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Australian Gold Reagents Ltd

International Cyanide Management Code Recertification Audit

Central and South American Supply Chain - Summary Audit Report

October 2025

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Australian Gold Reagents Ltd

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Rev	Date	Details
Rev A	18/07/2023	Summary Audit Report
Rev 0	28/10/2025	Amendment to include terminal Zárate

	Name	date	signature
Prepared by:	Rudi Seebach	21/07/2023	N\A
Reviewed by:	Ed Clerk	21/07/2023	N\A
Approved by:	Ed Clerk	21/07/2023	N\A
Update Approved by:	Ed Clerk	28/10/2025	

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.

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1 Introduction

1.1 Operation General Information

Name of Transport Operation:	Central and South American Supply Chain
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Australian Gold Reagent Pty Ltd
Name of Responsible Manager:	Darren Gould, Production Support and Logistics Specialist
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1.2 Operation Location Detail and Description

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.

AGRs Central and South America supply chain covers transportation of AGR's solid cyanide to ports in Argentina, Brazil, Chile, Dominican Republic and Peru. Ports that were added to the supply chain include the Port of Angamos, Port of Antofagasta, Port of Valparaiso and the Port of Caucedo. Only the Port of Angamos is currently in use by AGR, the other ports have been added for potential use in the future. WSP were engaged in 2025 to conduct an amendment to the recertification audit of AGRs supply chain to add Port Zárate, which will be used commencing 2025.

It is only within the Dominican Republic supply chain where the ICMC certified road transportation company Marítima Dominicana, S.A.S is used to transport solid cyanide land based to end users by AGR. The remainder of the transporters included in the scope of the audit do not currently transport cyanide on behalf of AGR and have been included in the scope for potential use in the future. Aucan Logistics SPA, were added to the supply chain and therefore new to the supply chain for potential future use.

1.2.1 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.

1.2.1.1 Port of Deseado, Argentina

The Port is serviced by a wharf as opposed to a container terminal and its associated facilities. The published equipment at the port consists of 1 x 50 ton, 1 x 45 ton and 1 x 41 ton mobile cranes. Visually there were a number of mobile cranes situated at the port however these may be the property of private contractors operating at the port. The port has no laydown or storage areas for handling dangerous goods though does maintain a 650sqm bonded warehouse. Due to the sensitivities of the fishing industry no dangerous goods are allowed to be stored or containers stacked on the wharf.

Previously the Port appeared to have no container handling equipment such as reach stackers (container fork-lifts) however there were at least three of these observed conducting container loading and movement activities. There are no Port operations (stevedoring) personnel involved in handling the sodium cyanide containers through the Port. Port Operations only oversee the handling operation which is conducted as follows:

- The sodium cyanide containers arrive on self-geared vessels at the port of Puerto Deseado. Self-geared vessels are equipped with ships derricks (cranes) for unloading and loading containers on the vessel. These derricks are operated by the vessel's crew
- The importer of the sodium cyanide has 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
- The vessel's crew utilising the derricks will only unload when the sodium cyanide containers can be lifted off the vessel and immediately loaded onto road transport trailers. In relation to sodium cyanide arriving from AGR, the transport equipment reference is that provided by the ICMI accredited transport company Cruz del Sur
- To ensure clarity on who is responsible for the stevedoring services at this port, the Terminal Handling Charges that are normally paid for stevedoring charges at destination Ports are invoiced by Maersk Shipping as part of the shipping rate to the Port of Deseado
- Customs clearance is processed before the arrival of the vessel to allow for the direct unloading of the vessel onto vehicles
- 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
- Overseeing the port operations are the vessels captain and crew, port management, mining company safety personnel, transport company personnel and transport supervisor.

1.2.1.2 Port of Santos, Brazil

The Port of Santos is located within the Sao Paulo district in the town of Santos, Brazil. The port, located on the bank of the Estuario de Santos, is managed by the Santos Port Authority (SPA). Santos Port is the main container port servicing Brazil; AGR has the ability to ship to this port by utilising Maersk for the shipment of product from Fremantle Western Australia and the shipping line's service through to Santos Port.

Within the port complex is the largest container terminal within Latin America in Brazil Terminal Portuario (BTP), operated by Santos Brazil. The container terminal wharf has a current dock length of 980 metres with plans for expansion to 1,300 metres. There are four berths; three for container ships and another for Roll On Roll Off (RORO) vessels. The Terminal allows unloading of the shipments of containers and the subsequent road transport to AngloGold Ashanti mine sites located in the Belo Horizonte and Crixas areas of Brazil.

The terminal maintains 13 cranes for loading/unloading vessels, 39 rubber tyred gantry (RTG) cranes and a fleet of trucks dedicated to intra-port container movements. The hardstand area provides 610,000sqm of storage capacity and accommodates movement of approximately two million TEUs per year with additional warehouse space of 12,000sqm and all vehicle and equipment maintenance in managed internally.

Containers of sodium cyanide are typically transferred direct to vehicle however the terminal maintains a dedicated dangerous goods area with ground treatment to prevent any environmental issues along with bunded trailers to allow for the placement of leaking containers. In addition, the terminal has emergency response capability though major incidents would require external fire brigade response.

The port has a controlled entry point and is enclosed with strong wire fencing all around the landside of the port and utilises security camera surveillance consisting of 431 cameras which are constantly monitored withing the operations centre.

1.2.1.3 Port of San Antonio, Chile

San Antonio is Chile's largest port and the busiest port on South America's west coast. Located on the shores of central Chile, it is 110km from the country's capital, Santiago.

In 1960 the Portuaria Compania de Chile (EMPORCHI) was given responsibility to administer, operate, and maintain the port. By 1995, Puerto San Antonio was Chile's busiest port, with increasing traffic in containerized cargo. Inner Puerto San Antonio contains four terminals including the Terminal Multioperado which is operated by several companies and administered by EMPORCHI. Terminal Panul Port specializes in handling imports of solid bulk cargo, and Terminal Vopak specializes in liquid bulk cargoes.

Puerto San Antonio covers 495 hectares, including 353 hectares of water and 142 hectares of land. Maximum depth of its waters is 23 meters in the access channel and nine (9) metres in the container terminal. Puerto San Antonio has excellent access to transport routes to Santiago, southern Chile, and Argentina. Chile's most important port, Puerto San Antonio had an average monthly container load of nearly 1.4 million TEU (containers) in 2022.

Puerto Panul SA operates the North Terminal dedicated to solid bulk cargoes. The terminal handles in excess of 3.3 million tons of cargo, making it the leading solids bulk port in Chile. The terminal specializes in solid bulk, but is not limited to that cargo type and accommodates vessels up to 60 thousand DWT.

In 2020 the Policarpo Toro Dock consortium was awarded to QC Terminales. This is now operated within a port concession regime. It can accommodate vessels up to 190 meters long allowing for 45 thousand tons DWT. It handles chemicals, liquids and bulk cargo. San Terminal Antonio Internacional (STI) is the main port terminal in Chile and operates the South Molo Terminal which specializes in handling containerized cargo. STI is 50% owned by the SAAM group and 50% by SSA Marine.

The terminal contains a 29 hectare container yard with storage for up to 22,000 TEU and 2,700 reefer connections. The terminal offers rail and road access and 24-hour security services. STI employs 200 technical people. STI has 800 meters of continuous wharf with alongside maximum depth of 15 meters.

DP World operates within several sites of the port along with the new Costanera Dock. In 2020 DP World transferred in excess of eight million tonnes of cargo with load types being containers, solid and liquid bulk, imported vehicles and cruise liners. The vessels operated by MSC who handle AGR's shipping requirements to Chile call both container terminals and utilise the services of both stevedoring companies STI and DP World for their unloading and stevedoring requirements.

1.2.1.4 Port of Rio Haina, Dominican Republic

The Haina Port is one of the main Container Ports servicing the Dominican Republic; AGR has ability to ship to Haina Port utilising the Mediterranean Shipping Company for the shipment of product from Fremantle in Western Australia. The alternative Port in the Dominican Republic is the Caucedo Port, this Port was not considered suitable as the road transport from the Port to the end user gold mine is longer and the route goes through the city area of Santo Domingo. The Autoridad Portuaria Dominicana (Dominican Port Authority) oversees the operation of all Port operations in the

Dominican Republic including the safe navigation of shipping in the Dominican Republic's water. Haina Port has one container terminal: Haina International Terminal (HIT).
Three Gantry cranes for loading and unloading containers on vessels. Each has a maximum lifting capacity of 48 metric tonnes. AGR containers are between 25 and 26 metric tonnes, therefore well within the operating limits of the cranes. Numerous reach stackers are available and are designed to handle the maximum weight for forty foot containers of 44 metric tonnes, therefore their capacity exceeds the required capacity to lift containers shipped by AGR.
The containers are accepted and stacked on the port in the designated space allocated by the HIT Terminal Planner. The containers can then be allocated will then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork.

1.2.1.5 Port of Callao, Peru

Peru's National Port Authority (Spanish) (APN) governs all ports in Peru, including the Port of Callao. The Empresa Nacional De Puertos S.A. (ENAPU) was created by law in 1970 as a decentralized public organization under the Transports and Communications Sector. ENAPU was made responsible for operating, maintaining, and administering all terminals and jetties in the Republic of Peru. La Empresa Nacional de Puertos ENAPU S.A. administers and develops the Port of Callao under the country's Ministry of Transport and Communications. APM Operate the North Pier (Muelle Norte) and DP World operate the South Pier (Muelle Sur).

The Port of Callao has been awarded with official confirmation of compliance for ISPS certification. The International Ship and Port Facility Security Code (ISPS) is a comprehensive set of measures taken to enhance the security of ships and port facilities developed in response to the perceived threat to ships and port facilities in the wake of the 9/11 attacks in the United States of America.

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

The stevedoring company manages the on shore (terminal) operations. The Port of Callao has two container terminals; The North Pier (Muelle Norte), operated by APM and the South Pier (Muelle Sur), operated by DP World. This due diligence report will encompass both terminals.

Containers of cyanide are taken from the vessels and transported by terminal trucks to a designated dangerous goods area within the respective terminals. Containers of dangerous goods within these areas are segregated according to international DG segregation requirements. The containers are tracked using the latest GPS technology so that the control centres within the respective terminals are updated on a live basis as to the positioning of the containers within the DG storage areas.

It is the policy of the port that all containers of sodium cyanide, are to be removed from the port within forty eight hours following discharge of the vessel. Should the containers of cyanide not be cleared through customs within the forty eight hour period, then the terminal operators may transfer the containers to an inland clearance depot operated by Licsa who are located a short distance outside of the port confines. The containers are still under customs control at this time, and when customs clearance has been arranged then collection from the Licsa inland clearance depot can be made by the importers.

The stevedoring companies are fully aware when sodium cyanide containers are to arrive at the Port. The shipping company provide a full manifest of containers on the vessel and the manifest of the containers that are to be handled off and on the vessel. These manifests will specify dangerous goods and the product, class and quantities. This information allows the stevedores to understand and identify the containers to be handled.

1.2.1.6 Port of Antofagasta, Chile

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle Western Australia and the shipping line's service through to Chile. The Port allows unloading of the

shipments of containers and the subsequent road transport as required. The terminal also maintains empty container storage facilities.

Puerto Antofagasta is a port in northern Chile and is the secondary port utilised by AGR for customers in this region, typically only used when a berth at Puerto Angamos is not available. The port consists of two terminals and several berths. Terminal 1 is a multi-operated terminal and is managed by EPA while Terminal 2 is a mono-operated terminal managed by Antofagasta Terminal Internacional (ATI). The port is located within the city itself.

ATI has managed the mono-operated terminal since 2003, consists of a single berth and its cargo transfer operations comprises 9.85 hectares. The terminal owners are SAAM, Empresas Navieras and Sociedad Inmobiliaria Punta de Rieles Limitada. 58% of vessels calling at ATI are container ships. In contrast, Terminal 1 consists of three berths with its vessel types primarily bulk carriers, general cargo and passenger ships.

The berths at Puerto Antofagasta range in length from 185m to 260m. Water depths at berths range from 7.9 to 12m. To support the safe docking and turnaround of vessels within the port, rules and practices are in place such as management of weather conditions and tidal variations, the use of pilots and tugs along with overall port operations. The ports Pilot controls all entry into the port and collaborates with the vessels captain to ensure the Port pilots instructions are adhered to. Once docked, the shipping activities transition to port activities. The vessel manifests are utilised to determine what containers require unloading along with the identification of dangerous goods and their specific details and requirements.

AGR do not currently use the port. The port has been included in the scope of the supply chain audit since it is possible that AGR may use the port in the future.

1.2.1.7 Port of Angamos, Chile

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle Western Australia and the shipping line's service through to Chile. The Port allows unloading of the shipments of containers and the subsequent road and rail transport as required. The terminal also maintains empty container storage facilities.

Puerto Angamos is one of the main ports in northern Chile and is the primary port utilised by AGR for customers in this region. It is a four berth, mono-operated, multi-purpose terminal on South America's west coast. Located in northern Chile in Mejillones, its nearest major city is Antofagasta which is 65km to the south.

There are still four berths in use at Puerto Angamos and they range in length from 180m to 225m. Berths 2 and 3 can be combined for a total length of 366m. Water depths at berths range from 12.5 to 14.7m.

