean Supply Chain - Auditor's finding and attestation

The original audit was performed at the DuPont Sourcing and Logistics building in Wilmington, Delaware – USA. The audit was performed by an independent third-party auditor who was pre-approved by the ICMI as a Lead Auditor for all types of Code audits and as a technical expert for Code audits of cyanide transportation and production operations.

The verification audit of DuPont US/Canada Ocean, rail and barge supply chain management operations was conducted on-site with additional reviews of due diligence information following the on-site audit activity. The supply chain management processes and the due diligence reviews of ocean carriers, ports, rail partners, rail terminals, and barges were conducted in accordance with the agreed audit plan and due diligence documentation requirements.

Cyanide transportation management practices for the DuPont ocean carrier and rail management organizations were evaluated against the Cyanide Code requirements documented in the *ICMI Cyanide Code* (2009), *ICMI Cyanide Code Transportation Protocol* (2009), and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol* (2009). DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the Cyanide Transportation Supply Chain were reviewed. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at DuPont. Additionally, records regarding carrier selection, ongoing carrier performance evaluations, incident tracking, equipment maintenance, security measures, port evaluations, rail terminal evaluations, barge evaluations, shipment tracking, cargo labeling practices, shipping documentation, community involvement, and emergency response records were randomly sampled and found to be acceptable.

DuPont and its transportation partners were evaluated previously during a non-certification Cyanide Code verification audit using the 2005 revision of the Cyanide Code transportation Protocol. Although the 2007 audit was a non-certification audit, this audit was conducted in accordance with Re-Certification Guidelines, namely the confirmation that DuPont and its transportation partners have continued to be in conformance since the original audit in 2007.

2012 Addendum Information:
The 2012 Addendum Due Diligence Review of the Port of Antwerp and the Port of Rio Haina was conducted in March 2012. DuPont ships cyanide to the Port of Antwerp and also from the Port of Antwerp. Cyanide is shipped to the Port of Rio Haina, there is no outward bound freight from this Port. DuPont physically evaluated both of these ports for suitability and conformance to Cyanide Code requirements. The port evaluation information was submitted to the ICMI-Approved Third-Party Lead /Technical Transportation Expert Auditor for the Due Diligence Review. DuPont information and information that is publically available was reviewed during the March 2012 Due Diligence Review process.

The results of the initial verification audit and the related due diligence reviews indicate that DuPont and all portions of its Global Ocean Supply Chain are in FULL COMPLIANCE with Cyanide Code requirements. Additionally, the results of the 2012 Addendum Review indicate that the Port of Antwerp and the Port of Rio Haina are also in FULL COMPLIANCE with Cyanide Code requirements.

After reviewing the results from the on-site environmental, health, safety, and security review and information that is publically available regarding the safety, security, and suitability of the Port of Antwerp and the Port of Rio Haina, the ICMI-approved Lead/Transportation Auditor concluded that the DuPont Ocean Supply Chain Cyanide Code Certification scope expansion to include these ports is justified. This scope expansion does not alter the original certification timing requirements. The DuPont Ocean Supply Chain will be due for re-certification in 2013.

Global Ocean Supply Chain - Auditor's Finding

This Global Ocean Supply Chain including its 2012 expanded scope is:

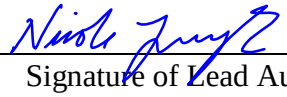
☑ **in full compliance**
in substantial compliance
not in compliance

with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010
Date(s) of Due Diligence Review of Port of Antwerp and Port of Rio Haina:	March 9-12, 2012

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 the Audit Reports accurately describe 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.

DuPont Global Ocean Supply Chain  8/7/2010 - 3/12/2012 - 1/25/2013
Name of Facility Signature of Lead Auditor Date

Consignor Summary

Operational & Audit Information for Consignor

The DuPont Corporate Sourcing & Logistics group located in Wilmington, Delaware manages the domestic and international transportation of sodium cyanide. The Ocean Transport Procurement Group has overall responsibility and authority for coordinating ocean carrier selection, safety, security, and quality performance tracking, ocean carrier contracts, route selection, booking of shipments, shipment tracking, and incident investigation. The DuPont Procurement Group works together with a professional freight forwarding service provider to coordinate shipments and ensure that the appropriate level of shipment tracking and controls are in place.

Cyanide Product Stewards within the DuPont Cyanides Business coordinate activities associated with route risk evaluation when customers are originally established and again at established frequencies. The Product Stewards also coordinate community communications, training sessions, port evaluations, customer evaluations, and package & label reviews. Corporate Emergency Response Specialists work together with the DuPont Cyanides Business to coordinate emergency response planning procedures, preparation and maintenance of emergency equipment, training of DuPont emergency response personnel, and evaluation of plans and procedures through periodic emergency response drills.

DuPont maintains formal standards, policies, guidelines, and procedures for ensuring Distribution Safety. DuPont Corporate standards exist for Incident Prevention, Emergency Response, Transportation Risk Assessment, Distribution Regulatory Compliance, and Training, and Distribution Handling & Storage. In addition, the Sourcing & Logistics Groups maintain desk manuals with specific procedures for the procurement of transportation services and the management of carriers.

