Australia Gold Reagents

Ocean Freight Supply Chain

International Cyanide Management Code

Transportation Recertification Audit

Summary Audit Report

21 May 2026

CYANIDE AUDIT SERVICES

CONTENT

1. AUDIT DETAILS

1.1 Operation

Ocean Freight Supply Chain

1.2 Owner

Australia Gold Reagents Pty Ltd (AGR)

1.3 Operator

CSBP Ltd

1.4 Responsible Person

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1.6 Contact Information

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1.7 Audit Dates

The audit was conducted from 20 to 24 April, 2026.

1.8 Description of Operations

1.8.1 AGR - Ocean Freight Supply Chain

AGR manages the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd. CSBP, a subsidiary of Wesfarmers Ltd, is the principal participant and undertakes both plant operations and sales functions, while Coogee Chemicals contributes as a local manufacturer and distributor of industrial chemicals.

AGR's cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, approximately 40 kilometres south of Perth in Western Australia. From this site, AGR manufactures and dispatches two cyanide products: a 30% strength liquid solution and a solid briquette product with a purity greater than 97%. In its role as sales agent, AGR acts as the consignor and holds overarching responsibility for the management of cyanide transport activities.

AGR's Australian supply chain covers the transport of cyanide from the Kwinana production facility to mine sites across Western Australia, as well as road transport to Fremantle Port for export consignments. For export product, the certified supply chain extends through to the stevedoring activities at Fremantle Port. AGR's Australian Supply Chain is separately certified under the Cyanide Code and is not included within the scope of this audit.

AGR's Ocean Freight Supply Chain is the consolidated group of marine carriers engaged by AGR to transport cyanide from Australia to international customers. It provides the marine link between the certified Australian Supply Chain and the certified supply chain or certified transporter responsible for delivery to the customer site.

The scope of AGR's Ocean Freight Supply Chain includes the shipment of solid cyanide, packaged in intermediate bulk containers (IBCs) within shipping containers, from Fremantle Port, Western Australia, to various interstate and international ports. These services are provided by the following shipping lines (carriers):

- CMA CGM Group (CMA CGM)
- Maersk Shipping (Maersk)
- Mediterranean Shipping Company (MSC)
- Ocean Network Express (One)

No carriers previously approved within AGR's Ocean Freight Supply Chain have since been removed from the scope of this Supply Chain.

1.8.2 Carriers

1.8.2.1 CMA CGM Group (CMA CGM)

Compagnie Maritime d'Affrètement (CMA) was established in 1978, initially operating a single vessel on one shipping route. As global trade expanded, particularly with the growth of containerised cargo and increasing economic activity in China, the company significantly strengthened its presence in Asia. This growth enabled CMA to become a leading carrier on routes between Asia and the Mediterranean, as well as a major operator servicing Northern Europe.

In 1996, CMA acquired Compagnie Générale Maritime, which enhanced its access to vessels and extended its reach into the Americas. Following their merger in 1999, CMA CGM emerged as one of the larger global shipping groups at that time. Continued expansion through further acquisitions, including Australian National Line in 1998, together with diversification into intermodal transport, terminal operations, logistics services, air freight, training and digital solutions, has contributed to its position as a major global shipping company.

Today, CMA CGM operates across 177 countries, supported by an extensive network of offices and logistics facilities. The company manages a fleet of more than 700 vessels with a total capacity of approximately 5 million twenty-foot equivalent units (TEUs). Its services connect over 420 commercial ports worldwide through around 250 shipping routes, with operations supported by a workforce of approximately 160,000 employees.

AGR may engage CMA CGM, including its subsidiary ANL, to transport product from Fremantle Port in Western Australia to international customers. ANL has a strong focus on shipping within Oceania and provides connections to a broad range of destinations, including Asia, New Zealand, the Pacific Islands, the Indian Subcontinent and North America.

As part of the CMA CGM group, ANL operates in line with the company's broader operational framework and sustainability commitments. Consistent with industry requirements, cargo will only be accepted where packaging, containers and documentation comply with the International Maritime Dangerous Goods (IMDG) Code.

AGR recognises that all vessel bookings and schedules are dependent on cargo acceptance within CMA CGM's booking system. Confirmation of acceptance is required before empty containers are released for packing and dispatch. Through this arrangement, CMA CGM supports AGR in delivering product from Fremantle to customers worldwide.

CMA CGM is subject to regular assessment and certification against internationally recognised ISO standards by accredited classification societies. Its commitment to ethical conduct, regulatory compliance, and the ongoing improvement of environmental and social performance is reflected through a range of certifications and industry recognitions.

The company maintains certification across key management systems, including ISO 14001 for environmental management, ISO 9001 for quality management, and ISO 45001 for occupational health and safety. It also aligns its practices with ISO 26000, which provides guidance on social responsibility. These certifications support consistent and reliable operations while contributing to the delivery of high-quality services.

In addition to corporate certifications, individual vessels are issued relevant compliance certificates. These include certification under the International Ship and Port Facility Security Code, confirming that vessel security systems meet required standards. Vessels are also certified under the Maritime Labour Convention,

demonstrating compliance with minimum working and living conditions for seafarers. Safety Management Certificates issued under the International Convention for the Safety of Life at Sea confirm that both the company and onboard management systems operate in accordance with approved safety and environmental protection policies.

1.8.2.2 Maersk Shipping (Maersk)

A.P. Moller–Maersk (Maersk) was founded in 1904 as a small Danish shipping enterprise. The company later became an early adopter of containerisation, initially introducing container services through its Panama Line. Its first fully containerised voyage took place on 5 September 1975, when the vessel Adrian Maersk departed Port Elizabeth on the United States East Coast carrying 385 containers. This marked a significant step in the transition towards standardised container shipping, enabling more efficient, reliable, and cost-effective cargo transport.

