

## SUMMARY AUDIT REPORT



### ICMI Cyanide Code Principle 2 SUMMARY AUDIT REPORT

**Dinet Perú, S.A.**  
**Cyanide Transportation Certification Audit**  
**Callao - Perú**

**Submitted to:**  
**International Cyanide Management Institute (ICMI)**  
**1400 I Street, NW – Suite 550**  
**Washington, DC 20005, USA**



Geosoluciones Panamá, S.A.  
P.O. Box 0923-00340  
Santiago, Panamá

### Initial Audit



ISOSURE, S.A.C.  
Av. Los Paracas 429 Salamanca  
Lima, Peru

Dinet Perú, S.A  
Name of Facility

  
Signature of Lead Auditor

April 24-25, 2013  
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# SUMMARY AUDIT REPORT

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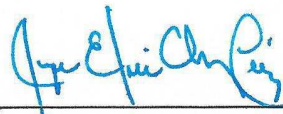
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### **3. EMERGENCY RESPONSE: Protect communities and the environmental through the development of emergency response strategies and capabilities.**

*Transport Practice 3.1: Prepared detailed emergency response plans for potential cyanide releases.*

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

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

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

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

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### A- GENERAL SUMMARY

#### A.1 Information of the Audited Operation

Name of Cyanide Transportation Facility: Dinet Perú, S.A.  
Name of Facility Owner: Dinet Perú, S.A.  
Name of Facility Operator: Dinet Perú, S.A.  
Name of Responsible Manager: Luis Miguel Maldonado Ortega  
Address: Avenida Japón (Ex A. Bertello), 551 Urb. Industrial Bocanegra - El Callao  
State/Province: Country: Callao / Perú  
Telephone: (511) 517-0100 Fax: E-Mail: [asistentedecalidad@dinet.com.pe](mailto:asistentedecalidad@dinet.com.pe)

#### (CERTIFICATION AUDIT)

##### *Location detail and description of operation:*

Dinet Perú, S.A. (Dinet) is a company specialized in the transport and storage of hazardous materials (chemical substances and solid waste). This company has 21 years of experience, 1,392 employees, and 72 units. The cyanide can be transported from the port terminal in ISO-tanks or intermodal containers to different gold and other mineral mines.

Dinet is certified under ISO 9000-2008, OHSAS 18001, BS ISO 14001 and BASC.


Dinet, S.A. received a certification on pre-operational recognition on September 13, 2011 (under the International Cyanide Management Institute, for Cyanide Transportation operations).

***The scope of this audit includes the operation of ground transportation from Port Authority or storage facility located in Lurin and Callao, where cyanide is released, to deliver at the customer's facility.***

Cyanide is received from the manufacturer or storage facility in either of the following packaging presentation:

- Interior Poly-propylene super-sack filled up to 1 ton and placed inside a Polyethylene bag and wooden box
- Tuff-pack of 48 Kg, 20 of these packs are placed inside a wooden box
- 30-gallon metallic drums; four per pallet and plastic wrapped

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No less than 20 boxes or 165 drums are placed in standard TEU shipping containers; boxes and drums are placed in each container to prevent lateral movement within the container where drums are fastened with belts when transported.

Dinet have two (2) operation routes (vertical-Panamericana and transverse) with six (6) drivers operators, supplying cyanide using eleven (11) vehicles, including "Mina Raura"; shipments are sporadic on average every 45 days and around 5 to 40 containers.

In 2011 and 2013 (April) there were no cyanide deliveries, and in 2012 there were four (4) deliveries.

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### A.2 Overall Auditor's Finding

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: Geosoluciones Panamá, S.A.



Audit Team Leader: Jorge Efrén Chong Pérez Email: [geosoluciones@cwpanama.net](mailto:geosoluciones@cwpanama.net)


Names and Signatures of Other Auditors: Carlo Brando Bolivar Vargas

Date(s) of Audit: April 24-25, 2013

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanided 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 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.

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### B- DINET ROLE AS CYANIDE TRANSPORTATION

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

*Transport Practice 1.1: Select cyanide transport routes to minimize the potencial for accidents and releases.*

This operation is

- In full compliance
- In substantial compliance Transport Practice 1.1
- Not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

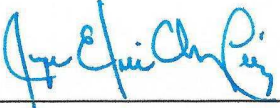
Dinet, S.A. began prepared a Master List Documents, which is by 60% completed; that include Transport and Distribution Manual, Route Tracking, Distribution and MATPEL (“hazmat”) Transportation, Contingency Plan for Cyanide Transportation, Local Transportation Tracking, National Transportation Tracking, and Vehicles Inspection Check List Forms.

