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INTERNATIONAL CYANIDE MANAGEMENT CODE

Australian Gold Reagents – Africa Supply Chain
Summary Audit Report

Prepared for Harry Aung
Australian Gold Reagents
June 2024
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1 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: AGR Africa Supply Chain

Name of Facility Owner: Not applicable

Name of Facility Operator: Australian Gold Reagents Pty Ltd

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2 SODIUM CYANIDE TRANSPORTATION

2.1 AGR Australia Ltd

AGR is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd (Coogee Chemicals). CSBP, a subsidiary of Wesfarmers Ltd is the major participant in the venture and acts as both plant operator and sales agent. Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

AGR in its capacity as the sales agent is the consigner and is responsible for the overall management of the cyanide transportation activities.

2.2 Kwinana Production Facility

AGRs cyanide production facility is located within CSBPs fertiliser and chemicals complex at Kwinana, approximately 40 km south of Perth, Western Australia. AGR produces two forms of cyanide namely solid and solution. Cyanide solution is produced as a 30% strength liquid and solid cyanide is >97% solid white briquette. Crimson dye is added by the manufacturer for both products.

AGRs production facility was recertified in full compliance with the Code on 28 August 2023.

2.3 Australian Supply Chain

AGRs Australian Supply Chain covers both road and rail transport from AGRs Kwinana production facility to end user mine sites in Australia and to the Port of Fremantle for export. The Australian Supply Chain includes the port and stevedore operations at Fremantle Port.

AGRs Australian Supply Chain was recertified in full compliance with the Code on 9 November 2022.

2.4 Ocean Freight Supply Chain

The scope of AGR's Ocean Freight supply chain includes the marine transportation of solid cyanide (in intermediate bulk containers (IBCs) within shipping containers) from the Fremantle Port, Western Australia, to various interstate and international Ports. The carriers used are the Mediterranean Shipping Company (Aust) Pty Ltd (MSC), Maersk Australia Pty Ltd (Maersk), and Ocean Network Express (ONE).

The carriers' roles within AGR's cyanide distribution network, or the Ocean Freight Supply Chain itself, are not part of the scope of this audit.

AGRs Ocean Freight Supply Chain was recertified in full compliance with Code on 6 July 2023.

2.5 Africa Supply Chain

The Africa supply chain covers the land-based transportation of AGR's solid cyanide from the various ports in Africa to mining end point users. AGR uses ICMC certified transport operators to transport cyanide from the ports to the mines. The elements of the Africa Supply chain included in this recertification are described in following sections.

Changes from the scope of the previous supply chain audit include:

- The Port of Abidjan has been removed from the supply chain. The port was not used during the audit period.

- The removal of the following road transporters. These transporters have remained ICMC certified but were not used during the audit period and have been removed from the supply chain.
 - Freight Forwarders Tanzania (FFT)
 - Africa Global Logistics (AGL), formerly Bollore Group.
 - Stellar Logistics
 - Verhad

2.6 Ports

The international sales and exports of cyanide, by AGR, take into consideration the ports and their extended infrastructure available to service the intended target area. AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from point of origin to destination. Each port is selected on the basis that it is the closest port to the customer and that it meets all reasonable industry standards for safety, security, and emergency response.

2.6.1 Port of Conakry, Guinea

The port is managed by the Government Port Authorities and terminal handling by Bolloré Guinea. The terminal operations manager and staff are aware when sodium cyanide containers are to arrive at the Port. The Port undertakes the removal of the shipping containers from the vessel and placement onto transport vehicles. The process for cyanide at the port is to directly load onto vehicles for transport to the mine site. Sodium cyanide containers are not stored at the terminal.

Customs clearance procedures are usually completed prior to the vessel arrival to enable this direct loading method. Once the consignment is cleared through customs and a release certificate is issued for each container. The port has a strict security process managing the transporter's vehicle entering the terminal to collect a designated container.

2.6.2 Port of Dar es Salaam, Tanzania

Dar es Salaam Port is the main container port servicing Tanzania. The Port of Dar es Salaam is owned by The Tanzania Ports Authority (TPA) and contains 2 km of quays with a total of eleven deep water berths. These berths are used for the import and export of conventional break bulk cargo, containerised cargo, motor vehicles, bulk liquids, and grains.

TPA regulates and licenses port and marine services and facilities. It also manages vessel traffic in the port, safety and security. TPA operates a system of ports serving the Tanzania hinterland and the landlocked countries of Malawi, Zimbabwe, Zambia, Democratic Republic of Congo (DRC), Burundi, Rwanda, and Uganda.

The terminal has a sophisticated terminal software operating system known as the Next Generation Terminal Management System (nGEN). nGen, is a proprietary modular, scalable terminal-management platform that controls the entire scope of operations including ship and yard planning, gate operations, vessel operations and interactions, yard configuration and performance, overall operations monitoring, equipment utilisation, productivity, and cost optimisation.

Tanzania International Container Terminal Services Ltd (TICTS), located at Dar es Salaam, is the country's largest container terminal. All containerised cargo is handled by TICTS at a dedicated container terminal. The terminal has three berths totalling 540 meters in length with a capacity to handle approximately 400,000 TEUs, per year which includes many classes of Dangerous Goods cargo.

2.6.3 Port of Durban, South Africa

The Port of Durban commonly called Durban Harbour, is the second largest port of South Africa and one of the busiest ports in Africa. Durban Port is South Africa's main cargo and container port, handling the largest volume of sea-going traffic of any port in southern Africa.

Ideally placed on major shipping routes and with excellent rail and road links, the port plays an integral role in the country's economy. The port occupies the natural expanse of Durban Bay – an area of 1850 ha, with the water area being 892 ha in extent at high tide and 679 ha at low. The entrance channel is 122 m wide and is maintained at a dredged 12.8 m draught (depth of water).