By 2015, A.P. Moller–Maersk had developed into a diversified global group with operations spanning shipping, port terminals, logistics, oil and gas, and offshore services across more than 130 countries. In 2016, the organisation announced a strategic restructuring to separate its activities into two primary divisions: Transport & Logistics, and Energy. This transition was aimed at strengthening its position as an integrated transport and logistics provider with a more focused operational model.

Maersk's strategy focuses on developing three core business areas, namely Ocean, Logistics & Services, and Terminals, to provide integrated end to end supply chain solutions. This approach has required significant investment in digital transformation, together with the implementation of decarbonisation initiatives to support long term sustainability objectives.

AGR engages Maersk to transport product from Fremantle Port in Western Australia to international customers. Container shipping operations generally follow a hub-and-spoke model, whereby large vessels operate along major global trade routes connecting regions such as Europe, the Mediterranean, the Indian subcontinent, Southeast Asia, China, and the west coast of the United States. Key hub ports along these routes are supported by feeder services that connect smaller regional ports.

For AGR, exports are shipped from Fremantle to a Southeast Asian hub, where cargo is transferred onto mainline vessels bound for Mediterranean or European hubs. From these hubs, shipments are transhipped again onto feeder vessels servicing final destination ports. This multi-stage logistics model enables efficient global distribution while maintaining connectivity with regional markets.

Maersk is regularly audited and certified against internationally recognised ISO standards by accredited classification bodies. Its commitment to ethical conduct, regulatory compliance, and continuous improvement in environmental and social performance is demonstrated through a range of certifications and assurance frameworks. These include ISO 14001:2015 for environmental management, ISO 27001:2022 for information security management (Maersk Technology), and ISO 9001:2015 for quality management.

The company also applies ISO 14083 principles for the calculation and reporting of greenhouse gas emissions in logistics and transport. In addition, Maersk holds SOC Type II certification, providing assurance over internal controls related to customer data protection, and Transported Asset Protection Association (TAPA) certifications, which confirm that supply chain security measures are in place to mitigate risks such as theft.

Maersk maintains strong relationships with a broad range of stakeholders, including government bodies, industry associations, non-government organisations, and commercial partners. These collaborations support the company's ability to meet its sustainability commitments and contribute to ongoing improvements across the global maritime and logistics sector.

1.8.2.3 Mediterranean Shipping Company (MSC)

Established in 1970 and headquartered in Geneva, Switzerland since 1978, Mediterranean Shipping Company (MSC) is a privately owned organisation operated by the Aponte family. Over time, it has developed from a single-vessel enterprise into one of the world's leading container shipping companies, with a fleet of approximately 1,000 vessels and a workforce exceeding 200,000 employees worldwide.

MSC delivers transport and logistics services to customers, communities, and international partners across the globe. Its operations are supported by an integrated network of road, rail, and maritime transport systems, allowing the company to provide global reach while maintaining strong local expertise. Through its international network of offices, customers can engage directly with company representatives, while digital platforms enable efficient cargo bookings and other e-business services. MSC has also contributed to advancements in smart container technologies, supporting the broader digitalisation of the shipping industry.

The company services more than 520 ports across approximately 300 trade routes, transporting around 30 million TEUs each year. Its fleet incorporates modern technologies designed to enhance operational efficiency and environmental performance. In addition to its core shipping activities, MSC has expanded into inland transportation, logistics services, and port terminal investments. The company also operates dedicated dangerous goods management centres, which oversee the safe handling and stowage of hazardous cargo globally through its MSC Link system.

AGR utilises MSC to transport product from Fremantle Port in Western Australia to international customers. Container shipping typically follows a hub-and-spoke model, where large vessels operate along major global routes connecting regions such as Europe, the Mediterranean, the Indian subcontinent, Southeast Asia, China, and the west coast of the United States. Key shipping hubs along these routes are supported by feeder vessels that connect smaller or regional ports.

In AGR's case, exports are shipped from Fremantle to a Southeast Asian hub, where they are transferred onto mainline vessels destined for Mediterranean or European hubs. From there, cargo is transhipped again onto feeder vessels for delivery to final destination ports. MSC has supported AGR's export operations since 2002, when AGR commenced exporting solid sodium cyanide. As part of this arrangement, AGR was required to demonstrate that its packaging complied with Australian regulatory requirements and the IMDG Code.

MSC also assisted in establishing stevedoring operations at Fremantle Port and provided support in developing export documentation processes. The company retains the authority to reject cargo that does not meet IMDG Code requirements for packaging, containers, or documentation, and AGR acknowledges that vessel bookings and scheduling are dependent on acceptance through MSC's dangerous goods management system.

Based on its experience, AGR considers MSC to be a professional and reliable service provider. MSC is regularly audited and certified against internationally recognised ISO standards by accredited classification bodies. Its commitment to ethical practices and continuous improvement in environmental, social, and operational performance is demonstrated through certifications including ISO 14001:2015 for environmental management, ISO 45001:2018 for occupational health and safety, ISO 28000:2022 for security management systems, ISO 22301:2019 for business continuity, ISO 27001:2013 for information security, ISO 9001:2015 for quality management, and ISO 22000:2018 for food safety.

As a family-owned organisation, MSC maintains strong relationships with a broad range of stakeholders, including governments, industry associations, non-government organisations, and commercial partners, supporting its long-term sustainability commitments.

