

JUNE 2024

INTERNATIONAL CYANIDE MANAGEMENT CODE

Australian Gold Reagents – Asia Supply Chain Summary Audit Report

Prepared for Harry Aung
Australian Gold Reagents
June 2024
Ref. W24017_04 | Revision 0

Submitted to:



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REVISION HISTORY AND DISTRIBUTION LIST

Revision No.	Issue Date	Status	Delivered	No. of Copies
A	14 May 2024	Draft	Electronic	1
0	12 June 2024	Final	Electronic	1

APPROVALS

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Checked				
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1 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	AGR Asia Supply Chain
Name of Facility Owner:	Not applicable
Name of Facility Operator:	Australian Gold Reagents Pty Ltd
Name of Responsible Manager:	Harry Aung
Address:	Kwinana Beach Road, Kwinana
State/Province:	Western Australia, 6966
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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 Asia Supply Chain

The Asian supply chain covers the port of Surabaya, Indonesia.

Road transportation and the previously included ports are no longer part of the supply chain and were not used under AGR contract during the audit period. Changes from the scope of the previous supply chain audit include:

- Removal of the Port of Laem Chabang, Thailand
- Removal of the Port of Da Nang, Vietnam

- Removal of Pioneer Ocean Freight (POF)
- Removal of PT Transcontinent
- Removal of Linfox

2.6 Port of Surabaya, Indonesia

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.

The port of Surabaya is one of the busiest ports in Java containing a large shipyard, Indonesia's main naval station and several naval schools. It is located on Java's north-eastern coast at the mouth of the Mas River.

Within the port of Surabaya is the International Wharf (1 000 m long with alongside depth of 10.5 m) and the Domestic Wharf (450 m long with alongside depth of 7.5 m). The International Container Yard covers 29 ha and has capacity for 30 000 TEUs and 250 reefer pugs. The Domestic Container Yard covers nine ha and has capacity for nine thousand TEUs of containerised cargo. The Container Freight Station includes a

10 000 m² stacking area and 6 500 m² for dangerous goods. The terminal also has two rail tracks of 420 m.

2.7 Road Transport

Within the Asia Supply Chain, AGR no longer contracts the road transportation of cyanide to customers. Road transport is contracted and coordinated by the customer.

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

2.8 Transit storage

Within the scope of this audit there is no interim storage included under normal operating conditions.

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.

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.

AGR does not, within the scope of the Asia supply chain, subcontract the transport of cyanide.

Transport Practice 1.2

Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

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

AGR completes triennial due diligence assessments on their selected ports. The due diligence assessment for Port of Surabaya found that the ports are performing dangerous goods handling duties in accordance with international and local regulations.

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.

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.

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. The production facility was last fully recertified against the Code on 28 August 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 has processes in place to track shipments. AGR completes triennial due diligence assessments on ports which include consideration of general cargo handling, tracking and security.

Containers coming into the port are recorded and tracked through the ports TOC system.

Importer of the sodium cyanide is to ensure the road transport provider has the road transport equipment present at the Port when the vessel docks or is ready to unload the containers. Customs clearance is processed before the arrival of the vessel to allow for the direct unloading of the vessel onto vehicles that are provided by ICMC certified transporters.

Once loaded on the road transport vehicles the containers are checked against the shipping manifest and customs clearance documents, on completion of the checks the containers can depart the Port for the road transport to the mine site.

No road transport is included within this supply chain.

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.

Under normal operating conditions there is no interim storage at the Port operations included within this supply chain. Containers are loaded directly from the vessel onto the road transporters equipment.

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 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 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 port. The port due diligence review provides a summary of AGRs assessment.

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 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 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 port. The port due diligence review provides a summary of AGRs assessment.

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.

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 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

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 port. The port due diligence review provides a summary of AGRs assessment.

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..

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 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.

4 DUE DILIGENCE

4.1 Port of Surabaya, Indonesia

The Port of Surabaya in Indonesia is utilised as part of AGR's Asian Supply Chain. The due diligence of the port dated November 2023 was prepared for AGR by Darren Gould, Product Support and Logistics.

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

AGR use the PT Terminal Petikemas (TPS) located in Surabaya in the northern part of the Port of Tanjung Perak Surabaya. The terminal handles loading and unloading and stacking of containers for both domestic and ocean going (overseas) vessels.

TPS is strategically located with connections to major highway and railways. Geographically, TPS is located in the Port of Tanjung Perak with coordinates 7; 12; S, 112; 40E, at the end of the shipping channel between the islands of Java and Madura islands.

A digital terminal operating system has been in operation since 2013. This integrated software is used for airport and seaport operations. TOS consists of 2 main modules with one model covering operations and the other billing. The movement of the containers can be monitored in real time; either by polling officer or the Consignor.

The stevedoring operations are managed by PT Terminal Petikemas using their own labour. The 20-foot containers of cyanide are discharged from the vessel using the Quay cranes. These cranes are rated to handle lifts up to 50 tons. The weight of AGR's sodium cyanide 20-foot containers is well within the specified weight limit for these cranes. The weight of AGR's sodium cyanide containers is also suitable for the Reach Stackers or Rubber Tyred Gantry Cranes which will handle the containers in the dedicated dangerous goods storage area and onto the transport vehicles.

The manifest which is handed over from the Vessel Operator to Port Operator will include the weight and the hazards associated with the containers. The containers are then loaded onto trailers owned and maintained by PT Terminal Petikemas. The containers are then taken to the dedicated dangerous goods area located at the end of each stack, whilst clearing or customs requirements are completed. Once all customs clearances are done and transport permits obtained the onward transport of the product is allowed. All movements of containers are GPS controlled by the TOS System.

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 PT Terminal Petikemas at the Port of Surabaya has been selected on the basis it provides and has all the standards and equipment expected of an international port and provides an alternative option for import of product into Indonesia.

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

Containers coming into the port are recorded and tracked through the ports TOC system.

Importer of the sodium cyanide is to ensure the road transport provider has the road transport equipment present at the Port when the vessel docks or is ready to unload the containers. Customs clearance is processed before the arrival of the vessel to allow for the direct unloading of the vessel onto vehicles that are provided by ICMC certified transporters.

Once loaded on the road transport vehicles the containers are checked against the shipping manifest and customs clearance documents, on completion of the checks the containers can depart the Port for the road transport to the mine site.

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

PT Terminal Petikemas Surabaya have procedures for dealing with incidents involving various dangerous goods handled by the port. Specific cyanide mock drills have been completed with the last full cyanide related exercise completed in December 2022. There is an onsite emergency response team with equipment available to respond to an incident.

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.

