SUMMARY AUDIT REPORT

International Cyanide Management Code

Australian Gold Reagents, Asia Supply Chain, Re-certification Audit, Summary Audit Report

Submitted to:

International Cyanide Management Institute
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WASHINGTON, DC 20005
UNITED STATES OF AMERICA

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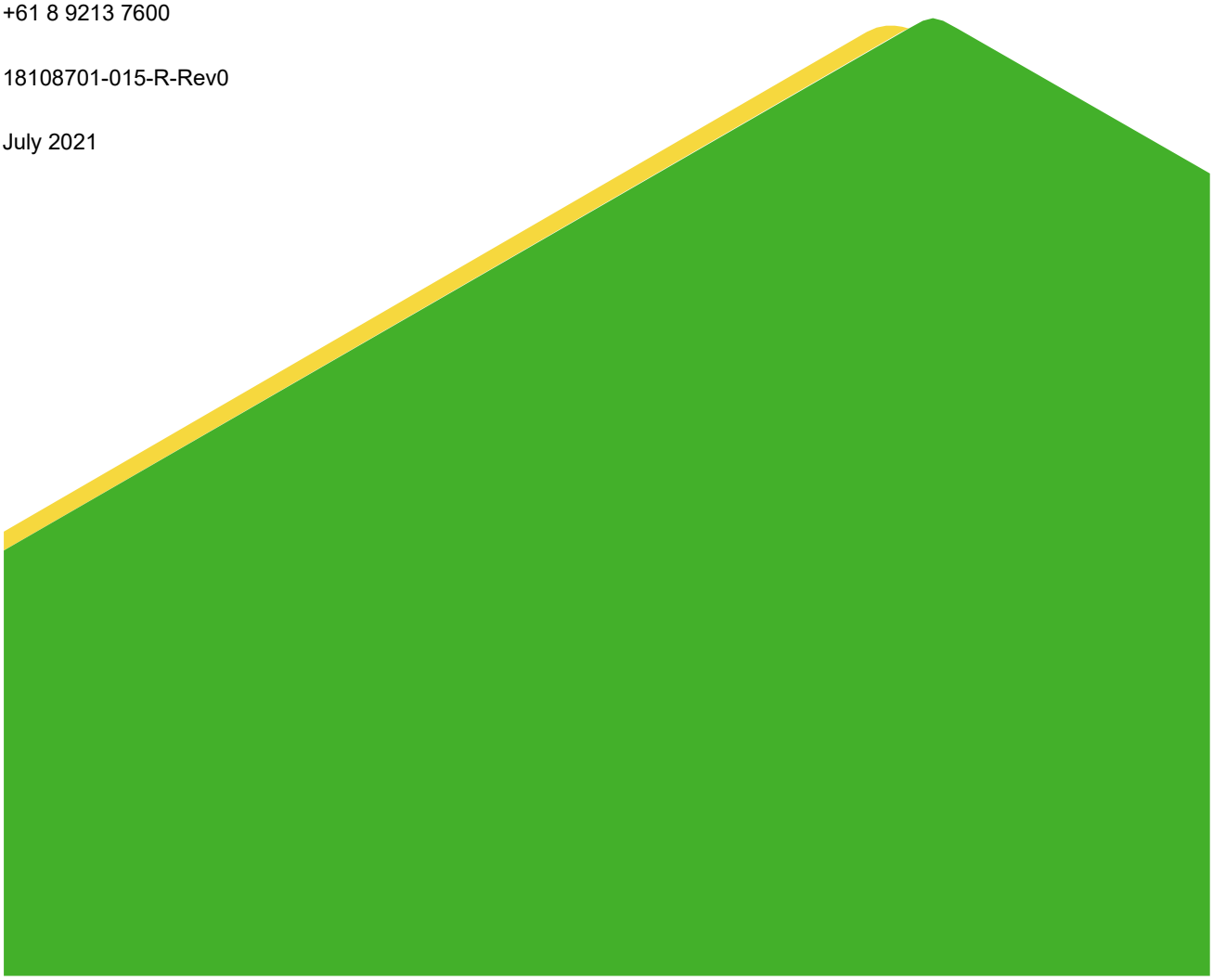

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APPENDIX A
Important Information

1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Asian Supply Chain
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Australian Gold Reagents Pty Ltd
Name of Responsible Manager:	Darren Gould, Product Support & Logistics Specialist
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2.0 CYANIDE TRANSPORTATION

2.1 Australian Gold Reagents 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 West Australian supply chain

AGR's West Australian supply chain is from the Kwinana production facility, using rail and road transport to end user mine sites in Western Australia; as well as road transport to Fremantle Port for export supply. For export product this supply chain is up to and includes the stevedore operation at Fremantle Port.

