Design
for a better
future /

International Cyanide
Management Institute

International Cyanide Management Code

AGR Australian Supply Chain, Re-certification Summary Audit Report

wsp

April 2026

Question today
Imagine tomorrow
Create for the future

International Cyanide Management Code
AGR Australian Supply Chain, Re-certification Summary Audit Report

International Cyanide Management Institute

WSP
Lvl 3, Mia Yellagonga Tower 2, 5 Spring St
Perth WA 6000
PO Box 7181
Cloisters Square WA 6850

Tel: +61 8 9489 9700
Fax: +61 8 9489 9777
wsp.com

Rev	Date	Details
A	18/12/2025	Draft report
B	06/02/2026	Draft report – Track change
0	16/04/2026	Report

	Name	Date	Signature
Prepared by:	Ed Clerk	16/04/2026	
Reviewed by:			
Approved by:			

WSP acknowledges that every project we work on takes place on First Peoples lands.
We recognise Aboriginal and Torres Strait Islander Peoples as the first scientists and engineers and pay our respects to Elders past and present.

Table of contents

List of appendices

1 Introduction

1.1 Operational information

Name of Transportation Facility:	Australian Gold Reagents Pty Ltd
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Australian Gold Reagents Pty Ltd
Name of Responsible Manager:	Martin Maloney
Address:	Kwinana Beach Road, Kwinana
State/Province:	Western Australia 6167
Country:	Australia
Telephone:	+61 417 528 957
Email:	Martin.Maloney@agrcyanide.com

2 Background

2.1 AGR

AGR is the management company of the unincorporated joint venture between CSBP Limited (CSBP) and Coogee Chemicals Pty Ltd (Coogee Chemicals). CSBP is part of the Wesfarmers Chemicals, Energy and Fertilisers Division of Wesfarmers Limited. CSBP is the major participant in the venture and acts as operator and sales agent for the AGR business. As the operating agent, employees of CSBP act on behalf of AGR.

The AGR cyanide production facility is located within the CSBP manufacturing complex at Kwinana, approximately 40 km south of Perth in the state of Western Australia. AGR produces and transports:

- 30% liquid sodium cyanide in isotainers
- >97% solid sodium cyanide briquette in sea containers
- >97% solid sodium in solids to solutions (STS) isotainers

CSBP and AGR are responsible for the overall management of cyanide transportation activities including emergency response under Ministerial Statement 006. CSBP assumes the responsibility of consignor under Western Australian Dangerous Goods Transport legislation.

The transport of both liquid and solid sodium cyanide throughout Australia is undertaken by rail and/or road along recognised dangerous goods transport routes classified by the relevant authorities. The transport network includes contracted transporters servicing Fremantle Port (for export) and various gold mining operations in several states.

AGR's primary role is that of consignor; in this capacity AGR undertakes the following activities:

- Transport route selection
- Provision of cyanide safety management program
- Provision of cyanide specific training to road transport operators and rail/unloading personnel
- Audits and inspections of road transport operators
- Provision of inspection and preventative maintenance program for cyanide isotainers and sea containers
- Tracking of cyanide road and rail shipments
- Provision of emergency response plans and resources

AGR's production facility undertakes the packaging, labelling and securing of cyanide for road and rail transport. The facility is excluded from the scope of this Supply Chain.

2.2 Team Global Express

Team Global Express (TGE) was formed in 2021 after the sale of Toll Global Express to Allegro Funds, a private equity firm. This marked the separation from the Toll Group brand and the start of a new logistics business. TGE is headquartered in Melbourne, Australia, with operations across Australia and New Zealand. The company operates a multimodal network (road, rail, sea, air) for its customers globally.

TGE transports sea containers and isotainers (Solids and STS) from the Kwinana Production Facility to the Kewdale Rail head for onward rail shipment (via Aurizon) to Adelaide, South Australia, and to Melbourne, Victoria. In South Australia, it also transports sea containers from the Aurizon Gillman Terminal to a customer gold mine. In Victoria it also transports isotainers from the Dynon Intermodal Terminal to a customer gold mine.

.

2.3 QUBE

Qube Holdings Limited (Qube) was founded in 2006 after the breakup of Patrick Corporation and it is headquartered in Sydney. It provides import and export logistics services, with operations across Australia, New Zealand, and Southeast Asia. It has two main divisions:

- Qube Logistics and Infrastructure – road and rail transport, warehousing, container parks, intermodal terminals.
- Qube Ports and Bulk – stevedoring, bulk cargo handling, automotive terminals. It has a 50% stake in Patrick Terminals.

Qube provides road transportation of cyanide for AGR in Western Australia. Qube is a signatory to the Code and was recertified as fully compliant with the Code on 10 March 2025.

Qube transports:

- Shipping containers direct from the Kwinana Production Facility to the Port of Fremantle by road
- Shipping containers direct from the Kwinana Production Facility to customer sites in Western Australia.
- Isotainers from the Kwinana Production Facility direct to customers sites (by road) in Western Australia
- Isotainers from the West Kalgoorlie Railyard to customer sites (by road) in Western Australia.

2.4 Aurizon

Aurizon Holdings Limited (Aurizon) provides rail transportation of isotainers (liquid and STS) from the Kwinana Production Facility to the Kewdale Rail head for onward rail shipment to the West Kalgoorlie Container Terminal for interim storage (if needed) and intermodal transfer to regional customers in Western Australia. Product transported to customers in South Australia and Victoria is conducted via the following terminals along the Aurizon rail system:

- Forrestfield Container Terminal – Perth, Western Australia
- West Kalgoorlie Container Terminal, Western Australia
- Gillman Terminal – Port Adelaide, South Australia
- Dynon Intermodal Terminal – Melbourne, Victoria.