Published equipment at Puerto Angamos is as follows:

- Six mobile harbour cranes with a lifting capacity of 100 tons
- 12 reach stacker cranes for full containers
- 5 toplifter cranes for empty containers
- 33 container trucks
- 37 forklift trucks.

To support the safe docking and turnaround of vessels within the port, rules and practices are in place such as management of weather conditions and tidal variations, the use of pilots and tugs along with overall port operations. The ports Pilot controls all entry into the port and collaborates with the vessels captain to ensure the Port pilots instructions are adhered to. Once docked, the shipping activities transition to port activities. The vessel manifests are utilised to

determine what containers require unloading along with the identification of dangerous goods and their specific details and requirements.

The container terminal and associated wharf activities are managed by a third party stevedore. These stevedoring operations include:

- Handling of all containers and the loading/unloading of vessels
- Management of general cargo storage
- Container delivery and,
- Port security operations

Any containers containing dangerous goods once offloaded from the vessel, are typically loaded directly onto alternate transportation utilising the harbour cranes and removed from the terminal.

1.2.1.8 Port of Valparaiso, Chile

AGR has ability to ship this port by utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle Western Australia and the shipping line's service through to Chile. The Port allows unloading of the shipment of containers and the subsequent road and rail transport as required. The terminal also maintains empty container storage facilities. The Port of Valparaiso is located approximately 120km west of the nearest major city in Santiago and 93km from San Antonio Port to the south.

The Port of Valparaiso is a 100% state owned operation which maintains five berths across two terminals. Terminal 1, operated by Terminal Pacifico Sur (TPS), specialises in containerised cargo within a secured area while Terminal 2, operated by Terminal Portuario de Valparaiso, specialises in break-bulk cargo. Full container, refrigerated cargo, multipurpose and cruise ships are however received at both terminals. Terminal 1 is a single-operated terminal consisting of 14.62 hectares with docking frontage up to 740m and a draft of up to 14.1m and is the point of handling for AGR's sodium cyanide. Terminal 2 is utilised as a cargo and passenger terminal.

The port model maintains a Logistics Support Extension Zone known as ZEAL. This is effectively a coordination point for the port entry and exit for all trucks and cargo. The Port Community System of Puerto Valparaiso, or SILOGPORT control this system including the monitoring and tracking the physical cargo along with the corresponding documentation. TPS signage at ZEAL details vehicle and driver compliance for the transport of all dangerous goods transport within the port precinct.

An extension of the ZEAL is the ZEAL route which allows the port city of Valparaiso to be bypassed and provides direct terminal access for all vehicles thereby reducing pollution and congestion in the city area. It is claimed that the implementation of this route has removed up to 500,000 trucks a year from entering the city area. This route is publicly accessible and is a reasonable decline when travelling towards the port. The route also consists of three tunnels sections. These are speed limited to 40km/h and are well lit. Published equipment at the Port of Valparaiso consists of fixed, mobile and floating cranes capable of lifts up to 100T along with container stackers. The Port of Valparaiso has rail service running through it and direct connection to major highways to effectively service the surrounding mining regions.

To support the safe docking and turnaround of vessels within the port, rules and practices are in place such as management of weather conditions and tidal variations, the use of pilots and tugs along with overall port operations. The ports Pilot controls all entry into the port and collaborates with the vessels captain to ensure the Port pilots instructions are adhered to. Once docked, the shipping activities transition to port activities. The vessel manifests are utilised to determine what containers require unloading along with the identification of dangerous goods and their specific details and requirements.

Containers are unloaded from the vessel and stacked on the port. Trucks enter the port the following day through ZEAL according to their scheduled booking time to collect the offloaded containers and remove them from the terminal. Loading of sodium cyanide onto trucks is by container stacker and takes place at night due to restrictions on dangerous goods being transported within the city area. The transport of dangerous goods is only permitted between 2300 and 0600.

Once loaded, vehicles are required to exit the port via three checkpoints with the convoy being established immediately prior to the last.

AGR do not currently use the port. The port has been included in the scope of the supply chain audit since it is possible that AGR may use the port in the future.

1.2.1.9 Port of Caucedo, Dominican Republic

The Port of Caucedo is the newest and one of the main Container Ports servicing the Dominican Republic. Other ports within the country, with the exception of Rio Haina, are not considered due to the distance from the end user and the risks associated with the routes due to the nature of the goods. The Port of Caucedo is approximately 130km from the end user mine site while Rio Haina Port is approximately 92kms.

DP World is the operating company responsible for all aspects of the operations and administration of the Port of Caucedo. Located approximately 25kms from the national district of Santo Domingo, it primarily services cargo ships and is a multipurpose port receiving vehicles, general cargo and containers as well as transhipments. Over two thirds of the TEU movements through the Dominican Republic are handled at this port.

Entry into Port is controlled by the Port's Pilot who understands the Port protocols and any unique issues regarding the approach and docking of a vessel at the Port. The Ship's Captain works in conjunction with the Pilot as he understands his vessel and can implement and assist with the Pilot's instructions. 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 vessel, 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 port maintains compliance and certification with the ISPS Code (ISPS Level 1) and is protected by CESEP who specialise in port security.

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle, Western Australia and the shipping line's service through to Dominican Republic. The Port allows unloading of the shipments of containers and the subsequent road transport to the customer as required.

AGR do not currently use the port. The port has been included in the scope of the supply chain audit since it is possible that AGR may use the port in the future.

1.2.1.10 Port of Zárate, Argentina

Terminal Zárate is a privately owned port located in the city of Zárate, Argentina, within the province of Buenos Aires. It is located around 102 km northwest of the city of Buenos Aires on the Paraná River. Terminal Zárate serves as a multipurpose, intermodal terminal, with operational container, general cargo and vehicle terminals. AGR only ships in containers of which the port allows for unloading of shipments of vehicles, containers, project bulk cargo and road and rail transport when required.

Contracted shipping providers will be able to be used by AGR for shipping to this port from Fremantle, Western Australia to Argentina. There is a partnership arrangement with the Port between Murchison and Cotia Trading, operating and belonging to the Ports and Logistics Division of the Murchison group. The berth length at the Port is 480 m, with a depth of 10.67 m. The container yard covers 116,000 m^2 of storage, as well as a 800 m^2 container repair area and in total has an annual capacity of 270,000 twenty-foot equivalent container units (TEUs).

Equipment at the site includes:

- One IMPSA Panamax Quay Crane

- One Liebherr Post Panamax Crane
- Six rubber-tyred gantries (RTGs)
- Seven reach stacker cranes for full containers
- Four reach stacker cranes for empty containers
- 26 forklift trucks (ranging from 1.8 tonne to 32 tonne capacity)

The Port provides for safe docking and turnaround of vessels with rules and regulations in place to manage weather conditions and tidal variations. The terminal harbour master controls all entry into the port and collaborates with the vessels captain to ensure terminal instructions are followed. Ships do not need assistance to berth as they must enter against the current. Once the ships are docked the shipping activities transition to terminal activities. Vessel manifests are then used to identify dangerous goods and any specific details and requirements.

The dedicated container terminal is internally managed and includes handling (loading/unloading of vessels), management, container delivery and security operations. Containers that are offloaded and contain dangerous goods are placed into dedicated storage before being loaded onto alternative transportation and removed from the Port. The Port is aware of sodium cyanide products being shipped into Argentina as they also handle this chemical from other countries that supply regional mining operations. Port Zárate was specifically chosen as it is a major terminal with all of the relevant standards and equipment expected of a major international Port.

1.2.2 Road Transportation

1.2.2.1 Victor Mason Transportes Cruz del Sur, Argentina

Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued by Celso Sandt (ICMI Lead Auditor and Technical Expert).

AGR do not currently use the transporter. The transporter has been included in the scope of the supply chain audit since it is possible that AGR may use the transporter in the future.

1.2.2.2 Transportes Alvarez e Hijos SRL, Argentina

Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.

AGR do not currently use the transporter. The transporter has been included in the scope of the supply chain audit since it is possible that AGR may use the transporter in the future.

1.2.2.3 Transportes Niquini Ltd, Brazil

Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.

AGR do not currently use the transporter. The transporter has been included in the scope of the supply chain audit since it is possible that AGR may use the transporter in the future.

1.2.2.4 Maritima Dominicana, S.A.S, Dominican Republic

AGR added Maritima Dominicana (Mardom) to the Central and South American supply chain in January 2020 with transport operations commencing in February 2020. AGR use Mardom for the transport of cyanide product from the Port of Haina to customers in the Dominican Republic. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.

1.2.2.5 Aucan Logistics SPA, Chile

Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan transports cyanide to different mining operations within Chile in sealed containers. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

AGR do not currently use the transporter. The transporter has been included in the scope of the supply chain audit since it is possible that AGR may use the transporter in the future.

1.2.3 Transit Storage

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

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

There is no interim storage undertaken during road transport to the end user.

1.3 Auditor's Finding

The operation is:

☒ in full compliance
☐ in substantial compliance

☐ not in compliance

With the International Cyanide Management Code.

1.3.1 Compliance Statement

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

1.3.2 Auditor Information

Audit Company:	WSP Australia Pty Ltd (WSP)
Audit Team Leader:	Rudi Seebach
Email:	rudi.seebach@wsp.com

Name and Signature of other Auditors:

Name	Position	Signature	Date
Edward Clerk	Technical Specialist	N/A	21/07/2023
Rudi Seebach	Lead Auditor	N/A	21/07/2023
Edward Clerk	Technical Specialist		28/10/2025

The ICMC Recertification Audit was conducted over period 1 June - 6 July 2023. The amendment to add Port Zárate was conducted in October 2025.

1.3.3 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 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 Recertification Audit. I further attest that the Recertification Audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety, and environmental audits.

Name of Operation	Signature of Lead Auditor	Date
Central and South American Supply Chain	N/A	21/07/2023
Central and South American Supply Chain (Port Zárate amendment)		28/10/2025

Note that Ed Clerk assumed the responsibility of Lead Auditor following the resignation of Rudi Seebach.

2 Principles and Standards of Practice

2.1 Principle 1 – Transport

Transport cyanide in a manner that minimizes the potential for accidents and releases.

2.1.1 Standard of Practice 1.1

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

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 1.1
	☐ not in compliance with	

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

AGR, through the use of ICMC-certified road carriers, has a process for the selection of transport routes that minimise the potential for accidents and releases or the potential impacts of accidents and releases.

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

Each mine site delivered to by AGR's transporters have a detailed route plan. This document will cover all the route requirements for route management as per the ICMI Transport verification protocol and AGR standards. Route Plans are annually by AGR and the transporter.

After completion of route audit (AGR Route Audit), the outcome of the audit and road conditions will be reviewed with the various transporters. Where AGR has concerns about the route and road condition adding considerable risks, AGR will seek to understand how these risks may be mitigated, including (but not limited to) the following;

Use of alternate route or sections of route where road conditions are;

- Poor (including large potholes, extremely rough),
- Extremely steep in gradient,
- Narrow and/or have sheer drops on sides with no protection,
- Through an extremely busy section of a town.
- Use of alternate bridges where a bridge may be in poor condition,
- Set and monitor strict speed restrictions to offset an otherwise unavoidable risk,
- Implement a stop and investigate process before proceeding through sections that include otherwise unavoidable risk, and
- Any further actions that may be determined necessary to mitigate the risks.

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. The procedure also ensures risks of selected routes are elevated, necessary precautions are documented and drivers receive appropriate training. Implementation of this procedure was evident in route reviews. AGR conducts due diligence assessments on ports used in the Supply Chain to identify potential risks.

AGR does contract contractors to conduct activities required under Transport Practice 1.1 and has procedure to ensure contractors are aware of the applicable Code requirements and ensure compliance with those requirements.

AGR Customer and Supply Chain Operating Standards and Procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR only utilises ICMC certified transporters for road transportation elements of its supply chain.

Ports

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

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

The measures taken to address risks identified for carriers are addressed within the due diligence process. 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. The due diligence assessments did not identify the requirement for additional safety or security measures.

AGR utilises select ports and carriers within its Supply Chain and has undertaken due diligence assessments to verify that the shipments are managed in accordance with AGR's and the ICMC's requirements.

Road Transportation

AGR utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

- Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.

- Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.
- Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.
- Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.
- Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022

2.1.2 Standard of 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**	
The operation is	☐ in substantial compliance with	Standard of Practice 1.2
	☐ not in compliance with	

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

AGR

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 does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.2. AGR Customer and Supply Chain Operating Standards and Procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR only utilises ICMC certified transporters for road transportation elements of its supply chain.

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.

Road Transportation

AGR utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

- Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.
- Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.

— Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.

— Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.

— Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

2.1.3 Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 1.3
	☐ not in compliance with	

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

AGR

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.

It is key commitment of AGR that road transport equipment shall be maintained to meet or exceed Australian Standards for transport of dangerous goods, manufacturers' specifications and be subject to standards agreed during the carrier selection process. All transporters must comply with all applicable national and state laws and AGR's policies and procedures related to the transport of sodium cyanide and shall demonstrate appropriate experience to operate equipment for the transport of dangerous goods.

AGR has monitoring systems in place to evaluate the transporter's compliance with the Code and AGR's requirements. AGR Customer and Supply Chain Operating Standards and Procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR only utilises ICMC certified transporters for road transportation elements of its supply chain.

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 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 utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

- Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.

- Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.