The port is managed by Transnet National Ports Authority (TNPA), which is a government corporation of South Africa and subsidiary of Transnet. Transnet is responsible for managing and governing eight South African seaports.

Almost all containers are handled at Durban Container Terminal (DCT) which is the largest of its kind in the southern hemisphere. Containers handled at the terminal currently represent more than 60% of the total number handled at all South African ports. DCT serves as a pivotal hub for the entire Southern African region, serving trade links to the Far East, Middle East, Australasia, South America, North America, and Europe. It also serves as a trans-shipment hub for East Africa and Indian Ocean islands.

The terminal has 2,128 m of quayside divided into seven berths. DCT has more than 13,000 ground slots and 600 reefer points and handles an average of 50 000 TEUs per month. A rail terminal receives and dispatches containers to Johannesburg and other destinations as far as Zambia. DCT has a capacity of 2.9 million TEUs per annum.

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

2.6.4 Port of King Abdullah, Saudi Arabia

King Abdullah Port is Saudi Arabia's newest port facility which opened in September 2013. It is part of a large new development project 'King Abdullah Economic City' (KAEC); the project takes up 160 km² of what is ultimately a recent city development including residential areas, industrial areas, and port and rail transport terminals. The city is located 100km north of Jeddah on the Red Sea.

The port falls under the Ports Developing Company (PDC) and was formed in 2010 by the Saudi BinLaden Group and Emaar, the Economic City. The Joint venture is based on both companies having strengths in construction and operation of large infrastructure projects including Ports. Emaar, The Economic City (Emaar TEC) company is the master developer and planner of the KAEC including the port.

The planning of the KAEC and KAP has allowed the development the city and port facilities to be laid out and planned which includes direct access from the Port to national roads servicing the major centres in Saudi Arabia. This direct access to and from the Port includes the industrial areas of the KAEC area and onto the national roadways in Saudi Arabia, the access away from the residential parts of KAEC.

The port allows unloading of the shipments for the subsequent road transport of the containers to the various mine sites within the Kingdom of Saudi Arabia. The Port with its modern infrastructure and roadways and 24/7 direct access to the national road network offers improvements over the Jeddah Islamic Port.

The container terminal was completed in 2017 offering four container vessel berths, with 1440 m of quay length, and the capacity to handle 4 million twenty-foot equivalent units (TEU) per annum. This also includes 300,000m² of container storage areas with a capacity of 700,000 TEU.

2.6.5 Port of Takoradi, Ghana

The Port of Takoradi is located 230 kilometres east of Accra, Ghana. Takoradi is strategically positioned to service the northern hinterland of Ghana and serve as an alternative port for economic operators in the landlocked countries of Burkina Faso, Niger, and Mali. Historically, the port has handled up to 27% of Ghana's seaborne traffic, 68% of Ghana's seaborne exports and 15% of Ghana's seaborne imports.

Major commodities handled through the port are manganese, bauxite, wheat, bulk and bagged cocoa, quicklime, containerised cargoes, equipment for the mining and oil/gas industry. Traffic through the port is facilitated by leading shipping lines and the port's wide range of equipment along with stevedoring services provided by the private sector enable it to offer a wide range of services.

The port allows for the unloading of shipments for final road transportation to the mining operations in Ghana as well as Burkina Faso and Eastern Mali. The Ghana Ports and Harbour Authority (GPHA) oversees port operations.

2.6.6 Port of Tema, Ghana

The port of Tema is the largest port in Ghana and located 30 km from Accra. The port handles about 12 million tonnes of cargo annually and receives over 1,650 vessel calls per year, including container vessels, general cargo vessels, tankers, Roll-on/Roll-off (Ro-Ro) and cruise vessels.

Tema port is the main container port servicing Ghana and its neighbouring landlocked countries. The port area includes a 1 million twenty-foot equivalent units (TEUs) container terminal, a fishing harbour, a shipyard with the largest dry dock in West Africa and a range of deep-water berths. The Ghana Ports and Harbour Authority (GPHA) oversees port operations.

2.6.7 Port of Walvis Bay, Namibia

The Port of Walvis Bay is Namibia's main and largest port strategically located half-way down the coast with direct access to principal shipping routes. Temperate weather conditions are experienced all year round providing reliable and efficient cargo handling.

The port handles container imports, exports, and trans-shipments, as well as bulk and break-bulk of various commodities. The port serves a wide range of industries such as the petroleum, salt, mining, and fishing industries.

The Port of Walvis Bay is operated by the National Port Authority known as NAMPORT and the port is owned by the government of Namibia. The container terminal at the port of Walvis Bay can accommodate about 4000 containers with provision for 482+ reefer container plug points. The port can handle about 750,000 containers per annum. The port is compliant with the International Ship and Port Facility Security code (ISPS).

2.7 Road Transport

Within the African Supply Chain, AGR contracts the road transportation of cyanide to Transport Terrassement Minier (TTM) based in Guinea to complete transport to some of its customers in West Africa. No other road transport contractors are used within the Supply Chain.

As noted, previously included transporters were not used during the audit period and have been removed from the scope of certification.

2.7.1 Transport Terrassement Minier (TTM)

Established in 1995, TTM is a Guinean-owned company providing civil engineering, construction, and transportation services to major clients within West Africa. TTM is an authorised dangerous goods transporter within Guinea and provide customs clearance, logistics, and warehousing services.

TTM was recertified as being fully compliant with the Code on 1 May 2023.

2.8 Transit storage

Within the scope of this audit, transit storage is associated with port operations where containers of cyanide are removed from the vessels and may be temporarily stored and then placed on road vehicles for the next part of the journey. These transit storage depots are managed by the relevant port authorities and due consideration of relevant protocol requirements has been made through the due diligence process.