A due diligence of Aurizon and its terminals was undertaken by AGR in May 2025. The AGR Author of the due diligence meets the requirements of a ICMC Transport Technical Expert Auditor with over 20 years in logistics including 14 years in dangerous goods.

2.5 Patricks Terminal, Fremantle Port

Patricks Terminal operates stevedoring facilities at Fremantle Ports inner harbour container port. There is a dedicated storage area for interim storage of up to 100 tonnes solid sodium cyanide within shipping containers. Typically, cyanide is transported from the Kwinana production facility and loaded directly onto the vessel. A due diligence of Patrick's was undertaken by AGR in April 2025. A due diligence of Aurizon and its terminals was undertaken by AGR in May 2025. The AGR Author of the due diligence meets the requirements of a ICMC Transport Technical Expert Auditor with over 20 years in logistics including 14 years in dangerous goods.

2.6 DP World, Fremantle Port

DP World operates stevedoring facilities at Fremantle Ports inner harbour container port. There is a dedicated storage area for interim storage of solid sodium cyanide within shipping containers. Typically, cyanide is transported from the Kwinana production facility and loaded directly onto the vessel. A due diligence of DP World was undertaken by AGR in May 2022. A due diligence of Aurizon and its terminals was undertaken by AGR in May 2025. The AGR Author of the due diligence meets the requirements of a ICMC Transport Technical Expert Auditor with over 20 years in logistics including 14 years in dangerous goods.

2.7 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. Transit storage may occur at the following railheads:

- West Kalgoorlie Container Terminal in Perth, Western Australia
- Dynon Intermodal Terminal in Melbourne, Victoria
- Gillman Terminal in Adelaide, South Australia.

These railheads were assessed by AGR in its due diligence assessments.

Interim storage may occur at:

- TGE's Kewdale Depot in Western Australia
- TGE's Regency Park depot in South Australia
- TGE's Altona Depot in Victoria

In the event of interim storage, it is typically less than 48 hours and the containers and isotainers are not removed from the vehicles.

2.8 Audit scope

The scope of the AGR's Australian Supply Chain covers transportation of cyanide within Australia to customer mine sites in Australia and export ports to connect with AGR's ICMC certified international supply chains. The Australian Supply Chain incorporates:

- Road transportation in Australia:
  - Qube Holdings Limited
  - Team Global Express Pty Ltd
- Rail transportation in Australia
  - Aurizon Holdings Limited
- Ports
  - Patricks Terminal
  - DP World

The dispatch operation (loading of trucks and railcars) at the AGR production facility is conducted as part of warehousing and dispatch operations which are addressed within the AGR's Production Facility Audit. The loading of trucks and railcars at this facility by production facility personnel is excluded from this audit scope.

2.9 Auditor's findings and attestation

AGR is:	☒ **in full compliance with**	**The International Cyanide Management Code**
	☐ in substantial compliance with	
	☐ not in compliance with	
Audit Company:	WSP Australia Pty Limited	
Audit Team Leader:	Ed Clerk, Exemplar Global	
Email:	ed.clerk@wsp.com	

This operation has not experienced any compliance issues during the previous three-year audit cycle

2.10 Name and signatures of other auditors

Name	Position	Signature	Date
Ed Clerk	Lead Auditor		16/4/2026

2.11 Dates of audit

The field component of the recertification Audit was conducted over period the period 15-16 September 2025.

2.12 Auditor attestation

I attest that I meet the criteria for knowledge, experience, and conflict of interest for Code Verification Audit Team Leader, established by the ICMI and that all members of the audit team meet the applicable criteria established by the ICMI 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 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 has implemented a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases.

AGR does not employ transport drivers and equipment operators or directly operate transport vehicles and equipment; this is undertaken by transport subcontractors.

AGR has implemented the procedure for *Cyanide Transport Route and Risk Assessment* to guide the assessment and review of transport routes.

These procedures, and the risk assessments, prompt AGR to consider a variety of aspects, including population density, infrastructure (roadway, rail, port) construction and condition, pitch and grade, and prevalence and proximity of water bodies and fog.

AGR has implemented a procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks.

The approach to route assessments is outlined in the Transport Management Plan (TMP) and in the *Cyanide Transport Route Review and Risk Assessment* procedure.

Each proposed route is assessed by AGR driving the road components of the route and identifying hazards along the route and documenting this in a route assessment.

AGR implements an annual review process to re-evaluate routes used for cyanide deliveries and this review process is done in consultation with its transport subcontractors. It is conducted by AGR driving the route or meeting with the transport contractor to conduct a desktop review.

In addition to the annual review, subcontractors have feedback processes on route condition which is available to AGR.

AGR does document the measures taken to address risks identified with the selected routes. The management measures are detailed within the TMP, Journey Management Plans (JMP) and Driving Plans.

AGR has a process in place to seek input from applicable governmental agencies, communities and other stakeholders as necessary in the selection of routes and development of risk management measures. AGR's TMP notes that it will transport its product along authorised RAV (Restricted Access Vehicle) networks or NHVR (National Heavy Vehicle Regulations) networks for heavy vehicles. Where deviation from this is required, the designated transporter, with support from AGR, will liaise with the relevant authorities and local government prior to the transportation of cyanide commencing.