Personnel interviewed during the February 9-10, 2010 DuPont Verification Audit / Global Ocean Transport Due Diligence Investigations:

Transport Practice Discussed → **Audit Participants**	**1.1 Route selection Risk Assessment**	**1.2 Driver / Operator Training & Qualifications**	**1.3 Equipment Suitability**	**1.4 Safety Program & Preventive Maintenance**	**1.5 Ocean Transport**	**1.6 Tracking of shipments**	**2.1 Interim Storage**	**3.1-3.5 Emergency Response**	**Supply Chain Management - General Discussions**
International Transportation Procurement Manager (Ocean Transport)	X				X	X		X	X
Marine Procurement (Ocean Transport)	X				X	X		X	X
Product Stewardship Manager, North America Cyanides	X						X	X	
Cyanide Business Global Product Stewardship Manager	X	X	X	X		X	X	X	X
Logistics Leader, Cyanides Business			X	X		X		X	X
Emergency Response Specialist/Site Fire Chief DuPont Memphis Plant								X	
Safety, Health & Environmental Manager – Sourcing & Logistics								X	X
Regulatory Affairs – Cyanides Business (packaging requirements and certifications)		X							
Internal DuPont Hazmat Consultant		X			X				

DuPont Consignor / Transporter – Auditor's finding and attestation

The DuPont cyanide transportation management practices using ocean carriers (including ports) were evaluated against the Cyanide Code requirements documented in the *ICMI Cyanide Code* (2009), *ICMI Cyanide Code Transportation Protocol* (2009), and the *ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol* (2009). DuPont internal Standards, Policies, Practices, and Procedures regarding the management of the Cyanide Transportation Supply Chain were reviewed. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at DuPont. Additionally, records regarding carrier selection, ongoing carrier performance evaluations, incident tracking, security measures, port evaluations, shipment tracking, cargo labeling practices, shipping documentation, community involvement, and emergency response records were randomly sampled and found to be acceptable.

DuPont Consignor / Transporter - Auditor's Finding

DuPont Consignor / Transporter operations are:

☑ **in full compliance**

in substantial compliance

not in compliance

with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010
Date(s) of Due Diligence Review of Port of Antwerp and Port of Rio Haina:	March 9-12, 2012

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 the Audit Reports accurately describe 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.

DuPont Consigner/Transporter Operations _____ 8/7/2010 - 3/12/2012 - 1/25/2013

Name of Facility | Signature of Lead Auditor | Date

Description of Consignor's role in ensuring compliance of its carriers

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
- not in compliance with

Transport Practice 1.1

Summarize the basis for this Finding:

DuPont maintains formal standards, policies, guidelines, and procedures for ensuring Distribution Safety. DuPont Corporate standards exist for Incident Prevention, Emergency Response, Transportation Risk Assessment, Distribution Regulatory Compliance, and Training, and Distribution Handling & Storage. In addition, the Sourcing & Logistics Groups maintain desk manuals with specific procedures for the procurement of transportation services and the management of carriers.

Interviews were conducted to confirm that before DuPont initially qualifies a new customer for sodium cyanide, they follow a standard practice which is called the "First Order Process". Regional Cyanide Product Stewards evaluate the new customer for their ability to safely use and store material. They also evaluate the possible routes that can be used to transport the cyanide from DuPont to the customer site. This evaluation of the route includes consideration of population densities, infrastructure issues, pitch and grade of roads, and prevalence and proximity of water bodies. The route evaluation includes an evaluation of all portions of the route including rail transport, origination and destination rail yards, ocean carrier transport, ports, and barges, when applicable. The risks associated with the route used to bring cyanide from DuPont to a customer are evaluated as part of the First Order Process when the initial contract with the customer is established. The route assessment is performed by the Product Stewardship function within the DuPont Cyanides Business. Any necessary risk-mitigation measures are identified and defined during this First Order Process. Examples of risk mitigation measures were evaluated and found to be acceptable during the audit.

Routes are re-evaluated periodically, usually during customer visits. A review of records and the results of interviews show that routes are re-evaluated at least every three years, or more frequently if necessary. Additionally, DuPont has a very formal Product Stewardship Review

process in which all aspects of cyanide product stewardship (labeling, product trail, use or transportation incidents, MSDS, etc.) are reviewed at least every three years.

DuPont trains community responders and hospitals in Memphis, Tennessee, at international ports, and at customer sites. Records of community interactions / training sessions were reviewed and found to be acceptable. According to a U.S. Port analysis compiled by DuPont in February 2010, ports in use at the time of the audit had all been contacted, but access to U.S. Ports in this post 9/11 era is very difficult. DuPont has concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist ports with regard to security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

The primary risks with the ocean transportation supply chain relate to the possibility of losing track of a shipment due to a trans-shipment or other factors, or the risk of having a container opened en-route by a person who has not been trained in cyanide safety. DuPont's overall selection of the routing for shipments gives very strong preference to routing that does not involve a trans-shipment step (transferring the shipment from one carrier to another en-route). In addition to the care taken to avoid trans-shipment situations in the routing process, DuPont contracts with a freight forwarding company to arrange and then track shipments closely. Information regarding DuPont's ability to track ocean shipments was sampled during the audit and was found to be suitable for mitigating the risk of losing track of a specific shipment. In order to reduce the chance that an unauthorized or untrained person may open an inter-modal container, the containers are sealed. Records that included the information on container seals were reviewed for each of the ocean carriers for the time period 2007 through 2010. Information on the shipping records was appropriate and no problems were evident.

DuPont uses its formal standards, policies, guidelines, formal contracts with safety, health, environmental, and security terms and conditions to ensure that cyanide is appropriately handled and transported by its transportation partners.

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.

The operation is
- ☑ in full compliance with
- in substantial compliance with
- not in compliance with

Transport Practice 1.2

Summarize the basis for this Finding:

This requirement does not apply to DuPont for this supply chain.

Transport Practice 1.3: *Ensure that transport equipment is suitable for the cyanide shipment.*

The operation is ☑ in full compliance with / in substantial compliance with / not in compliance with Transport Practice 1.3

Summarize the basis for this Finding:

DuPont ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during the 2007 audit and were found to be compliant. Confirmation was made during this audit that no package changes have been made since the initial Cyanide Code audit of this supply chain.

The DuPont packaging operation (LSI) was audited and certified to the Cyanide Code using the Cyanide Code Production Protocol in 2006 and re-certified in 2009. Checklists and procedures used to load inter-modal containers require an inspection of the cargo and containers to ensure that all equipment is deemed to be safe for transport. LSI maintains procedures for loading intermodal containers. The shipments of bulk and semi-bulk packages in inter-modal containers are standard weights and standard blocking and bracing configurations are used. Shipping paperwork was reviewed to confirm that shipment weights were consistent and acceptable.