The criteria route evaluation used for transport cyanide are: traffic density, towns, bridges, waterways, road conditions, route design (curves, berms, number of lanes), altitude, intersections, detours, weather conditions and socio-political conditions.

As recommended in the past pre-operational audit, all routes were evaluated and registered on the route sheet and in every transportation IPER form (Risk Evaluation and Dangerous Identification). Route and IPER records were revised.

The contingency plan has been created for all Dinet routes involving Cyanide transportation, on December 19<sup>th</sup>, 2011 and updated on October 4<sup>th</sup>, 2013.

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"Dinet Peru S.A. send letters related to emergency response for hazardous materials informing the community, about the cyanide transport operations, where they are instructed to send feedback to DINET to improve transport operations.

Also trips reports and recommendations are providing by convoy supervisor in the route plan format "Plan de Ruta" issues for each trip.

Dinet has a control center, where each unit that transports cyanide is permanent monitored via GPS, and if the driver incurred in speed, is called immediately.

In those road segments where communication is no available, geo-fencing coverage is applied to check the convoy progress.

Trailers carrying cyanide return the same day.

According with contingency plan, transportation is done in which there is a supervisor who has the safety and security responsibilities of transport operations. In case any situation, he reported the incident to the control center of the company providing the following information immediately:

- Location
- Existence of personal injury (own and others)
- Existence of cargo damage
- There are chemical spill?

Dinet provides information (MSDS, emergency and product information) to support emergency centers (emergency responders, medical centers and Fire Companies) along the routes, and they have to sign an acknowledged received letter of such information. This activity is carried out so that they could be prepared for an emergency.

Dinet does not subcontract other companies to transport Sodium Cyanide.

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*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.*

*This operation is*

- In full compliance
- In substantial compliance Transport Practice 1.2
- Not in compliance

*Summarize the basis for this Finding/Deficiencies Identified:*

Dinet establishes a minimum requirements for the drivers: good health condition, legal affairs, defensive driving and emergencies response training handling sodium cyanide.

Training and maintenance employees were interviewed and its supervisors confirmed the implementation and proper procedures training in Cyanide transportation practices.

Both auditors participated in a safety orientation program provided to workers, also training records were reviewed which are required by the "Ministerio de Transportes y Comunicaciones"

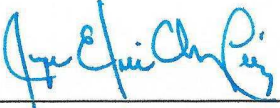
Dinet will only subcontract other companies to transport Sodium Cyanide, when their client's service demand. The procedure also establishes that the subcontracted transporters must be certified under the Cyanide Code.

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

*This operation is*

- In full compliance
- In substantial compliance Transport Practice 1.3
- Not in compliance

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*Summarize the basis for this Finding/Deficiencies Identified:*

Dinet will lease the transport units (International trucks and RMB trailers) since the last pre-operational audit. A maintenance coordinator was hired Mr. Fernando Nario, who previously worked for the International truck dealer. Every unit has no more than three years.

Dinet keeps a preventive maintenance program and performed by "Tracto Camiones USA", who is the authorized representative dealer in Lima. Preventive trucks maintenance are given every 12,000 km (or 350 hours), every 48,000 km and every 96,000 Km.

Tracking maintenances and inspections are given by the transportation supervisor (currently Sandro Rojas) who checked the good condition of every unit going out for a particular route, and thus ensure good conditions.

Inspection records were checked, which includes 70 items including on check list, on what should be inspected (pre-trip / post trip), along with the actions required i.e. component repair, change part, etc. Similarly were verified repair orders.

Dinet complies with the peruvian "Ministerio de Transportes y Comunicaciones MTC" on annual inspections of mechanical conditions and technical revisions under SGC quality assurance. MTC has issued vehicle operation permits, which are continuously required police by check points. Similarly SGS performs periodic complementary mechanical and environmental emission test.


Dinet does not subcontract other companies to transport Sodium Cyanide, unless the client's demand would overcome their capacity.

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

*This operation is*

- In full compliance
- In substantial compliance Transport Practice 1.4
- Not in compliance

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*Summarize the basis for this Finding/Deficiencies Identified:*

Dinet has a procedure PRO-TYD-005 “Transporte y Distribución Nacional de MATPEL” (Hazardous Material Transportation and Distribution), which aims to ensure the transport of hazardous materials including cyanide, without causing damage or injury to persons and /

or the environment, as well as the preservation of the load transported from the point of receipt to the point of release set by the client.