Direct engagement of communities by AGR within Australia did not occur as the community can comment during the designation of dangerous goods routes and the community was not designated a role as part of the planned response to an emergency involving cyanide.

The routes selected by AGR do not present special safety or security concerns, and do not require the use of convoys, escorts or other additional safety or security measures.

AGR does subcontract the transport and handling of cyanide and has established procedures to inform subcontractors of the requirements of this Transport Practice. AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of transporters. AGR undertakes annual audits of its transport subcontractors to confirm compliance with its requirements and those of the ICMC. Periodic driver unloading audits are also completed by AGR to assess compliance with procedures.

AGR has implemented periodic performance meetings with subcontractor transporters to monitor compliance between the formal audit programs.

AGR has contracts in place with subcontracted transporters and those contracts also contain conditions relating to compliance with AGR's Transport Management Plan and other key documents.

AGR has completed due diligence assessments of Patrick Terminals and DP World at the Fremantle container terminal and Aurizon (Rail Operator and West Kalgoorlie Terminal, Gillman Terminal, and Dynon Terminal) and is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

AGR utilise an ICMC certified transporter, Qube for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

AGR subcontract TGE for the transport of cyanide product from the Kwinana Production Facility to the Kewdale Rail head for onward rail shipment to Adelaide, South Australia and to Melbourne, Victoria.

Interviews with TGE confirmed that AGR conduct and document the route assessments. The process is done in consultation with TGE and government regulators and resources who provide specialist advise on regulations and authorised routes.

TGE has established a process to provide feedback to AGR if routes change or deliveries are delayed. TGE has a vehicle monitoring system that provides real-time forward-looking video feed that captures route conditions.

TGE documents the risk management measures in its JMP and Driving Plans which are approved by AGR.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon in May 2025. AGR found no issues of concern regarding Aurizon's awareness and management of the handling and systems in place for the sodium cyanide product.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern with regard to the Patricks Terminal awareness and management of the handling and systems in place for the sodium cyanide product.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern with regard to the DP World Terminals awareness and management of the handling and systems in place for the sodium cyanide product.

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 its selection and management of road transport subcontractors only uses trained, qualified and licensed operators of its transport vehicles. All drivers operating cyanide transport and handling equipment must have a current government issued driver's license with relevant dangerous goods category, and be trained in AGRs mandatory training modules.

AGR requires subcontractor drivers and equipment operators to complete cyanide awareness training modules (solution and solid modules) through the WESCEF learning management system (LMS). They are also instructed on the unloading of solid and liquid isotainers.

Within this supply chain, drivers are responsible for the unloading of liquid and STS isotainers. No loading of sea containers, isotainers and STS isotainers on and off trucks is conducted by AGR's road subcontractors.

AGR has processes in place requiring all personnel operating cyanide handling and transport equipment been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

AGR's TMP specifies the training requirements for subcontractors.

AGR does subcontract the transport and handling of cyanide and has established procedures to inform subcontractors of the requirements of this Transport Practice.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new transporters. AGR undertakes annual audits of its transport subcontractors to confirm compliance with its requirements and those of the ICMC. Periodic driver unloading audits are also completed by AGR to assess compliance with procedures.

AGR has implemented periodic performance meetings with subcontractor transporters to monitor compliance between the formal audit programs.

AGR has contracts in place with subcontracted transporters and those contracts also contain conditions relating to compliance with AGR's Transport Management Plan and other key documents.

AGR has completed due diligence assessments of Patricks and DP World at the Fremantle Container Terminal and Aurizon (Rail Operator and West Kalgoorlie Terminal, Gillman Terminal, and Dynon Terminal) and is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

AGR utilise an ICMC certified transporter, Qube for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

A site inspection, interviews and maintenance records confirmed that TGE has process in place to ensure personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

TGE maintains a spreadsheet system to track driver licence currency.

In addition to AGR's training requirements, TGE have additional mandatory training requirements for cyanide transport driver drivers including Dangerous Goods Compliance training, Dangerous Goods Awareness training, Mine Site Inductions and Railhead Inductions.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon in May 2025. AGR found no issues of concern regarding Aurizon's operation of cyanide handling and transport equipment.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding Patricks Terminal's operation of cyanide handling and transport equipment.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding DP World Terminal's operation of cyanide handling and transport equipment.

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 has processes in place requiring its transport subcontractors use only equipment designed and maintained to operate within the loads it will be handling is used.

AGR's solution isotainers and STS isotainers are intermodal vessels designed and constructed of stainless steel and satisfy the requirements of the Australian Code for the Transport of Dangerous Goods by Road and Rail. No flushing or

rinsing occurs once a solution isotainer is emptied. The isotainers are returned as containing residual cyanide solution via the original transport route. The STS isotainers are flushed following discharge and are also returned as containing residual cyanide solution via the original transport route. No additional procedures are deemed necessary for the return journey for both types of isotainers.

The units are approved for road transport by the competent authority and meet the requirements of the Dangerous Goods Safety (Road and Rail Transport of Non-Explosives) Regulations 2007.

Maintenance of each isotainer is carried out as per manufacturers requirements and to meet IMDG and ADG standards and the relevant engineering standards.

