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SUMMARY AUDIT REPORT

**AUSTRALIAN GOLD REAGENTS PTY LTD
WESTERN AUSTRALIAN SUPPLY CHAIN**

**ICMI CYANIDE TRANSPORTATION
VERIFICATION PROTOCOL
RECERTIFICATION AUDIT
MAY 2016**

*2018 Addendum - Inclusion of Qube Bulk Pty. Ltd.
to the ICMI Certified AGR WA Supply Chain*

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APPROVAL & CHANGE HISTORY

Approval and Change History					
Rev	Description	Approval			
		Date	By		
			MSA	MSA	AGR
A	Issued for Concurrence	06 June 2016	MS	SAZ	DG
0	Issued for Information	30 June 2016	MS	SAZ	DG
1	<i>Qube Bulk Pty. Ltd. Inclusion of Qube Bulk Pty. Ltd to the ICMI Certified AGR WA Supply Chain, as a transporter of solid and liquid sodium cyanide</i>	<i>12 December 2018</i>	<i>MS</i>	<i>SAZ</i>	<i>DG</i>

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1. INTRODUCTION

1.1. Operator Details

Name of Cyanide Transportation Facility:	Western Australian Supply Chain
Name of Facility Owner:	Australian Gold Reagents Pty. Ltd.
Name of Facility Operator:	CSBP Limited
Name of Responsible Manager:	Darren Gould, Technical Sales Support Representative – Australian Gold Reagents Pty Ltd
Address:	Kwinana Beach Road, Kwinana
State/Province:	Western Australia, 6966
Country:	Australia
Telephone:	(+61 8) 9411 8875
Fax:	(+61 8) 9411 8289
E-Mail:	dgould@a-g-r.com.au
Audit Protocol Employed:	International Cyanide Management Institute, Cyanide Transportation Verification Protocol, October 2009 www.cyanidecode.org

1.2. Description of Operation

Australian Gold Reagents Pty. Ltd. (AGR) is the management company of the unincorporated joint venture between CSBP Limited (CSBP) and Coogee Chemicals Pty Ltd. CSBP is part of the Wesfarmers Chemicals, Energy and Fertilisers Division of Wesfarmers Limited. CSBP is the major participant in the venture and acts as both operator and sales agent of the entire business. Coogee Chemicals Pty Ltd is a local manufacturer and distributor of industrial chemicals. As the operating agent, CSBP employees act on behalf of AGR.

The AGR cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, approximately 40 km south of Perth within the state of Western Australia. AGR produces and transports two different forms of sodium cyanide from the Kwinana production facility, namely solution and solids. Sodium cyanide solution is produced as a 30% solution and solid sodium cyanide as a >97% white briquette.

CSBP and AGR are responsible for the overall management of the sodium cyanide transportation activities including emergency response in accordance with the relevant statutory obligations, Ministerial Conditions and the Western Australia Hazardous Materials Emergency Management Plan (HAZMAT). CSBP assumes the responsibility of "consignor" under the Western Australia Dangerous Goods Transport legislation.

The transportation of both solution and solid sodium cyanide within Western Australia is undertaken by rail and/or road along recognised dangerous goods routes classified by the relevant authorities. The transport distribution network includes contracted transport providers servicing the Fremantle Port (for export) and various gold mining operations located within Western Australia, the overall management of which is provided by way of the AGR Sodium Cyanide Transport Management Plan. The transport distribution network is termed the Western Australian Supply Chain.

The **Western Australian Supply Chain** currently includes the following components:

Australian Gold Reagent (AGR): Its primary role in the supply chain is that of the cyanide consignor. In this role, the major areas where AGR provides services and support to the other supply chain entities are:

- Transport route selection;

- Provision of the cyanide safety management program for the entire cyanide supply chain through procedures and documented systems;
- Provision of cyanide specific training to road transport operators and rail loading/unloading personnel;
- Provision of a preventative maintenance program for cyanide isotainers and seatainers;
- Tracking of cyanide road and rail shipments throughout the supply chain to prevent losses, and;
- Provision and implementation of emergency response plans and resources throughout the entire supply chain.

In addition, the AGR cyanide production facility at Kwinana acts as the first component of the cyanide supply chain. AGR's Kwinana facility includes road and rail loading of solution sodium cyanide using isotainers, loading of packaged solid sodium cyanide in seatainers for road transport to Fremantle Port and loading of solid sodium cyanide in isotainers for road transport to regional customers.

Aurizon receives solution sodium cyanide in CSBP owned isotainers, from AGR's Kwinana manufacturing facility for rail transport initially to the Forrestfield Rail Yard where trains are assembled for transport to the West Kalgoorlie rail facility. Solution sodium cyanide isotainers are unloaded at the West Kalgoorlie facility for interim storage and transportation by road to regional customers. A due diligence investigation of Aurizon's compliance with the ICMI Cyanide Transportation Verification Protocol was undertaken by AGR in May 2016.

Coogee Chemicals - Specialised Bulk Liquid Dangerous Goods Transport Division (Coogee) prime movers and trailers receive solid sodium cyanide in seatainers for road transport along approved road routes from AGR's Kwinana manufacturing plant to Patricks Terminal at the Port of Fremantle, for distribution to overseas customers. Coogee prime movers and trailers also receive liquid and solid sodium cyanide in isotainers for road transport along approved road routes from AGR's Kwinana manufacturing plant to regional Western Australian customers. Coogee may, under emergency situations, also transport solution sodium cyanide along approved contingency routes directly to the regional customers by road in the event that the rail network is not accessible.