There is no interim storage outside of the Port operations included within this supply chain.

2.9 Auditors Finding and Attestation

in full compliance with

AGR is: in substantial compliance with **the International Cyanide Management Code**

not in compliance with


No significant cyanide exposures or releases were noted to have occurred during AGRs recertification audit.

Audit Company: Enpoint

Audit Team Leader: Mike Woods, Exemplar Global (113792)

Email: mikewoods@endpoint.com.au

2.10 Name and Signatures of Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		12.06.2024

2.11 Dates of Audit

The ICMC Recertification Audit was conducted over three days between with the final field work completed on 7 March 2024.

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 Cyanide Transportation Verification Protocol for the International Cyanide Management Code and using standard and accepted practices for health, safety and environmental audits.

3 TRANSPORTATION VERIFICATION PROTOCOL

PRINCIPAL 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.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 1.1

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

AGR, through the use of ICMC-certified road carriers, has a process for the selection of transport routes that minimise the potential for accidents and releases or the potential impacts of accidents and releases. There have been no changes to the road carriers used in the supply chain other than Bollore have changed their name to Africa Global Logistics.

AGR implements a procedure to evaluate the risks of selected cyanide transport routes and takes the measures necessary to manage these risks. A route review, from the port to the mine site(s), is undertaken as part of the international carrier risk assessment. This process involves representatives of both AGR and the international carrier driving the proposed route(s) and documenting the risks. Recommendations are then made as to route changes, additional safety controls or security considerations where necessary. AGR requires the contractor to complete subsequent route surveys on a routine basis according to the carrier's overall risk rating.

AGR conducts triennial due diligence assessments on ports used in the supply chain to identify potential risks.

AGR has undertaken an assessment of each of the carriers in the supply chain to satisfy themselves that the selected carriers are meeting AGR's requirements for the handling and transportation of cyanide. The *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

Selection is a three-stage process and, broadly, involves:

1. Identification of potential suitable carriers in the country of desired operation. It is generally not possible to call for tenders in the countries in which AGR operates and as such, AGR carry out due diligence of existing ICMI certified carriers or other approved dangerous goods transporters.
2. Following the identification of potential international carriers, AGR completes an assessment of whether the carriers satisfy AGR's minimum requirements for the transport of cyanide.
3. Prior to acceptance of the preferred international carrier, an overall risk assessment of the carrier is conducted. The outcome of the risk assessment is the generation of an overall risk rating for the international carrier, as either a Low, Medium, or High risk carrier. The risk rating is used to determine the frequency and scope of ongoing audits and other reviews.

The process outlined above is used to verify that:

- Suitable transport equipment that is fit for the purpose of transporting cyanide.
- A preventative maintenance programme in place for its transport equipment, and it can provide evidence to indicate that this preventative maintenance system is adhered to.
- Complied with and continues to comply with, all statutory and legal requirements of the relevant country(s) in which they operate or through which they transport.
- Policies and procedures in place in relation to emergency response, fatigue management, driver training and performance management; and drugs and alcohol and can demonstrate adherence to them.
- Sound reputation and there is no evidence to suggest that the carrier is not in a sound financial position.

Ports

The international sales and exports of cyanide by AGR take into consideration the ports and their extended infrastructure available to service the intended target area. The destination port is selected on the basis that it is the closest port to the customer and that it meets reasonable industry standards for safety, security and emergency response.

Due diligence assessments of the ports used in the supply chain were completed by AGR (within their three-year cycle) and reviewed by Enpoint.

Enpoint's assessments concluded that the due diligence assessments of the ports within the supply chain completed by AGR have reasonably evaluated these facilities. The due diligence assessments concluded that no additional management measures were needed for the ports. The due diligence assessment reviews are presented in Section 4.

Road Transport

AGR utilises ICMC certified transporter for road transportation elements of its supply chain and the certifications were maintained in full compliance. TTM was recertified as fully compliant with the Code on 1 May 2023.

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

AGR is: in substantial compliance with

Transport Practice 1.2

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

AGR, through the use of ICMC-certified road carriers, has a process in place for the use of only trained, qualified and licensed operators in operating transport vehicles during the transportation of its cyanide.

AGR has undertaken audits of its supply chain carriers and has monitoring systems in place to assess transporter's ongoing compliance with ICMI and AGR cyanide handling and transportation requirements.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.2.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of each of the carriers in the supply chain to satisfy themselves that the carriers are meeting AGR's requirements and holds regular meetings with the contractors.

Ports

AGR does not operate transport vehicles or equipment at port facilities used in its supply chain, operation is undertaken by the managing Port Authority or stevedoring service provider at the port.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with international and local regulations. Ports selected in the Supply Chain are located in IMO member countries, member nations must ensure that ports comply with the requirements of the IMO DG Code 2018.

AGR conducts triennial due diligence assessments of port facilities used in the supply chain.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 1.3

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

AGR does not directly operate transport vehicles, though through the use of ICMC-certified road carriers has a process in place requiring that only equipment designed and maintained to operate within the loads it will be handling is used.

AGR has monitoring systems in place to evaluate the transporter's compliance with the Code and AGR's requirements.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.3.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of each of the carriers in the supply chain to satisfy themselves that the carriers are meeting AGR's requirements and holds regular meetings with the contractors.

Ports

Ports used by AGR have equipment operation and maintenance capabilities and procedures that are not dependent on AGR. The ability of the port facilities to operate safely, and their capability to handle dangerous goods is assessed during the due diligence process.

AGR conducts triennial due diligence assessments for ports used in its Supply Chain.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with AGR's requirements and relevant regulations.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 1.4

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 1.4 requiring the development and implementation a safety program for transport of cyanide.