AGR's solid sodium cyanide is packaged in Intermediate Bulk Containers (IBC's) of 1000kg capacity. The solid sodium cyanide briquettes are sealed within a PVC plastic liner which is within a woven polypropylene bag, which is within a plywood box with a built-in pallet. The IBC complies with International Maritime Dangerous Goods Code for Group 1 hazardous goods, and has been subjected to the relevant tests required by the Code. The Competent Authority has approved this specific design of IBC for use by AGR. The IBCs are transported in standard shipping containers (TEU), typically containing 20 tonnes of product. Shipping containers are internally inspected at the completion of IBC unloading onsite and returned to AGR empty via the original transport route. No additional procedures are deemed necessary for the return journey.

The majority of sea containers used are shipping company units which pass through a container depot, where they are inspected for cleanliness and sea-worthiness to meet the appropriate AGR standard, before being delivered to CSBP. At CSBP despatch staff inspect each TEU and if there are any signs of contamination or damage it will not be loaded and replaced with another through the same process.

When transporting these containers, AGR's TMP requires transport operators to comply with the following:

- Rail wagons shall be compliant and maintained by the rail operator to the standard required by the Office of the National Rail Safety Regulator (ONRSR).
- Road transport equipment shall be maintained to meet or exceed Australian Standards for the transport of dangerous goods, manufacturers' specifications and be subject to standards agreed during the carrier selection process

AGR has processes in place to verify the adequacy of the equipment for the load it must bear.

AGR's TMP details the minimum safety requirements and programmes that its transport subcontractors are required to implement, including prestart inspections and preventative maintenance programs.

AGR, has procedures and processes to prevent overloading of its containers and its subcontractor transport vehicles. The IBC and isotainers are consistently filled to set weights and the containers are weighed prior to dispatch.

AGR requires its transport subcontractors to only use and maintain vehicles capable of transporting the containers. This is verified through contractor pre-selection processes, route surveys and annual compliance inspections.

AGR does subcontract the transport and handling of cyanide and has established procedures to inform subcontractors of the requirements of this Transport Practice.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new transporters. AGR undertakes annual audits of its transport subcontractors to confirm compliance with its requirements and those of the ICMC. Periodic driver unloading audits are also completed by AGR to assess compliance with procedures.

AGR has implemented periodic performance meetings with subcontractor transporters to monitor compliance between the formal audit programs.

AGR has contracts in place with subcontracted transporters and those contracts also contain conditions relating to compliance with AGR's Transport Management Plan and other key documents.

AGR has completed due diligence assessments of Patricks and DP World at the Fremantle Container Terminal and Aurizon (Rail Operator and West Kalgoorlie Terminal, Gillman Terminal, and Dynon Terminal) and is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

TGE maintains a master fleet list (required by regulations) detailing all vehicle specifications. TGE maintains its equipment using maintenance software which schedules maintenance based on milage and time. The maintenance booking system is maintained by the Depot Manager and the key performance indicators for the depot include compliance with maintenance schedules. Equipment that is not maintained in accordance with the system requirements is flagged to management through an escalation process.

TGE also has implemented pre-start inspection programs and checks.

Equipment used in the transportation of cyanide is rotated but all equipment used is designed and maintained to transport AGR's product.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon in May 2025. AGR found no issues of concern regarding the suitability of Aurizon's transport equipment to operate safely, and their capability to handle dangerous goods.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the suitability of Patricks Terminal's transport equipment to operate safely, and their capability to handle dangerous goods.

This Port has equipment operation and maintenance capabilities and procedures that are not dependent on AGR.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the suitability of DP World's transport equipment to operate safely, and their capability to handle dangerous goods.

This Port has equipment operation and maintenance capabilities and procedures that are not dependent on AGR.

3.1.4 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	

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 to ensure cyanide is transported in a manner that maintains the integrity of the producer's packaging.

Solid cyanide is package into wooden intermediate bulk containers (IBCs) and the lid secured with screws and then packing straps are applied. IBCs are inspected prior to loading and damage containers are marked and placed in a designated area for re-dissolving on site.

IBCs are loaded into shipping containers with the number of each IBC and shipping container recorded on the loading sheet. Once the container is loaded the doors are closed and unique seal applied. The seal number and container number are recorded on shipping documentation that accompanies the shipment through to the customer.

Solid sodium cyanide is also loaded into solid to solution (STS) isotainers via hatch in the end of the vessel. Once the vessel has been filled the hatch is replaced and seals applied.

Liquid sodium cyanide is loaded into a dedicated fleet of isotainers and red seals are applied to the coaming lid of the isotainer.

AGR has procedures in place for the inspection of shipping containers prior to use and containers with damage that could impact the integrity of the container or door seals are not used.

AGR has a preventative maintenance program for isotainers and STS isotainers that addresses structure, integrity, valves, locks, and placarding.

AGR's TMP requires its transport subcontractors (rail and road) to use twist locks to secure containers during transportation. Seals on doors and valves are also required for chain of custody purposes.

AGR uses placards and other signage to identify the shipment as cyanide, as required by local regulations or international standards. 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 TMP notes that isotainers are dedicated to the transport of sodium cyanide and are marked with the required Emergency Information Panels (EIP) and placarding, in accordance with the ADG Code. Similarly, sea containers used for the transport of solids are marked with the relevant signage depending on its mode of transport and destination. Placarding for road transport to the port will be either on the container itself, or on the trailer.

AGR has a process to ensure that the transporters implement a safety program for cyanide transport. The purpose of AGR's TMP is to detail the basic processes and procedures to be adopted by its transport subcontractors to avoid the potential for accidents and incidents associated with the transport of its cyanide.