- Transportes Niquini (Niquini) is an ICMC-certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.
- Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that was originally certified in January 2013 and recertified on 8 July 2022.
- Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

2.1.4 Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 1.4
	☐ not in compliance with	

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

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 procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. AGRs 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 22 September 2020.

The shipping containers used for transportation of solid sodium cyanide are locked and tagged with a security seal during transit to the end user. The 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 does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.4.

AGR has monitoring systems in place to evaluate the transporter's compliance with the Code and AGR's requirements. AGR Customer and Supply Chain Operating Standards and Procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR only utilises ICMC certified transporters for road transportation elements of its supply chain.

Road Transportation

AGR utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

- Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.
- Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.

— Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.

— Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.

— Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

2.1.5 Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 1.5
	☐ not in compliance with	

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.

2.1.6 Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 1.6
	☐ not in compliance with	

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 does contract other entities to conduct any of the activities required in Transport Practice 1.6 and has established procedures to ensure contractors meet the requirements.

AGR has monitoring systems in place to evaluate the transporter's compliance with the Code and AGR's requirements. AGR Customer and Supply Chain Operating Standards and Procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR only utilises ICMC certified transporters for road transportation elements of its supply chain.

Road Transportation

AGR utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

— Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.

— Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.

— Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.

— Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.

— Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

2.2 Principle 2 – Interim Storage

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

2.2.1 Standard of Practice 2.1

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

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 2.1
	☐ not in compliance with	

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 Callao, Port of Rio Haina, Port of Santos and Port of San Antonio 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.

For the rest of the ports the normal operation are for the containers of cyanide to be unloaded from the vessels and loaded directly onto road transport trailers supplied by an ICMC-certified transporter for immediate transport from the Port.

Ports of Callao: Terminals are managed as part of the Port of Callao according to Federal, State and IMDG Code regulations. The cyanide lay down area currently used is segregated and the lay down area is segregated according to international DG segregation requirements. Safety signage was evident throughout the port. Product is in shipping containers ready for loading onto vessels for sea transport. Containers are stored on the port in open air allowing adequate ventilation. Both terminals have onsite emergency response teams who are trained to respond to any emergency.

Port of Rio Haina: The Port of Rio Haina Port is managed according to Federal, State and IMDG Code regulations. The cyanide lay down area currently used is designated dangerous goods area, is a bitumen surface and proven appropriate for large reach stackers and trucks. Policies dictate smoking, open flames and eating and drinking areas. PPE is stipulated by policies. Rio Haina Port Authority and Customs surveillance cameras on the wharf are monitored and independent from terminal cameras. Containers are stored in the port in open air allowing adequate ventilation. There is a procedure for examining product loads for possible damage or leakage, prior unloading. The lay down area is on bitumen surface and

proven appropriate for large container forklifts and trucks. There were no signs of damage or cracks upon inspection. Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide.

Port of Santos: Access to the repackaging facility was not possible at the time of the visit however previous inspections and discussions with the terminal operator indicate that sodium cyanide is managed in accordance with terminal policy and procedures and the cyanide lay down area currently used is segregated with a security fence and the lay down area is only used for cyanide with emergency information panels on display. The lay down area is on bitumen surface and appropriate for large container forklifts and trucks. Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide. Containers are transferred to an enclosed warehouse within the secure port confines for repackaging into larger containers prior to road transport. The ICMI accredited transport company Niquini are trained in emergency response in the event of a spill. They also have an agreement with a specialised Emergency Response company Ambipar in the event of any major spillage that could not be handled by the transport company.

Port of San Antonio: The short term storage, as well as control and planning of container loading and unloading, is conducted through a sophisticated logistic planning system. The Port has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking containers.

The terminals are managed as part of the port according to Federal, State and IMDG Code regulations. Sodium cyanide is managed in accordance with the Stevedores policy and procedures and the cyanide lay down area currently used is segregated with a security fence and the lay down area is only used or cyanide. Emergency Information Panels indicate the cyanide lay down area. Containers are stored on the port in open air allowing adequate ventilation. The lay down area is on bitumen surface and proven appropriate for large container forklifts and trucks. The Stevedores Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide.

2.3 Principle 3 – Emergency Response

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

2.3.1 Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 3.1
	☐ not in compliance with	

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 Customer and Supply Chain Operating Standards and Procedure 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.

AGR Transport Management Plan highlight about Emergency Response Plan to provide offsite support in the event of an incident involving its sodium cyanide product. A coordinated response effort involves the appropriate hazard management authorities including Police, Fire and Rescue Service, transport carriers, mine site emergency response teams and other mine site personnel if appropriate. The Management Plan also highlights on the following points:

— Alerting system in case of emergency

— Incident communication and raising of alarm

— Emergency contact information

— Spill Management

— Emergency Response Team and it's responsibility

— Emergency Response Exercise

Ports

AGR conducts 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 utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

— Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.

— Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.

— Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.

— Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.

— Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

2.3.2 *Standard of Practice 3.2*

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

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 3.2
	☐ not in compliance with	

AGR is in FULL COMPLIANCE with Transport Practice 3.2 requiring the operation to 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 Customer and Supply Chain Operating Standards and Procedure 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 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 regard 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 Transport Management Plan requires all transporters to complete the AGR online product awareness training, complete an AGR approved training program verifying specific capabilities in the transportation and unloading of solid and/or solution sodium cyanide, and take part in training exercises as reasonably requested. The plan also highlights on the responsibility of the AGR, concerned Transporters and other agencies pertaining to emergency response.

Apart from the requirement of communication equipment, the transporter are required to provide adequate (including AGR prescribed) safety equipment for the protection of their personnel during operations.

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

AGR has monitoring systems in place to evaluate the transporter's compliance with the Code and AGR's requirements. AGR Customer and Supply Chain Operating Standards and Procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR only utilises ICMC certified transporters for road transportation elements of its supply chain.

Ports

AGR conducts 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 utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

— Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.

— Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.

— Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.

— Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.

— Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

2.3.3 Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 3.3
	☐ not in compliance with	

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 Customer and Supply Chain Operating Standards and Procedure 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 to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences have found that there were no issues of concern in regard 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 Transport Management Plan highlights on the process/information and requirement to notify AGR and concerned agency in case of sodium cyanide incident. If a spill occurs near a water resource and there is a possibility of contamination of the water resource 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. The management plan and procedures are reviewed and updated on regular interval.

Ports

The port due diligence report found that AGR will be engaged and notified by the notifying party or the transport company of the incident and AGR's expertise is available 24/7 if required.

Road Transportation

AGR utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

— Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.

— Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.

— Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.

— Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.

— Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

AGR does have a procedure for notifying the International Cyanide Management institute (ICMI) of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. AGRs definition of a significant incident is aligned with ICMI requirements and would activate the Significant Incident Management Team (SIMT) and reporting through to the ICMI is part of the external communications process managed by that team.

AGR Transport Management Plan provides all details with respect to the reporting of incidents to the ICMI. There have been no significant cyanide incidents within the audit evidence evaluated for this initial certification audit.

2.3.4 Standard of Practice 3.4

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

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 3.4
	☐ not in compliance with	

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 Customer and Supply Chain Operating Standards and Procedure 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.

AGR Transport Management Plan highlights on the neutralisation and spill recovery procedures and suitable neutralising agent. Soil containing the spill are treated with ferrous sulphate or sodium hypochlorite. The assessment of the effectiveness of the treatment, and continuation of treatment is undertaken until cyanide has been neutralised. Contaminated liquids would be either neutralised at the spill site and disposed of as treated effluent or transported to a near-by mine site for mixing with process liquid or use as a reagent. Contaminated liquid may, in some circumstances, upon approved by the relevant Competent Authorities be returned to Kwinana works for treatment.

AGR Transport Management Plan mentions that '*while some unique situations may exist where it is acceptable to add neutralising agents to water sources, generally, hypochlorite and ferrous sulphate MUST NOT be allowed to enter any natural body of surface or ground water*.'

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 regard 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 utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

- Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.
- Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.
- Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.
- Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.
- Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

2.3.5 Standard of Practice 3.5

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

	☒ **in full compliance with**	
The operation is	☐ in substantial compliance with	Standard of Practice 3.5
	☐ not in compliance with	

AGR is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation to 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 Customer and Supply Chain Operating Standards and Procedure 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.

The review of AGR Emergency Response Post Activity/Exercise Report demonstrates mock drills undertaken and areas of improvement and recommendation are recorded for further improvement.

Ports

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

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.

AGR will continue endeavours to liaise with the port with a view to evaluating response procedures and capabilities, and offer the AGR sodium cyanide awareness training package to terminal operators and other relevant port personnel.

Road Transportation

AGR utilise or may utilise the following ICMC certified transporters for road transportation elements of its supply chain:

- Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an ICMC certified transporter based in Argentina. Cruz del Sur was originally certified in 2010. The transporter's recertification audit was performed in January 2023 and found to be in full compliance with the ICMC for Cyanide Transportation as per the declaration issued the ICMI Lead Auditor and Technical Expert.
- Transportes Alvarez e Hijos SRL (Alvarez) is an ICMC certified transporter based in Argentina. Alvarez were pre-certified in November 2018 and were recertified on 8 July 2022.
- Transportes Niquini (Niquini) is an ICMC certified transporter based in Brazil. Niquini was originally certified in 2009 and recertified on 19 August 2020.
- Maritima Dominicana (Mardom) is part of the AGR Central and South American supply chain. Mardom is an ICMC certified transporter that were originally certified in January 2013 and recertified on 8 July 2022.
- Aucan Logistics SPA (Aucan) is an ICMI certified transporter. Aucan was certified under the ICMC for transporting cyanide on 25 October 2022.

3 Due Diligence

3.1 Port of Deseado, Argentina

The Port of Deseado in Argentina is utilised as part of AGRs Central and South American Supply Chain. The due diligence of the port dated 18 February 2023 was prepared by AGR. The due diligence reports were reviewed by Rudi Seebach and Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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.

3.1.1 Summary of Port operations

The Port is serviced by a wharf as opposed to a container terminal and its associated facilities. The published equipment at the port consists of 1 x 50 ton, 1 x 45 ton and 1 x 41 ton mobile cranes. Visually there were a number of mobile cranes situated at the port however these may be the property of private contractors operating at the port. The port has no laydown or storage areas for handling dangerous goods though does maintain a 650sqm bonded warehouse. Due to the sensitivities of the fishing industry no dangerous goods are allowed to be stored or containers stacked on the wharf.

Previously the Port appeared to have no container handling equipment such as reach stackers (container fork-lifts) however there were at least three of these observed conducting container loading and movement activities. There are no Port operations (stevedoring) personnel involved in handling the sodium cyanide containers through the Port. Port Operations only oversee the handling operation which is conducted as follows:

- The sodium cyanide containers arrive on self-geared vessels at the port of Puerto Deseado. Self-geared vessels are equipped with ships derricks (cranes) for unloading and loading containers on the vessel. These derricks are operated by the vessel's crew
- The importer of the sodium cyanide has 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
- The vessel's crew utilising the derricks will only unload when the sodium cyanide containers can be lifted off the vessel and immediately loaded onto road transport trailers. In relation to sodium cyanide arriving from AGR, the transport equipment reference is that provided by the ICMI accredited transport company Cruz del Sur
- To ensure clarity on who is responsible for the stevedoring services at this port, the Terminal Handling Charges that are normally paid for stevedoring charges at destination Ports are invoiced by Maersk Shipping as part of the shipping rate to the Port of Deseado
- Customs clearance is processed before the arrival of the vessel to allow for the direct unloading of the vessel onto vehicles
- 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
- Overseeing the port operations are the vessels captain and crew, port management, mining company safety personnel, transport company personnel and transport supervisor.

3.1.2 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.

AGR uses Maersk Shipping to take its shipments or consignments to the port of Puerto Deseado in Argentina. This port is owned by the Argentine Government. Containers of cyanide are unloaded from the self-geared vessels using the ships derricks and loaded immediately onto road transport trailers supplied by ICMI accredited transporter Cruz del Sur.

Once loaded, the containers are driven directly out of the port and taken to the relevant mine site. An export or international route will include the following:

- AGR Production, packaging and despatch
- Road Transport to shipping Port (Fremantle), road route covered in the Transport Management Plan for Sodium Cyanide (Australia)
- International shipping up to the port of Puerto Deseado, and the handling of the containers from the vessel direct onto road transport vehicles
- Road transport from port to customer (mining operation) undertaken by ICMI accredited company Cruz del Sur

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

3.1.3 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 sodium cyanide, solid (briquettes) are packed in a 1,000kg approved bulk bag, hermitically sealed in a plastic liner, placed in a wooden box on pallet base or IBC. As per the IMO DG Code this packaging is referenced as UN 11HD2/X/; approval of AGR's sodium cyanide packaging has been granted by the regulator and AGR given the approval reference AGR 6030, which is displayed on the packaging label.

AGR prepares a document the is referenced as 'Multimodal Dangerous Goods Form'; this form meets the requirements 9 of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4; commonly known as a MO41 Document. When the Maersk Operations staff board the vessel on arrival at port they will give copies of the Dangerous Goods manifest (including stowage plan) and Packing Certificates for each of the hazardous cargo transport units loaded at that port to the vessel's Captain.

Maersk Operations comply with the requirements of part 7 of the DG code. Their container booking and tracking system manages the stowage and separation positions of all DG containers on their vessels to ensure compliance with international regulations.