AGR has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. AGR's cyanide is packaged at its ICMC certified production facility in Kwinana Western Australia, in accordance with the packaging and labelling requirements required by the political jurisdictions through which the load will pass. Individual IBCs are loaded into sea containers which are sealed prior to departure from the facility. The containers are not opened until they reach their destination at the mine.

The production facility was last fully recertified against the Code on 28 August 2023.

AGR, through the use of ICMC-certified road carriers, has a process to ensure that cyanide is transported in a manner that maintains the integrity of the packaging.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of each of the carriers in the supply chain to satisfy themselves that the carriers are meeting AGR's requirements and holds regular meetings with the contractors.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 1.5

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 1.5 requiring international standards for transportation of cyanide by sea.

AGR does not transport cyanide by sea within the scope of this supply chain.

Transport Practice 1.6

Track cyanide shipments to prevent loss during transport.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 1.6

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 1.6 requiring tracking of cyanide shipments to prevent loss during transport.

AGR, through the use of ICMC-certified road carriers, has a process to ensure that cyanide is transported in a manner that maintains the integrity of the packaging. AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.6.

AGR's *Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of each of the carriers in the supply chain to satisfy themselves that the carriers are meeting AGR's requirements and holds regular meetings with the contractors.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

PRINCIPAL 2 – INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Transport Practice 2.1

Store cyanide in a manner that minimises the potential for accidental releases.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 2.1

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 2.1 requiring the design, construction and operate cyanide interim storage sites to prevent releases and exposures.

Within the scope of this audit, transit storage is associated with port operations where containers of cyanide are removed from the vessels and may be temporarily stored and then placed on road vehicles for the next part of the journey.

Within the scope of this audit, a trans-shipping depot and interim storage site is not applicable to the port of Abidjan, port of Conakry, the port of King Abdullah. The normal operation is for the containers of cyanide to be unloaded from the vessels and loaded directly onto road transport trailers for immediate transport from the Port.

Within the scope of this audit, a trans-shipping depot and interim storage site is applicable to the port of Tema, port of Takoradi, port of Walvis Bay, port of Durban, and port of Dar es Salaam. These transit storage depots are managed by the relevant port authorities and due consideration of relevant protocol requirements has been made through the due diligence process.

At these ports containers of cyanide are removed from the vessels, temporarily stored, and then placed on road vehicles for the next part of the journey. These transit storage depots are managed by the relevant port authorities and due consideration of relevant protocol requirements has been made through the due diligence process.

Under normal operating conditions there is no interim storage outside of the Port operations included within this supply chain.

PRINCIPAL 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

AGR is: in substantial compliance with

Transport Practice 3.1

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 3.1 requiring preparation of detailed emergency response plans for potential cyanide releases.

AGR, through the use of ICMC-certified road carriers addresses the requirements to prepare detailed emergency response plans for potential cyanide releases.

AGR does not physically transport cyanide within the scope of this Supply Chain. AGR's procedure International Carrier Selection and Performance Management details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers and conduct due diligence assessments on port facilities.

AGR monitor shipments and has plans and capability to provide technical support and assistance to responders and subcontractors.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

Ports

AGR have considered emergency response arrangements at Port Facilities used in the supply chain and concluded that suitable capabilities to respond are available at the selected ports. The port due diligence reviews provide a summary of AGRs assessments.

Transport Practice 3.2

Designate appropriate response personnel and commit necessary resources for emergency response.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 3.2

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 3.2 requiring the designation of appropriate response personnel and commit necessary resources for emergency response.

AGR, through the use of ICMC-certified road carriers addresses the requirements to prepare detailed emergency response plans for potential cyanide releases.

AGR does not physically transport cyanide within the scope of this Supply Chain. AGR's procedure International Carrier Selection and Performance Management details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers and conduct due diligence assessments on port facilities.

AGR monitor shipments and has plans and capability to provide technical support and assistance to responders and subcontractors. AGR provides training to subcontractor transporters through mock drill activities. General response to emergencies is also covered in AGR's online learning modules completed periodically by transport drivers.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 3.2.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of each of the carriers in the supply chain to satisfy themselves that the carriers are meeting AGR's requirements and holds regular meetings with the contractors.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

Ports

AGR have considered emergency response arrangements at Port Facilities used in the supply chain and concluded that suitable capabilities to respond are available at the selected ports. The port due diligence reviews provide a summary of AGRs assessments.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 3.3

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 3.3 requiring development of procedures for internal and external emergency notification and reporting.

AGR through the use of ICMC certified road carriers does provide emergency response training of appropriate personnel. AGR does not physically transport cyanide within the scope of this Supply Chain. AGR's procedure *International Carrier Selection and Performance Management* details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.

AGRs Transport Management Plan, Section 14 details the definition of a notifiable incident and the process for reporting. The Transport Management Plan includes a commitment for review every 3 years as a minimum. The Plan was last updated in May 2023 to version 39.0.0.

No significant incidents occurred during the audit period.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

Transport Practice 3.4

Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 3.4

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 3.4 requiring the development of procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

AGR, through the use of ICMC-certified road carriers addresses the requirements to develop procedures for remediation. AGR does not physically transport cyanide within the scope of this Supply Chain and uses ICMC-certified carriers.

Whilst AGR's product is being transported, emergency response is governed by the certified transporter.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving its cyanide product. AGRs Transport Management Plan provides details on:

- Handling hazards and pre-cautions
- Containment
- Neutralisation and Spill Recovery
- Reporting and investigation

AGRs Transport Management Plan does prohibit the use of Chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. In addition, AGRs approach of using ICMC certified carriers means that those transporters have procedures with also prohibit the use of these chemicals.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

AGR is: in substantial compliance with

Transport Practice 3.5

not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 3.5 requiring the periodic evaluation of response procedures and capabilities and revise them as needed.