1.8.2.4 Ocean Network Express (ONE)

Ocean Network Express (ONE) was established on 7 July 2017 following the integration of liner shipping operations from Kawasaki Kisen Kaisha ("K" LINE), Mitsui O.S.K. Lines (MOL), and Nippon Yusen Kaisha (NYK). The company operates from its global headquarters in Singapore and is supported by a network of regional headquarters located in Hong Kong, Singapore, the United Kingdom, North and South America, Dubai, and Brazil.

As a key participant in global supply chains, ONE promotes sustainable practices across its operations and supply network. The company works with customers and business partners to enhance supply chain transparency, manage risk, and support continuous improvement in sustainability performance. This collaborative approach aims to deliver shared value while aligning with customer expectations and broader industry objectives.

ONE reports a total vessel capacity of approximately 2.0 million TEUs, supported by a fleet of more than 240 vessels. Its operational fleet includes over 200 vessels, with individual capacities ranging from under 1,000 TEUs

to more than 24,000 TEUs. AGR engages ONE to transport product from Fremantle Port in Western Australia to international markets. AGR has demonstrated that its product packaging complies with Australian regulatory requirements and has been tested in accordance with the IMDG Code.

At Fremantle Port, ONE vessels are serviced through container terminal operations. The company retains the right to refuse cargo where packaging, containers, or documentation do not meet IMDG Code requirements. AGR acknowledges that all vessel bookings and scheduling are contingent on cargo acceptance within ONE's booking system, and that empty containers are only released once bookings are confirmed for preparation and loading.

Based on its operational experience, AGR considers ONE to be a professional and reliable shipping provider. The company recognises that improving long-term sustainability outcomes in the maritime sector requires collaboration and proactive engagement across the broader industry. As such, ONE maintains relationships with a wide range of stakeholders, including governments, industry associations, non-government organisations, and commercial partners, to support its sustainability objectives.

ONE participates in several industry initiatives and holds recognised certifications that support its sustainability and operational commitments. These include involvement in Clean Cargo, a business-led initiative focused on reducing environmental impacts in global shipping. The company has also received a Silver rating from EcoVadis for its sustainability performance, placing it within the top tier of assessed organisations in its sector. ONE has obtained Authorised Economic Operator (AEO) status in both the United Kingdom and the Netherlands, demonstrating compliance with international supply chain security standards.

In addition, ONE is a member of the Singapore Shipping Association, contributing to industry engagement and dialogue with regulators and international maritime bodies. The company has achieved ISO 14001:2015 certification for environmental management and ISO 9001:2015 certification for quality management. It is also a member of the World Shipping Council, where it collaborates on global shipping and environmental initiatives, and is a signatory to the Global Maritime Forum's Call for Action supporting the decarbonisation of shipping in line with International Maritime Organization (IMO) objectives.

1.8.3 Transit Storage

Trans-shipment may occur within AGR's Supply Chain when carriers transfer cargo between vessels due to operational factors such as weather conditions, voyage planning, cargo mix or scheduling requirements. This process involves unloading containers at a port terminal, temporary placement within the facility and subsequent loading onto another vessel for onward transport.

Such trans-shipments form a normal part of international container operations, and AGR does not control when or where they occur. However, AGR's due diligence assessments have confirmed that the carriers used, manage the handling and movement of cyanide in accordance with the IMDG Code and maintain professional and safe shipping practices.

2. AUDITOR INFORMATION

2.1 Audit Company

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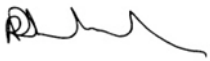
2.4 Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute (ICMI) and meet the applicable criteria established by the ICMI for Code Auditors.

I attest that this Audit Report accurately describes the findings of the recertification audit. I further attest that the audit was conducted in a professional manner in accordance with the International Cyanide Management Code's *Cyanide Transportation Verification Protocol (June 2021)* and using standard and accepted practices for health, safety and environmental audits.

Australia Gold Reagents Ocean Freight Supply Chain		21 May 2026
Operation	**Signature of Lead Auditor**	**Date**

3. AUDIT FINDING

The operation is:

- ☒ IN FULL COMPLIANCE
- ☐ IN SUBSTANTIAL COMPLIANCE
- ☐ NOT IN COMPLIANCE

With the International Cyanide Management Code.

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

4. TRANSPORT VERIFICATION PROTOCOL

Principle 1 – Transport

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

Standard of Practice 1.1

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation 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 engages shipping providers such as MSC, Maersk, ONE and CMA CGM to transport solid cyanide both domestically and internationally. Containers are loaded and secured onto vessels at Fremantle Port by stevedoring contractors, and similarly unloaded at destination ports by local stevedoring service providers. Accordingly, these carriers function primarily as marine transport providers, while container handling activities at ports are generally undertaken by stevedoring companies.

In some cases, shipments are transhipped through intermediary ports or hubs before reaching their final destination. While AGR does not control the timing or location of these transhipments, its due diligence processes have confirmed that the selected carriers manage transport in accordance with the IMDG Code and operate to a professional standard. This includes the selection and use of transhipment terminals.

Shipping routes are inherently variable and should not be regarded as fixed or definitive. Vessels may adjust their course to reach the same destination in response to operational and environmental factors such as tides, ocean currents, weather systems and storms. This variability is reflected in shipping schedules, where transit times between ports are presented as estimates rather than exact timeframes.

For international exports of sodium cyanide, AGR plans shipping arrangements in line with available maritime services capable of reliably servicing the intended market. AGR operates only within export regions supported by major global shipping lines that provide regular container services from Fremantle Port to the destination country or region. For these logistics requirements, AGR engages directly with shipping companies.