Toll Intermodal prime movers and trailers receive solid sodium cyanide in seatainers for road transport along an approved road route from AGR's Kwinana manufacturing plant to Pacific National Marshalling Yard in Kewdale, for distribution by rail to Eastern States customers.

Toll Mining Services prime movers and trailers transport solution sodium cyanide isotainers by road from the Aurizon West Kalgoorlie Container Terminal facility to regional customers.

Patrick Terminals (Patrick) operates stevedoring facilities at the Port of Fremantle and unloads solid sodium cyanide seatainers from trucks for interim storage at a dedicated storage facility prior to loading onto ships for supply to overseas customers. A due diligence investigation of compliance with the ICMI Cyanide Transportation Verification Protocol was undertaken of Patrick's operations by AGR in May 2016.

2018 Addendum

Qube Bulk Pty. Ltd (Qube) transports cyanide by road in various forms on behalf of Australian Gold Reagents Pty Ltd (AGR) in Western Australia. AGR is the cyanide consignor for cyanide manufactured at the AGR Kwinana facility and transported to various mines in accordance with the ICMI certified AGR Western Australian Supply Chain. In April 2018, Qube replaced Toll Mining Services and Coogee Chemicals for all road transport associated with the WA Supply Chain.

Qube is contracted to provide road transport of cyanide products from AGR's manufacturing plant in Kwinana, and from the Aurizon rail terminal in Kalgoorlie to various mine sites in Western Australia. Some deliveries are also from AGR to the Aurizon rail terminal in Kwinana. The cyanide is transported in solid form in either isotainers as solids to solution tanks (SST) or in IBCs packed freight containers. Cyanide is also transported as a liquid solution (30% cyanide) in isotainers.

Qube Bulk was listed as a signatory to the Cyanide Code on 20 March 2018. A certification audit conducted by Sustainability Pty Ltd, found Qube to be fully compliant to the ICMI Cyanide Transportation Verification Protocol, as evidenced by the Summary Audit Report dated 23 November 2018. Qube Bulk was certified in full compliance to the Cyanide Code on 29 November 2018.

2. AUDIT TEAM FINDINGS AND ATTESTATION

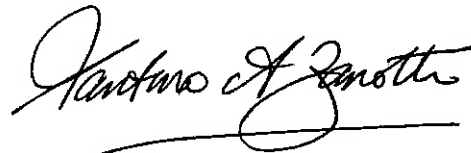
AGR Western Australian Supply Chain is

- in full compliance with the International Cyanide Management Code
 in substantial compliance
 not in compliance

This Operation has not experienced compliance problems during the previous three-year audit cycle.

It is also confirmed that this Operation has not experienced any significant cyanide incidents during the preceding audit cycle.

Audit Company:	Michael Sputore & Associates Pty. Ltd
Date(s) of the Audit	16 th to 23 rd May 2016 inclusive
Audit Team Leader:	Michael Sputore
E-mail:	msa@iinet.net.au
Names and Signatures of Other Auditors:	Santino Zanotti



30 June 2016 & 3 December 2018

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

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation and using standard and accepted practices for health, safety and environmental audits.

Signature of Lead Auditor:	Michael Sputore
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30 June 2016 & 3 December 2018

3. AGR KWINANA

3.1. Operational Information

Name of Cyanide Transportation Facility:	Western Australian Supply Chain
Name of Facility Owner:	Australian Gold Reagents Pty. Ltd.
Name of Facility Operator:	CSBP Limited
Name of Responsible Manager:	Darren Gould, Technical Sales Support Representative – Australian Gold Reagents Pty Ltd
Address:	Kwinana Beach Road, Kwinana
State/Province:	Western Australia, 6966
Country:	Australia
Telephone:	(+61 8) 9411 8875
Fax:	(+61 8) 9411 8289
E-Mail:	dgould@a-g-r.com.au
Audit Protocol Employed:	International Cyanide Management Institute, Cyanide Transportation Verification Protocol, October 2009 www.cyanidecode.org

3.2. Audit Findings

AGR Kwinana is **in full compliance with the International Cyanide Management Code**
in substantial compliance with
not in compliance with

This finding is relevant to AGR's activities in ensuring compliance of its cyanide carriers with the Code transport standards of practices, and its activities in cyanide loading and interim storage at the AGR Kwinana facility.

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.*

AGR Kwinana is **in full compliance with Transport Practice 1.1**
in substantial compliance with
not in compliance with

Basis for this Finding:

AGR, through its transport consigner CSBP, has demonstrated that cyanide has been transported along recognized dangerous goods routes classified by the relevant authorities and in accordance with specific Western Australian transport approval conditions. These routes are selected and approved on the basis of minimizing the potential for accidents and release of cyanide and minimizes the potential impact of such events. The route selection and approvals process includes procedures to be in place for road transport times of operation and truck configurations. AGR requires contracted transporters to comply with its approved transport routes and cyanide transport procedures through specific contract conditions. AGR have continued to review the route and transport mode options every two years in accordance with the Ministerial Condition imposed by the Western Australian Department of Environment, the AGR Transport Management Plan for Sodium Cyanide Product and procedures. This review process includes consideration of feedback on route conditions provided by the transport operators and the outcomes of consultations with regulators, emergency responders

and other stakeholders. Ongoing assessment and review of transport routes are completed between the two year formal reviews when relevant AGR staff commutes along cyanide transport routes for operational requirements. There have been no new routes introduced since the last audit.