AGR, through the use of ICMC-certified road carriers addresses the requirements to periodically evaluate response processes. AGR does not physically transport cyanide within the scope of this Supply Chain and uses ICMC-certified carriers.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving its cyanide product. AGRs Transport Management Plan details the procedures to follow in the event of an emergency. The Transport Management Plan was reviewed and updated in May 2023.

Road Transport

The road transporters used within AGRs Africa Supply Chain have maintained their status of being certified as fully compliant with the Code. TTM was recertified as fully compliant with the Code on 1 May 2023.

Ports

AGR have considered emergency response arrangements at Port Facilities used in the supply chain and concluded that suitable capabilities to respond are available at the selected ports. AGRs complete due diligence assessments on a 3 yearly basis. The port due diligence reviews provide a summary of AGRs assessments.

4 DUE DILIGENCE

4.1 Port of Conakry, Guinea

The port of Conakry in Guinea is utilised as part of AGR's African Supply Chain. The due diligence of the port dated 27 March 2023 was prepared by Ben Amoo-Mensah AGR's African Consultant and include a tour of the Port facility with representatives of Port and transport contractor TTM. The report is an updated of the due diligence report prepared in 2020.

The due diligence report was reviewed by Mike Woods of Enpoint during April 2024, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.1.1 Summary of Port Operations

The port is managed by the Government Port Authorities and the terminal stevedoring company is Bolloré Guinea. The Port activity is to remove the shipping containers from the vessel and place the shipping containers on the wharf or onto in-port transport for transfer to a storage area. If containers are placed on the wharf they will be later removed by in-port transport to a storage area. The terminal operations manager and staff are aware when sodium cyanide containers are to arrive at the Port.

Customs clearance procedures are usually completed prior to the vessel arrival to ensure direct loading onto vehicles for delivery to the mine sites. Once the consignment is cleared through customs and a release certificate is issued for each container. The port has a strict security process managing the transporter's vehicle entering the terminal to collect a designated container.

Sodium cyanide containers are cleared and loaded directly from the shipping vessels onto trucks as soon as they arrive in the port as sodium cyanide are not stored on the terminal. The cyanide containers are cleared and loaded as soon as possible from the shipping vessels upon arrival. This is in place with the objective of removing the containers from the Port and under the Convoy system have then delivered safely to the mine operation.

4.1.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Conakry has been chosen as the preferred port in Guinea as it is the main container port and has the standards and equipment expected of an international port. Alternative Ports are available in Liberia, Sierra Leone, and other West African locations however the inland road transport legs are very far from the mine site. The distance also involves border crossings and therefore with the long driving distances poses a far higher risk.

4.1.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.1.4 Transport Practice 1.6

The shipping line's manifest which includes the DG cargo containers information is sent to the port and terminals before the entry of DG cargo. This information helps the movement of the container is arranged in a safe way in the port and terminal.

Conakry receive the vessels manifest which includes the containers for unloading and handling by the Port. This information is then captured in the port's container terminal software program. This program then assists with the movement of the container from arrival to handover to transport company and the eventual return of the empty container.

Once the clearing and Port formalities are complete the consignment is collected by the Port by the road transport company. The trucks have GPS tracking devices which are monitored by the transporter until the convoy arrives at the mine site. The convoy is escorted by escort team, police, and the gendarme. At the mine site the delivery notes are signed by the mine site personnel acknowledging receipt of the shipment.

4.1.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

4.1.6 Transport Practice 3.1

The port has an Emergency Procedure Guide specific for Cyanide and a copy of the Material Safety Data Sheet. Port workers have all been trained in Hazmat and training is available in French. The Port of Conakry undertakes Emergency response Exercises' at least once per year on Handling of Hazardous cargo although this is not Cyanide specific.

4.1.7 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.2 Port of Dar es Salaam

The port of Dar es Salaam in Tanzania is utilised as part of AGR's African Supply Chain. The due diligence of the port was dated August 2023 and is an update of the due diligence completed in August 2020.

The due diligence report was reviewed by Mike Woods of Enpoint during April 2024, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.2.1 Summary of Port Operations

Dar es Salaam Port is the main container port servicing Tanzania; AGR has ability to ship to this port by utilising the Mediterranean Shipping Company for the shipment of product from Fremantle Western Australia and the shipping line's service through to Dar es Salaam.

The port of Dar es Salaam is owned by The Tanzania Ports Authority (TPA) and contains two kilometres of quays with a total of eleven deep water berths. These berths are used for the import and export of conventional break bulk cargo, containerised cargo, motor vehicles, bulk liquids, and grains.

Tanzania Ports Authority (TPA) regulates and licenses port and marine services and facilities. It also manages vessel traffic in the port while ensuring safety and security. TPA operates a system of ports serving the Tanzania hinterland and the landlocked countries of Malawi, Zimbabwe, Zambia, Democratic Republic of Congo (DRC), Burundi, Rwanda, and Uganda.

All containerised cargo is handled by TICTS at a dedicated container terminal with a quay length of approximately 540 m, with a capacity to handle approximately 700,000 TEUs per year which includes many classes of Dangerous Goods cargo.

TPA is equipped with an array of machinery and equipment to handle a wide range of cargo. The port has highly trained professionals in various fields work around the clock to ensure that cargo entering and exiting the ports is in pristine condition and on time.

The terminal has a sophisticated terminal software operating system known as the Next Generation Terminal Management System (nGEN). nGen, is a proprietary system developed in-house, providing a modular, scalable terminal-management platform that controls the entire scope of operations including ship and yard planning, gate operations, vessel operations and interactions, yard configuration and performance, overall operations monitoring, equipment utilisation, productivity, and cost optimisation.