AGR's West Australian Supply Chain was re-certified as being in full compliance with the Code on 15 November 2019. The West Australian Supply Chain is not part of the scope of this audit.

2.3 Kwinana production facility

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

The production facility was re-certified as being in full compliance with the Code on 22 September 2020.

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)[1].

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.

2.5 Asia Supply Chain

The Asian supply chain covers the land-based transportation of AGR's solid cyanide from the ports of Laem Chabang, Thailand and the port of Surabaya, Indonesia and the port of Da Nang Vietnam to end point users. Within the Asian supply chain, POF, PTTC, and Linfox transport cyanide by road, AGR contract POF and Linfox, whilst PTTC are contracted by the mine site directly. The transport route via POF was suspended in 2020 and replaced by Linfox. The elements of the Asia Supply chain included in this certification are described below:

2.5.1 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.

2.5.1.1 Port of Laem Chabang

The port of Laem Chabang is situated on the eastern side of the Gulf of Thailand, south-east of Bangkok and north of Pattaya. Laem Chabang is Thailand's main deep seaport and currently handles over 1 million Twenty-foot Equivalent Units (TEUs) annually.

Thailand's strategic geographical location and close proximity to neighbouring countries such as Myanmar, Laos, Cambodia, and Malaysia enable Laem Chabang to act as a gateway port for South East Asia for international trade and goods import. Furthermore, Laem Chabang is well connected to its neighbouring hinterland via a network of highways, railways, and waterways.

2.5.1.2 Port of Surabaya

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 m^2 stacking area and 6 500 m^2 for dangerous goods. The terminal also has two rail tracks of 420 m.

[1] ONE was established on 7 July 2017 by the merging of three international shipping companies, these were K-Line Kawasaki Australia Pty Ltd (K-Line), Mitsui OSK Lines (MOL) and Nippon Yusen Kaisha (NYK Line). ONE's regional headquarters have been established in Hong Kong, Singapore, UK, USA and Brazil and services commenced in April 2018.

2.5.1.3 Port of Da Nang

The port of Da Nang is located in central Vietnam at the mouth of the Han River, Da Nang Bay and is the third largest port in Vietnam. Da Nang Port is also selected as the terminus of the East–West Economic Corridor, linking four countries including Myanmar, Thailand, Laos, and Vietnam, also as the main gateway to the East Sea for the entire region.

2.5.2 Road Transportation

AGR contracts the road transportation of cyanide within the Supply Chain to POF or Linfox. PTTC are contracted by the mine site directly.

2.5.2.1 Pioneer Ocean Freight

The Pioneer Group of Companies (PCG) was founded in 1972 and today is an international freight forwarder and multi-modal transport operator. Pioneer Ocean Freight (POF) forms the Thailand transportation arm of PGC and has been established for 33 years. The company employs approximately 200 staff including 35 drivers, and has a dedicated fleet of prime movers and trailers each capable of carrying up to 28 tonnes. Pioneer specialises in:

- Customs clearance
- International freight forwarding and multimodal transport
- Export documentation
- Packing, crating, unpacking, and warehousing
- Inland transportation and container trucking
- Air transportation and air courier services.

POF subcontracts the driving of trucks and convoy support vehicles, in part, to Nanon (Thailand) Co Ltd.

POF was recertified as being fully compliant with the Code on 18 December 2017 and at the time of this assessment was listed as temporarily inactive on the ICMI website with the notation that it is not currently transporting cyanide. The operation was last audited December 18, 2017, and its certification expired December 18, 2020.