Although AGR does not determine the specific routes taken by vessels, it has undertaken due diligence assessments of MSC, Maersk, ONE and CMA CGM to verify compliance with IMDG Code requirements. The assessments note that approval of carriers is not permanent, and performance is subject to ongoing monitoring and periodic review.

AGR undertakes due diligence reviews of its carriers every three years to identify and manage potential risks. Any mitigation measures arising from identified risks are incorporated into the due diligence framework. To date, these assessments have not identified the need for additional safety or security controls.

AGR does not determine the specific routes taken by vessels, it has undertaken due diligence assessments of MSC, Maersk, ONE and CMA CGM to identify and manage potential risks. Any mitigation measures arising from identified risks are incorporated into the due diligence framework. To date, these assessments have not identified the need for additional control measures.

In addition, AGR's Customer and Supply Chain Operating Standards Plan requires that, as far as reasonably practicable, AGR determine the country risk associated with each jurisdiction into which sodium cyanide is supplied, transported through, or exported from. The procedure further requires that a summary of applicable

requirements and associated risks for each relevant country be prepared and updated annually, including import requirements, export requirements, and requirements for the transit or transport of sodium cyanide.

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

AGR's Customer and Supply Chain Operating Standards and Procedure outlines the approach for selecting new carriers and managing their performance on an ongoing basis. AGR engages a defined group of carriers within its supply chain and conducts due diligence assessments to confirm that shipments are handled in line with both AGR requirements and those of the Cyanide Code.

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	

Summarise the basis for this Finding/ Deficiencies Identified:

The operation 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 engages ocean carriers such as MSC, Maersk, ONE and CMA CGM to transport cyanide to international ports. Containers are loaded, secured and discharged by stevedores at the respective ports of origin and destination. These port operations fall outside the scope of this audit and are instead reviewed through a separate supply chain due diligence process.

The vessels operated by MSC, Maersk, ONE and CMA CGM are classed by Lloyd's Register Group, which provides ship classification, certification and inspection of critical equipment and components. AGR has undertaken due diligence assessments of these carriers to confirm that shipments are managed in accordance with the IMDG Code. These assessments did not identify any concerns regarding the handling or transport of cyanide by the carriers.

AGR's due diligence assessments demonstrate that each shipping line within the supply chain has established training frameworks to ensure personnel involved in the handling and transport of cyanide are competent and able to minimise the risk of releases and exposure.

CMA CGM coordinates training programmes covering the safe handling and management of hazardous materials, dangerous goods and chemicals. This includes role-specific instruction aligned with the IMDG Code, as well as requirements for maintaining records of work-related injuries and illnesses to support ongoing monitoring and improvement.

Maersk implements structured training and guidance for personnel involved in dangerous goods transport, including cyanide. This encompasses procedures for safe handling, segregation, stowage and emergency response, along with systems for recording and reviewing occupational health and safety incidents.

MSC provides training and operational guidance focused on the management of hazardous materials and dangerous goods. Personnel are trained in safe handling practices, risk awareness and incident prevention, supported by processes for tracking and managing workplace injuries and illnesses.

Training in accordance with ONE's Dangerous Goods policy is delivered by global customer service to personnel at global headquarters and regional headquarters. This training ensures that established procedures for the labelling, storage, handling and transport of hazardous goods are consistently understood and applied.

Collectively, these training systems demonstrate that personnel across all carriers are equipped with the necessary knowledge and competencies to safely manage cyanide during marine transport.

AGR's Customer and Supply Chain Operating Standards and Procedure outlines the approach for selecting new carriers and managing their performance on an ongoing basis. AGR engages a defined group of carriers within its supply chain and conducts due diligence assessments to confirm that shipments are handled in line with both AGR requirements and those of the Cyanide Code.

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

The carriers engaged by AGR maintain their own equipment operation and maintenance systems, independent of AGR oversight. Their capacity to operate safely and manage dangerous goods is evaluated as part of AGR's due diligence process.

AGR undertakes due diligence reviews of its carriers on a three-year cycle. These assessments have not identified any concerns in relation to the handling or transport of cyanide by the carriers.

AGR's due diligence assessments demonstrate that all vessels operated by MSC, Maersk, ONE and CMA CGM are registered with Lloyd's Register Group. In Australia, the *Customs Act of 1901* requires vessels engaged in international trade to be appropriately registered, with import and export documentation identifying both the vessel name and its Lloyd's registration number.

Port State Control (PSC) forms part of the regulatory framework used to verify compliance with these requirements. While primary responsibility for vessel safety and operation rests with shipowners and flag states, PSC inspections provide an additional level of oversight. These inspections are undertaken to confirm that vessels visiting Australian ports are seaworthy, present no undue pollution risk, maintain safe working conditions, and comply with applicable international conventions.

In Australia, PSC inspections are carried out by marine surveyors from the Australian Maritime Safety Authority (AMSA), who have the authority to board and detain vessels deemed unseaworthy or substandard. Inspections typically include verification that dangerous goods are properly documented, stowed and segregated, and that container securing arrangements are fit for purpose.

Vessels are generally eligible for inspection at six-month intervals, with selection based on risk factors such as environmental considerations, complaints and AMSA targeting criteria. Surveyors follow established procedures outlined in inspection manuals aligned with IMDG Code guidance.

Australia also participates in regional Port State Control regimes such as the Tokyo Memorandum of Understanding on Port State Control, which promotes information sharing, including the publication of detained vessels. Comparable inspection regimes operate in other major maritime jurisdictions, reinforcing compliance and supporting the ongoing safe operation of international shipping.