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.*

in full compliance with Transport Practice 1.2

AGR Kwinana is in substantial compliance with
not in compliance with

Basis for this Finding:

CSBP and AGR have demonstrated that a comprehensive competency based awareness and emergency response training management program has been maintained for all transport modes and service contractors. The transport operators are required to meet the minimum competency standards and dangerous goods licensing requirements as stipulated in the AGR Transport Management Plan for Sodium Cyanide Product and the Vehicle Operator's Handbook for Sodium Cyanide. Both of these documents are included in contract requirements for AGR transporters. The transport operator training of new drivers includes induction onto the CSBP site, training in cyanide transport and awareness and assessment prior to accreditation by AGR. This ensures continuous awareness of the Transport Management Plan and the Vehicle Operator's Handbook. AGR maintains records of initial and refresher training undertaken and the appropriate driver accreditations. The driver training and refresher training of transport drivers forms an important Key Performance Indicator on all contracts between AGR and the transport companies. Although AGR/CSBP provides cyanide specific training to the transporters, heavy haulage and dangerous goods management training of operators is provided by the contracted transport companies in accordance with the minimum standards prescribed in the Transport Management Plan and the Vehicle Operators Handbook.

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

in full compliance with Transport Practice 1.3

AGR Kwinana is in substantial compliance with
not in compliance with

Basis for this Finding:

The AGR Transport Management Plan for Sodium Cyanide Product includes the use of purpose built isotainers for the road and rail transport of liquid and solid cyanide to AGR's Western Australian based customers. CSBP continues to maintain evidence that demonstrates compliance with its isotainers certification and preventative maintenance program for liquid and solid cyanide isotainers over the period since the previous ICMI recertification audit. Solid cyanide is transported within approved IBC packaging which is transported within sea containers and it is also transported as a solid in isotainers to be made into solution at the respective mine site. Evidence was sighted during the audit that the contract road transport providers employ vehicle operators, prime movers and trailers whose rated capacity is well within the loads they carry and are licensed and approved by the relevant authorities, consistent with the AGR contract requirements. The rail service provider Aurizon maintains a comprehensive Rail Safety Management System which includes procedures and manuals for equipment specifications and maintenance to ensure compliance with Western Australian Dangerous Goods Transport legislation. The contracts with road transport providers continue to specify that equipment must comply with dangerous goods transport applicable laws. Sea container forklifts operated by Aurizon and CSBP are rated well above the loads they are required to handle. IBC packaging forklifts operated by CSBP are rated well above the IBC gross weight.

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

AGR Kwinana is **in full compliance with Transport Practice 1.4**
 in substantial compliance with
 not in compliance with

Basis for this Finding:

The AGR Transport Management Plan for Sodium Cyanide Product describes the responsibilities, roles and procedures relating to the safe handling and transport of cyanide. The Transport Management Plan includes minimum requirements for signage and placarding of cyanide loads. The Vehicle Operator's Handbook requires comprehensive recorded inspections to be completed prior to each cyanide transport event. Cyanide load restraint requirements for transporters are prescribed in the Transport Management Plan and Vehicle Operators Handbook. Procedures are in place for modification or suspension of cyanide transport operations and shipment plans in response to inclement weather or civil unrest. Drug abuse prevention programs were observed to be in place for all cyanide transporters. All contract road transport providers continue to maintain heavy vehicle accreditation with the relevant authorities in relation to driver competency, preventative maintenance and fatigue management and were able to demonstrate robust preventive maintenance systems for their transport equipment. Aurizon maintains and continues to implement a comprehensive Rail Safety Management System which is subject to audits by AGR for compliance with the AGR Transport Management Plan. The rail transport operations maintain records that demonstrate continuous compliance with relevant statutory authority requirements, legislation and ICMI Code requirements. Compliance with relevant authorities and Western Australian Dangerous Goods Transport legislation is an AGR transport service provider contract requirement. These regulatory safety obligations include measures that reflect the requirements of the ICMI Code for transport operations in regard to placarding, load restraint, inspection programs, driver fatigue and emergency/unplanned events. A review of cyanide transport safety incident reports verified that transport operators are continuing to report transport hazards and actions are taken to remove or minimize the safety risks posed by these hazards.

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

AGR Kwinana is in full compliance with
 in substantial compliance with
 not in compliance with
 not applicable in relation to Transport Practice 1.5

Basis for this Finding:

Transportation by sea or air is not undertaken by AGR within Western Australia and therefore this transportation practice was not assessed within the scope of this recertification audit.

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

AGR Kwinana is **in full compliance with Transport Practice 1.6**
 in substantial compliance with
 not in compliance with

Basis for this Finding:

CSBP and AGR have maintained shipping and handling records which demonstrate that cyanide deliveries are suitably reconciled with production and shipping quantities. Transport contractors maintain communication and tracking procedures in accordance with the AGR Transport Management Plan which includes the use of satellite phones, dress alarms, mobile phones, UHF radios and real time GPS tracking systems. Rail locomotives are provided with satellite phones, mobile phones and UHF radios and are tracked continuously by the train management and control centres. Communication

blackout areas for mobile telephones have been eliminated by the introduction of satellite phones by the transporters. Copies of the relevant Safety Data Sheets (SDS) are included in the Vehicle Operator's Handbook and must be carried in the driver's cab at all times. AGR undertakes regular audits of contractor compliance with the AGR Transport Management Plan to monitor the implementation of cyanide tracking measures during transport.

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.