2.5.2.2 PT Trans Continent

PTTC was established in 2003 and provides freight forwarding, logistical, shipping agency, custom clearance and warehousing services for mining, oil and gas and project cargo. The operation has Indonesian offices in Jakarta, Balikpapan, Batam, Manado, Medan, Sibolga, Bali, Ternate, and Surabaya. In addition, PTTC has overseas agents in Australia, Japan, Singapore, USA, Germany, Thailand, China, South Africa, and the UK.

PTTC has three certified supply chains:

- PTTC MSM/TTN and NHM Supply Chain, Certified on 29 January 2018
- PTTC Bakan and Seruyung Supply Chain, Certified on 29 January 2018
- PTTC Martabe Supply Chain, Certified on 29 January 2018.

Within the scope of this Supply Chain, PTTC is contracted directly via the mine site to transport AGR's product.

2.5.2.3 Linfox

Linfox provides road transport from the port of Da Nang, Vietnam to customer mine sites. AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. AGR's plan to complete the supply chain amendment has been impacted by the COVID-19 pandemic and associated travel restrictions. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed its due diligence assessments of Linfox prior to engaging the road transporter for cyanide transport activities. Linfox Transport Quang Binh Co., Ltd., Viet Nam (Linfox) has subsequently become a signatory to the Code on 8 March 2021.

2.6 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.

2.7 Auditors Findings 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 AGR's recertification audit.

Audit Company: Golder Associates Pty Ltd

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

Email: mwoods@golder.com.au

2.8 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		16 July 2021

2.9 Dates of Audit

The ICMC Recertification Audit was conducted over three days between 1 to 4 February 2021.

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.

3.0 CONSIGNOR SUMMARY

3.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

3.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

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

Summarise the basis for this Finding/Deficiencies Identified:

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

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.

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 for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management 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 programme 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.
- A sound reputation and there is no evidence to suggest that the carrier is not in a sound financial position.

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 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.

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.

The requirement to seek input from communities, other stakeholders, and applicable governmental agencies as necessary is not relevant to the port component of this Supply Chain

Due diligence assessments of the ports used in the supply chain were completed by AGR (within their three-year cycle) and reviewed by Golder. Golder's assessments concluded that AGR's due diligence assessments have reasonably evaluated these facilities. The due diligence assessment did not identify additional management measures needed for the ports.

Road Transportation

AGR had utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response. AGR worked with Linfox through the route assessment process to satisfy themselves that the hazards had been identified and controls developed that were commensurate with the transport route.

3.1.2 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	

Summarise the basis for this Finding/Deficiencies Identified:

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

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 has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

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 Transportation

AGR had utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response. AGR worked with Linfox through the route assessment process to satisfy themselves that the hazards had been identified and controls developed that were commensurate with the transport route.

3.1.3 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	

Summarise the basis for this Finding/Deficiencies Identified:

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

AGR

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 has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

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 Transportation

AGR had utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training, and emergency response. AGR worked with Linfox through the route assessment process to satisfy themselves that the hazards had been identified and controls developed that were commensurate with the transport route.

3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

AGR is

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

Transport Practice 1.4

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

AGR

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 and which are sealed prior to departure from the facility.

The production facility was last fully recertified against the Code on 3 August 2017 and AGR have conducted the recertification audit assessment in March 2020.

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 has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

Road Transportation

AGR had utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response. The sea containers of solid cyanide product are picked up by Linfox which includes checking seals on the containers and the containers remain sealed until the mine takes possession of the containers.

3.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

	☒ **in full compliance with**	
AGR is	☐ in substantial compliance with	**Transport Practice 1.5**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to AGR.

AGR does not and does not intend to transport consignments of cyanide by sea or air within the scope of this audit.

3.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

AGR

AGR, through the use of ICMC-certified road carriers, has a process in place to track cyanide shipments and prevent losses during transport. AGR has undertaken audits of the carriers to verify that tracking capabilities and suitable arrangements for response are in place.

Road Transportation

AGR had utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response. AGR confirmed that Linfox have communication equipment in place suitable for the transport route including radios and mobile phones, and the necessary shipping tracking and inventory systems and pre-departure checks to meet AGR's requirements.