Additionally, DuPont tracks transportation incidents for all transportation modes throughout the world. The incident tracking database was reviewed during the audit. No cyanide-related ocean incidents associated with failure of equipment or inter-modal containers were recorded in 2007-2010 (period sampled during this audit).

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.

The operation is ☑ in full compliance with / in substantial compliance with / not in compliance with Transport Practice 1.4

Summarize the basis for this Finding:

Appropriate placards are displayed on all four sides of the inter-modal containers. A photo of a loaded inter-modal container was available for review at the audit. Additionally, the International Maritime Organization (IMO) requirement for the marine pollutant signage to be posted on the container was also observed as being properly placed on the inter-modal container. All documentation (procedures and checklists) require for proper placarding (all 4 sides) to be confirmed prior to the inter-modal container being released. These procedures and practices

were audited when the LSI shipping methods were observed during the 2009 cyanide re-certification production audit.

Intermodal Cartage employees at the LSI packaging facility transport the inter-modal containers away from Memphis, TN. During the on-site audit of this operation in 2007 observations were made that drivers conduct a pre-trip inspection prior to departure. Mechanical defects are called to the attention of the on-site mechanic. Issues that would affect safety and/or legal compliance are resolved prior to movement off-site. Pre-trip inspections were witnessed, and multiple pre-trip inspection checklists were reviewed during the 2007 audit of Intermodal Cartage and were found to be acceptable.

Transport Practice 1.5: *Follow international standards for transportation of cyanide by sea and air.*

The operation is
- ☑ in full compliance with
- in substantial compliance with
- not in compliance with

Transport Practice 1.5

Summarize the basis for this Finding:
DuPont ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance. The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable regulations and have "organized safety programs." Contracts were reviewed during the audit and this standard clause appears in Article 21 of the ocean carrier contract. Each carrier was asked for information regarding fulfillment of Cyanide Code requirements using a customized ICMI transportation protocol. Responses and information provided by all carriers was deemed to be appropriate by the 3rd-party auditor.

Standard clause 22.40 of the DuPont / Ocean Carrier contracts require that all transportation is conducted in accordance with all regulatory requirements. This would include U.S. Department of Transportation and IMDG requirements.

The ocean routes are chosen by the ocean carriers. The destination ports are evaluated by the DuPont Regional Product Steward for Cyanides. Part of the evaluation prior to the first shipment of product is an evaluation of the port. The DuPont Cyanides Business Regional and Global Product Stewards were interviewed as part of this audit. The U.S. Regional Product Steward reported that U.S. ports in use at the time of the audit had all been contacted to inquire about emergency response capabilities, environmental policies, security practices, and adherence to Maritime Transportation Security Act requirements. A report written in February 2010 summarizing the information gathered through this due diligence activity was provided to the auditor as evidence that appropriate due diligence evaluations had been done on all U.S. ports noted in the introduction section of this report. DuPont has also concluded that the Homeland

Security and U.S. Coast Guard infrastructure that is available to assist ports with regard to security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

DuPont performs audits of international ports and provides cyanide safety training at ports, when authorized to do so by the individual ports. Records were sampled during the 2007 audit and during this 2010 audit. A sample of First Order evaluation information showed that DuPont has been consistently reviewing international ports for safety and security between 2007 and 2010. The auditor concluded that DuPont has effective processes for ensuring that international ports have demonstrated appropriate safety, security, and road infrastructure prior to being approved for hazardous material shipments.

As recommended by the ICMI *Auditor Guidance for the Use of the Cyanide Transportation Verification Protocol,* dated October 2009, specific information regarding this practice is addressed below:

a) The DuPont packaging specifications were reviewed as part of the verification audit and were found to be conformant to the packaging requirements of the IMDG Code.
b) Photos of packaging for drums and IBCs presented at the audit were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
c) Photos of packaging for drums and IBCs presented at the audit were appropriately labeled and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
d) Photos of loaded inter-modal containers were reviewed and were found to be marked and placarded in accordance with the IMDG Code. This aspect of compliance was also evaluated in 2009 at the on-site verification audit of the LSI operation in Memphis, TN.
e) Shipping documents were reviewed for a sample of cyanide shipments. All information required by the IMDG Code is required as standard practice on DuPont shipping paperwork.
f) The container packing certificates were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMDG Code requirements.
g) DuPont maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements (records including valid SOLAS certificates). The ocean carriers confirmed to DuPont that they have cyanide emergency response information available on board each vessel.
h) DuPont maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements.

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.

The operation is
☑ in full compliance with
in substantial compliance with Transport Practice 1.6
not in compliance with

Summarize the basis for this Finding:

DuPont works together with its freight forwarder to track shipments using a secure web-based shipment tracking system. Appropriate action is taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that location can always be confirmed. Email communications containing database tracking information was reviewed during the audit and confirmation was made that shipments are being tracked continuously and that DuPont normally has access to "real-time" information regarding the location and status of its shipments of cyanide. Shipping paperwork was reviewed and was found to be conformant to Code requirements, including chain of custody requirements. The following documentation is used to track inventory and movement of cyanide: bills of lading and shipping papers indicating the number of packages and amount of material. The abovementioned documents were reviewed during the audit. Ocean carriers reported that they maintain databases with MSDS information for the products they carry.

2. INTERIM STORAGE: ***Design, construct and operate cyanide trans-shipping 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
☑ in full compliance with
in substantial compliance with Transport Practice 2.1
not in compliance with

Summarize the basis for this Finding:

This requirement does not apply to the DuPont supply chain management activities.

Ocean carriers reported that during transport, the storage of cyanide both on land and on vessels is in accordance with the applicable stowage and segregation requirements in the IMDG and the Coast Guard 33 CFR regulations. The terminal must segregate containers similar to the segregation onboard vessels.