3.1.4 Transport Practice 1.6

Maersk Shipping utilizes their in house tracking system 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.

3.1.5 Transport Practice 2.1

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

3.1.6 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.

3.2 Port of Santos, Brazil

The Port of Santos in Brazil is utilised as part of AGRs Central and South American Supply Chain. The due diligence of the port dated 14 March 2023 was conducted by AGR. The due diligence reports were reviewed by Rudi Seebach and Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1

3.2.1 Summary of Port Operations

The Port of Santos is located within the Sao Paulo district in the town of Santos, Brazil. The port, located on the bank of the Estuario de Santos, is managed by the Santos Port Authority (SPA). Santos Port is the main container port servicing Brazil; AGR has the ability to ship to this port by utilising Maersk for the shipment of product from Fremantle Western Australia and the shipping line's service through to Santos Port.

Within the port complex is the largest container terminal within Latin America in Brazil Terminal Portuario (BTP), operated by Santos Brazil. The container terminal wharf has a current dock length of 980 metres with plans for expansion to 1,300 metres. There are four berths; three for container ships and another for Roll On Roll Off (RORO) vessels. The Terminal allows unloading of the shipments of containers and the subsequent road transport to AngloGold Ashanti mine sites located in the Belo Horizonte and Crixas areas of Brazil.

The terminal maintains 13 cranes for loading/unloading vessels, 39 rubber tyred gantry (RTG) cranes and a fleet of trucks dedicated to intra-port container movements. The hardstand area provides 610,000sqm of storage capacity and accommodates movement of approximately two million TEUs per year with additional warehouse space of 12,000sqm and all vehicle and equipment maintenance in managed internally.

Containers of sodium cyanide are typically transferred direct to vehicle however the terminal maintains a dedicated dangerous goods area with ground treatment to prevent any environmental issues along with bunded trailers to allow for the placement of leaking containers. In addition, the terminal has emergency response capability though major incidents would require external fire brigade response.

The port has a controlled entry point and is enclosed with strong wire fencing all around the landside of the port and utilises security camera surveillance consisting of 431 cameras which are constantly monitored withing the operations centre.

3.2.2 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. Santos and BTP has been chosen as the preferred port in the Brazil 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 Santos and BTP means that the road transport to the mine is best placed for access to the mines.

3.2.3 Transport Practice 1.2

The stevedoring operations are managed by Santos Brazil using their own labour supply. Santos Brazil Equipment Operators are put through training course & port driving requirements in accordance with training procedures including generic dangerous goods training. Records of training are maintained in an electronic data base showing operators skills which automatically notifies appropriate people when updates and renewals are required.

3.2.4 Transport Practice 1.3

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts, cranes and ITVs are all designed and sourced to meet the handling requirements.

The twenty foot containers of cyanide are discharged from the vessel using the Ship to Shore Cranes. The containers are then loaded onto trailers owned and maintained by Santos Brazil. The containers are then taken to the dedicated dangerous goods area whilst any further clearing or customs requirements are done.

Once the consignment is cleared through customs and a release certificate is issued for each container and the transporter's vehicle enters the Terminal to collect a designated container. All transporter vehicles must be recorded in a national data base and certified capable of moving the container from the port area. All maintenance is carried out by the respective terminals in their dedicated maintenance areas.

3.2.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately. The de-stuffing operation is performed by Santos Brazil terminal employees including observers and those handling the equipment, who have been trained in the use of the equipment (fork-lifts and reach stackers); trained in dangerous goods handling; wear appropriate personnel protective clothing for the goods that they are handling.

The transhipping area has full CCTV coverage with cameras both inside and outside sheds where the operations take place. In addition, the Customs Department have their own security personnel and cameras monitoring the transhipping process from twenty foot to forty foot containers. The terminal Facilities Emergency Response Team is based alongside the transhipping area and are utilised as required.

3.2.6 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 sodium cyanide, solid (briquettes) are packed in a 1,000kg approved bulk bag, hermitically sealed in a plastic liner, placed in a wooden box on pallet base or IBC. As per the IMO DG Code this packaging is referenced as UN 11HD2/X/; approval of AGR's sodium cyanide packaging has been granted by the regulator and AGR given the approval reference AGR 6030, which is displayed on the packaging label.

AGR prepares a document that is referenced as 'Multimodal Dangerous Goods Form'; this form meets the requirements 9 of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4; commonly known as a MO41 Document. When the Maersk Operations staff board the vessel on arrival at Port they will give copies of the Dangerous Goods manifest (including stowage plan) and Packing Certificates for each of the hazardous cargo transport units loaded at that port to the vessel's Captain.

3.2.7 Transport Practice 1.6

The Terminal has a state-of-the art surveillance system ensuring the security of goods at all times including video cameras installed at strategic locations in the terminal which are monitored 24/7.

The implementation of strict internal controls and a state-of-the art surveillance system contribute to the optimization of operations and cargo security. The containers are accepted and stacked on the port in the designated space allocated by the Santos Brazil Terminal Planner.

Once the consignment is cleared through customs and a release certificate is issued for each container. BTP has a strict security process managing the transporter's vehicle entering the Terminal to collect a designated container. The transport company makes an appointment with BTP to collect containers from the port. Without this appointment allows the trucks cannot enter onto the port.

The containers can then be allocated and then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork. All through this process the containers are referenced by their individual numbers which are associated with the Bill of Lading and tracked through the online system.

Sodium Cyanide movements in Brazil are also monitored and permitted by the Brazilian Military once all customs clearances are done and transport permits obtained the onward transport of the product is allowed.

3.2.8 Transport Practice 2.1

Sodium cyanide is managed in accordance with terminal policy and procedures and the cyanide lay down area currently used is segregated with a security fence and the lay down area is only used for cyanide with emergency information panels on display. The lay down area is on bitumen surface and appropriate for large container forklifts and trucks. Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide.

Containers of sodium cyanide are typically transferred direct to vehicle however the terminal maintains enclosed warehouse within the secure port confines for repackaging into larger containers prior to road transportation. They also have an agreement with a specialised Emergency Response company Ambipar in the event of any major spillage that could not be handled by the transport company.

3.2.9 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.

3.3 Port of San Antonio, Chile

The Port of San Antonio in Chile is utilised as part of AGRs Central and South American Supply Chain. The due

diligence of the port dated 13 December 2022 was conducted by AGR. The due diligence reports were reviewed by Rudi Seebach and Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.
- Transport Practice 3.1
- Transport Practice 3.2
- Transport Practice 3.3
- Transport Practice 3.4
- Transport Practice 3.5

3.3.1 Summary of Port Operations

San Antonio is Chile's largest port and the busiest port on South America's west coast. Located on the shores of central Chile, it is 110km from the country's capital, Santiago.

In 1960 the Portuaria Compania de Chile (EMPORCHI) was given responsibility to administer, operate, and maintain the port. By 1995, Puerto San Antonio was Chile's busiest port, with increasing traffic in containerized cargo. Inner Puerto San Antonio contains four terminals including the Terminal Multioperado which is operated by several companies and administered by EMPORCHI. Terminal Panul Port specializes in handling imports of solid bulk cargo, and Terminal Vopak specializes in liquid bulk cargoes.

Puerto San Antonio covers 495 hectares, including 353 hectares of water and 142 hectares of land. Maximum depth of its waters is 23 meters in the access channel and nine (9) metres in the container terminal. Puerto San Antonio has excellent access to transport routes to Santiago, southern Chile, and Argentina. Chile's most important port, Puerto San Antonio had an average monthly container load of nearly 1.4 million TEU (containers) in 2022.

Puerto Panul SA operates the North Terminal dedicated to solid bulk cargoes. The terminal handles in excess of 3.3 million tons of cargo, making it the leading solids bulk port in Chile. The terminal specializes in solid bulk, but is not limited to that cargo type and accommodates vessels up to 60 thousand DWT.

In 2020 the Policarpo Toro Dock consortium was awarded to QC Terminales. This is now operated within a port concession regime. It can accommodate vessels up to 190 meters long allowing for 45 thousand tons DWT. It handles chemicals, liquids and bulk cargo.

San Terminal Antonio Internacional (STI) is the main port terminal in Chile and operates the South Molo Terminal which specializes in handling containerized cargo. STI is 50% owned by the SAAM group and 50% by SSA Marine.

The terminal contains a 29 hectare container yard with storage for up to 22,000 TEU and 2,700 reefer connections. The terminal offers rail and road access and 24-hour security services. STI employs 200 technical people. STI has 800 meters of continuous wharf with alongside maximum depth of 15 meters.

DP World operates within several sites of the port along with the new Costanera Dock. In 2020 DP World transferred in excess of eight million tonnes of cargo with load types being containers, solid and liquid bulk, imported vehicles and cruise liners.

The vessels operated by MSC who handle AGR's shipping requirements to Chile call both container terminals and utilise the services of both stevedoring companies STI and DP World for their unloading and stevedoring requirements.

3.3.2 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.

San Antonio port has been chosen as the preferred port in the region as it is the countries main container terminal and has all of the standards and equipment expected of a major international port. In addition, the location of San Antonio means that the road transport to the mine is best placed for access to the relevant mines.

3.3.3 Transport Practice 1.2

The stevedoring operations are managed by either STI or DP World using their own labour supply. AGR has previously offered to the Stevedores training department, its Transport Safety product awareness and handling video (the video information is presented in Spanish). Equipment Operators are put through training course & port driving requirements in accordance with training procedures including generic dangerous goods training. Records of training are maintained in an electronic data base showing operators skills which automatically notifies appropriate people when updates and

renewals are required. The terminal has previously been issued a translated (Spanish) version of AGR's Sodium Cyanide Solid Material Data Sheet for the use of training of personnel and development of E.R procedures.

3.3.4 Transport Practice 1.3

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts, cranes and ITVs are all designed and sourced to meet the handling requirements.

The twenty foot containers of cyanide are discharged from the vessel using the fixed and mobile Cranes which have various ratings up to 100 tonnes. The weight of AGR's sodium cyanide twenty foot containers are well within the specified weight limit for these cranes. The weight of AGR's sodium cyanide containers then is also suitable for the RTG's and reach stackers 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 if any the hazards associated with the containers.

3.3.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately. AGR packaging is designed to fit 20 IBC neatly inside a standard 20 foot sea container. Additional bracing is also applied to the packaging to ensure it does not move in the container.

3.3.6 Transport Practice 1.5

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

For AGR's shipments, despatch 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.

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.

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.

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. Either DP world or STI is provided a list of all containers that require lifting on or off the vessel. This list filters the cargo and details each of the hazardous cargoes handling and stowage requirements.

3.3.7 Transport Practice 1.6

The Terminal has a state-of-the art surveillance system ensuring the security of goods at all times including video cameras installed at strategic locations in the terminal which are monitored 24/7. The implementation of strict internal controls and a state-of-the art surveillance system contribute to the optimization of operations and cargo security.

Both STI and DP World uses an electronic system which on receival of the Bill of Laiding/PRA information provides them knowledge of the shipment contents prior to the vessel arriving ensuring planning for unloading and storage can occur. The containers are accepted and stacked on the port in the designated space allocated by the Terminal Planner.

Once the consignment is cleared through customs and a release certificate is issued for each container. Both stevedores have a strict security process managing the transporter's vehicle entering the Terminal to collect a designated container. The transport company makes an appointment with either DP world or STI to collect containers from the respective terminal. Without this appointment allows the trucks cannot enter onto the terminal.

The containers can then be allocated and then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork. All through this process the containers are referenced by their individual numbers which are associated with the Bill of Laiding and tracked through the online system.

3.3.8 Transport Practice 2.1

AGR containers are taken off the ship by the cranes and will be sent in either of two directions depending on their destination and timing of next movements. Containers of this class of product can only sit on the port area for dedicated dangerous goods whilst any further clearing or customs requirements are completed for a maximum of six hours. If delayed collection or delayed transhipment is to occur (greater than 6 hours), the containers are moved off the immediate port area to a bond storage facility that is adjacent to the container terminals but still in the port area.

The short term storage, as well as control and planning of container loading and unloading, is conducted through a sophisticated logistic planning system. Both STI and DP World has designated container handling equipment and

planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking container.

Sodium cyanide is managed in accordance with the Stevedores policy and procedures and the cyanide lay down area currently used is segregated with a security fence and the lay down area is only used for cyanide.

Emergency Information Panels indicate the cyanide lay down area. Product remains in shipping containers ready for loading onto trucks for transport. Containers are stored on the port in open air allowing adequate ventilation. The lay down area is on bitumen surface and proven appropriate for large container forklifts and trucks. The SAAM Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide.

3.3.9 Transport Practice 3.1

Both STI and DP World have ER procedures for managing issues surrounding Dangerous Goods (including sodium cyanide) though both contract out their ER response to Suatrans (or Reimer as alternate option) who are experts in emergency response to dangerous goods.

Emergency Response Exercises are reported to be regularly conducted by both stevedores and the port authority representatives are present. Annually an ER activity including the state managed emergency authorities is conducted which includes management of dangerous goods.

3.3.10 Transport Practice 3.2

The port authority has a standard response expectation to a dangerous goods incident which is to raise the alarm, cordon off the area and stand down operations. The alarm will mobilise the ER team as required. Detailed procedures relating to process and procedure are detailed within Emergency Response Plan. Both stevedores Emergency Response Procedure includes the local emergency services which are aware of AGR product and emergency response requirements.