Prior to the transport operation, a UN Number, NFPA diamond and diamond DOT are placed on the three visible sides of the containers. Placards or other signals used to identify the shipment as cyanide are in place, it was verified that in the training room this topic is part of the material taught.

Dinet safety program includes pre-trip inspection to each vehicle, which is performed by the driver, verified-signed by the supervisor and the head of the fleet.

The safety transport procedures provides:

- Pre-transport operation inspections and documentation of units.
- Review information from the unit to give approval for the transport operation.
- Drivers must rest at least 8 hours prior to operation and do not drive more than 12 hours a day.
- Cyanide transport is only allowed in day time.
- The cyanide load traveling within 20 feet containers, making arrangements to prevent movement.
- The transport operation will take place in convoy mode.
- The convoy leader is responsible to stop the convoy when weather condition and transport operation are faced.
- It prohibited the consumption of alcohol, drugs or any medication that may affect the driver performance or convoy members.
- At the end of the trip the operations leader and drivers must submit a report that details the same route incidents, advance information, sensitive areas found and relevant information to ensure safety and security on future trips. A random trip report was checked to verify procedure.

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In addition to the procedure PRO-TYD-005 mentioned earlier, Dinet has a manual T00-M-001 "Manual de Transporte y Distribución", which describes the main procedures in the area, transportation operations comprising Entry - Customs, National Transportation and Local Distribution, including HAZMAT, with all requirements of service (reporting use of medication (legal drugs) and alcohol test before each shift, and documents delivery for settlement of the service.

As indicated previously, Dinet does not subcontract other companies to transport Sodium Cyanide, unless clients demand would overcome their capacity.

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

*This operation is*

- In full compliance
- In substantial compliance Transport Practice 1.5
- Not in compliance

*Summarize the basis for this Finding/Deficiencies Identified:*


Dinet Perú, S.A. does not transport by sea or air, the scope of transportation is from Callao or Lurín District, to the mines of Peru.

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

*This operation is*

- In full compliance
- In substantial compliance Transport Practice 1.6
- Not in compliance

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*Summarize the basis for this Finding/Deficiencies Identified:*

Dinet Perú, S.A. uses a GPS system, monitored at a control center, which has a permanent supervisor in charge. The vehicle control system can support up to 80 units simultaneously. Usually the transportation of cyanide occurs using six (6) vehicles and an escort.

Dinet provides cellular service, radio and in those road segments where communication is not available, geo-fencing coverage is applied to check the convoy progress.

The GPS system updates location in real time, in areas without GPS coverage saves the information which is then transmitted, after passing vehicles.

Control center performs GPS permanent units monitoring, so that if there is communication failure is detected immediately.

Additionally in the "Check List de Equipo de Cianuro", or Trip Check List; ensures that phone communication is in order.


To prevent loss of cyanide during shipment Dinet has the procedure PRO-TYD-004 to ensure internal and external customer traceability of the units and the goods with local safety standards, and timely information for the proper management.

The bill of lading and reference guide ("Guía de Remisión del Remitente y Guía de Remisión del Transportista" are part of shipping records of amount transported and chain of custody. Were revised samples from May 21<sup>th</sup> and June 4<sup>th</sup>, 2012. In 2013 Dinet not carried cyanide.

Peruvian regulations require that the quantity of cyanide are indicated as well as maintain existing MSDS Sheets (in Peru are valid for five years) during transport. These two requirements are strictly enforced, because at certain points of the tracks are compliance verification checks by national authorities. Violations represent high fines and other consequences.

As indicated previously, Dinet does not subcontract other companies to transport Sodium Cyanide, unless clients' demand overcome their capacity.

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### **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.

*This operation is:* THIS PRACTICE DOES NOT APPLY TO THE DINET OPERATION.

- In full compliance
- In substantial compliance Transport Practice 2.1
- Not in compliance

*Summarize the basis for this Finding/Deficiencies Identified:*

Dinet Perú, S.A. transportation operations do not involved the use of interim storage facilities. The route driver time is from 6 a.m. to 6 p.m. Cyanide transportation is done in one day.

### **3. EMERGENCY RESPONSE: Protect communities and the environmental through the development of emergency response strategies and capabilities.**

Transport Practice 3.1: Prepared detailed emergency response plans for potential cyanide releases.