AGR Kwinana is **in full compliance with Transport Practice 2.1**
in substantial compliance with
not in compliance with

Basis for this Finding:

The operation at CSBP is a manufacturing operation and the storage of solid and liquid sodium cyanide prior to despatch is covered under the Cyanide Production Verification Protocol.

Interim storage of liquid sodium cyanide is carried out at Aurizon West Kalgoorlie Container Interchange Terminal. A due diligence review by AGR and a visit and inspection by the auditors confirmed that Aurizon complied with all the requirements of Transport Practice 2.1.

Overnight storage of fully loaded liquid sodium cyanide isotainers is undertaken at Toll Mining Services Kalgoorlie in a dedicated bunded area. Inspection of this facility by the auditors confirmed compliance to the requirements of Transport Practice 2.1.

Temporary storage of sea containers prior to loading onto ships occurs at Patrick Terminals. A due diligence review by AGR of Patrick Terminals confirmed compliance to Transport Practice 2.1.

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.

AGR Kwinana is **in full compliance with Transport Practice 3.1**
in substantial compliance with
not in compliance with

Basis for this Finding:

CSBP acting on behalf of AGR is responsible for the overall management of the cyanide transportation activities including emergency response in accordance with the relevant statutory authorities and Ministerial approval conditions. These statutory emergency response requirements reflect ICMI transport code requirements including consideration of route selection, mode of transport, interim storage, and physical nature of the cyanide and the roles of external responders. The AGR Transport Management Plan provides the emergency response plans of sufficient detail to meet the statutory obligations and is aligned to the Western Australian Hazardous Materials Management Plan (HAZMAT). The Transport Management Plan is supported by CSBP's Management of Emergencies Procedure, Crisis Management Plan and the emergency procedures provided in the Vehicle Operator's Handbook. Contracted transport service providers and external service provider roles and responsibilities in relation to emergency response are clearly stated in the Transport Management Plan. The plans have been reviewed and updated at least annually over the previous three years.

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

AGR Kwinana is **in full compliance with Transport Practice 3.2**
in substantial compliance with
not in compliance with

Basis for this Finding:

CSBP has been accredited as Emergency Responder for sodium cyanide by the regulator, Department of Minerals and Petroleum. Specialised cyanide transport incident Emergency Response (ER) is provided throughout the supply chain by two dedicated CSBP response teams located at Kwinana. Training of the ER teams is provided by a combination of internal and external accredited personnel and mock drill exercises. Training records are available to demonstrate that the ER teams have maintained the required competencies since the previous ICMI recertification audit. AGR also provides cyanide awareness and initial response training for all transport contractors. Details of the roles, duties and responsibilities of ER personnel and the equipment requirements are described within the AGR Transport Management Plan and related CSBP ER procedures. The ER response teams provide continuous response availability to all carriers in the supply chain and have access to a comprehensive range of emergency response equipment at CSBP's Kwinana production facilities. The AGR Transport Management Plan includes a list of the available equipment at Kwinana, equipment provided with the transport vehicles and details of the ferrous sulphate stocks located strategically along the transport routes and at the interim storage facilities. ER for cyanide incidents at the Port of Fremantle is coordinated and directed by the Fremantle Port Authority using the Port's ER plans. However, CSBP's ER response teams provide technical support to the Port for cyanide related emergency scenarios.

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

AGR Kwinana is **in full compliance with Transport Practice 3.3**
in substantial compliance with
not in compliance with

Basis for this Finding:

CSBP has continued to maintain a dedicated emergency contact telephone number which reports direct to the Kwinana Emergency Control Centre (manned 24 hours, 365 days). This contact information is applicable throughout the supply chain and available to all the carriers within the supply chain through the AGR Transport Management Plan and the Vehicle Operator's Handbook. CSBP's ER plans reflect the external reporting coordinated through the state HAZMAT plan. Controlled hard copy versions of the Management of Emergencies Manual, emergency response contact lists (including but not limited to AGR and CSBP management and emergency response personnel, outside responders, port and customer mine site emergency personnel, and other response and contract transport personnel along the transport network) are maintained at the Kwinana Emergency Control and Response Centres. Emergency contact details are also provided within the AGR Transport Management Plan and Vehicle Operator's Handbook. CSBP have developed and maintained an intranet based electronic document management system within which document controlled versions of existing plans, procedures, forms, contact and checklists are available. These key documents are also available at all times in electronic format on a notepad to the Duty Incident Controller who has the responsibility of initiating first response to any cyanide incident.

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

AGR Kwinana is **in full compliance with Transport Practice 3.4**
in substantial compliance with
not in compliance with

Basis for this Finding:

The AGR Transport Management Plan provided to all carriers in the supply chain, includes procedures for the handling, containment, recovery, treatment, neutralisation and clean up for a range of liquid and solid cyanide scenarios associated with both road and rail transport.

This includes specific procedures in relation to the use of clean up chemicals for both surface water and underground water scenarios and includes the prohibition of sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface waters. The procedures have been revised periodically since the last ICMI recertification audit.