The packaging used for solid cyanide conforms to IMO and US DOT requirements. Certifications and approvals were reviewed during the 2007 audit and confirmation was made through interviews that no packaging changes have occurred since then. As part of the ocean carrier due diligence audit, documentation was reviewed that confirmed that ocean carriers must contractually adhere to regulatory requirements and maintain formal safety programs.

Additionally, safety checklists and seals are used by the DuPont packaging facility after the containers are packed. This process was reviewed during the on-site audits of DuPont, its carriers, and its packaging facilities in 2006, 2007, and 2009. The seal enables verification that the container was not opened during transit.

The destination ports are evaluated by the DuPont Regional Product Steward for Cyanides. Part of the evaluation prior to the first shipment of product is an evaluation of the port. Product Stewards visit the port and observe that personnel are handling materials safely, that the port is secure and the roadway infrastructure into the port is suitable. Completed checklists showing port evaluations were sampled during the audit and were found to be acceptable. Interviews confirmed that all ports in use at the time of the audit had been evaluated.

2012 Addendum Information:
During the 2012 Due Diligence Review of the Port of Antwerp and the Port of Rio Haina information was evaluated from on-site evaluations of these ports performed by DuPont. Handling practices, security, training, and emergency planning practices at each port were evaluated and were found to be acceptable. The Due Diligence Review of the DuPont information and information that is publically available for the Port of Antwerp and the Port of Rio Haina were used to confirm that the Ports are acceptable for managing hazardous material shipments, including cyanide.

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

Summarize the basis for this Finding:

DuPont has several key documents that were reviewed as part of this verification audit: 1) Cyanides Global Response Plan for Off-Site Incidents; 2) U.S. Integrated Emergency Response

Team Standard Operating Guidelines; and 3) Sodium Cyanide Emergency Response Procedures; 4) Transportation Emergency Information fact sheet for DuPont Solid (Sodium or Potassium) Cyanide. Together, the documents provide extensively detailed plans, procedures and information to address all ICMI Cyanide Code emergency response requirements. DuPont's emergency response plans are appropriate for all modes of transportation used by DuPont and for interim facilities. The most detailed scenarios with specific action steps to be taken were found in the Emergency Response Procedures. The scenarios and emergency plans address actions to be taken for spills inside buildings, outside, and in inter-modal containers. Plans also include steps to be taken in case of fire or human exposure. The Transportation Emergency Information sheet has quick, but complete information that has been seen in use during transportation activities observed during previous DuPont Cyanide Code audits. The emergency response procedures consider steps to be taken for wet, dry and gaseous cyanide. The Transportation Emergency Information sheet is designed to address solid briquettes. There is another fact sheet also available (for solution), but at the time of the audit only solid sodium cyanide was being transported by ocean carrier.

The DuPont emergency plans are general and universally applicable to all types of emergencies. The Transportation Emergency Information sheet has details of action steps for transporters. This was deemed appropriate by the auditor. Professional emergency responders together with technical guidance from DuPont would be responsible for addressing issues involving the way in which the structure of a transportation container or vessel should be managed after an emergency. The three response plans describe the different levels of response actions for anticipated emergency situations. The emergency procedures offer descriptions of the tactical steps that need to be taken to contain and clean up a spill or manage an exposure incident. The Integrated Emergency Response Team Guidelines define the action steps to be taken by the responding team and the notifications that need to be made in case of an emergency. The Cyanides Global Response Plan for Off-Site Incidents describes the steps that are to be taken by Cyanide Hot Line and other Cyanides Business personnel. All of the plans and emergency response information clearly outline the roles and responsibilities of internal and external responders.

Transport Practice 3.2: *Designate appropriate response personnel and commit necessary resources for emergency response.*

The operation is
- ☑ in full compliance with
- in substantial compliance with
- not in compliance with

Transport Practice 3.2

Summarize the basis for this Finding:

Training requirements and are detailed in the U.S. Integrated Emergency Response Team Standard Operating Guidelines. According to Section II of this document, all emergency responders receive initial and then annual re-fresher training. DuPont also offers cyanide safety

training to all of its transportation partners and customers. DuPont also offers this type of training to community responders in many strategic locations. Records of the training sessions were reviewed during this and previous Cyanide Code audits of DuPont transportation partners. The roles and responsibilities of relevant internal and external personnel are clearly described in the Transportation Emergency Information sheet, DuPont emergency plans and procedures. Lists of necessary emergency response equipment are contained within each of the emergency plans. Additionally, the emergency response procedures detail the different types of personal protective equipment necessary for the different types of response scenarios. According to interviews, emergency response equipment listed in the different plans is checked during emergency response drills, which occur at least annually. The emergency equipment listed in the Cyanides Business plan is maintained at the Memphis Plant. Availability of the equipment is ensured through Plant processes that were confirmed during the 2009 Cyanide Code Production audit.

Transport Practice 3.3: *Develop procedures for internal and external emergency notification and reporting.*

The operation is
- ☑ in full compliance with
- in substantial compliance with
- not in compliance with

Transport Practice 3.3

Summarize the basis for this Finding:

The notification procedures, including telephone numbers, are described in the Emergency Response plans, procedures, and Transportation Emergency Information sheet. The two response plans have DuPont internal contact information and the U.S. Integrated Emergency Response plan has external phone numbers (such as governmental contact information, etc.). Emergency contact information is also contained in the Transportation Emergency Information sheet. According to Section 4 of the Cyanides Global Response Plan for Off-Site Incidents, emergency plans including notification numbers are checked at least annually. The Cyanides plan had last been updated in 2010 and the U.S. Integrated Emergency Response plan was last updated in 2009. The Emergency Response Procedures were last updated in 2010.