3.2 Principle 2 – Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

3.2.1 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	

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 2.1 that requires transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

AGR

AGR does not operate trans-shipping or interim storage facilities within its Supply Chain, but circumstances may arise where trans-shipping of cyanide product is required. This involves unloading the cargo at a terminal facility, temporary set down, and loading onto another vehicle for the continuation of the delivery.

AGR has no control over when and where this happens, but via the due diligence process has satisfied itself that the transhipment of product occurs in accordance with relevant legislation and complies with standards for the carriage of dangerous goods.

Within the scope of this audit, a trans-shipping depot and interim storage site is associated with the Port of Laem Chabang, Port of Surabaya, and Port of Da Nang where containers of cyanide are removed from the vessels, temporarily stored and then placed on road vehicles for the next part of the journey. The transit storage depot is managed by the relevant port authority and due consideration of relevant protocol requirements has been made through the due diligence process.

Ports

Port of Laem Chabang, Thailand

The Laem Chabang Dangerous Goods Warehouse is managed under Thailand Regulations by JWD InfoLogistics Co Ltd to IMDG Code regulations. It handles all types of containers and goods. The dangerous good yard is laid out by DG Class and this allows the required segregation of products and classes.

Each Class area is designated with signs and each container is allotted a bay within its Class area. The cyanide lay down area (Class 6) has is segregated by distance from other Classes; the same segregation exists between all Classes. The cyanide bays are allocated from the warehouse computer system which captures the container, its container number, the number of product packages in each container, the product and the UN reference number. The nature of the product also captured in the reference material.

The warehouse is fully walled with security fencing on the wall. The entrance is covered by manned gates. Manned security cameras cover the yard area and gates. The full yard area is fully lit.

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 in transit through Thailand and are not opened and kept sealed until they arrive on site at the customer in Laos. The containers are placed on a concrete surface; the drainage of the concrete surface is to catchment channels that lead to sumps with sump pumps that are controlled by warehouse management.

Port of Surabaya, Indonesia

Interim storage may occur at the port while customs clearances are obtained. The containers are removed from the vessel and place them in the dedicated dangerous good area. The dedicated storage areas are located at the end of each container stack and have CCTV coverage.

Access to the port is restricted and the TOPS system controls the movements of containers within the port. The containers remained sealed and part of the checks for loading onto the trucks is that the seals are intact and the containers have not been opened. The sodium cyanide packaging has a sealed plastic liner which stops the contact of product from moisture or humidity.

Following final customs clearance, the containers will then be placed on road transport vehicles for the inland transport to the gold mine (final destination). These road transport vehicles will be from the ICMI accredited transport company providing the road transport from the Port to the mine site.

Port of Da Nang, Vietnam

Interim storage may occur at the port while customs clearances are obtained. The containers are removed from the vessel and place them in the dedicated dangerous good area. The dedicated storage areas are located at the end of each container stack and have CCTV coverage. The due diligence provides that the lay down area is on a concrete surface and proven appropriate for large container forklifts and trucks.

The containers remained sealed and part of the checks for loading onto the trucks is that the seals are intact and the containers have not been opened. The sodium cyanide packaging has a sealed plastic liner which stops the contact of product from moisture or humidity.

Road Transport

There are no interim storage facilities within the road transport component of the supply chain.

3.3 Principle 3 – Emergency Response

Protect communities and the environment through the development of emergency response strategies and capabilities.

3.3.1 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	

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

AGR

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.

Ports

AGR conducts triennial due diligence assessments on port facilities used in the Supply Chain, emergency response capabilities are assessed during this process.

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.

The port due diligence reviews assess emergency response capabilities, identify emergency response plans and outline additional information specific to the emergency response infrastructure and resources located at each port.

Road Transportation

AGR has utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response. AGR confirmed that Linfox have communication equipment in place suitable for the transport route including radios and mobile phones, and an emergency response plan has been developed in consultation with AGR and technical support would be provided by AGR in the event of an incident. Linfox have developed an overarching rapid response plan that outlines how the organisation responds to a range or situations and included roles, responsibilities and contact details.

Cyanide Awareness Training has been provided to Linfox personnel that includes instructions in the event of an emergency.

3.3.2 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	

Summarise the basis for this Finding/Deficiencies Identified:

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

AGR

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.

Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the 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 cyanide.

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 for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

Ports

AGR conducts triennial due diligence assessments on port facilities used in the Supply Chain, emergency response capabilities are assessed during this process.

The due diligence assessments found that the ports used by AGR have appropriate emergency response capabilities to deal with potential dangerous goods releases.

Individual port due diligences identify the emergency response plans and outline additional information specific to the emergency response infrastructure and resources located at each port.

Road Transportation

AGR has utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response. Cyanide Awareness Training has been provided to Linfox personnel that includes instructions in the event of an emergency and AGR are working with Linfox to build capacity.

3.3.3 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	

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

AGR

AGR, through the use of ICMC-certified road carriers addresses the requirements to develop procedures for internal and external emergency notification and reporting.

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.

Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the 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 cyanide

Road Transportation

AGR has utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response.

Linfox have developed an overarching rapid response plan that outlines how the organisation responds to a range or situations and included roles, responsibilities and contact details.

3.3.4 Transport Practice 3.4

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

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

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

AGR

AGR, through the use of ICMC-certified road carriers addresses the requirements to develop procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

AGR does not physically transport cyanide within the scope of this audit. 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.

Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the 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 cyanide.

Road Transportation

AGR has utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response. AGR will provide technical advice and guidance on the response to cyanide incidents including procedures for neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

3.3.5 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	

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

AGR

AGR, through the use of ICMC-certified road carriers addresses the requirements for provisions for periodically reviewing and evaluating the adequacy of emergency response documentation.

AGR does not physically transport cyanide within the scope of this audit. 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.

Ports

AGR conducts triennial due diligence assessments on port facilities used in the Supply Chain, emergency response capabilities are assessed during this process.

The due diligence assessments found that the ports used by AGR have appropriate emergency response capabilities to deal with potential dangerous goods releases.

Individual port due diligences identify the emergency response plans and outline additional information specific to the emergency response infrastructure and resources located at each port.

Road Transportation

AGR has utilised ICMC certified transporter for road transportation elements of its supply chain.

- Pioneer Ocean Freight (POF), AGR's transporter Thailand based transporter was recertified on 18 December 2017 and AGR ceased using the transporter in December 2020.
- PTTC AGR's Indonesian based transport was recertified on 29 January 2018. The deadline for recertification of PTTC has been extended to 30 September 2021 due to COVID-19 travel restrictions and health concerns.

AGR informed ICMI that it commenced using Linfox Vietnam as a cyanide transporter from Da Nang Port, Vietnam to Phu Bia Mine in Laos in January 2020. The deadline for conducting the certification audit for Linfox Vietnam has been extended to April 30, 2021 due to health concerns and travel restrictions resulting from the COVID-19 virus.

AGR completed due diligence assessments of Linfox prior to engaging the transporter for the movement of cyanide. The Due diligence process was completed remotely and covered the transportation procedures, equipment to be used, driver training and emergency response. AGR are working with Linfox as they work towards achieving independent ICMC accreditation an initial plan has been developed and will be updated as part of building and ICMC compliant system by the transporter.

4.0 DUE DILIGENCE

4.1 Port of Laem Chabang, Thailand

The Laem Chabang, Thailand is utilised as part of AGR's Asian Supply Chain. The due diligence of the port dated 10 October 2019 was prepared by AGR's Darren Gould, Product Support and Logistics AGR.

The due diligence reports were reviewed by Mike Woods of Golder during February 2021, 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

Laem Chabang is the main Container Port servicing Thailand; AGR has ability to ship to Thailand utilising the Mediterranean Shipping Company (MSC) or Ocean Network Express (ONE) for the shipment of product from Fremantle in Western Australia. The Port allows unloading of the shipments for the transit of the containers through Thailand and the final road transport section to the Phu Bia PBM Gold Mine in Laos. There are no alternative ports with the facilities to handle containers of Sodium Cyanide in Thailand.

The stevedoring company Maersk Logistics operate under a long-term lease agreement with the port authorities and manage the on shore (wharf) operations at Berth B1. This is the berth currently used by the shipping companies to facilitate the unloading of their vessels.