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

AGR Kwinana is **in full compliance with Transport Practice 3.5**
in substantial compliance with
not in compliance with

Basis for this Finding:

The AGR Transport Management Plan, which includes the emergency response plans, includes a commitment to undertake both external and internal audits of all carriers within the supply chain against the requirements of the Plan. Evidence exists that the Transport Management Plan and associated emergency response documents have previously been reviewed and updated as required by the ministerial condition. Transport Management Plan audits are undertaken every two years including emergency response aspects by an independent external company. These audits have been completed for all carriers within the supply chain. The Transport Management Plan also includes a requirement for the planning, training and emergency exercises and a specific procedure exists for emergency scenario development and training. Cyanide emergency exercises (including outside responders and transport contractors as appropriate) are undertaken on a biennial basis with the cyanide emergency response exercises being conducted at the Aurizon West Kalgoorlie Terminal in June 2013, Aurizon and Toll in 2015 and Coogee Chemicals in 2016. AGR maintains records of the emergency mock drill exercises which includes the exercise details, findings and applicable action items. In addition, The CSBP Emergency Response Team's training, on an annual basis, includes training in dealing with cyanide incidents.

4. AURIZON

4.1. Operational Information

Aurizon Holdings Limited (Aurizon) offices are located in Perth Western Australia. Aurizon is a rail and road based freight transport company across Australia.

Aurizon transports coal, iron ore and other minerals as well as agricultural and general freight.

Aurizon operates the daily rail service for dangerous goods between Kwinana, Perth and Kalgoorlie for servicing the mining and resources sector.

Aurizon receives liquid sodium cyanide in CSBP owned isotainers, from AGR's Kwinana manufacturing facility for rail transport initially to the Forrestfield Rail Yard where trains are assembled for transport to the West Kalgoorlie rail facility. Liquid sodium cyanide isotainers are unloaded at the West Kalgoorlie facility for interim storage and transportation by road to regional customers.

4.2. Summary of Due Diligence Investigation

A due diligence review of Aurizon's cyanide transport operations was completed by AGR in May 2016.

Visits to the Aurizon Forrestfield Yard and Aurizon Container Interchange at Kalgoorlie were undertaken by the auditors to confirm key aspects of the due diligence review report.

The auditors visited both locations during this recertification audit to undertake a physical visit, review documentation and due diligence findings and interview appropriate personnel.

This due diligence report was reviewed by the audit team's transport technical auditor, who found that the operations of Aurizon had been comprehensively evaluated through the due diligence review. The scope of the due diligence review included Aurizon's rail operations for liquid sodium cyanide, from CSBP, to and including the West Kalgoorlie Interchange Container Terminal.

5. COOGEE CHEMICALS

5.1. Operational Information

Coogee Chemicals - Specialised Bulk Liquid Dangerous Goods Transport Division (Coogee) is based in Kwinana Western Australia. Coogee provides transport services from the customer's operation or Coogee Chemicals' manufacturing facilities and tank terminals to the point of use. Coogee has a specialised fleet of dangerous goods road tankers and trailing equipment. The company services transport requirements throughout Western Australia.

Coogee prime movers and trailers receive solid sodium cyanide from AGR's Kwinana manufacturing facility in seaintainers for road transport along approved routes to Patrick Terminals at Fremantle Wharf. Coogee also receives solid and liquid sodium cyanide from AGR's Kwinana manufacturing facility in isotainers for road transport to regional Western Australian customers along approved transport routes.

Coogee may, under emergency situations, also transport both liquid and solid sodium cyanide along approved contingency routes to the regional customers in the event that the rail network is not accessible.

5.2. Audit Findings

Coogee Chemicals is **in full compliance with the International Cyanide Management Code**
 in substantial compliance with
 not in compliance with

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.*

Coogee Chemicals is **in full compliance with Transport Practice 1.1**
 in substantial compliance with
 not in compliance with

Basis for this Finding:

The selection of road transport routes is undertaken by AGR in accordance with the requirement of the ICMI Transport Code (as described in 2.2.1 above). The route selection is carried out by AGR on behalf of all carriers within the supply chain.

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.*

Coogee Chemicals is **in full compliance with Transport Practice 1.2**
 in substantial compliance with
 not in compliance with

Basis for this Finding:

AGR has demonstrated that a comprehensive competency based awareness and emergency response training management program has been maintained for all Coogee operators. AGR provides the cyanide and emergency response training components, while Coogee Chemicals are responsible for ensuring drivers hold appropriate heavy vehicle and dangerous goods carrier accreditations. Evidence was sighted that all drivers held the appropriate heavy vehicle and dangerous goods licences.

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

Coogee Chemicals is **in full compliance with Transport Practice 1.3**
 in substantial compliance with
 not in compliance with

Basis for this Finding:

Coogee provides vehicle operators, prime movers and trailers for the transport of AGR owned and managed liquid and solid sodium cyanide isotainers and solid sodium cyanide seatainers. Evidence was sighted during the audit that Coogee employs vehicle operators, prime movers and trailers licensed and approved by the relevant authorities, consistent with the AGR contract requirements. The AGR contract with Coogee continues to specify that equipment must comply with dangerous goods transport applicable laws. These requirements include ICMI Transport Code obligations for transport equipment design and maintenance to be relevant to the loads being handled, procedures to verify the suitability of load bearing equipment and procedures to prevent overloading.

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

Coogee Chemicals is **in full compliance with Transport Practice 1.4**
 in substantial compliance with
 not in compliance with

Basis for this Finding:

The AGR Transport Management Plan describes the responsibilities, roles and procedures relating to the safe handling, temporary storage and transport of cyanide. AGR undertakes audits of Coogee to determine compliance with the safety requirements of the Transport Management Plan and the Vehicle Operator's Handbook. The audits verified that Coogee continues to maintain heavy vehicle accreditation with the relevant authorities in relation to driver competency, preventative maintenance and fatigue management. These audits also provide verification of continued compliance with the ICMI Transport Code requirements. Coogee also maintains a robust maintenance and checking system for its fleet of prime movers and trailers designated for the transport of cyanide. A review of cyanide transport safety incident reports verified that Coogee is continuing to report transport hazards and actions are taken to remove or minimize the safety risks posed by these hazards.