Transport Practice 3.4: *Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.*

The operation is ☑ in full compliance with / in substantial compliance with / not in compliance with Transport Practice 3.4

Summarize the basis for this Finding:

Specific details regarding the remediation, neutralization, decontamination, and disposal of clean-up debris are contained within the Emergency Response Procedures. Extensive descriptions of necessary action steps depending on the incident scenario are clearly outlined in the document. Interviews with DuPont personnel during this and previous Cyanide Code audits showed a high level of awareness that the use of treatment chemicals is prohibited if cyanide spills into surface waters. Page 7 of the Emergency Response Procedures specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water.

Transport Practice 3.5: *Periodically evaluate response procedures and capabilities and revise them as needed.*

The operation is ☑ in full compliance with / in substantial compliance with / not in compliance with Transport Practice 3.5

Summarize the basis for this Finding:

According to Section 4 of the Cyanides Global Response Plan for Off-Site Incidents, emergency plans including notification numbers are checked at least annually. The Cyanides plan had last been updated in 2010 and the U.S. Integrated Emergency Response plan was last updated in 2009. The Emergency Response Procedures were last updated in 2010.

Many emergency drills are conducted at DuPont on an on-going basis. Emergency response drills at the Memphis Plant, for example are conducted quarterly. This was evaluated during the 2009 re-certification audit. According to the Cyanides Global Response Plan for Off-Site Incidents, the plan is to be tested by conducting drills at least annually.

Records were available to show that the Global Cyanides Business has conducted emergency response drills each year for the past three years. Drills typically involve at least one transportation partner and often one or more customers. Drill critiques were sampled and were found to be appropriate.

Ocean Carriers and Ports – Summary of Due Diligence Investigations

Operational and Audit Information for Ocean Carriers and Ports

All global ocean moves of sodium cyanide that originate in the United States are within the scope of this verification audit of DuPont's processes used to manage the ocean transport of its products. The results of the due diligence evaluations of six (6) ocean carriers are also contained within this report. The six ocean carriers for which due diligence investigations were performed are:

1. American President Lines (APL)
2. Hamburg Sued
3. Maersk Line Agency
4. Mediterranean Shipping Co. (MSC)
5. MITSUI O S K Lines LTD (MOL)
6. Seaboard Marine

The Due Diligence Investigations were also conducted for U.S. and international ports in use at the time of the audit. Records were sampled to confirm that DuPont had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by DuPont for hazardous material shipments. The following ports are used by DuPont for sodium cyanide shipments to gold mine customers:

Ports of Export	Ports of Import	Destination Countries
Jacksonville, FL	Antofagasta	Argentina
Long Beach, CA	Arica	Brazil
Los Angeles, CA	Balboa	Chile
Miami, FL	Belem	Colombia
New Orleans, LA	Buenos Aires	Dominican Republic
Seattle, WA	Callao	Ecuador
San Pedro, CA	Cartegena	Ghana
Savannah, GA	Caucedo	Guatemala
	Corinto	Honduras
	Guayaquil	Nicaragua
	Guatamala	Panama
	Montevido	Peru
	Puerto Angamos (Mejilliones)	Uruguay
	Puerto Cabello	Venezuela
	Puerto Chacabuco	
	Colon	

Ports of Export	Ports of Import	Destination Countries
	Corinto Puerto Cortes Puerto Deseado Puerto Quetzal Rio De Janeiro Salvador San Antonio Santos Takoradi Valparaiso Vitoria	
	Ports added in 2012 Addendum	
Port of Antwerp	Port of Antwerp Port of Rio Haina	Belgium Dominican Republic

Ocean Carriers and Ports - Auditor's finding and attestation

DuPont ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance.

2013 Scope Clarification Statement:
DuPont contracts with Ocean Carriers to transport their products from the Memphis Plant to international ports. The Ocean Carriers determine the U.S. ports of departure, and manage and control all aspects of the rail movements from Memphis to the U.S. ports. Pursuant to their agreements with DuPont, the Ocean Carriers identified in this report select rail carriers that comply with applicable environmental, health, safety, and security regulations which were determined through Due Diligence evaluation to be equivalent to ICMI Cyanide Code requirements. The rail segments between Memphis and U.S. ports are therefore also included in the scope of this audit. U.S./Canada rail segments used by DuPont for routes other than those from its Memphis plant to U.S. ports are contracted and controlled directly by DuPont and are included in a separate supply chain and certification audit report.

The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable regulations and have "organized safety programs." Contracts were reviewed during the audit and this standard clause appears in Article 21 of the ocean carrier contract.

As part of DuPont's due diligence effort, each of the six ocean carriers was asked to perform a self-evaluation against the Cyanide Code Transportation Protocol requirements using a

customized ICMI transportation protocol. The results from these evaluations were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that each carrier is authorized for hazardous materials and that the United States Department of Transportation Hazmat Certificate Registration is valid.

In addition to DuPont's efforts to ensure that Cyanide Code requirements are fulfilled, there are many agencies charted with the task of confirming that shipping is conducted in a safe and secure manner. One such organization is the International Maritime Organization (IMO). The IMO was established in Geneva in 1948 and it currently headquartered in London, United Kingdom. The IMO is a specialized agency of the United Nations. The IMO's primary purpose is to develop and maintain a comprehensive regulatory framework for shipping. The IMO regulates practices associated with safety, environmental concerns, legal matters, technical co-operation, maritime security and the efficiency of shipping.

One initiative of the IMO is the International Convention for the Safety of Life at Sea (SOLAS), which was enacted in 1974. Records were available for each of the six ocean carriers noted in this report to show that they had successfully passed a SOLAS audit and that they each maintained valid SOLAS certificates. According to information reviewed during the due diligence investigation, the provisions of SOLAS include: fire protection, life saving equipment, radio communications, safety of navigation, transportation of dangerous goods, management of safe operations of ships, and maritime security.