Software programs control container placement and movement; these software packages identify each individual container placement area in designated stacks. The input information for the placement of containers comes from the vessel's manifest. It is this program that identifies containers with hazardous cargo and allows for all containers with hazardous cargo to be moved by direct discharge to the waiting trailers which then proceed to the Dangerous Goods Logistics Centre located within the port confines. All containers containing hazardous cargo are transported to the Dangerous Goods Logistics Centre by JWD InfoLogistics using their own transportation fleet. Containers are secured onto the trailers by twist locks. All containers of dangerous goods are inspected whilst still on-board the vessel by a representative of JWD InfoLogistics

JWD InfoLogistics have over thirty years' experience in the handling and storage of dangerous goods, and have been operating at Laem Chabang Port for 14 years.

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 are allowed to depart the port for the road transport to the mine site.

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 Fremantle Port 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.

Laem Chabang has been chosen as the preferred port in Thailand as it is the country's premier deep sea container port and has all the standards and equipment expected of an international port. In addition, the location of Laem Chabang 110 km to the south of Bangkok provides good access to the road network while avoiding the main urban area of the city.

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 1000 kg 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 can only load 20 IBCs per container, product, packaging plus container 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

MSC and ONE utilises their own in-house tracking systems to monitor the progress of all containers from the loading port through the various transhipment ports until the final destination port. The vessel's Captain carries a Dangerous Goods manifest (including stowage plan) and Packing Certificates for each of the hazardous cargo transport units which is updated at each port visited.

Maersk Logistics 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 immediate delivery to the Dangerous Goods Logistics Centre.

Transport from the Port Berth B1 to the Dangerous Goods Logistics Centre is controlled by strict documentary checks detailing the container details and contents.

4.1.5 Transport Practice 2.1

The Laem Chabang Dangerous Goods Warehouse is managed under Thailand Regulations by JWD InfoLogistics Co Ltd to IMDG Code regulations. It handles all types of containers and goods. The dangerous good yard is laid out by DG Class and this allows the required segregation of products and classes.

Each Class area is designated with signs and each container is allotted a bay within its Class area. The cyanide lay down area (Class 6) has is segregated by distance from other Classes; the same segregation exists between all Classes. The cyanide bays are allocated from the warehouse computer system which captures the container, its container number, the number of product packages in each container, the product and the UN reference number. The nature of the product also captured in the reference material.

The warehouse is fully walled with security fencing on the wall. The entrance is covered by manned gates. Manned security cameras cover the yard area and gates. The full yard area is fully lit.

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 in transit through Thailand and are not opened and kept sealed until they arrive on site at the customer in Laos. The containers are placed on a concrete surface; the drainage of the concrete surface is to catchment channels that lead to sumps with sump pumps that are controlled by warehouse management.

4.1.6 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.

4.2 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 12 December 2020 was prepared for AGR by Darren Gould, Product Support and Logistics. A site visit was conducted to the port in 2018 as part of a previous due diligence assessment.

The due diligence reports were reviewed by Mike Woods of Golder during February 2021, 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

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 domestically and ocean going (overseas) vessels.

TPS location is strategic because it is directly related to highway toll Surabaya and Railways. Because of this location, it is known as TPS, Gateway to Eastern Indonesia territory. 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 along the 25 miles.

A digital terminal operating system called TOPS system has been in operation since 1999, supplied by Realtimes Business Solutions from Sydney, Australia. This integrated software used for airport and seaport operations. TOPS consists of TOP-X (for X Windows) and TOP-O (for Oracle); therefore, the movement of the containers can be monitored in real time; either by polling officer or the Consignor. TOPS provides the actual condition of the planning and control systems.

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 any of 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 any further clearing or customs requirements are done. 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 TOPS System.

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 Fremantle Port 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.

4.2.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1000 kg 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 can only load 20 IBCs per container, product, packaging plus container 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

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.

4.2.5 Transport Practice 2.1

Interim storage may occur at the port while customs clearances are obtained. The containers are removed from the vessel and place them in the dedicated dangerous good area. The dedicated storage areas are located at the end of each container stack and have CCTV coverage.

Access to the port is restricted and the TOPS system controls the movements of containers within the port. The containers remained sealed and part of the checks for loading onto the trucks is that the seals are intact and the containers have not been opened. The sodium cyanide packaging has a sealed plastic liner which stops the contact of product from moisture or humidity.