AGR has previously offered both terminals training departments its Transport and General product safety awareness and handling training video (the video information is presented in Spanish) however this was not able to be followed up as access to the port was not available. A mobile safety bund is available within both terminals and at the SAAM depot for use when isolating spillage from any containers.

3.3.11 Transport Practice 3.3

Bothe stevedores operate communication equipment units operate 24/7 and, whenever necessary, Customs the Police or emergency services are called, as well as the Special Maritime Police Department (Depom). AGR will be engaged and notified by the notify party or the transport company of the incident and AGR's expertise is available 24/7 if required.

3.3.12 Transport Practice 3.4

Both stevedores have procedures for managing dangerous goods spill and the standard response is in line with port authority procedures. The standard approach is to raise the alarm, cordon off the area and stand down operations. The alarm will mobilise the ER team as required. Detailed procedures relating to process and procedure are detailed within Emergency Response Plan.

3.3.13 Transport Practice 3.5

The electronic document management data base that is subject to regular review and amendment as required. Personnel are trained in accordance with the procedures and training records are managed electronically triggering annual renewal. ER provider personnel are trained as per their own procedures and keep record of their training qualification.

3.3.14 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.

3.4 Port of Rio Haina, Dominica Republic

The Port of Rio Haina in the Dominican Republic is utilised as part of AGRs Central and South American Supply Chain. The due diligence of the port dated 17 March 2023 was conducted by AGR. The due diligence reports were reviewed by Rudi Seebach and Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1
- Transport Practice 3.2
- Transport Practice 3.3
- Transport Practice 3.4
- Transport Practice 3.5.

3.4.1 Summary of Port Operations

The Haina Port is one of the main Container Ports servicing the Dominican Republic. Other ports within the country are not considered due to the distance from the end user and the risks associated with the routes due to the nature of the goods. The Haina Port is about 92kms from the end user mine site with the road route approved by the regulators.

Haina International Terminals (HIT), established in October 2000, is the operating company responsible for all aspects of the operations and administration of the Port of Rio Haina having completely taken over from the Dominican Port Authority in 2008. Located approximately 10kms from the national district of Santo Domingo, it is a multipurpose port receiving vehicles, general cargo, fuels, grains and containers.

The port maintains two terminals, East Haina and West Haina and 15 berths, nine on the eastern bank and 6 on the western bank. Pier 6 is the primary berth for loading and unloading of containers and maintains a capacity of 4,500TEUs.

Entry into Port is controlled by the Port's Pilot who understands the Port protocols and any unique issues regarding the approach and docking of a vessel at the Port. The Ship's Captain works in conjunction with the Pilot as he understands his vessel and can implement and assist with the Pilot's instructions. 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 vessel, 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 port maintains compliance and certification with the ISPS Code since 2006 and is protected by armed guards from CESEP, specialising in port security.

The container terminal consists of four berths and has a designed capacity of 600,000TEUs but currently operates at 60% capacity. In 2019 the depth of the main container dock was increased to allow vessels carrying up to 4,500TEUs to be received. The terminal maintains three gantry cranes with lifting capacity up to 40 tons with a reach of 13 rows of containers. Published information claims a productivity for these cranes of 22 movements per hour per crane. Additionally, there are two mobile cranes, each with a capacity of 100 tons. Being mobile, these cranes operate throughout the entire terminal and are not restricted to container movements. Thirty reach stackers, each with a 45 ton capacity are also operated within the terminal.

3.4.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from 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.

Haina port has been chosen as the preferred port in the Dominican Republic as it is the countries main container terminal and has all of the standards and equipment expected of a major international port. In addition, the location of Haina means that the road transport to the mine is able to avoid the main centre and busier pathways of the city.

HIT has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. The Navis system manages segregation requirements for the product. HIT also do not mix different dangerous goods when stacking containers. Once the consignment is cleared through customs and a release certificate is issued for each container HIT has a strict security process managing the transporter's vehicle entering the Terminal to collect a designated container. HIT has a terminal vehicle management plan that is used to ensure vehicles are coordinated to avoid interaction and potential for accidents and releases.

3.4.3 Transport Practice 1.2

HIT Equipment Operators are put through training course and port driving requirements in accordance with HIT training procedures including generic dangerous goods training according to HIT procedures. Records of training are maintained in an electronic data base showing operators skills which automatically notifies appropriate people when updates and renewals are required.

3.4.4 Transport Practice 1.3

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts, cranes and ITVs are all designed and sourced to meet the handling requirements.

HIT has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. The containers are removed from the shipping vessels using the gantry cranes and then further handled with reach stackers when in the transit area at the facility. One movement of container from vessel to Internal Transport Vehicle (ITV), the container is taken to the designated laydown or transit storage area, a reach stacker takes the container from the ITV and places it in its designated stacking place. Once the consignment is cleared through customs and a release certificate is issued for each container and the transporter's vehicle enters the Terminal to collect a designated container. All transporter vehicles must be registered HIT data base and certified capable of moving the container from the port area.

3.4.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately. AGR packaging is designed to fit 20 IBC neatly inside a standard 20 foot sea container. Additional bracing is also applied to the packaging to ensure it does not move in the container.

HIT are reported to have a Drug and Alcohol Policy which includes random testing, causal testing if concerns are raised or post incident; and voluntary testing if on arrival at work an operator is concerned about his fitness for work.

3.4.6 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 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and Internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers). For AGR's shipments, despatch 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.

AGR prepares a document that is referenced as 'Multimodal Dangerous Goods Form'; this form meets the requirements 9 of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4; commonly known as a MO41 Document.

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. This ensures the stows the cargo according to DG requirements by storing the sodium cyanide containers in a separate designated area.

3.4.7 Transport Practice 1.6

Haina International Terminal (HIT) have software which on receival of the Bill of Lading/PRA information providing HIT knowledge of the shipment contents prior to the vessel arriving ensuring planning for unloading and storage can occur. The transport company makes an appointment with HIT to collect containers from the port. Without this appointment allows the trucks cannot enter onto the port.

The containers are accepted and stacked on the port in the designated space allocated by the HIT Terminal Planner. The containers can then be allocated will then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork. All through this process the containers are referenced by their individual numbers which are associated with the Bill of Lading and tracked through the online system.

3.4.8 Transport Practice 2.1

- HIT is managed as part of the Rio Haina Port according to Federal, State and IMDG Code regulations. It handles all types of containers and goods.
- The cyanide lay down area currently used is designated dangerous goods area, is a bitumen surface and proven appropriate for large reach stackers and trucks.
- All other HIT policies dictate smoking, open flames and eating and drinking areas. PPE is stipulated by HIT Policies.

- Rio Haina Port Authority and Customs surveillance cameras on HIT Wharf are monitored and independent from HIT Terminal cameras.
- Product is in shipping containers ready for loading onto vessels for sea transport. Containers are stored on the port in open air allowing adequate ventilation.
- HIT have a procedure for examining product loads for possible damage or leakage, prior unloading and in accordance with their procedure.
- The lay down area is on bitumen surface and proven appropriate for large container forklifts and trucks. There were no signs of damage or cracks upon inspection.
- The Port and HIT Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide.

3.4.9 Transport Practice 3.1

HIT response to a dangerous goods incident is to raise the alarm, cordon off the area and stand down operations. The alarm will mobilise the ER team as required. Detailed procedures relating to process and procedure are detailed within HIT Emergency Response Plan. If required, the military will be engaged who are responsible for certain products entering and being transported with Dominican Republic.

3.4.10 Transport Practice 3.2

HIT response to a dangerous goods incident is to raise the alarm, cordon off the area and stand down operations. The alarm will mobilise the ER team as required. Detailed procedures relating to process and procedure are detailed within HIT Emergency Response Plan.

HIT ER team are trained according to their internal procedures and further engage a contracting group who are experts in DG management where required. HIT Emergency Response Procedure includes the local emergency services and military who are responsible for certain products entering and being transported with Dominican Republic who are aware of AGR product and emergency response requirements. Where a spill has occurred, the military will oversee the incident in conjunction with HIT and the Port Authority and the contractor will perform the clean-up and manage the container as required.

3.4.11 Transport Practice 3.3

HIT response to a dangerous goods incident is detailed in their procedures and includes the port authority, the military, the consignee, notify party and transport company. AGR will be engaged and notified by the notifying party or the transport company of the incident and AGR's expertise is available 24/7 if required.

3.4.12 Transport Practice 3.4

HIT Emergency Response Procedure includes the local emergency services and military who are responsible for certain products entering and being transported with Dominican Republic who are aware of AGR product and emergency response requirements. Where a spill has occurred, the military will oversee the incident in conjunction with HIT and the Port Authority and the contractor will perform the clean-up and manage the container as required.

All recovered products will be sealed and enclosed as per military requirements and delivered to the mine site for disposal. HIT has neutralising agent stored adjacent to the cyanide storage are on the port and both HIT, and the contractor are trained in the use of this product as part of their ER procedures.

3.4.13 Transport Practice 3.5

HIT Documents are managed in an electronic data base and subject to regular review and amendment as required. Current versions of the referenced documents may be made available upon request from HIT. Personnel are trained in

accordance with the set procedures and training records are managed electronically triggering annual renewal. Contractor personnel are trained as per HIT and their own procedures and HIT keep record of the contractor training qualification.

3.4.14 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.

3.5 Port of Callao, Peru

The Port of Callao, Peru is utilised as part of AGRs Central and South American Supply Chain. The due diligence of the port dated 7 December 2022 was conducted by AGR. The due diligence reports were reviewed by Rudi Seebach and Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.
- Transport Practice 3.1
- Transport Practice 3.2
- Transport Practice 3.3
- Transport Practice 3.4

3.5.1 Summary of Port Operations

Peru's National Port Authority (Spanish) (APN) governs all ports in Peru, including the Port of Callao. The Empresa Nacional De Puertos S.A. (ENAPU) was created by law in 1970 as a decentralized public organization under the Transports and Communications Sector. ENAPU was made responsible for operating, maintaining, and administering all terminals and jetties in the Republic of Peru. La Empresa Nacional de Puertos ENAPU S.A. administers and develops the Port of Callao under the country's Ministry of Transport and Communications. APM Operate the North Pier (Muelle Norte) and DP World operate the South Pier (Muelle Sur).

The Port of Callao has been awarded with official confirmation of compliance for ISPS certification. The International Ship and Port Facility Security Code (ISPS) is a comprehensive set of measures taken to enhance the security of ships and port facilities developed in response to the perceived threat to ships and port facilities in the wake of the 9/11 attacks in the United States of America.

Once the vessel is secure alongside the wharf the shipping activities changeover to Port activities. The vessels manifests of what containers are required to be unloaded from the vessel, including the manifest for containers for loading are

handed over. This manifest will identify hazardous cargos, their UN number and classification along with any segregation requirements.

The stevedoring company manages the on shore (terminal) operations. The Port of Callao has two container terminals; The North Pier (Muelle Norte), operated by APM and the South Pier (Muelle Sur), operated by DP World. This due diligence report will encompass both terminals.

Containers of cyanide are taken from the vessels and transported by terminal trucks to a designated dangerous goods area within the respective terminals. Containers of dangerous goods within these areas are segregated according to international DG segregation requirements. The containers are tracked using the latest GPS technology so that the control centres within the respective terminals are updated on a live basis as to the positioning of the containers within the DG storage areas.

It is the policy of the port that all containers of sodium cyanide, are to be removed from the port within forty eight hours following discharge of the vessel. Should the containers of cyanide not be cleared through customs within the forty eight hour period, then the terminal operators may transfer the containers to an inland clearance depot operated by Licsa who are located a short distance outside of the port confines. The containers are still under customs control at this time, and when customs clearance has been arranged then collection from the Licsa inland clearance depot can be made by the importers.

The stevedoring companies are fully aware when sodium cyanide containers are to arrive at the Port. The shipping company provide a full manifest of containers on the vessel and the manifest of the containers that are to be handled off and on the vessel. These manifests will specify dangerous goods and the product, class and quantities. This information allows the stevedores to understand and identify the containers to be handled.

3.5.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from 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 Callao has been chosen as the preferred port in Peru 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 Callao means that the road transport to the customer warehouse is of the shortest distance and is able to avoid the main centre and busier pathways of the city. Terminal operators have designated container handling equipment and planned laydown area for dangerous goods as well as general cargo.

Terminal operators also do not mix different dangerous goods when stacking containers. The stevedoring activity is to remove the shipping containers from the vessel and place the shipping containers on the trucks for immediate removal from the port area. The vehicles will be from the selected transport company providing the road transport from the Port or the Licsa Inland Clearance Depot to the customer warehouse.

3.5.3 Transport Practice 1.2

The terminal operators in DP World and APM both reportedly conduct several emergency response exercises per year and maintain security and environmental certifications which ensure the safe handling of dangerous goods passing through the port facility.

3.5.4 Transport Practice 1.3

Terminal Operators have designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. The containers are removed from the shipping vessels using the gantry cranes and then further handled with reach stackers when in the transit area at the facility. The container is taken to the designated laydown or transit storage area. Once the consignment is cleared through customs and a release certificate is issued for each

container, the transporter's vehicle enters the Terminal to collect a designated container. All transporter vehicles must be certified capable of moving the container from the port area.