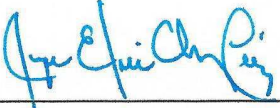
*This operation is*

- In full compliance
- In substantial compliance Transport Practice 3.1
- Not in compliance

*Summarize the basis for this Finding/Deficiencies Identified:*

Dinet Perú, S.A. operates in one (1) active route which is covered by its contingency plan through a risk assessment:

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PL-TYD-001 "Plan de Contingencias para el Transporte de Cianuro de Sodio".

The objectives of this Contingency Safety Plan are to prevent the occurrence of incidents during the transportation of Cyanide, establish procedures for an effective response to emergency situations, establish standards of accountability, minimize the impact of emergencies for employees, and minimize damage to the property and the environment.

Transport units are Volkswagen 320 HO, 350 HP Freightliner, International 400 HP and 400 HP Yuejin (6 cylinders) attached to ACS trailers (3 axles), capable of supporting the load safely.


Dinet Perú, S.A. has identified and described the steps to follow in case of possible incidents scenarios for the transport, condition of the road, port, and the necessary controls have been implemented to reduce the risk of these, and developed a IPER ("Hazard Identification and Risk Assessment"), associated with the route.

As part of the master list, a format list is available which describes the equipment, substances and media that escorts should carry in case of emergency response actions with cyanide in briquettes transported by TEU containers.

Trained Dinet Team performs only first response consisting of isolating the incident scenario, chemical containment and initial communication or might participate in cleanup activities. Second response (spill clean-up) could be the supplier or mine, depending on what is planned for each route.

The Contingency Plan PL-TYD-001, establishes the responsibilities of the members of the emergency response team, and highlights the role of supplier, the mine, and firefighters and police, in the control of emergencies.

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

*This operation is*

- In full compliance
- In substantial compliance Transport Practice 3.2
- Not in compliance

*Summarize the basis for this Finding/Deficiencies Identified:*

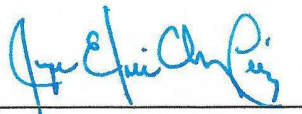
The Contingency Plan to Transport Sodium Cyanide, revised on December 19, 2011, section 4, established: The Safety Officer and Operations Supervisor are responsible to identify and provide training to personnel. Training program includes:

- Provide personnel training on the operation of the Contingency Safety Plan.
- Develop safety emergencies drills.
- Provide an initial training to personnel involved in the operation that covers aspects related to the transportation of materials.
- New employees must be trained in operations, security and other aspects related with safety.

Section 3.2 established the responsibilities of the Crisis Committee members, such as:

- The chairman of the Crisis Committee has to establish procedures, requirements and recommendations to be taken during an emergency.
- Operations supervisor supervises operation performance, trailers and customer relationship.
- Safety office is the person in charge of the safety program.
- Control house supervisor monitors the GPS units.
- Convoy leader is responsible for: develop an operative inspection of the units before the beginning of a transport operation. He has to check the documentation related to the operation (guides, instructions)
  - Maintain radio communication with Operations Supervisor and Safety Officer.

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- Lead warning and signal activities in case of an incident until the arrival of a supervisor. Comply and verify a strict route accomplishment.

Annex 4 indicates “LISTADO DE EQUIPOS PARA RESPUESTA A INCIDENTES”. The convoy leader manages a verification checklist that is established in the contingency safety plan as part of the operative inspection unit.

On 2011, 52 employees were trained on Contingency Safety Plan and Cyanide Handling; also on 2012, 66 employees attended training as part of a periodic program. With respect of TRAINING ON HAZARDOUS MATERIALS I, II and III (MATPEL) 195 employees were trained.

As part of this program, four (4) employees were certified on Hazardous Material MATPELL III Technicians, 45 employees attend MATPELL II training and 146 employees attended MATPEL I training.

In order to secure availability of emergency response equipment, through inspection procedures, ANNEX No. 2 of the Contingency Safety Plan related to the operative safety procedures established:

Convoy leaders have to maintain a strict control at the beginning and ending of each transport operation. In turn, each driver operator must complete an operative checklist before the beginning of the transport operation. The safety officer must check and sign the checklist before the operation but in case of lack of approval, movements can be done.

The Safety Officer must complete the operative checklist of the escort vehicle and is responsible that each unit counts with safety emergency kits.