AGR does subcontract the transport and handling of cyanide and has established procedures to inform subcontractors of the requirements of Transport Practice 1.4.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new transporters. AGR undertakes annual audits of its transport subcontractors to confirm compliance with its requirements and those of the ICMC. Periodic driver unloading audits are also completed by AGR to assess compliance with procedures.

AGR has implemented periodic performance meetings with subcontractor transporters to monitor compliance between the formal audit programs.

AGR has contracts in place with subcontracted transporters and those contracts also contain conditions relating to compliance with AGR's Transport Management Plan and other key documents.

AGR has completed due diligence assessments of Patricks and DP World at the Fremantle Container Terminal and Aurizon (Rail Operator and West Kalgoorlie Terminal, Gillman Terminal, and Dynon Terminal) and is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

TGE's JMPs are supplemented with Safe Driver Plans for extended trips. The Safe Driver Plans are custom plans to manage the risks of the trip. Prior to starting and at each stop, drivers conduct a walk around the vehicle to conduct checks, which include checks on the cargo, twist locks, and seals.

TGE drivers are trained in Dangerous Goods and placarding requirements. The drivers conduct checks on placarding when the trucks are initially loaded. The drivers carry spare EIPs in the event they are missing from the container when it is collected. The TGE trucks have placard holders installed.

TGE has a structured safety management system that encompasses the safe transport of AGR's cyanide.

a Vehicle inspections prior to each departure/shipment?

Pre-trip and pre-start inspections are completed by the driver prior to each trip. A review of convoy documentation confirmed that pre-start checks are completed.

b A preventative maintenance program?

TGE operates a tiered maintenance program for prime movers and trailers which is scheduled and recorded. A review of maintenance records and interviews confirmed the implementation of a preventative maintenance program

c Limitations on operator or drivers' hours?

TGE has implemented a fatigue management program that meets mandated requirements for heavy vehicle transporters operating in Australia.

d Procedures to prevent loads from shifting?

Containers and isotainers are secured using twist locks, which are designed and constructed to international transport standards. Twist locks are inspected as part of the pre-trip and pre-start inspections.

e Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered?

TGE operates under AGR's transport management plan and there are processes in place for modification and suspension of transport. Both the TMP and JMPs require the driver to contact the Depot in the event transportation needs to be modified or suspended. The decision to modify or suspect is only done with the approval of AGR.

f A drug abuse prevention program?

TGE has a *drug abuse prevention program.* This program is supported by a Drug and Alcohol Policy which allows periodic medicals, and drug and alcohol testing.

g Retention of records documenting that the above activities have been conducted?

Records are maintained that the above activities have been conducted.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon in May 2025. AGR found no issues of concern regarding the Aurizon's safety programs, including maintenance and inspections, in the handling of its product.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the Patrick's safety programs, including maintenance and inspections, in the handling of its product.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the DP World's safety programs, including maintenance and inspections, in the handling of its product.

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 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 requires subcontractor transport vehicles to have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders. AGR's TMP requires transport subcontractors to equip all transport vehicles with effective communication equipment.

AGR has processes in place to ensure transport communication equipment is periodically tested to ensure it functions properly. This is specified in the TMP.

AGR has processes to identify blackout areas along transport routes and implement procedures for blackout areas. Communication blackout areas are identified during the route surveys and no blackout areas were identified along this supply chain. If blackout areas are identified, these are typically limited to mobile phones and these areas can be managed with the use of satellite phones and satellite duress buttons.

AGR has systems to track the progress of cyanide shipments. AGR's TMP requires its transport contractors to be fitted with a satellite tracking system.

AGR has implemented inventory controls and chain of custody documentation to prevent loss of cyanide during shipment. Shipping containers, isotainers and STS isotainers leaving the production facility are locked and tagged with a security seal during transit to the end user.

AGR has shipping records indicating the amount of cyanide in transit and Safety Data Sheets available during transport.

Detailed shipping documentation is provided to subcontracted transporters and available throughout the journey. The documentation contains details on container or isotainer number, volume of cyanide and seal numbers. Safety Data Sheets are also made available.

AGR does subcontract the transport and handling of cyanide and has established procedures to inform subcontractors of the requirements of this Transport Practice.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new transporters. AGR undertakes annual audits of its transport subcontractors to confirm compliance with its requirements and those of the ICMC. Periodic driver unloading audits are also completed by AGR to assess compliance with procedures.

AGR has implemented periodic performance meetings with subcontractor transporters to monitor compliance between the formal audit programs.

AGR has contracts in place with subcontracted transporters and those contracts also contain conditions relating to compliance with AGR's Transport Management Plan and other key documents.

AGR has completed due diligence assessments of Patricks and DP World at the Fremantle Container Terminal and Aurizon (Rail Operator and West Kalgoorlie Terminal, Gillman Terminal, and Dynon Terminal) and is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

All TGE vehicles have installed hands free mobile systems. In addition to mobile phones, the vehicles are also equipped with satellite communication, GPS systems, and personal distress beacons. Communications to the mine, AGR and emergency responders, is typically via TGE's Depot Manager.

TGE's vehicle communication equipment is tested through continual use rather than a scheduled testing program. Redundancy is also provided through the multiple communication devices.

All of TGE's vehicles have a combination of terrestrial and satellite communication systems and there are no known blackout areas along the routes within this supply chain.

TGE uses a several satellite tracking systems to provide live tracking od all their vehicles. The tracking systems used vary depending on the geographical location but all systems comply with AGR's requirements.