AGR's Customer and Supply Chain Operating Standards and Procedure outlines the approach for selecting new carriers and managing their performance on an ongoing basis. AGR engages a defined group of carriers within its supply chain and conducts due diligence assessments to confirm that shipments are handled in line with both AGR requirements and those of the Cyanide Code.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

Product packaging is undertaken at the ICMI-certified Kwinana production facility, with cyanide packaged and transported in accordance with applicable international regulatory requirements and AGR procedures. This ensures compliance with the relevant legal and regulatory obligations of all jurisdictions through which the shipments transit.

Carriers such as MSC, Maersk, ONE and CMA CGM require confirmation from AGR that all cargo presented for transport meets the packaging standards specified under the IMDG Code. These carriers retain the right to reject cargo that does not comply with prescribed packaging, container integrity and documentation requirements.

AGR has undertaken due diligence assessments of these carriers to verify that cyanide shipments are managed in accordance with the IMDG Code. These assessments have not identified any concerns regarding the handling, transport or management of cyanide by the carriers.

Throughout transit, cyanide remains securely sealed within locked shipping containers until it reaches the designated end-use destination.

AGR conducts due diligence reviews of carriers engaged in its supply chain on a three-year cycle. AGR's due diligence assessments confirm that vessels operated by MSC, Maersk, ONE and CMA CGM are subject to internationally recognised dangerous goods transport requirements.

As all carriers operate under the regulatory framework of the IMO, they are required to comply with the IMDG Code. The IMDG Code sets mandatory requirements for the classification, packaging, labelling, documentation, stowage and transport of dangerous goods by sea, including cyanide.

Under these arrangements, no dangerous goods may be loaded without prior acceptance from the relevant Dangerous Cargo Office or equivalent function within the carrier organisation. Approval is only granted following review of shipment details and issuance of an acceptance reference number.

Acceptance of dangerous goods does not transfer responsibility from the shipper/consignor, who remains fully responsible for correct classification, declaration and presentation of the cargo in accordance with the IMDG Code. Classification responsibility rests with the shipper/consignor or the appropriate competent authority where specified.

Prior to shipment, the shipper is required to provide a completed Dangerous Goods Declaration and a signed packing certificate to the carrier's local agent. Dangerous goods will not be accepted for loading without these mandatory documents.

AGR's due diligence confirms that these requirements are consistently applied across MSC, Maersk, ONE and CMA CGM, with no issues of concern identified in relation to the maritime transport of cyanide.

Transport Practice 1.4.3 does not apply to AGR's Ocean Freight Supply Chain, as transport vehicles do not form part of this supply chain.

AGR's Customer and Supply Chain Operating Standards and Procedure outlines the approach for selecting new carriers and managing their performance on an ongoing basis. AGR engages a defined group of carriers within its supply chain and conducts due diligence assessments to confirm that shipments are handled in line with both AGR requirements and those of the Cyanide Code.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea.

AGR conducts due diligence reviews of carriers engaged in its supply chain on a three-year cycle. AGR's due diligence assessments confirm that vessels operated by MSC, Maersk, ONE and CMA CGM transport cyanide by sea in compliance with the Dangerous Goods (DG) Code of the International Maritime Organization (IMO), as follows:

AGR's sodium cyanide product is packaged in accordance with the requirements of the IMDG Code. The product is classified as Sodium Cyanide, Solid (UN 1689), Class 6.1, Packing Group I.

Packaging is undertaken using approved IBC configurations in line with IMDG Code provisions. Packing Instruction P002 is not applicable as AGR utilises IBC packaging systems. In accordance with provision PP31, UN 1689 requires hermetically sealed packaging, which is achieved through the use of sealed inner liners within the packaging system.

The applicable IBC instruction (IBC07) permits the use of wooden IBCs (11D type). For Packing Group I substances, the IMDG Code requires transport in closed cargo transport units, consistent with provision B1. Stowage and segregation requirements are Category B, requiring segregation "away from" acids.

AGR's sodium cyanide (solid briquettes) is packaged in 1,000 kg approved bulk bags with hermetically sealed plastic liners, which are then placed within a wooden box on a pallet base or within an IBC.

In accordance with the IMDG Code packaging provisions, this system is referenced as UN 11HD2/X/. Regulatory approval has been granted for AGR's packaging design, with approval reference AGR 6030 required to be displayed on the packaging label.

AGR's labels include the product name, UN number, and the marine pollutant mark to ensure clear identification and compliance with applicable dangerous goods transport requirements.

The product is classified with the appropriate hazard class and any applicable subsidiary risks in accordance with regulatory requirements. Hazard labels are affixed to two sides of the IBC, positioned to ensure clear visibility during handling and transport. Label placement is aligned with the same sides as the pallet base, allowing unobstructed forklift access while maintaining compliance and visibility requirements throughout the transport chain.

Placards are affixed to all four sides of the cargo transport unit, including each end and both lateral sides. The placards display the UN 1689 number, the Class 6 (Toxic) diamond, and the marine pollutant mark to ensure clear hazard identification throughout transport and handling.

AGR prepares a document known as the "Multimodal Dangerous Goods Form", which complies with the requirements of SOLAS 74, Chapter VII, Regulation 5 and MARPOL 73/78, Annex III, Regulation 4. This document is commonly referred to as an MO41 document.

The required information is incorporated into the Multimodal Dangerous Goods Form (MO41), which is prepared by AGR. This document meets the requirements of SOLAS 74, Chapter VII, Regulation 5 and MARPOL 73/78, Annex III, Regulation 4.