3.5.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately. AGR packaging is designed to fit 20 IBC neatly inside a standard 20 foot sea container. Additional bracing is also applied to the packaging to ensure it does not move in the container.

3.5.6 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 placard as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

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

For AGR's shipments, despatch 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 commonly known as MO41 Document.

3.5.7 Transport Practice 1.6

The stevedoring company receive the vessels manifest which includes the containers for unloading and handling by them This information is then captured in the container terminal software program. This program then assists with the location where each container from the vessel is to be placed for storage or in the case of all dangerous goods, the containers have to be directly discharged onto trucks for immediate departure from the port area.

3.5.8 Transport Practice 2.1

Both Terminals are managed as part of the Port of Callao according to Federal, State and IMDG Code regulations. It handles all types of containers and goods.

The cyanide lay down area currently used is segregated and the lay down area is segregated according to international DG segregation requirements. Safety signage was evident throughout the port.

Containers are stored on the port in open air allowing adequate ventilation and both terminals have onsite emergency response teams who are trained to respond to any emergency.

3.5.9 Transport Practice 3.1

Both terminals have onsite emergency response teams who are trained to respond to any emergency. Specific details of this response plan were not identified during this audit.

3.5.10 Transport Practice 3.2

Both terminals have onsite emergency response teams who are trained to respond to any emergency.

3.5.11 Transport Practice 3.3

Terminal operators response to a dangerous goods incident as detailed in their procedures and AGR will be engaged and notified by the notify party or the transport company of the incident. AGR's expertise is available 24/7 if required.

3.5.12 Transport Practice 3.4

Both terminals have onsite emergency response teams who are trained to respond to any emergency.

3.5.13 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.

3.6 Port of Puerto Antofagasta, Chile

The Port of Puerto Antofagasta is utilised as part of AGRs Central and South American Supply Chain. The due diligence of the port dated 9 December 2022 was conducted by AGR. The due diligence reports were reviewed by Rudi Seebach and Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.
- Transport Practice 3.1
- Transport Practice 3.2
- Transport Practice 3.3
- Transport Practice 3.4

3.6.1 Summary of Port Operations

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle Western Australia and the shipping line's service through to Chile. The Port allows unloading of the shipments of containers and the subsequent road transport as required. The terminal also maintains empty container storage facilities.

Puerto Antofagasta is a port in northern Chile and is the secondary port utilised by AGR for customers in this region, typically only used when a berth at Puerto Angamos is not available. The port consists of two terminals and several berths. Terminal 1 is a multi-operated terminal and is managed by EPA while Terminal 2 is a mono-operated terminal managed by Antofagasta Terminal Internacional (ATI). The port is located within the city itself.

ATI has managed the mono-operated terminal since 2003, consists of a single berth and its cargo transfer operations comprises 9.85 hectares. The terminal owners are SAAM, Empresas Navieras and Sociedad Inmobiliaria Punta de Rieles Limitada. 58% of vessels calling at ATI are container ships. In contrast, Terminal 1 consists of three berths with its vessel types primarily bulk carriers, general cargo and passenger ships.

The berths at Puerto Antofagasta range in length from 185m to 260m. Water depths at berths range from 7.9 to 12m. To support the safe docking and turnaround of vessels within the port, rules and practices are in place such as management of weather conditions and tidal variations, the use of pilots and tugs along with overall port operations. The ports Pilot controls all entry into the port and collaborates with the vessels captain to ensure the Port pilots instructions are adhered to. Once docked, the shipping activities transition to port activities. The vessel manifests are utilised to determine what containers require unloading along with the identification of dangerous goods and their specific details and requirements.

3.6.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from 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.

Puerto Antofagasta, while a secondary option, is a medium sized container terminal and has all of the standards and equipment expected of a major international port. In addition, the location of Puerto Antofagasta means that the road transport to the mine is suitably placed for access to the relevant mines though curfews apply to road transport due to the port being located within the city area.

Puerto Antofagasta maintains compliance with International Ship & Port Security Code which aims to control the maritime routes and increasing the security level on both ships and port facilities.

3.6.3 Transport Practice 1.2

The stevedoring operations are managed by a third party using their own labour supply. The port is currently handling sodium cyanide imported by an ICMI certified manufacturer and being transported away from the terminal by an ICMI certified transporter in Aucan Logistics.

3.6.4 Transport Practice 1.3

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts and cranes are all designed and sourced to meet the handling requirements.

The twenty foot containers of cyanide are discharged from the vessel using the fixed and mobile Cranes which have various ratings up to 100 tonnes. The weight of AGR's sodium cyanide twenty foot containers are well within the specified weight limit for these cranes. The manifest which is handed over from the Vessel Operator to Port Operator will include the weight and if any, the hazards associated with the containers. The containers are then loaded directly onto trailers owned and maintained by the designated transporter.

3.6.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately. The trailers are designed so that a container is placed within locating sides/holders to prevent the container shifting on the trailer.

AGR packaging is designed to fit 20 IBCs neatly inside a standard 20 foot sea container. Additional bracing is also applied to ensure the packaging does not move in the container.

3.6.6 Transport Practice 1.5

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

The cyanide shipment packages are packed and marked as required by IMDG Code. Product class and subsidiary risk, labels on two sides of the IBC – same side as pallet base allows fork-lift access. Placards are placed on each side and on each end of the cargo transport unit; this includes the UN 1689 Number/ Class 6 (Toxic) Diamond and Marine Pollutant Mark.

AGR prepares a document that is referenced as 'Multimodal Dangerous Goods Form'; this form meets the requirements 9 of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4; commonly known as a MO41 Document.

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. The terminal operator is provided a list of all containers that require lifting on or off the vessel. This list filters the cargo and details each of the hazardous cargoes handling and stowage requirements. 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. This ensures the stows the cargo according to DG requirements by storing the sodium cyanide containers in a separate designated area.

3.6.7 Transport Practice 1.6

All vessels when arriving or departing the port must declare details of any dangerous cargo on board. Shipping companies use chain of custody documentation which includes the vessel manifest. These manifest details the contents and location of each container and is accompanied by dangerous good documentation, Safety Data Sheets and packing certificates.

The Terminals dispatch centre supervises its operations in real time utilising CCTV along with the coordination of ship movements and pilot operations. The implementation of strict internal controls and a state-of-the art surveillance system contribute to the optimization of operations and cargo security.

3.6.8 Transport Practice 2.1

The operator will load the cargo directly onto the trailer of an ICMI certified transporters trailer for immediate removal from the port and transport directly to the customer. Containers will remain on board the vessel until such time as the vehicle is available to be loaded.

3.6.9 Transport Practice 3.1

A due diligence review by AGR found that within the port there is limited emergency response capability. A branch of the Chilean Navy, the Department for Territorial Waters and Merchant Marine (DGTMMM) has responsibility for the response to oil and hazardous substance marine pollution incidents. In the event of an incident involving sodium cyanide, the same procedures relating to that of an oil spill would apply. Likewise, the equipment for responding to an oil spill would also be deployed. Local emergency services would also support response activities.

The ICMI certified transporter also maintains an Emergency Response Plan (ERP) for cyanide related incidents and may be called upon to support the port in the event of a cyanide related emergency. Drivers complete annual training at a level appropriate to enable them to fulfil their role as outlined within the ERP.

3.6.10 Transport Practice 3.2

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide however, as mentioned above the responsibility for incident response would fall to the DGTMMM and emergency services.

3.6.11 Transport Practice 3.3

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide and AGR will be engaged and notified by the notify party or the transport company of the incident. AGR's expertise is available 24/7 if required.

3.6.12 Transport Practice 3.4

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide however, as mentioned above the responsibility for incident response would fall to the DGTMMM and emergency services. All recovered products will be sealed and enclosed and disposed as state regulatory requirements.

3.6.13 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.

3.7 Port of Puerto Angamos, Chile

The Port of Puerto Angamos is utilised as part of AGRs Central and South American Supply Chain. The due diligence of the port dated 9 December 2022 was conducted by AGR.

The due diligence reports were reviewed by Rudi Seebach from WSP, 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.
- Transport Practice 3.1
- Transport Practice 3.2

- Transport Practice 3.3
- Transport Practice 3.4

3.7.1 Summary of Port Operations

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle Western Australia and the shipping line's service through to Chile. The Port allows unloading of the shipments of containers and the subsequent road and rail transport as required. The terminal also maintains empty container storage facilities.

Puerto Angamos is one of the main ports in northern Chile and is the primary port utilised by AGR for customers in this region. It is a four berth, mono-operated, multi-purpose terminal on South America's west coast. Located in northern Chile in Mejillones, its nearest major city is Antofagasta which is 65km to the south.

There are still four berths in use at Puerto Angamos and they range in length from 180m to 225m. Berths 2 and 3 can be combined for a total length of 366m. Water depths at berths range from 12.5 to 14.7m.

Published equipment at Puerto Angamos is as follows:

- Six mobile harbour cranes with a lifting capacity of 100 tons
- 12 reach stacker cranes for full containers
- 5 toplifter cranes for empty containers
- 33 container trucks
- 37 forklift trucks.

To support the safe docking and turnaround of vessels within the port, rules and practices are in place such as management of weather conditions and tidal variations, the use of pilots and tugs along with overall port operations. The ports Pilot controls all entry into the port and collaborates with the vessels captain to ensure the Port pilots instructions are adhered to. Once docked, the shipping activities transition to port activities. The vessel manifests are utilised to determine what containers require unloading along with the identification of dangerous goods and their specific details and requirements.

The container terminal and associated wharf activities are managed by a third party stevedore. These stevedoring operations include:

- Handling of all containers and the loading/unloading of vessels
- Management of general cargo storage
- Container delivery and,
- Port security operations

Any containers containing dangerous goods once offloaded from the vessel, are typically loaded directly onto alternate transportation utilising the harbour cranes and removed from the terminal.

3.7.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from 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.

Puerto Angamos has been chosen as the preferred port in the region as it is one of the countries main container terminals and has all of the standards and equipment expected of a major international port. In addition, the location of Puerto Angamos means that the road transport to the mine is best placed for access to the relevant mines.

Puerto Angamos maintains compliance with the International Ship and Port Security Code which aims to controlling the maritime routes and increasing the security level on both ships and port facilities.

3.7.3 Transport Practice 1.2

The stevedoring operations are managed by a third party using their own labour supply. The port is currently handling sodium cyanide imported by an ICMI certified manufacturer in AGR and being transported away from the terminal by an ICMI certified transporter in Aucan Logistics. AGR is to offer training to all port and container terminal personnel once relevant contacts have been established.

3.7.4 Transport Practice 1.3

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts and cranes are all designed and sourced to meet the handling requirements.

The twenty foot containers of cyanide are discharged from the vessel using the fixed and mobile Cranes which have various ratings up to 100 tonnes. The weight of AGR's sodium cyanide twenty foot containers are well within the specified weight limit for these cranes.

The manifest which is handed over from the Vessel Operator to Port Operator will include the weight and if any, the hazards associated with the containers. The containers are then loaded directly onto trailers owned and maintained by the designated transporter. Where this does not occur, the port maintains a designated storage area for dangerous goods. Sodium cyanide is segregated and remains sealed at all times within its container.

3.7.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately. The trailers are designed so that a container is placed within locating sides/holders to prevent the container shifting on the trailer.

AGR packaging is designed to fit 20 IBCs neatly inside a standard 20 foot sea container. Additional bracing is also applied to ensure the packaging does not move in the container.

3.7.6 Transport Practice 1.5

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

For AGR's shipments, despatch 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.

AGR's sodium cyanide, solid (briquettes) are packed in a 1,000kg approved bulk bag, hermitically sealed in a plastic liner, placed in a wooden box on pallet base or IBC. As per the IMO DG Code this packaging is referenced as UN 11HD2/X/; approval of AGR's sodium cyanide packaging has been granted by the regulator and AGR given the approval reference AGR 6030, which is to be displayed on the packaging label.

AGR prepares a document that is referenced as 'Multimodal Dangerous Goods Form'; this form meets the requirements 9 of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4; commonly known as a MO41 Document. 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. The terminal operator is provided a list of all containers that require lifting on or off the vessel. This list filters the cargo and details each of the hazardous cargoes handling and stowage requirements.

The ship's Captain carries copies of the Emergency Information together with the Dangerous Goods manifest (stowage plan) and Packing Certificates for each hazardous container loaded. 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. This ensures the stows the cargo according to DG requirements by storing the sodium cyanide containers in a separate designated area.

3.7.7 Transport Practice 1.6

All vessels when arriving or departing the port must declare details of any dangerous cargo on board. Shipping companies use chain of custody documentation which includes the vessel manifest. These manifest details the contents and location of each container and is accompanied by dangerous good documentation, Safety Data Sheets and packing certificates.

The Terminals dispatch centre supervises its operations in real time utilising CCTV along with the coordination of ship movements and pilot operations. The implementation of strict internal controls and a state-of-the art surveillance system contribute to the optimization of operations and cargo security.

3.7.8 Transport Practice 2.1

The port has a dedicated dangerous goods storage area which allows for the safe segregation and storage of these products. Where possible however, the port, under the escort of the Port Authority, will load the cargo directly onto the trailer of an ICMI certified transporters trailer for immediate removal from the port and transport directly to the customer.