TGE have access to detailed shipping documentation throughout the journey. Prior to starting and at each stop, drivers conduct a walk around the vehicle to conduct checks, which include checks on the cargo, twist locks, and seals.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon in May 2025. AGR found no issues of concern regarding the Aurizon's communication, tracking and inventory control systems, in the handling of its product.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the Patricks' communication, tracking and inventory control systems, in the handling of its product.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the DP World's communication, tracking and inventory control systems, in the handling of its product.

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

Within the supply chain, interim storage occurs along the Aurizon rail system at:

- Forrestfield Container Terminal – Perth, Western Australia
- West Kalgoorlie Container Terminal, Western Australia
- Gillman Terminal – Adelaide, South Australia
- Dynon Intermodal Terminal – Melbourne, Victoria

Interim storage also occurs at the Port of Fremantle. Interim storages have been assessed by AGR in its due diligences.

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

Road Transportation

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

Transit (on truck) storage may occur at TGE's Kewdale, Regency Park and Altona Depots up to approximately 48 hours. At these facilities the containers, STS isotainers and isotainers remain on the vehicle.

Both facilities have training supported by signage that specify PPE, restrict smoking to designated areas, and prohibit open flames, eating and drinking in the vicinity of the cyanide.

Security measures are in place to prevent unauthorised access to cyanide. The perimeters of the Kewdale, Regency Park and Altona Depots have security fencing and lockable access gates. The depots are monitored with CCTV and alarm systems. The containers, isotainers and STS isotainers are also locked and have seals attached.

Cyanide is stored separately from incompatible materials such as acids, strong oxidisers and explosives through the transport container, and dedicated and isolated storage areas. The product remains withing the containers, isotainers and STS isotainers.

Cyanide is stored in a manner designed to minimise the potential for contact of solid cyanide with water. This is achieved through the transport container (container, isotainer and STS isotainer) and that the transport containers remain elevated on the vehicle. Both depots have sealed surfaces with controlled drainage.

Cyanide is stored with adequate ventilation to prevent build-up of hydrogen cyanide gas and cyanide dust a manner designed to minimise the potential for contact of solid cyanide with water. The transport containers are stored in the open.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon in May 2025. AGR found no issues of concern regarding the Aurizon's interim storage at the respective railyards.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the interim storage at the port.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the interim storage at the port.

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 has a tiered emergency management system with clear emergency management documentation. AGR's response to cyanide is detailed in the TMP and supported by CSBP's emergency management processes that are described in the *Management of Emergencies Procedure, Sodium Cyanide Response to Emergency Situations* and standard operating procedures for solid, liquid and gas cyanide release.

AGR's and CSBP's procedures have been designed to interface with all government hazard management agencies (HMA).

The AGR emergency response procedures are considered appropriate for the selected transportation routes and AGR does not directly operate an interim storage facilities. The TMP has been developed to address foreseeable transport emergency situations and hazards identified through the route assessment process.

The AGR emergency response procedures consider both the physical and chemical form of cyanide. The plan has been developed around the transport of sodium cyanide in solid form in IBCs within shipping containers or within STS isotainers and in liquid form within isotainers for both road and rail transport.

Isotainer vessel design and security measures are detailed in the TMP

The AGR emergency response procedures do include descriptions of response actions, as appropriate for the anticipated emergency situation.

The plan identifies external entities having designated roles in emergency response. The TMP notes that in the event of an emergency, the relevant state government fire service will be the HMA. They will provide detailed information on first strike action (the immediate response action to be taken by the emergency services), protective clothing, danger area dimensions, first aid, safety, pollution control, manufacturer identification, telephone contact numbers, and other related information for responding emergency services.

The HMA is responsible for all actions involving fire, leak or spillage. The senior fire officer on site is responsible. CSBP is always available to provide support to the relevant HMA for all actions.

If a spill occurs near a water resource and there is a possibility of contamination of the water resource, the HMA Incident Controller will notify the local Water and/or Environmental Regulator who will advise all potential water resource consumers that the resource should not be used until tests have been completed and clearance issued.

Communities are not delegated roles in the anticipated emergency scenarios.

Road Transportation

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

TGE follows the Emergency Management Guidebook as a generic response to hazardous chemicals incidents and the company has its own incident management plans. In the event of an incident involving cyanide the TMP and *Vehicle Operators Handbook for Sodium Cyanide* is followed.

TGE's responsibilities are to:

- Ensure personal safety first
- Secure the area
- Communicate/report the situation
- Contain the situation if possible
- Stand-by in the area

These are detailed in the Vehicle Operators Handbook for Sodium Cyanide.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon Rail in May 2025. AGR found no issues of concern regarding the Aurizon's emergency response documentation.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the emergency response documentation at the port.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the emergency response documentation at the port.

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 does provide emergency response training of appropriate personnel. CSBP has an Emergency Response Team and is an accredited responder by the Regulator for sodium cyanide. Cyanide transport incident response is provided through the CSBP response team based at Kwinana and technical support can be provide by AGR and CSBP production personnel.

Training of CSBP's emergency response team (ERT) is done via a combination of in-house training and accredited third-party trainers.

AGR emergency documentation contains descriptions of the specific emergency response duties and responsibilities of personnel. The specific duties and responsibilities is contained in procedures supporting the formation and function of the CSBP Crises Management Team and Emergency Response Team. Specific duties for road incidents is contained within the Drivers Handbook and TMP.

The emergency documentation contains lists of response equipment that should be available during transport or along the transportation route.