*As indicated previously, Dinet does not subcontract other companies to transport Sodium Cyanide, unless clients’s demand overcome their capacity.*

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

*This operation is*

✓ In full compliance

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- In substantial compliance Transport Practice 3.3
- Not in compliance

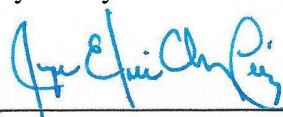
*Summarize the basis for this Finding/Deficiencies Identified:*

Section 3.3 Contingency Plan for Sodium Cyanide indicates the communication procedures in case of an emergency based on a system support that allow to know the exact position of the unit.

- Leader convoy: Is the person responsible of the transport operation and in case of an emergency inform the incident to the company's control center.
- Control House: Receive the call from the leader convoy and coordinates the emergency communications with the Crisis Committee.
- Operations Supervisor: After the facts, coordinates with the Safety Officer and the Control House Operator the actions to be taken to initiate the response (logistics, support personnel). At the same time, makes the necessary arrangements to inform the incident.
- Safety Officer (QHSE): Subsequently, with the public institutions (police and firefighters) and the private safety contractor (Security Guard) coordinate its presence at the incident area.
- Control House Supervisor: Coordinates with the control house the arrangements of the necessary support information needed in the incident area (communication in the incident area, GPS information).
- Transportation Manager: Organize formal logistical management to provide the necessary services, if needed.
- General Manager: Maintain closed information of the situation and must assumed the command of the incident.

Section 5.2 established Contingency Safety Plan on notification procedures.

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- DINET PERU S.A. in coordination with the client will communicate the incident and sent a final report to “MINISTERIO DE ENERGIA Y MINAS” according to the company’s standards.
- Communication with the Community
  - According with the type of emergency and the negative impact in the environment, MERCANTIL, S.A., will settle a meeting with local authorities, media and the community.
  - Due to the facts, the safety officer will communicate with policemen, firefighters, civil defense and hospitals.

The communication flows are indicated on page 9 of the Contingency Plan supported with the type of emergency that could be presented according to its seriousness.

The contingency plan, Annex No. 3 and page 31, has a contact list with emergency telephones numbers.

Section 4.5 on Contingency Safety Plan, page 11/34 established system to ensure that internal and external notification and reporting procedures are kept current. The contacts and reporting procedure will be updated annually.

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

*This operation is*

- In full compliance
- In substantial compliance Transport Practice 3.4
- Not in compliance

*Summarize the basis for this Finding/Deficiencies Identified:*


Steps to follow in case of spill

Immediately moved personnel without safety protection and maintain them windup.

Personal safety equipment

Must wear personal safety equipment (overall with hat, boots, gloves and respiratory protection).

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Preventive measures to avoid

Collect all visible materials and sealed on dry and environment damages. Empty drums and properly labeled. Avoid chemical liquids run down the drainage, in case of a misfortune, notify area emergency services.

Cleaning methods: Collect all visible materials.

Method to treat waste:

Apply sodium hypochlorite dilution, hypochlorite calcium or ferrous sulphate, according with MSDS, local and international standards and practices.

Avoid the contact of detoxification corrosive chemicals.

After one (1) hour, of the incident, wash the contaminated area with water to guarantee the dilution.

NOTE: According to detoxification procedure, ion cyanide converts to ion cyanates that with the continuation of the reaction decompose and produce carbonic anhydride and nitrogen.

Contingency Plan, Section 6.4.4 and page 19/34 established: Dinet prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.


“DINET PROHIBE EL USO DE SUSTANCIAS QUÍMICAS TALES COMO HIPOCLORITO DE SODIO, SULFATO FERROSO Y PERÓXIDO DE HIDRÓGENO PARA TRATAR CIANURO QUE HA SIDO VERTIDO EN AGUAS SUPERFICIALES.”

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

*This operation is*

- In full compliance
- In substantial compliance Transport Practice 3.5
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*Summarize the basis for this Finding/Deficiencies Identified:*

According to Contingency Safety Plan 1 – PL – SHE – 001, an annual revision must be done conformed with the results of the emergency drills done before.


On February 9, 2011, May 7, 2012 and August 15, 2012 emergencies drills were performed as a spill response.

The procedure for an annual Contingency Safety Plan revision is supported on the results of the drills, incidents, drivers operators feedback, leader convoy, as well as, management and plant supervisor.

Procedure to evaluate the contingency is indicated on section 2.5, page 3/34. The frequency of the contingency plan review will take place annually or as necessary to generate a new version.

There are no records of incidents since ICMI pre audit done on May 12 and 13, 2011.

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