Upon arrival at port, shipping company personnel boarding the vessel provide the Master with copies of the dangerous goods manifest, including the stowage plan, as well as packing certificates for each hazardous cargo transport unit loaded at that port.

Upon arrival at port, shipping company personnel boarding the vessel provide the Master with emergency information, along with the dangerous goods manifest (including the stowage plan) and packing certificates for each hazardous container loaded at that port.

MSC, Maersk, ONE and CMA CGM shipping operations comply with stowage and segregation requirements through their respective dangerous cargo management systems, which support the identification and safe handling of sensitive commodities, including DG.

These carriers are also subject to oversight by AMSA, which implements IMO requirements in Australia. This includes regulatory oversight of safety-related aspects of marine transport such as bulk liquids and solids, DG, general cargo and containerised cargo, as well as standards relating to cargo handling equipment and lifting gear.

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Summarise the basis for this Finding/ Deficiencies Identified:
The operation is in full compliance with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

AGR does not employ transport drivers or directly operate transport vehicles within the Ocean Freight Supply Chain. Due diligence assessments for MSC, Maersk, ONE, and CMA CGM found that their vessels maintain continuous tracking and communication throughout voyages. In addition, each service provider has systems in place to track individual containers from the point of origin through to the destination port.

MSC provides a track and trace system that enables AGR to monitor containerised cargo using the Bill of Lading, tracking number, or booking reference, with near real-time visibility of shipment location. MSC also operates an in-house freight booking system that tracks containers from release for use, through transit, to their return at the nominated container yard. Shipping documentation, including the Bill of Lading, identifies the vessel, allowing cargo to be readily tracked through MSC systems or shipping records.

Maersk provides a similar tracking capability, allowing AGR to monitor container cargo using the Bill of Lading, tracking number, or booking reference, with immediate access to shipment location and vessel details. Its in-house freight system tracks containers from release through shipment to return at the container yard, ensuring full visibility and traceability.

ONE operates a fully integrated global logistics network where transport data is entered once and tracked in real time worldwide. This reduces duplication, improves documentation accuracy, and enhances service efficiency. ONE continues to develop its systems to meet customer needs and offers a mobile application that provides features such as track and trace, schedule enquiries, notifications, and other online services.

CMA CGM also offers a comprehensive tracking system that enables cargo monitoring via container number, Bill of Lading, or booking reference. Its internal freight systems track containers throughout the shipping lifecycle, while shipping documentation identifies the vessel, allowing prompt and accurate tracking via CMA CGM systems or shipping records. Due diligence assessments for AMSC, Maersk, ONE, and CMA CGM demonstrate that transporters implement appropriate inventory controls and chain of custody documentation to prevent the loss of cyanide during shipment.

AGR primarily utilises MSC for its international ocean freight, as it provides a complete service from the Port of Fremantle to destination ports. AGR contracts directly with MSC, and shipping documentation remains under the control of AGR and MSC throughout transit. MSC's tracking systems enable cargo to be monitored using Bills of Lading, container numbers, or booking references, ensuring traceability. Following vessel departure, document sets are distributed via courier to authorised agents at the destination port, enabling pre-clearance or timely processing on arrival. This controlled documentation flow ensures that containers are only released to designated parties, maintaining chain of custody through to final delivery.

Where utilised, Maersk operates under the same contractual and documentation framework, with AGR contracting directly and retaining control of shipping documentation. Maersk's shipment tracking systems provide real-time visibility of cargo location and vessel details. Documentation, including Bills of Lading, is distributed to authorised agents to facilitate pre-clearance and controlled release of cargo. This ensures that container handover at destination is managed through verified documentation, supporting inventory control and traceability throughout the shipment lifecycle.

ONE supports inventory control through its fully integrated global logistics network, where shipment data is entered once and tracked in real time. This reduces duplication and errors while maintaining accurate documentation across the supply chain. ONE's digital platforms, including its mobile application, provide track and trace functionality, schedule visibility, and notifications, enhancing transparency and control. These systems support effective chain of custody by ensuring consistent, accessible, and up-to-date shipment information at all stages.

AGR may also utilise CMA CGM under the same direct contracting and documentation arrangements. CMA CGM provides comprehensive tracking systems that allow cargo to be monitored using container numbers, Bills of Lading, or booking references. Shipping documentation is controlled and distributed to authorised destination agents to enable pre-clearance and coordinated cargo handling. This process ensures that containers are released only upon verification of documentation, maintaining chain of custody and minimising the risk of loss during shipment.

In addition to the above, the Australian Department of Defence administers Australia's obligations under the Chemical Weapons Convention. Under this framework, AGR's sodium cyanide production facilities are registered and operate under the relevant licences.

All export customers are required to obtain an approved permit prior to shipment. AGR supports customers in preparing and submitting permit applications and lodges the application together with its own export documentation. Each customer's permit reference number must be included on the export documentation, and AGR cannot export any product without this approval in place.

AGR shipping records clearly identify the quantity of cyanide in transit, and Safety Data Sheets (SDS) are maintained and made available throughout transport. Contractors are required to carry documentation confirming the quantity of cyanide being transported, together with the relevant SDS.

The quantity of cyanide, packing certification, and SDS are incorporated within the marine shipping documentation. These documents accompany the cargo for the duration of the journey.

Chain of custody is maintained through comprehensive documentation used by carriers such as MSC, Maersk, ONE, and CMA CGM. This includes container-specific documentation (e.g. MO41 documentation) and vessel manifests, which identify the contents and location of each container onboard. In addition, all carriers utilise electronic tracking systems to monitor shipment status and location at each stage of transport, ensuring traceability and minimising the risk of loss.