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

Coogee Chemicals is in full compliance with
 in substantial compliance with
 not in compliance with
 not applicable in relation to Transport Practice 1.5

Basis for this Finding:

Transportation by sea or air is not undertaken by Coogee Chemicals within Western Australia and therefore this transport practice was not assessed within the scope of the recertification audit.

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

Coogee Chemicals is **in full compliance with Transport Practice 1.6**
in substantial compliance with
not in compliance with

Basis for this Finding:

CSBP and AGR have maintained shipping and handling records which demonstrate that cyanide deliveries are suitably reconciled with production and shipping quantities. The requirement to return the Road Delivery Notes to AGR as proof of delivery is a Key Performance Indicator in the transport contract. Coogee maintains communication and tracking procedures in accordance with the AGR Transport Management Plan which includes the use of satellite phones, mobile phones, UHF radios, duress alarms and real time GPS tracking systems. Communication blackout areas for mobile telephones are mitigated by satellite phones which are provided in all prime movers. Copies of the relevant SDS are included in the Vehicle Operator's Handbook and must be carried in the driver's cab at all times. AGR undertakes regular audits of Coogee compliance with the AGR Transport Management Plan to monitor the implementation of cyanide tracking measures during shipping.

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.

Coogee Chemicals is in full compliance with
in substantial compliance with
not in compliance with
 not applicable in relation to Transport Practice 2.1

Basis for this Finding:

Coogee does not operate a cyanide trans-shipping depot or interim storage site and therefore this transport practice was not assessed within the scope of the transportation recertification audit.

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.

Coogee Chemicals is **in full compliance with Transport Practice 3.1**
in substantial compliance with
not in compliance with

Basis for this Finding:

CSBP acting on behalf of AGR is responsible for the development of detailed emergency response plans (as described in section 2.2.3) for Coogee Chemicals transport operations. Coogee roles and responsibilities in relation to emergency response are clearly stated in the AGR Transport Management Plan.

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

Coogee Chemicals is **in full compliance with Transport Practice 3.2**
in substantial compliance with
not in compliance with

Basis for this Finding:

Specialised cyanide transport incident Emergency Response for Coogee operated cyanide transport is provided by two dedicated CSBP response teams located at Kwinana. AGR also provides cyanide awareness and initial response training for all transport contractors including Coogee.

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

Coogee Chemicals is **in full compliance with Transport Practice 3.3**
in substantial compliance with
not in compliance with

Basis for this Finding:

Emergency response, contact and reporting procedures are provided within the AGR Transport Management Plan and the Vehicle Operator's Handbook which Coogee drivers are trained in and use for all cyanide transport operations.

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

Coogee Chemicals is **in full compliance with Transport Practice 3.4**
in substantial compliance with
not in compliance with

Basis for this Finding:

Coogee transport operators are trained to respond to cyanide incidents in accordance with the AGR Transport Management Plan which includes notification of an incident, procedures for the handling, containment, recovery, treatment, neutralization and clean up for a range of liquid and solid cyanide scenarios associated with road transport.

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

Coogee Chemicals is **in full compliance with Transport Practice 3.5**
in substantial compliance with
not in compliance with

Basis for this Finding:

The periodic evaluation and review of the AGR Transport Management Plan is undertaken by AGR. Coogee is not responsible for this requirement.

6. TOLL INTERMODAL & TOLL MINING SERVICES

6.1. Operational Information

Toll Intermodal and Toll Mining Services has offices and transport depots in Perth and Kalgoorlie and are part of the Australia-wide Toll Group. Toll Intermodal and Toll Mining Services offer specialised transport services for dangerous goods. The company's bulk logistics focuses specifically in the energy, resources and dangerous goods industries.

Toll Mining Services transports liquid sodium cyanide isotainers by road from the Aurizon West Kalgoorlie facility to regional customers.

Toll Intermodal transports solid sodium cyanide in seatainers from AGR's Kwinana manufacturing facility for transport to the Pacific National Rail Marshalling Yard at Kewdale for rail transport to Eastern States customers.

6.2. Audit Findings

Toll is **in full compliance with the International Cyanide Management Code**
 in substantial compliance with
 not in compliance with

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.*

Toll is **in full compliance with Transport Practice 1.1**
 in substantial compliance with
 not in compliance with

Basis for this Finding:

The selection of road transport routes is undertaken by AGR in accordance with the requirement of the ICMI Transport Code (as described in 2.2.1 above). The route selection is carried out by AGR on behalf of all carriers within the supply chain.

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.*

Toll is **in full compliance with Transport Practice 1.2**
 in substantial compliance with
 not in compliance with

Basis for this Finding:

AGR has demonstrated that a comprehensive competency based awareness and emergency response training management program has been maintained for all Toll Intermodal and Toll Mining Services operators. AGR provides the cyanide and emergency response training components, while Toll Intermodal and Toll Mining Services are responsible for ensuring drivers hold appropriate heavy vehicle and dangerous goods carrier accreditations. Evidence was sighted that all drivers held the appropriate heavy vehicle and dangerous goods licences. The operator training includes induction of new drivers to ensure continuous awareness of the Transport Management Plan and the Vehicle Operator's Handbook. AGR maintains records of initial and refresher training undertaken and the appropriate driver accreditations. Dangerous goods management training has continued to be a core requirement for all Toll Intermodal and Toll Mining Services operators.