Radio Data System (RDS) provides staff and equipment (SSG, RTGs and Reach Stackers) with a means to communicate and interact with nGen/RDS in real-time so that container information can be updated instantly at the point of loading or unloading.

4.2.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Dar es Salaam has been chosen as the preferred port in Tanzania as it is one of the country's main container ports and has all the standards and equipment expected of an international port. In addition, it handles more than 85% of Tanzania's trade and is a vital gateway not just to Tanzania, but also to eastern, central, and Southern Africa.

4.2.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.2.4 Transport Practice 1.6

TICTS receive the vessels manifest which includes the containers for unloading and handling by them. This information is then captured in the container terminal software program. This program then assists with the location where each container from the vessel is to be placed for storage.

The vehicles of the Inland Container Depots pick up the containers under strict supervision in accordance with the Standard Operating Practices (SOPs) to their depot. Once the clearing & port formalities are complete the consignment is collected by the road transport company.

4.2.5 Transport Practice 2.1/3.1

Product is in shipping containers ready for loading onto transport for onward transport to the mine site and remains in the containers that were packed at the sodium cyanide factory. The containers are not opened and kept sealed until they arrive at the mine site. The containers are placed on a concrete surface within the port area while clearance is obtained and the consignment is collected by the road transport company.

The container storage area within the port is fully lit at night and the whole of the port area has controlled access. TICTS and the Inland Port Container Depot are in possession of an Emergency Procedure Guide developed for Cyanide and other hazardous chemicals. TICTS hold a mock DG spill exercise at least once per year although this is not Cyanide specific. The Inland Container Depot also undergo yearly cyanide training module for hazardous materials.

4.2.6 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.3 Port of Durban

The port of Durban in South Africa is utilised as part of AGR's African Supply Chain. The due diligence of the port was dated August 2023 and is an update of the due diligence report prepared in August 2020.

The due diligence report was reviewed by Mike Woods of Enpoint during April 2024, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.3.1 Summary of Port Operations

The Port of Durban commonly called Durban Harbour, is the second largest port of South Africa and one of the busiest ports in Africa. Durban Port is South Africa's main cargo and container port, handling the largest volume of sea-going traffic of any port in southern Africa.

Ideally placed on major shipping routes and with excellent rail and road links, the port plays an integral role in the country's economy. The port occupies the natural expanse of Durban Bay – an area of 1850 ha, with the water area being 892 ha in extent at high tide and 679 ha at low. The entrance channel is 122 m wide and is maintained at a dredged 12.8 m draught (depth of water).

The port is managed by Transnet National Ports Authority (TNPA), which is a government corporation of South Africa and subsidiary of Transnet. Transnet is responsible for managing and governing eight South African seaports.

Almost all containers are handled at Durban Container Terminal (DCT) which is the largest of its kind in the southern hemisphere. Containers handled at the terminal currently represent more than 60% of the total number handled at all South African ports. DCT serves as a pivotal hub for the entire Southern African region, serving trade links to the Far East, Middle East, Australasia, South America, North America, and Europe. It also serves as a transshipment hub for East Africa and Indian Ocean islands.

The terminal has 2,128 m of quayside divided into seven berths. DCT has more than 13,000 ground slots and 600 reefer points and handles an average of 50 000 TEUs per month. A rail terminal receives and dispatches containers to Johannesburg and other destinations as far as Zambia. DCT has expanded a capacity of 2.9 million TEUs per annum.

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

4.3.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Durban has been chosen as the preferred port in South Africa as it is one of the country's main container ports and has all the standards and equipment expected of an international port. DCT serves as a pivotal hub for the entire Southern African region, serving trade links to the Far East, Middle East, Australasia, South America, North America, and Europe.

4.3.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.3.4 Transport Practice 1.6

DCT receives the vessels manifest which includes the containers for unloading and handling by them. This information is then captured in the container terminal software program. This program then assists with the location where each container from the vessel is to be placed for storage.

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

The road transporter picks up the containers under strict supervision in accordance with the Standard Operating Practices (SOPs) after completing all clearing documentation.

4.3.5 Transport Practice 2.1/3.1

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

The container storage area within the port is fully lit at night and the whole of the port area has controlled access. Product in shipping containers ready for loading onto transport for onward transport to the mine site are packed into containers or bucket trailers and delivered to the mines. The containers are not opened at the Port.

Workers of DCT undergo DG training and mock drills yearly and as and when necessary to update themselves about emergency response issues.

4.3.6 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.4 Port of King Abdullah

The Port of King Abdullah is used as part of the Africa Supply Chain. The due diligence of the port was dated April 2024 and is an update of the due diligence report prepared in 2020.

The due diligence report was reviewed by Mike Woods of Enpoint during April 2024, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.4.1 Summary of Port Operations

King Abdullah Port, Saudi Arabia opened in September 2013. It is part of a large development project 'King Abdullah Economic City' (KAEC); the project takes up 160 km² of what is ultimately a city including residential areas, industrial areas, and port and rail transport terminals. This city is located 100 km north of Jeddah on the Red Sea.

The Port falls under the Ports Developing Company (PDC); this company was formed in 2010 by the Saudi BinLaden Group and Emaar, the Economic City. The Joint venture is based on both companies having strengths in construction and operation of large infrastructure projects including Ports. Emaar, The Economic City (Emaar TEC) company is the master developer and planner of the KAEC including the Port.

The planning of the KAEC and KAP has allowed the development the city and port facilities to be laid out and planned which includes direct access from the Port to national roads servicing the major centres in Saudi Arabia. This direct access to and from the Port includes the industrial areas of the KAEC area and onto the national roadways in Saudi Arabia, the access away from the residential parts of KAEC.