AGR's Customer and Supply Chain Operating Standards and Procedure outlines the approach for selecting new carriers and managing their performance on an ongoing basis. AGR engages a defined group of carriers within its supply chain and conducts due diligence assessments to confirm that shipments are handled in line with both AGR requirements and those of the Cyanide Code.

Principle 2 – Interim Storage

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

Standard of Practice 2.1

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation 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.

Depending on weather conditions, cargo type, and operational requirements, carriers may tranship cargo from one vessel to another during transit.

AGR does not operate trans-shipping or interim storage facilities within its supply chain; however, circumstances may arise where trans-shipping of cyanide product is required. This can involve unloading cargo at a terminal facility, temporary storage, and subsequent loading onto another vessel to continue delivery.

Transhipment ports were not specifically assessed as part of the due diligence assessments conducted by AGR. However, no concerns were identified regarding the management or transport of cyanide by current carriers, including MSC, Maersk, ONE, and CMA CGM. These assessments confirm that carriers undertake trans-shipment activities in accordance with the IMDG Code.

Principle 3 – Emergency Response

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

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	

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

While AGR's product is transported on vessels operated by MSC, Maersk, ONE, and CMA CGM, all onboard emergency response is under the authority of the vessel's Master. AGR undertakes due diligence and carrier assessments by reviewing carrier IMDG Code compliance, emergency response arrangements, and dangerous goods procedures to verify that shipments meet the emergency response requirements. The following outlines how each carrier implements safety, incident management, and emergency preparedness for dangerous goods transport.

MSC implements a comprehensive safety management system aligned with national laws, international regulations, and ISO standards. This includes hazardous materials training, risk assessments, incident investigations, and maintenance of injury/illness records. Shipboard emergency response plans are cargo-specific and define procedures for fire, spills, and other dangerous goods incidents.

Maersk operates structured emergency response, incident reporting and investigation systems requiring timely notification, root cause analysis, and stakeholder communication through case management processes. Significant incidents may involve independent surveyors. Regulatory reporting obligations are also met, including AMSA requirements in Australia for timely incident notification and formal reporting within defined timeframes.

ONE maintains integrated safety management systems aligned with applicable regulations and ISO standards. These include emergency response, training for hazardous materials handling, risk assessments, incident investigation processes and ongoing monitoring of workplace safety performance to support continuous improvement.

CMA CGM applies an IMDG Code-compliant dangerous goods framework, including onboard emergency response plans aligned with Emergency Response Guide protocols. The company also provides specialised training for shore and ship crews and conducts joint emergency response exercises with maritime authorities to ensure preparedness for incidents involving dangerous goods.

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	

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

AGR requires its contracted carriers, MSC, Maersk, ONE and CMA CGM, to designate appropriate emergency response personnel and commit the necessary resources to effectively manage any cyanide-related incident within their scope of responsibility. Each carrier maintains documented emergency response plans supported by trained personnel, specialised equipment and access to technical expertise to ensure an effective and timely response to incidents.

The adequacy of these arrangements is verified through AGR's due diligence and Carrier Assessment process. Assessments confirmed that all four carriers transport dangerous goods in compliance with the IMDG Code and operate in accordance with applicable international maritime safety conventions.

Each carrier has implemented a comprehensive safety and emergency response management system that addresses incidents involving cyanide and other dangerous goods during maritime transport. Vessel crews follow established emergency procedures in the event of a spill, fire or exposure incident.

Crew members are trained in the handling and management of hazardous materials and are competent in the use of personal protective equipment, chemical protective clothing, self-contained breathing apparatus and firefighting equipment. Vessels are equipped with appropriate emergency response equipment and personal protective equipment in accordance with their Ship Management Systems and statutory requirements.

MSC maintains a formalised crisis management structure supported by dedicated emergency response teams both onboard vessels and ashore. The company operates a 24-hour emergency response framework with clear escalation protocols, ensuring immediate notification of senior management and technical specialists in the event of an incident. MSC's approach includes coordinated shore-based support to vessels, access to hazardous cargo experts and the mobilisation of additional resources where required to manage complex emergency scenarios.

Maersk operates a well-established safety management system aligned with the Standards of Training, Certification and Watchkeeping for Seafarers Convention, ensuring that all crew are appropriately trained and certified. The company maintains a global network of dangerous cargo specialists and emergency response experts who provide technical guidance during incidents involving hazardous materials. Maersk vessels are equipped with enhanced safety and emergency response equipment, and the company provides continuous operational support through its global monitoring and response infrastructure to ensure effective incident management.

ONE integrates emergency preparedness and response into its broader supply chain management framework. Through its Supply Chain Management Guidelines, ONE requires adherence to strict health, safety and environmental standards, including the development and implementation of emergency response capabilities. Vessel crews are trained to manage hazardous materials incidents, and the company maintains systems for risk assessment, incident reporting and escalation. ONE also emphasises continuous improvement and coordination with partners to ensure a consistent and effective response to emergencies.

CMA CGM maintains a comprehensive emergency response framework supported by continuous vessel monitoring and a dedicated emergency response contact centre operating on a 24-hour basis. Crew members are trained in accordance with the Standards of Training, Certification and Watchkeeping for Seafarers Convention and receive additional specialised training in the handling of dangerous goods. The company provides onboard safety equipment that exceeds minimum regulatory requirements and ensures access to technical expertise and shore-based support to assist vessels in managing emergency situations effectively.

Overall, AGR has verified that its carriers have appropriate emergency response personnel, procedures and resources in place, supported by trained crews, specialised equipment and shore-based technical expertise, to manage cyanide-related transport incidents in accordance with applicable international requirements.