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

in full compliance with Transport Practice 1.3
 Toll is in substantial compliance with
 not in compliance with

Basis for this Finding:

Toll provides vehicle operators, prime movers and trailers for the transport of AGR owned and managed liquid sodium cyanide isotainers and solid sodium cyanide seatainers. There was evidence that Toll employs vehicle operators, prime movers and trailers licensed and approved by the relevant authorities, consistent with the AGR contract requirements. The AGR contract with Toll continues to specify that equipment must comply with dangerous goods transport applicable laws. These requirements include ICMI Transport Code obligations for transport equipment design and maintenance to be relevant to the loads being handled, procedures to verify the suitability of load bearing equipment and procedures to prevent overloading.

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

in full compliance with Transport Practice 1.4
 Toll is in substantial compliance with
 not in compliance with

Basis for this Finding:

The AGR Transport Management Plan describes the responsibilities, roles and procedures relating to the safe handling, temporary storage and transport of cyanide. AGR undertakes audits of Toll to determine compliance with the safety requirements of the Transport Management Plan and the Vehicle Operator's Handbook. The audits verified that Toll Intermodal and Toll Mining Services continue to maintain heavy vehicle accreditation with the relevant authorities in relation to driver competency, preventative maintenance and fatigue management. These audits also provide verification of continued compliance with the ICMI Transport Code requirements. Toll Intermodal and Toll Mining Services also maintains a robust maintenance and inspection system for its fleet of prime movers and trailers designated for the transport of cyanide. A review of cyanide transport safety incident reports verified that Toll Intermodal and Toll Mining Services is continuing to report transport hazards and actions are taken to remove or minimize the safety risks posed by these hazards.

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

Toll is in full compliance with
 in substantial compliance with
 not in compliance with
 not applicable in relation to Transport Practice 1.5

Basis for this Finding:

Transportation by sea or air is not undertaken by Toll Intermodal or Toll Mining Services within Western Australia and therefore this transport practice was not assessed within the scope of the recertification audit.

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

in full compliance with Transport Practice 1.6
 Toll is in substantial compliance with
 not in compliance with

Basis for this Finding:

CSBP and AGR have maintained shipping and handling records which demonstrate that cyanide deliveries are suitably reconciled with production and shipping quantities. The requirement to return the Road Delivery Notes to AGR as proof of delivery is a Key Performance Indicator written into the transport contract. Toll Intermodal and Toll Mining Services maintains communication and tracking procedures and equipment in accordance with AGR's Transport Management Plan which includes the use of satellite phones, mobile phones, UHF radios, duress alarms and real time GPS tracking systems. Communication blackout areas for mobile telephones are mitigated by satellite phones which are provided in all prime movers for Toll Mining Services. For Toll Intermodal who transports sea containers to the rail marshalling yards, there are no communication black spots in this operation. Copies of the relevant SDS are included in the Vehicle Operator's Handbook and must be carried in the driver's cab at all times. CSBP undertakes regular audits of Toll Intermodal and Toll Mining Services compliance with the AGR Transport Management Plan to monitor the implementation of cyanide tracking measures during shipping.

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.

in full compliance with Transport Practice 2.1
 Toll is in substantial compliance with
 not in compliance with

Basis for this Finding:

There is no interim storage conducted by Toll Intermodal, as containers are delivered directly to the Pacific National Marshalling Yards at Kewdale.

Toll Mining Services West Kalgoorlie yard incorporates a dedicated concrete lined cyanide trans-shipping pad to be used in situations where a truck has picked up liquid cyanide isotainers from Aurizon's West Kalgoorlie Container Interchange Terminal and is awaiting a new operator to transport the isotainers to one of the regional customer sites. The concrete lined pad is located in a secure area with adequate signage and is constructed in such a manner that any leakage from an isotainer is captured in a central concrete lined sump.

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.

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

Basis for this Finding:

CSBP acting on behalf of AGR is responsible for the development of detailed emergency response plans (as described in section 2.2.3) for Toll Intermodal and Toll Mining Services transport operations. Toll Intermodal and Toll Mining Services roles and responsibilities in relation to emergency response are clearly stated in the AGR Transport Management Plan.

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

in full compliance with Transport Practice 3.2
Toll is in substantial compliance with
not in compliance with

Basis for this Finding:

Specialised cyanide transport incident Emergency Response for Toll Intermodal and Toll Mining Services operated cyanide transport is provided by two dedicated CSBP response teams located at Kwinana. AGR also provides cyanide awareness and initial response training for all transport contractors including Toll Intermodal and Toll Mining Services.

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

in full compliance with Transport Practice 3.3
Toll is in substantial compliance with
not in compliance with

Basis for this Finding:

Emergency response, contact and reporting procedures are provided within the AGR Transport Management Plan and the Vehicle Operator's Handbook which Toll Intermodal and Toll Mining Services drivers are trained in and use for all cyanide transport operations.

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

in full compliance with Transport Practice 3.4
Toll is in substantial compliance with
not in compliance with

Basis for this Finding:

Toll transport operators are trained to respond to cyanide incidents in accordance with the AGR Transport Management Plan which includes notification of an incident, procedures for the handling, containment, recovery, treatment, neutralization and clean up for a range of liquid and solid cyanide scenarios associated with road transport.

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

Toll is **in full compliance with Transport Practice 3.5**
in substantial compliance with
not in compliance with

Basis for this Finding:

The periodic evaluation and review of the AGR Transport Management Plan is undertaken by AGR. Toll is not responsible for this requirement.