Additionally, Maersk participates in the voluntary Chemical Distribution Institute – Marine Packed Cargo program (CDI-mpc). Carriers in this program undergo a management systems safety audit using the CDI-mpc protocols that were created in cooperation with the United Stated American Chemical Council under its Responsible Care® initiatives. The CDI-mpc certificates are issues to individual ships. Maersk provided a number of these certificates of examples. All certificates showed that ships had been reviewed in 2009 for safe operations and adherence to best chemical management practices.

With regard to port safety and security, new amendments to the SOLAS Convention were enacted in 2002. These amendments gave rise to the International Ship and Port Facility Security (ISPS) Code, which went into effect on 1 July 2004. The concept of the code is to provide layered and redundant defenses against smuggling, terrorism, piracy, stowaways, etc. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans. In the United States the Port Facility Security Plans are filed with, and monitored by, the United States Coast Guard (the U.S. authority with jurisdiction over U.S. Ports).

The ocean routes are chosen by the ocean carriers. The destination ports are evaluated by the DuPont Regional Product Steward for Cyanides. Part of the evaluation prior to the first shipment of product is an evaluation of the port. The DuPont Cyanides Business Regional and Global

Product Stewards were interviewed as part of this audit. The U.S. Regional Product Steward reported that U.S. ports in use at the time of the audit had all been contacted to inquire about emergency response capabilities, environmental policies, security practices, and adherence to Maritime Transportation Security Act requirements. A report written in February 2010 summarizing the information gathered through this due diligence activity was provided to the auditor as evidence that appropriate due diligence evaluations had been done on all U.S. ports noted in the introduction section of this report. DuPont has also concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist ports with regard to security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

DuPont performs audits of international ports and provides cyanide safety training at ports, when authorized to do so by the individual ports. Records were sampled during the 2007 and 2010 audits to confirm that DuPont had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by DuPont for hazardous material shipments. A sample of First Order evaluation information showed that DuPont has been regularly reviewing international ports for safety and security between 2007 and 2010. The auditor concluded that DuPont has effective processes to ensure that international ports have appropriate safety, security, and road infrastructure prior to being approved for hazardous material shipments.

2012 Addendum Information:

The 2012 Addendum Due Diligence Review of the Port of Antwerp and the Port of Rio Haina was conducted in March 2012. DuPont physically evaluated these ports for suitability and conformance to Cyanide Code requirements. The port evaluation information was submitted to the ICMI-Approved Third-Party Lead /Technical Transportation Expert Auditor for review. DuPont information and information that is publically available was reviewed and during the March 2012 Due Diligence Review process.

The Port of Antwerp has been a major port in Europe since the 1800s. It is operated by the Antwerp Port Authority. The Port employs approximately 1,650 people and handles 186 million tons of freight annually, making it Europe's second largest Port. The Port has achieved extensive recognition for its security and sustainability initiatives. ISPS regulations apply to 85 facilities within the Port and have been fulfilled since 2004. The Port is regularly inspected and audits by Governmental authorities and international maritime organizations. Access to the Port is strictly controlled via electronic access cards and the Port is under 24/7 manned security surveillance. Additionally emergency response drills are conducted regularly and feedback reports on security are required to be submitted to authorities every six months. A DuPont Product Steward conducted an on-site review of the Port location where cyanide is managed. The on-site review addressed environmental, health, safety, and security topics. The results of the review concluded that handling practices are well aligned with Cyanide Code requirements. Port facilities and employee capabilities were found to be suitable for the proper handling of hazardous material shipments, including cyanide.

The Port of Rio Haina has been in operation since the 1970s and it is considered to be the main Port of Santo Domingo. The Port is managed by Haina International Terminals (HIT) and is regulated by the Dominican Port Authority (APORDOM). The Port achieved ISPS certification for its security measures in 2006, BASC certification (Business Alliance for Secure Commerce) in 2007, and C-TPAT certification in 2011. Port facilities are located on both banks of the Haina River. A DuPont Product Steward conducted an on-site review of the Port location where cyanide is managed. The on-site review addressed environmental, health, safety, and security topics. The results of the review concluded that handling practices are well aligned with Cyanide Code requirements. Port facilities and employee capabilities were found to be suitable for the proper handling of hazardous material shipments, including cyanide.

The results of the initial verification audit and the related due diligence reviews indicate that DuPont and all portions of its Global Ocean Supply Chain are in FULL COMPLIANCE with Cyanide Code requirements. Additionally, the results of the 2012 Addendum Review indicate that the Port of Antwerp and the Port of Rio Haina are also in FULL COMPLIANCE with Cyanide Code requirements.

DuPont Ocean Carrier & Ports - Auditor's Finding

Due diligence investigations have been performed so that it can reasonably be concluded that ocean carriers & ports, including those added in 2012, used by DuPont for sodium cyanide shipments are:

☑ **in full compliance**
in substantial compliance
not in compliance

with the International Cyanide Management Code.

Audit Company:	Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: CodeAudits@mss-team.com
Date(s) of Audit:	February 9-10, 2010
Date(s) of Due Diligence Review of Port of Antwerp and Port of Rio Haina:	March 9-12, 2012

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 the Audit Reports accurately describe 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.

DuPont Consigner/Transporter Operations [signature] 8/7/2010 - 3/12/2012 - 1/25/2013
Name of Facility Signature of Lead Auditor Date

Description of Due Diligence Information Reviewed for Ocean Carriers and Ports

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 management of Global Ocean Transport is:

☑ consistent with Transport Practice 1.1
substantially consistent
not consistent

Summary of the basis for this finding:

Ocean routes are chosen by the ocean carriers and are regulated by a number of international organizations. When DuPont plans a specific shipping route and chooses an ocean carrier, it evaluates safety performance, availability of direct shipping lanes, and authorizations for the transport of hazardous materials. All carriers undergo regular safety performance reviews. Information was reviewed in the DuPont incident tracking database and was found to be acceptable.