In 2013 Puerto Angamos certified its compliance with the ISPS Code, and the ISO 9001, 14001 and OHSAS 18001 international standards, thereby confirming its commitment to the health and safety of its employees, security and the environment.

3.7.9 Transport Practice 3.1

A due diligence review by AGR found that within the port there is limited emergency response capability. A branch of the Chilean Navy, the Department for Territorial Waters and Merchant Marine (DGTMMM) has responsibility for the response to oil and hazardous substance marine pollution incidents. In the event of an incident involving sodium cyanide, the same procedures relating to that of an oil spill would apply. Likewise, the equipment for responding to an oil spill would also be deployed. Local emergency services would also support response activities.

The ICMI certified transporter also maintains an Emergency Response Plan (ERP) for cyanide related incidents and may be called upon to support the port in the event of a cyanide related emergency. Drivers complete annual training at a level appropriate to enable them to fulfil their role as outlined within the ERP.

3.7.10 Transport Practice 3.2

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide however, as mentioned above the responsibility for incident response would fall to the DGTMMM and emergency services.

3.7.11 Transport Practice 3.3

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide and AGR will be engaged and notified by the notify party or the transport company of the incident. AGR's expertise is available 24/7 if required.

3.7.12 Transport Practice 3.4

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide however, as mentioned above the responsibility for incident response would fall to the DGTMMM and emergency services. All recovered products will be sealed and enclosed and disposed as state regulatory requirements.

3.7.13 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.

3.8 Port of Valparaiso, Chile

The Port of Valparaiso is utilised as part of AGRs Central and South American Supply Chain. The due diligence of the port dated 13 December 2022 was conducted by AGR. The due diligence reports were reviewed by Rudi Seebach and Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.
- Transport Practice 3.1
- Transport Practice 3.2
- Transport Practice 3.3
- Transport Practice 3.4

3.8.1 Summary of Port Operations

AGR has ability to ship this port by utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle Western Australia and the shipping line's service through to Chile. The Port allows unloading of the shipments of containers and the subsequent road and rail transport as required. The terminal also maintains empty container storage facilities. The Port of Valparaiso is located approximately 120km west of the nearest major city in Santiago and 93km from San Antonio Port to the south.

The Port of Valparaiso is a 100% state owned operation which maintains five berths across two terminals. Terminal 1, operated by Terminal Pacifico Sur (TPS), specialises in containerised cargo within a secured area while Terminal 2, operated by Terminal Portuario de Valparaiso, specialises in break-bulk cargo. Full container, refrigerated cargo, multipurpose and cruise ships are however received at both terminals. Terminal 1 is a single-operated terminal consisting

of 14.62 hectares with docking frontage up to 740m and a draft of up to 14.1m and is the point of handling for AGR's sodium cyanide. Terminal 2 is utilised as a cargo and passenger terminal.

The port model maintains a Logistics Support Extension Zone known as ZEAL. This is effectively a coordination point for the port entry and exit for all trucks and cargo. The Port Community System of Puerto Valparaiso, or SILOGPORT control this system including the monitoring and tracking the physical cargo along with the corresponding documentation. TPS signage at ZEAL details vehicle and driver compliance for the transport of all dangerous goods transport within the port precinct.

An extension of the ZEAL is the ZEAL route which allows the port city of Valparaiso to be bypassed and provides direct terminal access for all vehicles thereby reducing pollution and congestion in the city area. It is claimed that the implementation of this route has removed up to 500,000 trucks a year from entering the city area. This route is publicly accessible and is a reasonable decline when travelling towards the port. The route also consists of three tunnels sections. These are speed limited to 40km/h and are well lit. Published equipment at the Port of Valparaiso consists of fixed, mobile and floating cranes capable of lifts up to 100T along with container stackers. The Port of Valparaiso has rail service running through it and direct connection to major highways to effectively service the surrounding mining regions.

To support the safe docking and turnaround of vessels within the port, rules and practices are in place such as management of weather conditions and tidal variations, the use of pilots and tugs along with overall port operations. The ports Pilot controls all entry into the port and collaborates with the vessels captain to ensure the Port pilots instructions are adhered to. Once docked, the shipping activities transition to port activities. The vessel manifests are utilised to determine what containers require unloading along with the identification of dangerous goods and their specific details and requirements.

Containers are unloaded from the vessel and stacked on the port. Trucks enter the port the following day through ZEAL according to their scheduled booking time to collect the offloaded containers and remove them from the terminal. Loading of sodium cyanide onto trucks is by container stacker and takes place at night due to restrictions on dangerous goods being transported within the city area. The transport of dangerous goods is only permitted between 2300 and 0600. Once loaded, vehicles are required to exit the port via three checkpoints with the convoy being established immediately prior to the last.

3.8.2 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 Valparaiso is a preferred port in the region as it is one of the countries main container terminals and has all of the standards and equipment expected of a major international port. Therefore, it a is a suitable alternative to San Antonio Port. In addition, the location of the Port of Valparaiso means that the road transport access is well placed for access to the relevant mines. Port of Valparaiso maintains compliance with the International Ship and Port Security Code which aims to controlling the maritime routes and increasing the security level on both ships and port facilities.

3.8.3 Transport Practice 1.2

The stevedoring operations are managed by a third party using their own labour supply. The port is currently handling sodium cyanide imported by an ICMI certified manufacturer in AGR and being transported away from the terminal by an ICMI certified transporter in Aucan Logistics.

AGR will offer training to all port and container terminal personnel once relevant contacts have been established.

3.8.4 Transport Practice 1.3

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts and cranes are all designed and sourced to meet the handling requirements.

The twenty foot containers of cyanide are discharged from the vessel using the fixed and mobile Cranes which have various ratings up to 100 tonnes. The weight of AGR's sodium cyanide twenty foot containers are well within the specified weight limit for these cranes. The manifest which is handed over from the Vessel Operator to Port Operator will include the weight and if any, the hazards associated with the containers. The containers are then loaded directly onto trailers owned and maintained by the designated transporter. Where this does not occur, the port maintains a designated storage area for dangerous goods. Sodium cyanide is segregated and remains sealed at all times within its container.

3.8.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately. The trailers are designed so that a container is placed within locating sides/holders to prevent the container shifting on the trailer.

AGR packaging is designed to fit 20 IBCs neatly inside a standard 20 foot sea container. Additional bracing is also applied to ensure the packaging does not move in the container.

3.8.6 Transport Practice 1.5

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

The cyanide packages are marked/labelled as required under IMO DG Code. Product class and subsidiary risk, labels on two sides of the IBC – same side as pallet base allows fork-lift access. Placards are placed on each side and on each end of the cargo transport unit; this includes the UN 1689 Number/ Class 6 (Toxic) Diamond and Marine Pollutant Mark.

AGR prepares a document that is referenced as 'Multimodal Dangerous Goods Form'; this form meets the requirements 9 of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4; commonly known as a MO41 Document.

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. The terminal operator is provided a list of all containers that require lifting on or off the vessel. This list filters the cargo and details each of the hazardous cargoes handling and stowage requirements.

The ship's Captain carries copies of the Emergency Information together with the Dangerous Goods manifest (stowage plan) and Packing Certificates for each hazardous container loaded. 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. This ensures the stows the cargo according to DG requirements by storing the sodium cyanide containers in a separate designated area.

3.8.7 Transport Practice 1.6

All vessels when arriving or departing the port must declare details of any dangerous cargo on board. Shipping companies use chain of custody documentation which includes the vessel manifest. These manifest details the contents and location of each container and is accompanied by dangerous good documentation, Safety Data Sheets and packing certificates.

The Terminals dispatch centre supervises its operations in real time utilising CCTV along with the coordination of ship movements and pilot operations. The implementation of strict internal controls and a state-of-the art surveillance system contribute to the optimization of operations and cargo security.

3.8.8 Transport Practice 2.1

The port has a dedicated dangerous goods storage area which allows for the safe segregation and storage of these products. As scheduled, the port will load the cargo onto the trailer of an ICMI certified transporters trailer for removal from the port and transport directly to the customer.

3.8.9 Transport Practice 3.1

The port maintains first response responsibility with the primary task being to isolate, barricade and secure the area for emergency services response. A branch of the Chilean Navy, the Department for Territorial Waters and Merchant Marine (DGTMMM) has responsibility for the response to oil and hazardous substance marine pollution incidents. In the event of an incident involving sodium cyanide, the same procedures relating to that of an oil spill would apply. Likewise, the equipment for responding to an oil spill would also be deployed. Local emergency services would also support response activities.

The ICMI certified transporter also maintains an Emergency Response Plan (ERP) for cyanide related incidents and may be called upon to support the port in the event of a cyanide related emergency. Drivers complete annual training at a level appropriate to enable them to fulfil their role as outlined within the ERP.

3.8.10 Transport Practice 3.2

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide however, as mentioned above the responsibility for incident response would fall to the DGTMMM and emergency services.

3.8.11 Transport Practice 3.3

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide and AGR will be engaged and notified by the notify party or the transport company of the incident. AGR's expertise is available 24/7 if required.

3.8.12 Transport Practice 3.4

The port reportedly maintains Emergency Response processes for managing a potential spill of sodium cyanide however, as mentioned above the responsibility for incident response would fall to the DGTMMM and emergency services. All recovered products will be sealed and enclosed and disposed as state regulatory requirements.

3.8.13 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.

3.9 Port of Caucedo, Dominican Republic

AGR has not previously shipped through the Port of Caucedo. The desktop due diligence of the port dated 20 June 2023 was conducted by AGR. The due diligence reports were reviewed by Rudi Seebach and Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.
- Transport Practice 3.1
- Transport Practice 3.2
- Transport Practice 3.3
- Transport Practice 3.4
- Transport Practice 3.5

3.9.1 Summary of Port Operations

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle, Western Australia and the shipping line's service through to Dominican Republic. The Port allows unloading of the shipments of containers and the subsequent road transport to the customer as required.

The Port of Caucedo is the newest and one of the main Container Ports servicing the Dominican Republic. Other ports within the country, with the exception of Rio Haina, are not considered due to the distance from the end user and the risks associated with the routes due to the nature of the goods. The Port of Caucedo is approximately 130km from the end user mine site while Rio Haina Port is approximately 92kms.

DP World is the operating company responsible for all aspects of the operations and administration of the Port of Caucedo. Located approximately 25kms from the national district of Santo Domingo, it primarily services cargo ships and is a multipurpose port receiving vehicles, general cargo and containers as well as transhipments. Over two thirds of the TEU movements through the Dominican Republic are handled at this port.

Entry into Port is controlled by the Port's Pilot who understands the Port protocols and any unique issues regarding the approach and docking of a vessel at the Port. The Ship's Captain works in conjunction with the Pilot as he understands his vessel and can implement and assist with the Pilot's instructions. 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 vessel, including the manifest for containers for loading are handed over. This manifest will identify hazardous cargos and their UN number and classification, segregation requirements.

3.9.2 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 Caucedo has been chosen as one of the preferred ports in the Dominican Republic as it is one of the countries 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 Caucedo means that the road transport to the mine is able to avoid the main centre and busier pathways of the city.

The Port of Caucedo has designated container handling equipment and planned laydown areas for dangerous goods as well as general cargo.

3.9.3 Transport Practice 1.2

Port of Caucedo equipment operators complete training courses & port driving requirements in accordance with local requirements. Virtual reality and simulator training is used for crane and heavy vehicle operators to ensure competent. In addition, training is undertaken in anti-bribery, fraud awareness, information security, modern slavery and industrial safety and environment.

3.9.4 Transport Practice 1.3

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts, cranes and ITVs are all designed to meet the handling requirements.

The Port of Caucedo has designated container handling equipment and planned laydown areas for dangerous goods as well as general cargo. It is reported by the designated transporter that the containers are removed from the shipping vessels using the gantry cranes and then further handled with reach stackers when in the transit area at the facility. On movement of container from vessel to Internal Transport Vehicle (ITV), the container is taken to the designated laydown or transit storage area, a reach stacker takes the container from the ITV and places it in its designated stacking place. Once the consignment is cleared through customs and a release certificate is issued for each container, the transporter's vehicle enters the Terminal to collect a designated container.

3.9.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately;

- Lifting equipment (cranes or forklifts): lift containers by engaging couplings (twist-locks) into the top corners, lifting can only occur on full engagement
- Moving equipment (ITV): these are specifically designed vehicles for use inside the port terminal. The trailers are designed so that a container is placed within locating sides/holders to prevent the container shifting on the trailer.

AGR packaging is designed to fit 20 IBC neatly inside a standard 20 foot sea container.

3.9.6 Transport Practice 1.5

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

The AGR's product is packaged to IMDG Code. As per the IMO DG Code this packaging is referenced as UN 11HD2/X/; approval of AGR's sodium cyanide packaging has been granted by the regulator and AGR given the approval reference AGR 6030, which is to be displayed on the packaging label.

The cyanide packages are labelled as required by section 5.2.2 of the IMO DG Code; product class and subsidiary risk, labels on two sides of the IBC – same side as pallet base allows fork-lift access. Placards are placed on each side and on each end of the cargo transport unit; this includes the UN 1689 Number/ Class 6 (Toxic) Diamond and Marine Pollutant Mark.

AGR prepares a document that is referenced as 'Multimodal Dangerous Goods Form'; this form meets the requirements 9 of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4; commonly known as a MO41 Document. 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. This ensures the stows the cargo according to DG requirements by storing the sodium cyanide containers in a separate designated area.