AGR's Customer and Supply Chain Operating Standards and Procedure outlines the approach for selecting new carriers and managing their performance on an ongoing basis. AGR engages a defined group of carriers within its supply chain and conducts due diligence assessments to confirm that shipments are handled in line with both AGR requirements and those of the Cyanide Code.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

AGR requires its contracted carriers, MSC, Maersk, ONE and CMA CGM, to establish and implement procedures for both internal and external emergency notification and reporting for any cyanide-related incident within their scope of responsibility. These procedures form part of each carrier's broader emergency response management system and are supported by trained personnel, defined escalation protocols and access to technical expertise to ensure timely and effective communication.

The adequacy of these arrangements is verified through AGR's due diligence and Carrier Assessment process. Assessments confirmed that all four carriers transport dangerous goods in compliance with the IMDG Code and operate in accordance with applicable international maritime safety conventions.

All carriers maintain internal incident reporting processes that require prompt notification, escalation and investigation of incidents. External reporting obligations are governed by the relevant national and port authorities. For example, in Australia, notification requirements are mandated by AMSA.

These requirements include immediate notification of an incident, submission of an initial alert within four hours of becoming aware of the incident, and submission of a detailed written report within 72 hours. Security-related incidents must be reported as soon as possible and no later than 24 hours after awareness. Where incidents occur in port, the relevant Port Authority and/or Harbour Master must also be notified.

MSC applies a structured crisis management framework that includes immediate internal notification and escalation to senior management and technical specialists. The company deploys global experts to support incident response and ensures rapid communication between vessel and shore-based teams. This approach enables coordinated external reporting to relevant authorities in accordance with jurisdictional requirements.

Maersk implements formal internal reporting procedures through its standard operating processes, requiring timely reporting of incidents, investigation of root causes and communication with internal and external stakeholders via case management systems. In the event of significant incidents, Maersk may engage independent surveyors to support investigation and reporting. External notification is undertaken in accordance with regulatory requirements, including reporting to maritime authorities and port officials as applicable.

ONE has developed and implemented operational standards that guide vessel crews through a range of emergency scenarios, including cargo damage, fires, severe weather and security-related incidents. These standards include defined reporting and escalation requirements, ensuring that incidents are communicated internally and externally in a timely manner. ONE's framework supports structured reporting, risk assessment and coordination with relevant authorities and stakeholders.

CMA CGM maintains established internal reporting and escalation procedures supported by continuous vessel monitoring and a dedicated 24-hour emergency response contact centre. Incident information is communicated promptly between ship and shore, enabling timely notification to authorities and stakeholders. CMA CGM also participates in industry initiatives such as Cargo Incident Notification System, which facilitates the sharing and analysis of cargo-related incident data across member shipping lines to improve industry safety and inform regulatory developments.

Overall, AGR has verified that its carriers maintain effective procedures for internal and external emergency notification and reporting, supported by defined escalation protocols, regulatory compliance and industry

collaboration, to ensure that cyanide-related incidents are communicated and managed in a timely and appropriate manner.

AGR has an established procedure for notifying ICMI of any significant cyanide incidents, as defined in the ICMI Definitions and Acronyms document. This requirement is documented in Section 14.2 of the CSBP sodium cyanide Transport Management Plan, which includes ICMI contact details as well as a clear description of reportable incidents. AGR has confirmed that no significant cyanide incidents related to the Ocean Freight Supply Chain occurred during the current audit cycle that required notification.

Standard of Practice 3.4

Develop procedures for remediation of releases that recognise 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	

Summarise the basis for this Finding/ Deficiencies Identified:

The operation 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's sodium cyanide shipments are transported on vessels operated by MSC, Maersk, ONE and CMA CGM, overall responsibility for emergency response onboard remains with the vessel's Master, in accordance with international maritime requirements.

AGR, undertakes due diligence and carrier assessments to verify that all shipments are conducted in compliance with the IMDG Code. This includes confirming that each carrier has appropriate emergency response procedures, trained personnel, and access to specialist resources to effectively manage incidents involving dangerous goods, including cyanide.

AGR requires MSC, Maersk, ONE and CMA CGM to maintain comprehensive emergency response plans aligned with their contractual responsibilities. These plans address onboard incident management, emergency notification protocols, coordination with port and regulatory authorities, and access to technical support where required.

Due diligence assessments have confirmed that MSC, Maersk, ONE and CMA CGM transport dangerous goods in accordance with IMDG Code requirements, including the implementation of appropriate emergency preparedness and response measures.

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	

Summarise the basis for this Finding/ Deficiencies Identified:

The operation 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's sodium cyanide shipments are transported on vessels operated by MSC, Maersk, ONE and CMA CGM, overall responsibility for emergency response onboard remains with the vessel's Master, in accordance with international maritime requirements.

AGR, undertakes due diligence and carrier assessments to verify that all shipments are conducted in compliance with the IMDG Code. This includes confirming that each carrier has appropriate emergency response procedures, trained personnel, and access to specialist resources to effectively manage incidents involving dangerous goods, including cyanide.

AGR requires MSC, Maersk, ONE and CMA CGM to maintain comprehensive emergency response plans aligned with their contractual responsibilities. These plans address onboard incident management, emergency notification protocols, coordination with port and regulatory authorities, and access to technical support where required.

Due diligence assessments have confirmed that MSC, Maersk, ONE and CMA CGM transport dangerous goods in accordance with IMDG Code requirements, including the implementation of appropriate emergency preparedness and response measures.

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