Outside of HMA, frontline response can be supported by CSBP's ERT. The ERT supports both the cyanide production facility and transport operations and the ERT has dedicated plant and equipment located at the Kwinaina facility. All emergency response equipment under the management of the ERT is checked at varying frequencies depending on the equipment.

AGR has the necessary emergency response and health and safety equipment, including PPE during transport. The Drivers Handbook lists PPE and emergency response equipment required in each transport vehicle as well as the location of ferrous sulphate stockpiles along the routes. The availability of the ferrous sulphate is physically checked by AGR annually.

AGR has procedures to inspect emergency response equipment and assure its availability when required. All emergency response equipment under the management of the ERT is checked at varying frequencies depending on the equipment. Specific check sheets support the inspection process and the inspector is required to note the presence and serviceability of the inspected item. Defects are recorded and tracked to completion.

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

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new transporters. AGR undertakes annual audits of its transport subcontractors to confirm compliance with its requirements and those of the ICMC. Periodic driver unloading audits are also completed by AGR to assess compliance with procedures.

AGR has implemented periodic performance meetings with subcontractor transporters to monitor compliance between the formal audit programs.

AGR has contracts in place with subcontracted transporters and those contracts also contain conditions relating to compliance with AGR's Transport Management Plan and other key documents.

AGR has completed due diligence assessments of Patricks and DP World at the Fremantle Container Terminal and Aurizon (Rail Operator and West Kalgoorlie Terminal, Gillman Terminal, and Dynon Terminal) and is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

TGE drivers are trained in their role in an emergency situation in line with the *Vehicle Operators Handbook for Sodium Cyanide*.

Drivers PPE and emergency response equipment conforms to AGR's requirements. The equipment is contained in sealed bags that are collected and checked by the driver prior to each trip.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon Rail in May 2025. AGR found no issues of concern regarding the Aurizon's emergency response resourcing.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the emergency response resourcing at the port.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the emergency response resourcing at the port.

3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

AGR is:	☒ **in full compliance with**	**Transport Practice 3.3**
	☐ in substantial compliance with	
	☐ 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 has procedures and current contact information for notifying the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

CSBP provides AGR with a 24-hour emergency response service in the unlikely event of an emergency and this is displayed on the Emergency Information Panels (EIPs) on the isotainers and shipping containers in addition to the Australian Emergency Services numbers. This number is also provided in the Vehicle Operators handbook supplied to transporters.

AGR maintain a list of contact numbers for the strategic locations of ferrous sulphate throughout the state within the TMP.

Supporting AGR's TMP, CSBP has a Management of Emergencies Procedure that contains the procedural, contact and outside responder information required. The document identifies external emergency responders and their roles, and the procedure for making contact.

AGR has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.

AGR has provisions to ensure that internal and external emergency notification and reporting procedures are kept current. The TMP has been continually updated with the latest revision (42.0.0) in November 2025.

The TMP includes contact information and guidance for reporting significant cyanide incidents to the ICMI in accordance with signatory obligations. There have been no significant incidents during the audit period that necessitated reporting.

Supporting AGR's TMP, CSBP has a Management of Emergencies Procedure that contains the procedural, contact and outside responder information required. The document identifies external emergency responders and their roles, and the procedure for making contact.

CSBP maintains a list of contacts for use during emergencies. The contact names and numbers are checked and updated in the documentation system and replaced in the Emergency Control Centre (ECC) at least every twelve months by the Emergency Services Supervisor or following organisational changes.

AGR has a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document.

The TMP defines the ICMI definition of a significant incident and describes the ICMI reporting process to be followed. The notification process is the responsibility of AGR.

No Significant cyanide incidents have occurred during the reporting period.

Road Transport

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

TGE drivers are trained in their role in an emergency situation in line with the *Vehicle Operators Handbook for Sodium Cyanide*.

The drivers have completed the online AGR training modules that detail the actions to take in an emergency. The expectation is for drivers to report the incident to using Australia's 000 emergency number and AGR designated emergency number and the details are provided within the *Vehicle Operators Handbook* and on the EIP on the vehicle.

JMPs used by TGE contain key contact numbers. These are checked annually when the JMPs are reviewed.

The Drivers Handbook contains the location and contact details for ferrous sulphate stockpiles. These are checked annually.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon Rail in May 2025. AGR found no issues of concern regarding the Aurizon's emergency notification and reporting processes.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the emergency notification and reporting processes at the port.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the emergency notification and reporting processes at the port.

3.3.4 Transport Practice 3.4

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

AGR is:	☒ **in full compliance with**	**Transport Practice 3.4**
	☐ in substantial compliance with	
	☐ 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 does have 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.

The TMP provides details on the spill recovery and neutralisation procedure. Procedures are provided for:

- Hydrated ferrous sulphate crystals or solution.
- Sodium or calcium hypochlorite solution.

The TMP notes that recovery or removal of spilled product (either neutralised or not) should not be undertaken by untrained personnel or without approval of HMA or CSBP as appropriate.

AGR does prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. This is specified in the TMP.

Road Transportation

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

TGE drivers are not expected to coordinate remediation activities.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon Rail in May 2025. AGR found no issues of concern regarding the Aurizon's emergency procedures addressing remediation of releases.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the emergency procedures addressing remediation of releases at the port.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the emergency procedures addressing remediation of releases at the port.

3.3.5 Transport Practice 3.5

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

AGR is:	☒ **in full compliance with**	**Transport Practice 3.5**
	☐ in substantial compliance with	
	☐ 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 does have processes to undertake periodic reviews of its emergency response procedures and plans. The TMP is reviewed at least every two years and the most recent review was undertaken in November 2025. The Drivers Handbook and Management of Emergencies procedures are also reviewed every 2 years.