7. PATRICK TERMINALS

7.1. Operational Information

Patrick Terminals (Patrick) is one of Australia's leading providers of port related services to importers, exporters and shipping lines. Patrick's business is the provision of ship to shore and shore to door for both domestic and international trade markets. Patrick is part of Asciano Limited a publicly listed company on the Australian Stock Exchange. Patrick at Fremantle Port Western Australia provides container handling from shore to ship for the export of AGR's solid sodium cyanide.

Patrick operates stevedoring facilities at the Port of Fremantle and unloads solid sodium cyanide seaintainers from trucks for interim storage at a dedicated storage facility prior to loading onto ships for supply to overseas customers. A due diligence investigation of compliance with the ICMI Transport Code of Practice of Patrick's operations was completed by AGR in May 2016.

7.2. Summary of Due Diligence Investigation

The May 2016 due diligence report undertaken by AGR on Patrick's activities included temporary storage of hazardous materials, emergency response, and compliance with statutory requirements.

The due diligence assessment consisted of a visit by AGR/CSBP personnel to Patrick Terminal Fremantle to undertake a physical visit, review documentation and interview appropriate personnel.

A review of the report undertaken by the audit team's transport technical expert, found the AGR due diligence report to be a comprehensive evaluation of Patrick's cyanide temporary storage and loading activities.

2018 Addendum**8. QUBE****8.1. Operational Information**

Qube Bulk Pty Ltd (Qube) transports cyanide by road in various forms on behalf of Australian Gold Reagents Pty Ltd (AGR) in Western Australia. AGR is the cyanide consignor for cyanide manufactured at the AGR facility in Kwinana, Western Australia, and transported to various mines in accordance with the ICMI certified AGR Western Australian Supply Chain. In April 2018, Qube replaced Toll Mining Services and Coogee Chemicals for all road transport associated with the WA Supply Chain.

Qube is contracted to provide road transport of cyanide products from AGR's manufacturing plant in Kwinana, and from the Aurizon rail terminal in Kalgoorlie to various mine sites in Western Australia. Some deliveries are also from AGR to the Aurizon rail terminal in Kwinana. The cyanide is transported in solid form in either Isotainers as solids to solution tanks (SST) or in IBCs packed freight containers. Cyanide is also transported as a liquid solution (30% cyanide) in Isotainers.

Two divisions of Qube Holdings Ltd are used for cyanide transport: Qube Logistics and Qube Bulk. As part of the same company both work to the same management procedures. Qube's operations at Kwinana and Kalgoorlie are similar. Both are large, fenced areas with administration activities, large workshops and ample open spaces for vehicle manoeuvring. At each depot vehicles are routinely parked in designated areas according to a vehicle management plan. The workshops are used for standard maintenance activities; specialist work is contracted out to others.

When advised that cyanide is needed at a mine, Qube organises and dispatches appropriate vehicles to the collection point which will be either AGR premises in Kwinana or the Kalgoorlie rail container terminal. Prior to leaving the Qube depot, drivers log into the in-vehicle management system (IVMS). Following collection of the cyanide, vehicles depart for the mine using the specified routes advised by the consignor. Upon arrival drivers follow the appropriate procedure as required by the mine, then assist with the unloading of the cyanide before returning to the relevant depot.

Qube Bulk was listed as a signatory to the Cyanide Code on 20 March 2018. A certification audit conducted by Sustainability Pty Ltd, found Qube to be fully compliant to the ICMI Cyanide Transportation Verification Protocol, as evidenced by the Summary Audit Report dated 23 November 2018. Qube Bulk was certified in full compliance to the Cyanide Code on 29 November 2018.

8.2. Audit Findings

Qube is	<input checked="" type="checkbox"/> in full compliance with the International Cyanide Management Code in substantial compliance with not in compliance with
1. TRANSPORT:	Transport cyanide in a manner that minimizes the potential for accidents and releases.
<u>Transport Practice 1.1:</u>	Select cyanide transport routes to minimize the potential for accidents and releases.
Qube is	<input checked="" type="checkbox"/> in full compliance with Transport Practice 1.1 in substantial compliance with not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 1.1.

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.

Qube is **in full compliance with Transport Practice 1.2**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 1.2.

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

Qube is **in full compliance with Transport Practice 1.3**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Practice 1.3.

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

Qube is **in full compliance with Transport Practice 1.4**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 1.4.

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

Qube is in full compliance with
in substantial compliance with
not in compliance with
 not applicable in relation to Transport Practice 1.5

Basis for this Finding:

Transportation by sea or air is not undertaken by Qube within Western Australia.

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

Qube is **in full compliance with Transport Practice 1.6**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 1.6

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.

Qube is *in full compliance with*
in substantial compliance with
not in compliance with
 not applicable in relation to Transport Practice 2.1

Basis for this Finding:

Qube does not have trans-shipping depots or interim storage of cyanide as part of its cyanide transport operations.

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.

Qube is **in full compliance with Transport Practice 3.1**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 3.1.

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

Qube is **in full compliance with Transport Practice 3.2**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 3.2.

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

Qube is **in full compliance with Transport Practice 3.3**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 3.3.

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

Qube is **in full compliance with Transport Practice 3.4**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 3.4.

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

Qube is **in full compliance with Transport Practice 3.5**
in substantial compliance with
not in compliance with

Basis for this Finding:

The certification audit conducted by Sustainability Pty Ltd found Qube to be fully compliant to Transport Practice 3.5.