Following final customs clearance, the containers will then be placed on road transport vehicles for the inland transport to the gold mine (final destination). These road transport vehicles will be from the ICMI accredited transport company providing the road transport from the Port to the mine site.

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 Da Nang, Vietnam

The Port of Da Nang in Vietnam is utilised as part of AGR's Asian Supply Chain. The due diligence of the port dated 8 December 2020 was conducted by AGR's Darren Gould, Product Support and Logistics.

The due diligence reports were reviewed by Mike Woods of Golder during February 2021, 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 or Port operations

The Port of Da Nang is one of the main ports servicing Vietnam; The Port of Da Nang is a major port system located in Central Vietnam at the mouth of the Han River on the East Viet Nam Sea, in the city of Đà Nẵng. It is the third largest port system in Vietnam (after Saigon Port in Hồ Chí Minh City and the port of Hải Phòng). Đà Nẵng Port lies at one end of the East–West Economic Corridor, an economic corridor connecting Vietnam with Laos, Thailand, and Burma. Vietnam National Shipping Lines (Vinalines) is the port's authority.

The Song Han Terminal has five berths and 3 314 m^2 (35 670 sq ft) of warehouse space and 16 330 m^2 (175 800 sq ft) of yard space. There are Quayside gantry cranes rated to 36 tonnes and tyred gantry cranes rated to 36-40 tonnes.

The stevedoring operations are managed by Da Nang Port using their own labour. The 20-foot containers of cyanide are discharged from the vessel using the Quay 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 containers are then taken to the dedicated dangerous goods area located at the end of each stack, whilst any further clearing or customs requirements are done. Once all customs clearances are done and transport permits obtained the onward transport of the product is allowed. All movements of containers are GPS tracked.

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 Fremantle Port 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 Da Nang and San Hong Terminal has been chosen as the preferred port in the Vietnam as it is the country's main container terminal and has all of the standards and equipment expected of a major international port. In addition, the location of the Port of Da Nang means that the road transport to the mine is best placed for access to the mines.

4.3.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1000 kg 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 can only load 20 IBCs per container, product, packaging plus container 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

Once the vessel is secure alongside the wharf the shipping activities changeover to Port activities. The vessels manifest of what containers are required to be unloaded from the vessels, including the manifest for containers for loading are handed over. This manifest will identify hazardous cargos and their UN number and classification, segregation requirements.

The containers are loaded onto trailers owned and maintained by Da Nang Port. The containers are then taken to the dedicated dangerous goods area located at the end of each stack, whilst any further clearing or customs requirements are done. Once all customs clearances are done and transport permits obtained the onward transport of the product is allowed. All movements of containers are GPS tracked. Da Nang Porthas been awarded a Compliance Statement with the I.S.P.S. Code.

The containers are not opened and are kept sealed until they arrive at the mine sites. The containers are placed on a concrete surface within the port area.

4.3.5 Transport Practice 2.1

Interim storage may occur at the port while customs clearances are obtained. The containers are removed from the vessel and place them in the dedicated dangerous good area. The dedicated storage areas are located at the end of each container stack and have CCTV coverage. The due diligence provides that the lay down area is on a concrete surface and proven appropriate for large container forklifts and trucks.

The containers remained sealed and part of the checks for loading onto the trucks is that the seals are intact and the containers have not been opened. The sodium cyanide packaging has a sealed plastic liner which stops the contact of product from moisture or humidity.

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.

5.0 REFERENCES

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Laem Chabang, Thailand, 20 December 2019

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Surbaya, Indonesia, 12 December 2020

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Da Nang, Vietnam, 8 December 2020.

6.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

Signature Page

Golder Associates Pty Ltd

Mike Woods
ICMC Lead Auditor and ICMC Transportation Expert

CC/MCW/ds

A.B.N. 64 006 107 857

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APPENDIX A

Important Information

The document ("Report") to which this page is attached and of which this page forms a part has been issued by Golder Associates Pty Ltd ("Golder") subject to the important limitations and other qualifications set out below.

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The scope of Golder's Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder's affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification.

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