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company for the shipment of product from Fremantle Western Australia. The Port allows unloading of the shipments for the subsequent road transport of the containers to the various mine sites within the Kingdom of Saudi Arabia. The Port with its modern infrastructure and roadways and 24/7 direct access to the national road network offers has improvements over the Jeddah Islamic Port.

The port has a capacity of 2.7 million TEU via its four berths and has a 300,000 m² container storage area.

4.4.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of King Abdullah has been chosen as the preferred port in Saudi Arabia as it is a modern planned port facility with good connections to internal transport networks and has all the standards and equipment expected of an international port. It avoids the congestion that surrounds the Jeddah Islamic Port.

4.4.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.4.4 Transport Practice 1.6

The company's computer systems take the Vessels manifest and have the ability to identify dangerous goods consignments, determine the class of dangerous goods and establish the segregation requirements for that product. The program will then ensure the product (containers) are stacked in the correct area and segregation limits as required by the International Maritime Organisations Dangerous Goods Code are met.

KAP offers fast-track customs clearance through its Clearance Broker System (CBS) which helps in orchestrating the exchange of data among the various parties, allowing customs and other government agencies to release the goods in the most efficient way. The CBS office has been set in a central point in the port area, this central point combines, clearing agent companies, customs, stevedoring and port operations all in the same area to improve the ports efficiency.

Cyanide consignments are pre-cleared and the containers are taken off the vessel on direct lift onto the transport trucks – the objective being no cyanide containers being stored in the Port. The terminal is monitored 24/7 by CCTV and is well illuminated at night time for unloading/loading operations.

4.4.5 Transport Practice 2.1/3.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

The wharf area is prepared to handle heavy vehicles and loads any loss of containment will be captured in a special bunded area within the port confines. Equipped Emergency Response teams are available and support will escalate to the Coast Guard and then National Civil Defence.

A fully equipped fire station is located just outside the terminal within the port confines. A small but fully equipped clinic is staffed by paramedics is located with the port confines. The nearest hospital is at Rabigh some 40 kms from the port.

4.4.6 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.5 Port of Takoradi

The port of Takoradi in Ghana is utilised as part of AGR's African Supply Chain. The due diligence of the port dated August 2023 is an update of the previous due diligence report dated January 2021.

The due diligence report was reviewed by Mike Woods of Enpoint during April 2024, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.5.1 Summary of Port Operations

The Takoradi Port in south west Ghana is suitably located to service the mining industry located near the town of Tarkwa in the south west region of Ghana. AGR has ability to ship to these Ports in Ghana by utilising the Mediterranean Shipping Company for the shipment of product from the Fremantle Port in Western Australia and the shipping line's service through to both Tema and Takoradi Ports. The Ports allow unloading of the shipments for the final road transport section to the mining operations in Ghana as well as the landlocked countries within the West Africa region.

The Ghana Ports & Harbours Authority has subcontracted the Takoradi port container terminal to Tacotel Limited which is providing port terminal services in the port. Tacotel has specialized in receiving, storing and delivering import and export containers to our cherished clients at the port of Takoradi. Cyanide container are stored in Tacotel terminal upon arrival of a vessel.

Takoradi Port has been ISPS compliant since July 2004 and operating at MARSEC level 1. All port installations are manned by 24-hour CCTV surveillance plus professionally trained security personnel.

Cyanide is unloaded and placed into the designated storage area at Takoradi Port and collected by the customer.

4.5.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Takoradi has been chosen as one of the preferred ports in Ghana as due to its proximity to the mining hub of Tarkwa in the south west region of Ghana. Its location avoids congestion around the capital of Accra. The port has all the standards and equipment expected of an international port.

4.5.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.5.4 Transport Practice 1.6

GPHA/MPS receive the vessels manifest which includes the containers for unloading and handling by the Port. This information is then captured in the port's container terminal and MPS software programs. The software program then assists with the location where each container from the vessel is to be placed.

MPS utilises a designated area in their terminals for the sodium cyanide consignments. This ensures they comply with the segregation requirements. Once the clearing and Port formalities are complete, the consignment is collected from the Port.

4.5.5 Transport Practice 2.1/3.1

Takoradi Port has been ISPS compliant since July 2004 and operating at MARSEC level 1. All port installations are manned by 24-hour CCTV surveillance plus professionally trained security personnel. Cyanide is unloaded and placed into the designated storage area at Takoradi Port.

Cyanide transiting through the port remains within the Shipping container and is briefly held in the designed area on the port while customs clearance processes are completed. The consignment is collected from the Port by the customer.

4.5.6 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.6 Port of Tema

The port of Takoradi in Ghana is utilised as part of AGR's African Supply Chain. The due diligence of the port dated August 2023 is an update of the previous due diligence report dated January 2021.

The due diligence report was reviewed by Mike Woods of Enpoint during April 2024, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.6.1 Summary of Port Operations

The Tema Port near Accra is the main container port servicing Ghana, and its landlocked neighbouring countries; AGR has ability to ship to these Ports in Ghana by utilising the Mediterranean Shipping Company for the shipment of product from the Fremantle Port in Western Australia and the shipping line's service through to both Tema and Takoradi Ports. The Port allows shipments for the final road transport section to the mining operations in Ghana as well as the landlocked countries within the West Africa region.

The Ghana Ports and Harbour Authority (GPHA) oversees the operation of the overall Port operations; however, the management of dangerous goods terminal is done by Meridian Port Services (MPS). MPS is the stevedoring company which manages the on shore (wharf) operations in Tema as well as the MPS terminal 3 (completed 2019) which they constructed as part of the port expansion project.