According to interviews, DuPont gives strong preference to ocean carriers that have been evaluated as part of a Cyanide Code due diligence investigation. Strong preference is also given to direct shipping lanes that do not involve a transfer of the cargo to a different ship. Ports that have been found to be acceptable are chosen based on proximity to end customer. Only in cases where a closer port has unacceptable infrastructure or security is the shipment routed using a longer over-the-road segment.

2012 Addendum Information:

During the 2012 Due Diligence Review of the Port of Antwerp and the Port of Rio Haina information was evaluated from on-site evaluations of these ports performed by DuPont. Handling practices, security, training, and emergency planning practices at each port were evaluated and were found to be acceptable. The Due Diligence Review of the DuPont information and information that is publically available for the Port of Antwerp and the Port of Rio Haina were used to confirm that the Ports are acceptable for managing hazardous material shipments, including cyanide.

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.*

The management of Global Ocean Transport is:
- ☑ consistent with Transport Practice 1.2
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers
According to the responses to a questionnaire modeled after the Cyanide Code Transportation Protocol, all ocean carriers reported that they comply with IMO requirements and are in compliance with International Maritime Dangerous Goods (IMDG) and U.S. 49 Code of Federal Regulations (CFR) requirements concerning the transportation of the hazardous materials, including the training of employees.

Inter-modal moves once the shipment reaches the port are controlled by the ocean carrier. Each ocean carrier self-reported to DuPont that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel.

Transport Practice 1.3: *Ensure that transport equipment is suitable for the cyanide shipment.*

The management of Global Ocean Transport is:
- ☑ consistent with Transport Practice 1.3
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers
DuPont has contractual agreements with all of its ocean carriers that require that they comply with the regulations regarding the safe and appropriate shipping of dangerous goods. Part of the U.S. Department of Transportation Hazardous Materials Registration and Safety of Life at Sea regulatory processes addresses the use of safe and appropriate equipment.

DuPont ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during this audit and were found to be compliant. The LSI packaging operation was audited and certified to the Cyanide Code using the Cyanide Code Production Protocol in March 2006. LSI checklists and procedures require an inspection of the cargo and containers to ensure that all equipment is deemed to be safe for transport.

Transport Practice 1.4: *Develop and implement a safety program for transport of cyanide.*

The management of Global Ocean Transport is:
- ☑ consistent with Transport Practice 1.4
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers

Each ocean carrier self-reported to DuPont that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel.

In their response to the Cyanide Code requirements questionnaire, ocean carriers reported that it has a robust safety program which applies to all employees.

Transport Practice 1.5: *Follow international standards for transportation of cyanide by sea and air.*

The management of Global Ocean Transport is:
- ☑ consistent with Transport Practice 1.5
- substantially consistent
- not consistent

Summary of the basis for this finding:
DuPont ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance. The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable regulations and have "organized safety programs." Contracts were reviewed during the audit and this standard clause appears in Article 21 of the ocean carrier contract. Each carrier was asked for information regarding fulfillment of Cyanide Code requirements using a customized ICMI transportation protocol. Responses and information provided by all carriers was deemed to be appropriate by the 3rd-party auditor.

Standard clause 22.40 of the DuPont / Ocean Carrier contracts require that all transportation is conducted in accordance with all regulatory requirements. This would include U.S. Department of Transportation and IMDG requirements.

The ocean routes are chosen by the ocean carriers. The destination ports are evaluated by the DuPont Regional Product Steward for Cyanides. Part of the evaluation prior to the first shipment of product is an evaluation of the port. The DuPont Cyanides Business Regional and Global

Product Stewards were interviewed as part of this audit. The U.S. Regional Product Steward reported that U.S. ports in use at the time of the audit had all been contacted to inquire about emergency response capabilities, environmental policies, security practices, and adherence to Maritime Transportation Security Act requirements. A report written in February 2010 summarizing the information gathered through this due diligence activity was provided to the auditor as evidence that appropriate due diligence evaluations had been done on all U.S. ports noted in the introduction section of this report. DuPont has also concluded that the Homeland Security and U.S. Coast Guard infrastructure that is available to assist ports with regard to security and emergency response is sufficient to conclude that Cyanide Code requirements are fulfilled.

DuPont performs audits of international ports and provides cyanide safety training at ports, when authorized to do so by the individual ports. Records were reviewed during the 2007 audit and during this 2010 audit. A sample of First Order evaluation information showed that DuPont has been consistently reviewing international ports for safety and security between 2007 and 2010. The auditor concluded that DuPont has effective processes to ensure that international ports have appropriate safety, security, and road infrastructure prior to being approved for hazardous material shipments.

2012 Addendum Information:

The 2012 Addendum Due Diligence Review of the Port of Antwerp and the Port of Rio Haina was conducted in March 2012. DuPont physically evaluated these ports for suitability and conformance to Cyanide Code requirements. The port evaluation information was submitted to the ICMI-Approved Third-Party Lead /Technical Transportation Expert Auditor for review. DuPont information and information that is publically available was reviewed and during the March 2012 Due Diligence Review process.

As recommended by the ICMI *Auditor Guidance for the Use of the Cyanide Transportation Verification Protocol*, dated October 2009, specific information regarding this practice is addressed below:

i) The DuPont packaging specifications were reviewed as part of the verification audit and were found to be conformant to the packaging requirements of the IMDG Code.
j) Photos of packaging for drums and IBCs presented at the audit were appropriately marked and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
k) Photos of packaging for drums and IBCs presented at the audit were appropriately labeled and were found to be compliant with Chapter 5.2 of the IMDG Code requirements.
l) Photos of loaded inter-modal containers were reviewed and were found to be marked and placarded in accordance with the IMDG Code. This aspect of compliance was also evaluated in 2009 at the on-site verification audit of the LSI operation in Memphis, TN.

m) Shipping documents were reviewed for a sample of cyanide shipments. All information required by the IMDG Code is required as standard practice on DuPont shipping paperwork.
n) The container packing certificates were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMDG Code requirements.
o) DuPont maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements (records including valid SOLAS certificates). The ocean carriers confirmed to DuPont that they have cyanide emergency response information available on board each vessel.
p) DuPont maintains records which show that the ocean transport is conducted in compliance with all international and U.S. Department of Transportation (DOT) requirements.