3.9.7 Transport Practice 1.6

The Port of Caucedo have software which on receival of the Bill of Lading information, provides knowledge of the shipment contents prior to the vessel arriving ensuring planning for unloading and storage can occur. The transport company makes an appointment with the terminal to collect containers from the port. Without this appointment the trucks are not permitted entry to the port.

The containers are accepted and stacked on the port in the designated space. Containers would then be allocated, lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork. All through this process the containers are referenced by their individual numbers which are associated with the Bill of Lading.

3.9.8 Transport Practice 2.1

- The terminal is managed as part of the Port of Caucedo according to Federal, State and IMDG Code regulations. It handles all types of containers and goods.
- All operations are monitored via a command centre. Product is in shipping containers ready for loading onto vessels for sea transport.
- Containers are stored on the port in open air allowing adequate ventilation
- The lay down area is a bitumen surface and appropriate for large container forklifts and trucks.

3.9.9 Transport Practice 3.1

It is anticipated that a response to a dangerous goods incident would be to raise the alarm, cordon off the area and stand down operations in line with other port operations in the region. If required, the military will be engaged who are responsible for certain products entering and being transported with Dominican Republic. The transporter also maintains a full emergency response team and capability and would be available for support in the event of an incident.

3.9.10 Transport Practice 3.2

The Port of Caucedo maintains emergency response services. Local emergency services and military who are responsible for certain products entering and being transported with Dominican Republic who are aware of AGR product and emergency response requirements would also be engaged along with the transporter. Where a spill has occurred, the

military would oversee the incident in conjunction with the Port and the contractor or transporter would perform the clean-up and manage the container as required as per other ports in the region.

All recovered products will be sealed and enclosed as per military requirements and delivered to the mine site for disposal with other contaminated materials disposed of via an authorised hazardous waste disposal facility.

3.9.11 Transport Practice 3.3

The Port of Caucedo notification of a dangerous goods incident would include the military, the consignee, and transport company. AGR will be engaged and notified by the notifying party or the transport company of the incident and AGR's expertise is available 24/7 if required.

3.9.12 Transport Practice 3.4

The Port of Caucedo maintains emergency response services. Local emergency services and military who are responsible for certain products entering and being transported with Dominican Republic who are aware of AGR product and emergency response requirements would also be engaged along with the transporter. Where a spill has occurred, the military would oversee the incident in conjunction with the Port and the contractor or transporter would perform the clean-up and manage the container as required as per other ports in the region.

All recovered products will be sealed and enclosed as per military requirements and delivered to the mine site for disposal with other contaminated materials disposed of via an authorised hazardous waste disposal facility.

3.9.13 Transport Practice 3.5

The Port of Caucedo staff are trained in several areas including Industrial Safety and the Environment. Company reports state that the management of activities related to hazardous waste within the Terminal and wider port are the responsibility of contractors authorised by the Ministry of the Environment and Natural Resources. Evidence of periodic evaluation was unable to be identified however, with similar response procedures at the nearby Rio Haina Port, it is anticipated that these reviews are conducted by the authorised responders and transporter.

3.10 Port of Zárate, Argentina

AGR has not previously shipped through the Port of Zárate. The desktop due diligence of the port dated May and August 2025 was conducted by AGR. The due diligence reports were reviewed by Ed Clerk of WSP, who meets the ICMI requirements for ICMI Lead Auditor and 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 1.2
- Transport Practice 1.3
- Transport Practice 1.4
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.
- Transport Practice 3.1
- Transport Practice 3.2
- Transport Practice 3.3

- Transport Practice 3.4
- Transport Practice 3.5

3.10.1 Summary of Port Operations

Terminal Zárate is a privately owned port located in the city of Zárate, Argentina, within the province of Buenos Aires. It is located around 102 km northwest of the city of Buenos Aires on the Paraná River. Terminal Zárate serves as a multipurpose, intermodal terminal, with operational container, general cargo and vehicle terminals. AGR only ships in containers of which the port allows for unloading of shipments of vehicles, containers, project bulk cargo and road and rail transport when required.

Contracted shipping providers will be able to be used by AGR for shipping to this port from Fremantle, Western Australia to Argentina. There is a partnership arrangement with the Port between Murchison and Cotia Trading, operating and belonging to the Ports and Logistics Division of the Murchison group. The berth length at the Port is 480 m, with a depth of 10.67 m. The container yard covers 116,000 m2 of storage, as well as a 800 m2 container repair area and in total has an annual capacity of 270,000 twenty-foot equivalent container units (TEUs).

Equipment at the site includes:

- One IMPSA Panamax Quay Crane
- One Liebherr Post Panamax Crane
- Six rubber-tyred gantries (RTGs)
- Seven reach stacker cranes for full containers
- Four reach stacker cranes for empty containers
- 26 forklift trucks (ranging from 1.8 tonne to 32 tonne capacity)

The Port provides for safe docking and turnaround of vessels with rules and regulations in place to manage weather conditions and tidal variations. The terminal harbour master controls all entry into the port and collaborates with the vessels captain to ensure terminal instructions are followed. Ships do not need assistance to berth as they must enter against the current. Once the ships are docked the shipping activities transition to terminal activities. Vessel manifests are then used to identify dangerous goods and any specific details and requirements.

The dedicated container terminal is internally managed and includes handling (loading/unloading of vessels), management, container delivery and security operations. Containers that are offloaded and contain dangerous goods are placed into dedicated storage before being loaded onto alternative transportation and removed from the Port. The Port is aware of sodium cyanide products being shipped into Argentina as they also handle this chemical from other countries that supply regional mining operations. Port Zárate was specifically chosen as it is a major terminal with all of the relevant standards and equipment expected of a major international Port.

3.10.2 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 Zárate has been chosen as one of the preferred ports Argentina as it is one of the countries main container terminal and has all of the standards and equipment expected of a major international port. In addition, the road infrastructure from the Port is already at a high standard, already servicing the regional mining operations.

The Port of Zárate has a dedicated container terminal with management and procedures for handling dangerous goods as well as general cargo.

3.10.3 Transport Practice 1.2

Port of Zárate equipment operators complete training courses & port driving requirements in accordance with local requirements. Virtual reality and simulator training is used for crane and heavy vehicle operators to ensure competent. In addition, training is undertaken in anti-bribery, fraud awareness, information security, modern slavery and industrial safety and environment.

A physical visit to the terminal was attempted in April 2025 however access was not permitted at the time. As a result, verification of training and operations was not able to be physically verified. In August 2025, access to the terminal was made available which consisted only of a meeting and brief tour of the container terminal.

The stevedoring operations are managed directly by Port Zárate using their own labour supply. The terminal has confirmed that they have experience handling sodium cyanide though not for a several years. A visual review and discussion regarding the equipment and certifications confirm that the capability is in place.

AGR have offered Port Zárate access to it's online awareness training program and have supplied them with AGR's sodium cyanide solid safety data sheet, translated into Spanish, for the use of training.

3.10.4 Transport Practice 1.3

The container terminal is set up for the handling of containerised cargo with the relevant equipment, forklifts and cranes all designed and sourced to meet the handling requirements.

The twenty-foot containers of cyanide are discharged from the vessel using the Panamax Cranes and possibly the ships derricks. The weight of AGR's sodium cyanide TEUs are well within the specified design weight limit for these cranes. The weight of AGR's sodium cyanide containers then is also suitable for the RTG's and reach stackers 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 the terminal will include the weight and if any, the hazards associated with the containers. The containers are then loaded directly onto trailers dedicated to container movements within the terminal and placed in a dedicated area for Dangerous Goods. Sodium cyanide is segregated and remains sealed at all times within its container.

3.10.5 Transport Practice 1.4

All equipment at the terminal is designed to safely and securely lift or move containers and operators are trained appropriately;

- Lifting equipment (cranes or forklifts): lift containers by engaging couplings (twist-locks) into the top corners, lifting can only occur on full engagement
- Moving equipment (ITV): these are specifically designed vehicles for use inside the port terminal. The trailers are designed so that a container is placed within locating sides/holders to prevent the container shifting on the trailer.

AGR packaging is designed to fit 20 IBC neatly inside a standard twenty-foot sea container.

3.10.6 Transport Practice 1.5

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and Internationally, the IBCs are packed in twenty-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.

The AGR's product is packaged to IMO DG Code. As per the IMO DG Code this packaging is referenced as UN 11HD2/X/; approval of AGR's sodium cyanide packaging has been granted by the regulator and AGR given the approval reference AGR 6030, which is to be displayed on the packaging label.

The cyanide packages are labelled as required by section 5.2.2 of the IMO DG Code; product class and subsidiary risk, labels on two sides of the IBC – same side as pallet base allows fork-lift access. Placards are placed on each side and on each end of the cargo transport unit; this includes the UN 1689 Number/ Class 6 (Toxic) Diamond and Marine Pollutant Mark.

AGR prepares a document that is referenced as 'Multimodal Dangerous Goods Form'; this form meets the requirements 9 of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4; commonly known as a MO41 Document. 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. This ensures the stows the cargo according to DG requirements by storing the sodium cyanide containers in a separate designated area.

3.10.7 Transport Practice 1.6

At the time of completion of this Due Diligence, AGR has completed a single shipment of sodium cyanide to Terminal Zárate. However all vessels, when arriving or departing the port, must declare details of any dangerous cargo on board. Shipping companies use chain of custody documentation which includes the vessel manifest. This manifest details the contents and location of each container and is accompanied by dangerous good documentation, Safety Data Sheets and packing certificates.

The terminal supervises its operations in real time utilising a CCTV system comprising 150 cameras around operational areas and warehouses along with the coordination of ship movements and pilot operations. The terminal uses Navis N4, a Terminal Operating System designed specifically for the optimisation of containers and equipment in the port environment. This system allows for the effective tracking of containers and provides capability for the Planning department to arrange movements and storage requirements as necessary.

The implementation of strict internal controls and surveillance systems contribute to the optimization of operations and cargo security.

3.10.8 Transport Practice 2.1

The terminal has a dedicated dangerous goods storage area which allows for the safe segregation and storage of these products. The Navis N4 planning software allocates an appropriate storage area within the dedicated Dangerous Goods storage area based upon its IMO DG classification.

Truck access to the terminal is via a five-lane access at the security check point. Appointments for collection of full containers is not necessary. Following confirmation of clearance to the customer, the transporter receives a notice to collect the containers. There is a designated waiting area for trucks which is located on the terminal premises, approximately 1.6km from the terminal gate. There is a alcohol breathalyser stationed at this area and all drivers are required to test prior to access to the terminal being granted. This area is also able to be used for the staging of convoys prior to departing to the customer site. It is reported that 80% of trucks are loaded within 30 minutes from arrival.

In 2004 Port Zárate certified its compliance with the ISPS Code. Subsequently they have been certified against ISO 9001:2015 and 14001:2015 thereby confirming its commitment to the health and safety of its employees, security and the environment.

3.10.9 Transport Practice 3.1

At Port Zárate, the Safey, Hygiene and Environment (SHYMA) areas are in charge of Environmental Health and Safety (EHS) management. The terminal maintains an Emergency Response Plan for Dangerous Goods as well as an Emergency Brigade. The brigade maintain capability to provide an initial response to isolate and contain any incident. Container bunds are available at the terminal to support this process. The brigade however, does not provide further response to a Dangerous Goods incident due to a lack of suitable resources. In cases such as a sodium cyanide incident, once isolated and contained, the relevant customer must be able to provide an emergency plan and have an arrangement with a company that is capable of responding to such an incident. This responsibility is in place from the arrival of the container to its despatch from the terminal by the appropriate transporter. The terminal Emergency Brigade would support any response activity within their capability.

The designated transporter is also required to maintain an Emergency Response Plan (ERP) for cyanide related incidents.

3.10.10 Transport Practice 3.2

The terminal maintains emergency response processes for managing a potential spill of sodium cyanide however these have not been observed or witnessed. As outlined in the above, beyond initial isolation and containment, responsibility for incident response would fall to the customer.

3.10.11 Transport Practice 3.3

The port maintains emergency response processes for managing a potential spill of sodium cyanide however these have not been observed or witnessed as yet.

AGR may be engaged and notified by the notifying party, the transport company or the customer, of the incident. AGR's specialist advice is available 24/7 if required.

3.10.12 Transport Practice 3.4

The terminal maintains an Emergency Response Plan for Dangerous Goods. As outlined in the above, beyond initial isolation and containment, responsibility for incident response would fall to the customer.

3.10.13 Transport Practice 3.5

At the time of this Due Diligence, response procedures and capabilities have not been able to be physically verified though protocols and processes have been discussed. AGR will endeavour to continue to liaise with the terminal with a view to evaluating response procedures and capabilities. In addition, this would also serve to introduce and offer the AGR sodium cyanide awareness training package to terminal operators and other relevant port personnel.

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5 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 WSP has under the contract between it and its client.

Signature Page

WSP Australia Pty Ltd

Rudi Seebach		Ed Clerk
ICMI Lead Auditor	N/A	ICMI Technical Specialist

Note that Ed Clerk assumed the responsibility of Lead Auditor following the resignation of Rudi Seebach.

AGR Central and South American Supply Chain

Appendix A

Important Information

Limitation Statement

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