Currently all dangerous goods including sodium cyanide TEU's are conveyed from the MPS terminal to the Tema Bonded Terminal (TBT) where they are picked up by transporters. All cyanide containers of cyanide shipped by AGR are received at the wharf by MPS and stored in TBT. Transporters trucks are loaded from the TBT to various mine destinations.

AGR's ongoing review as a service provider and this due diligence report has found no issues of concern in regards to the Ghana Ports and Harbour Authority (GPHA), Meridian Port Services Limited and Tema Bonded Terminal's awareness and management of the handling and systems in place for the sodium cyanide product.

4.6.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to

the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The Tema Port has been chosen as it is one of the country's main container ports and has all the standards and equipment expected of an international port particularly and provides access to the main arterial roads to transport products to mine in the south west of Ghana and to the north of Ghana and neighbouring countries.

4.6.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.6.4 Transport Practice 1.6

GPHA/MPS receive the vessels manifest which includes the containers for unloading and handling by the Port. This information is then captured in the port's container terminal and MPS software programs. The software program then assists with the location where each container from the vessel is to be placed.

MPS utilises a designated area in their terminals for the sodium cyanide consignments. This ensures they comply with the segregation requirements. Once the clearing and Port formalities are complete, the consignment is collected from the Port.

4.6.5 Transport Practice 2.1/3.1

MPS activities are to remove the shipping containers from the vessel and place the shipping containers on the wharf or onto in-port transport for transfer to a designated storage area or to an off dock bonded terminal, TBT. If containers are placed on the wharf they are later removed by in-port transport to a designated area in TBT.

Currently all dangerous goods including sodium cyanide TEU's are conveyed from the MPS terminal to TBT where they are picked up by transporters. Cyanide containers are segregated and stacked separately. All cyanide containers of cyanide shipped by AGR are received at the wharf by MPS and stored in TBT. Transporters' trucks are loaded from the TBT to various mine destinations.

AGR's Consultant in Ghana has been working with the safety and ER department regarding cyanide handling and product awareness. There is an ongoing working relationship with AGR's Africa Consultant in Ghana, Vehrad Transport & Haulage, Bollore Ghana Ltd and MPS together with the Government Regulators and Mines Department regarding the handling and regulations for DG goods in Ghana.

4.6.6 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.7 Port of Walvis Bay

The port of Walvis Bay, Namibia is utilised as part of AGR's African Supply Chain. The due diligence of the port dated August 2023 is an update of the previous due diligence report dated January 2021.

The due diligence report was reviewed by Mike Woods of Enpoint during April 2024, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.7.1 Summary of Port Operations

The Port of Walvis Bay is the main port serving the country of Namibia. The Port of Walvis Bay is strategically located half-way down the coast of Namibia with direct access to principal shipping routes. Walvis Bay is a natural gateway for international trade.

The Port of Walvis Bay is Namibia's largest commercial port, receiving approximately 3,000 vessel calls each year and handling about 5 million tonnes of cargo. The port is a secure, efficient, and world-class port. Temperate weather conditions are experienced all year round and no delays are caused by weather. Its world-class infrastructure and equipment ensure reliable and safe cargo handling.

The Port of Walvis Bay handles container imports, exports, and trans-shipments, as well as bulk and break-bulk of various commodities. The port serves a wide range of industries such as the petroleum, salt, mining and fishing industries. Both bulk and bagged salt are exported from the Port of Walvis Bay. The port is compliant with the International Ship and Port Facility Security code (ISPS).

The Port of Walvis Bay is operated by the National Port Authority known as NAMPORT and the port is owned by the government of Namibia. The container terminal at the port of Walvis Bay can accommodate about 4000 containers with provision for 482+ reefer container plug points. The port can handle about 750,000 containers per annum.

The vessels operated by Mediterranean Shipping Company (MSC) and Maersk who handle AGR's shipping requirements from Fremantle, Australia to Namibia use the services of the Walvis Bay Stevedoring Company for their unloading and stevedoring requirements.

4.7.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to

the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Walvis Bay has been chosen as the preferred port in Namibia as it is one of the country's main container ports and has all the standards and equipment expected of an international port. In addition, the location of the port means that the road transport to the mine is of the shortest route and is able to avoid the main centres and busier pathways of the cities.

4.7.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.7.4 Transport Practice 1.6

Port security comprises: 24 hour automated surveillance systems (CCTV), a well trained security work force manning all port zones plus entrance and exit gates (24 hours to ensure security of goods at any time. There are security checks when entering and exiting the port.

Software programs control container movement through the Ports. It is the software programs that control container placement and movement; these software packages identify each individual container placement area in designated stacks or Dangerous Goods storage area. The input information for the placement of containers comes from the vessel's manifest. Sodium cyanide containers are stacked separately and segregated from other containers until customs clearance is completed and containers cleared from the port. The maximum clearance of DG goods from the port is 48hrs.

NAMPORT receives the vessels manifest which includes the containers for unloading and handling by them. This information is then captured in the container terminal software program. This program then assists with the location where each container from the vessel is to be placed for storage. Once the clearing and port formalities are complete the consignment is collected by the road transport company

4.7.5 Transport Practice 2.1/3.1

The container storage area within the port has full CCTV coverage, is fully lit at night and the whole of the port area has controlled access. The containers of cyanide are stores in a separate DG storage area within the port confines.

Product is in shipping containers ready for loading onto transport for onward transport to the mine site and remains in the containers that were packed at the production facility. The containers are not opened and are kept sealed until they arrive at the mine site. The containers are placed on a concrete

surface within the port and are usually collected from the port within 48 hours of discharge from the vessel.

There is a fire engine located within the terminal and NAMPORT have written procedures covering emergency preparedness and response and handling dangerous goods. Emergency response exercises are conducted at the Port.

4.7.6 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