Transport Practice 1.6: *Track cyanide shipments to prevent losses during transport.*

The management of Global Ocean Transport is:
☑ consistent with Transport Practice 1.6
substantially consistent
not consistent

Summary of the basis for this finding:

All Ocean Carriers
Ocean carriers reported that they have computer systems that are used for the tracking and management of all freight containers within their system. The management systems provide among other items the date, time, location, and carrier involved in the last interchange, transport action, or gate move. DuPont's freight forwarder has access to this information via the internet web sites. DuPont can request this information at any time.

The sodium cyanide shipments for this segment are containerized loads of IBCs and drums. All shipping containers are sealed. Shipping papers were reviewed. Auditors confirmed that seal numbers are recorded on the bills of lading. This enables personnel along any portion of the segment to confirm that the containers have not been opened.

2. INTERIM STORAGE: ***Design, construct and operate cyanide trans-shipping 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 management of Global Ocean Transport is:

- ☑ consistent with Transport Practice 2.1
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers

Ocean carriers reported that during transport, the storage of cyanide both on land and on vessels is in accordance with the applicable stowage and segregation requirements in the IMDG and the Coast Guard 33 CFR regulations. The terminal must segregate containers similar to the segregation onboard vessels.

The packaging used for solid cyanide conforms to IMO and US DOT requirements. Certifications and approvals were reviewed during the 2007 audit and confirmation was made through interviews that no packaging changes have occurred since then. As part of the ocean carrier due diligence audit, documentation was reviewed that confirmed that ocean carriers must contractually adhere to regulatory requirements and maintain formal safety programs. Additionally, safety checklists and seals are used by the DuPont packaging facility after the containers are packed. This process was reviewed during the on-site audits of DuPont, its carriers, and its packaging facilities in 2006, 2007, and 2009. The seal enables verification that the container was not opened during transit.

If a destination port is not already approved and showing acceptable performance for the handling of hazardous materials for DuPont shipments, it is evaluated by the DuPont Regional Product Steward for Cyanides. Part of the evaluation prior to the first shipment of product is an evaluation of the port. Product Stewards either visit the port and observe that personnel are handling materials safely, that the port is secure and the roadway infrastructure into the port is suitable or they confirm that DuPont has already approved the port for hazardous material shipments. Completed checklists showing port evaluations were sampled during the audit and were found to be acceptable. Interviews confirmed that all ports in use at the time of the audit had been either confirmed to have acceptable safety and security performance or had been specifically evaluated for cyanide shipments.

2012 Addendum Information:
A DuPont Product Steward conducted an on-site review of the Port of Antwerp location where cyanide is managed. The on-site review addressed environmental, health, safety, and security topics. The results of the review concluded that handling practices are well aligned with Cyanide Code requirements.

An on-site review of the Port of Rio Haina was conducted by a DuPont Product Steward. The on-site review addressed environmental, health, safety, and security topics. The results of the review concluded that handling practices are well aligned with Cyanide Code requirements.

The Due Diligence Review of the DuPont information and information that is publically available for the Port of Antwerp and the Port of Rio Haina were used to confirm that the Ports are acceptable for managing hazardous material shipments, including cyanide.

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 management of Global Ocean Transport is:

- ☑ consistent with Transport Practice 3.1
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers
Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. DuPont provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of the DuPont emergency protocols and the involvement of CHEMTREC. Interviews during this audit and the 2007 audit confirmed that personnel within DuPont and at the freight forwarder had appropriate awareness of the emergency response plans. The same emergency systems are used for any type of transportation emergency.

Transport Practice 3.2: *Designate appropriate response personnel and commit necessary resources for emergency response.*

The management of Global Ocean Transport is:
- ☑ consistent with Transport Practice 3.2
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers
Ocean carriers responded that they contract with professional emergency response contractors for landside emergencies. Onboard vessels, the emergency response would be conducted by trained crew members with shore side support and guidance.

DuPont offers immediate technical assistance for any cyanide spill, and offers emergency resources for spills that might occur near a DuPont site. DuPont contracts with CHEMTREC to ensure that appropriate notifications and emergency response is initiated if there is an incident.

Transport Practice 3.3: *Develop procedures for internal and external emergency notification and reporting.*

The management of Global Ocean Transport is:
- ☑ consistent with Transport Practice 3.3
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers
Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. DuPont provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of the DuPont emergency protocols and the involvement of CHEMTREC. Interviews during this audit and the 2007 audit confirmed that personnel within DuPont and at the freight forwarder had appropriate awareness of the emergency response plans. The same emergency systems are used for any type of transportation emergency.

Transport Practice 3.4: *Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.*

The management of Global Ocean Transport is:
- ☑ consistent with Transport Practice 3.4
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers
Ocean carrier responses confirmed that they coordinate all cyanide incidents with the DuPont cyanide team for the proper handling of the situation.

Transport Practice 3.5: *Periodically evaluate response procedures and capabilities and revise them as needed.*

The management of Global Ocean Transport is:
- ☑ consistent with Transport Practice 3.5
- substantially consistent
- not consistent

Summary of the basis for this finding:

All Ocean Carriers
DuPont Cyanide Hotline personnel are periodically involved in drills performed by sites and transportation partners. Safety conferences are held with rail and ocean carriers periodically. The adequacy of emergency preparedness plans is one of the topics discussed at these conferences.

Ocean carriers responded that the DuPont cyanide safety meetings provide the forum for the discussion and updating of response procedures and expectations. As part of the ocean carrier safety programs, drills and exercises (not necessarily cyanide specific) are conducted to test response capabilities.