AGR has also implemented a Transport Management Plan audit program as part of compliance with Ministerial Conditions and this audit program includes assessment of emergency response including audits of transporters.

In addition to the audit program, AGR uses desktop exercises and mock drills as part of the review process and has completed a drills with subcontractors across the audit period.

AGR has provisions for periodically conducting mock emergency drills and they are being implemented. Section 10 of the TMP describes the requirement for emergency exercises for the following emergencies:

- spills involving rail wagons
- spills involving road vehicles
- spills during transport
- solids spills at Fremantle Port
- straight-forward spill scenarios
- complex spill scenarios.

Multiple drills are conducted annually, and they have tested all elements of the emergency response process from notification to remediation and reporting. The drills include scenarios for human exposure and environmental release.

AGR has procedures to evaluate the Plan's performance after its implementation and revise it as needed. AGR completes post activity reports following all emergency exercises and incidents. The report contains details on the scenario / incident including an overview, attendees, run sheet, debrief notes, recommendation and photographs.

The debrief section notes what went well and what could be improved. The recommendations made are tracked though to completion. Recommendations include amendments to procedures and processes where appropriate.

Road Transportation

Qube

Qube was initially certified on 29 November 2018 and was recertified on 10 March 2025.

TGE

Periodic assessment and review of emergency response procedures is undertaken by AGR. Subcontracted road transporters are not responsible for this activity but are required to participate in mock exercises.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon Rail in May 2025. AGR found no issues of concern regarding the Aurizon's emergency system evaluation processes.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks in April 2025. AGR found no issues of concern regarding the emergency system evaluation processes at the port.

DP World

AGR completed a due diligence assessment on DP World in May 2025. AGR found no issues of concern regarding the emergency system evaluation processes at the port.

4 Important information

Your attention is drawn to the limitations statement, 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 limitations statement does not alter the obligations WSP has under the contract between it and its client.

Appendix A

Limitations

This Report is provided by WSP Australia Pty Limited (*WSP*) to Australian Gold Reagents Pty Ltd (*Client*) in response to specific instructions from the Client and in accordance with WSP's proposal dated 17 April 2025 (*Agreement*).

A1 Permitted purpose

This Report is provided by WSP for the purpose described in the Agreement and no responsibility is accepted by WSP for the use of the Report in whole or in part, for any other purpose (*Permitted Purpose*).

A2 Qualifications and assumptions

The services undertaken by WSP in preparing this Report were limited to those specifically detailed in the Report and are subject to the scope, qualifications, assumptions and limitations set out in the Report or otherwise communicated to the Client.

Except as otherwise stated in the Report and to the extent that statements, opinions, facts, conclusion and/or recommendations in the Report (*Conclusions*) are based in whole or in part on information provided by the Client and other parties identified in the report (*Information)*, those Conclusions are based on assumptions by WSP of the reliability, adequacy, accuracy and completeness of the Information and have not been verified. WSP accepts no responsibility for the Information.

WSP has prepared the Report without regard to any special interest of any person other than the Client when undertaking the services described in the Agreement or in preparing the Report.

A3 Use and reliance

This Report should be read in its entirety and must not be copied, distributed or referred to in part only. The Report must not be reproduced without the written approval of WSP. WSP will not be responsible for interpretations or conclusions drawn by the reader. This Report (or sections of the Report) should not be used as part of a specification for a project or for incorporation into any other document without the prior agreement of WSP.

WSP is not (and will not be) obliged to provide an update of this Report to include any event, circumstance, revised Information or any matter coming to WSP's attention after the date of this Report. Data reported and Conclusions drawn are based solely on information made available to WSP at the time of preparing the Report. The passage of time; unexpected variations in ground conditions; manifestations of latent conditions; or the impact of future events (including (without limitation) changes in policy, legislation, guidelines, scientific knowledge; and changes in interpretation of policy by statutory authorities); may require further investigation or subsequent re-evaluation of the Conclusions.

This Report can only be relied upon for the Permitted Purpose and may not be relied upon for any other purpose. The Report does not purport to recommend or induce a decision to make (or not make) any purchase, disposal, investment, divestment, financial commitment or otherwise. It is the responsibility of the Client to accept (if the Client so chooses) any Conclusions contained within the Report and implement them in an appropriate, suitable and timely manner.

In the absence of express written consent of WSP, no responsibility is accepted by WSP for the use of the Report in whole or in part by any party other than the Client for any purpose whatsoever. Without the express written consent of WSP, any use which a third party makes of this Report or any reliance on (or decisions to be made) based on this Report is at the sole risk of those third parties without recourse to WSP. Third parties should make their own enquiries and obtain independent advice in relation to any matter dealt with or Conclusions expressed in the Report.

A4 Disclaimer

No warranty, undertaking or guarantee whether expressed or implied, is made with respect to the data reported or the Conclusions drawn. To the fullest extent permitted at law, WSP, its related bodies corporate and its officers, employees and agents assumes no responsibility and will not be liable to any third party for, or in relation to any losses, damages or expenses (including any indirect, consequential or punitive losses or damages or any amounts for loss of profit, loss of revenue, loss of opportunity to earn profit, loss of production, loss of contract, increased operational costs, loss of business opportunity, site depredation costs, business interruption or economic loss) of any kind whatsoever, suffered or incurred by a third party.