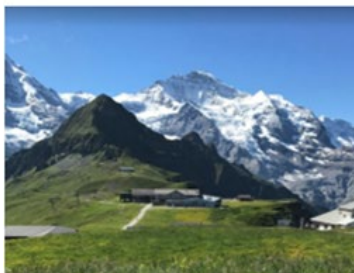
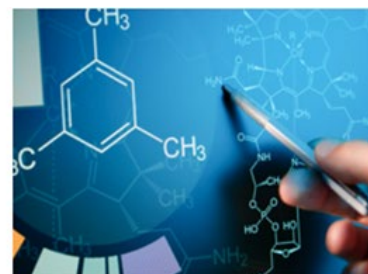


ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

C.B. SPED a. s., Czech Republic

2023 Re-Certification Audit



Submitted to:

The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

www.mss-team.com



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Operation General Information

Name of Operation Audited:	C.B. SPED a.s.
Names and contact information for this facility:	David Uhlíř J.S. Baara 80 370 21 Ceske Budejovice Czech Republic Email: duhlir@cbsped.cz

Operation Description

C.B. SPED was established in 1997 is a located in Ceske Budejovice, a city located approximately two hours south of Prague, in the Czech Republic. C.B. SPED is a full-service trucking and 3rd-Party Logistics (3PL) Provider. The company continues to maintain its ISO 9001 (Quality of Service) and ISO 14001 (Environmental Management) certification.

C.B. SPED has been transporting cyanide throughout Europe since 2000. C.B. SPED delivers cyanide for the International Cyanide Management Code certified supplier LZ Draslovka a.s. Kolin (Draslovka).


At the time of the audit cyanide deliveries were being made to multiple customers or customer/consignor warehouses in Europe. C.B. SPED maintains its Code Signatory status and Cyanide Code certification as part of its contractual agreement with Draslovka so that cyanide from this producer is always shipped using a Cyanide Code-certified transporter.

At the time of the audit, cyanide was being transported in semi-bulk bag-in-box packaging and in drums using enclosed trailers. The shipments originate in the Czech Republic and are bound for European customers and international destinations.

Neither C.B. SPED nor its sub-contractors have experienced any cyanide incidents at any time, before or since the initial Cyanide Code certification in 2012.

The International Cyanide Management Institute (ICMI) Approved Transportation Auditor verified that C.B. SPED operations are in FULL COMPLIANCE with Cyanide Code requirements for transporters.

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Auditor's Finding

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

The transportation operations were evaluated for Cyanide Code compliance using the 2021 versions of the *ICMI Cyanide Transportation Verification Protocol*. C.B. SPED internal policies, practices, and procedures regarding the management of the cyanide transportation operations were reviewed.

The auditor found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was very good. Requested records were readily available for review.

The results of this re-certification audit demonstrate that the C.B. SPED a.s. cyanide transportation operations are in FULL COMPLIANCE with International Cyanide Management Code requirements.

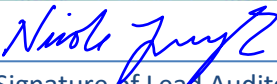
Compliance Statement

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

Auditor Information

Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Date of Audit:	November 14-15, 2023

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Signature of Lead Auditor

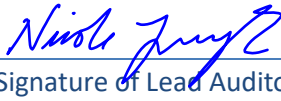
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Auditor Attestation

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 re-certification audit. I further attest that the re-certification 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.

C.B. SPED a.s.



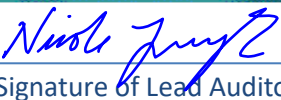
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Principles and Standards of Practice - Cyanide Transportation Verification Protocol

Principle 1 | TRANSPORT

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

Transport Practice 1.1

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

C.B. SPED follows the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) regulations. C.B. SPED and its subcontracted carriers have ADR experts who are responsible for ensuring that all ADR requirements are fulfilled and that the planning for the safe transport of shipments is completed. Considerations such as population density, infrastructure (specifically tunnels), pitch and grade of roads, the proximity of the transport route to water bodies, and route security are considered during the planning process.

At the time of the audit, cyanide was being shipped from Draslovka to locations in Europe. Detailed Security and Route Plans with maps, designated route details, and designated truck stop locations were available for review for each of the routes and were found to be acceptable.

Interviews were conducted with company Management, Drivers, and Dispatchers. Awareness of the need for having a designated route and Security Plan was very good. Routing considerations were found to be consistent with those required by the Code.


C.B. SPED utilizes an ADR Transportation Expert to evaluate risks associated with routes and establish a Security / Route Plan for each route. The routes used in Europe are mostly Class 1 highways and are generally considered to be very safe. The only roads that are used are formally designated by the European Union as being acceptable roads for the transport of Dangerous Goods.

According to interviews, one risk mitigation measure employed by drivers is the use of truck stops that have been specifically designated as being appropriate resting areas for drivers transporting Dangerous Goods. Such areas are monitored by local authorities and often Closed-Circuit TV [CCTV] to ensure that the areas are secure as possible.

Stopping locations are selected to be TAPA [Transported Asset Protection Association] compliant. Records were reviewed and this practice was confirmed.

According to interviews, driver feedback is obtained during each delivery through the dispatch operation. Routes are re-evaluated each year. Records from the re-certification period were available to demonstrate that this practice was in place. Any problems or issues from the previous year and any changes to allowable

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truck stops and routes are taken into consideration during this review.

Risk mitigation measures to be taken on a specific route are documented in the Security Plan. The routes traveled through Europe are generally considered safe. The primary consideration is where the truck will be parked overnight. The driver stays with the truck and the truck stops are pre-determined and are monitored by local authorities and where possible, CCTV.

The driver is required to always have the Security Plan during the transport. This practice was confirmed through interviews with the drivers and an evaluation of the paperwork that was available in the truck at the time of transport.

According to interviews with company personnel, acceptable Dangerous Goods routes and truck stops are designated by each country in the European Union. This information is referenced by C.B. SPED during the designation of acceptable routes. Additionally, only hazmat routes allowed by the governments through which the load is transported are used, which ensures adherence to local requirements regarding hazardous materials.

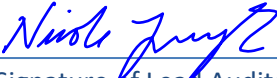
No parts of the routes present special or additional security concerns. The primary consideration is where the truck will be parked overnight. The driver stays with the truck and the truck stops are pre-determined and are monitored by local authorities and where possible, CCTV. In case of incidents like strikes in France, an alternate route, complete with appropriate parking areas has been identified and is available to mitigate these risks.

C.B. SPED does use subcontract trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all Cyanide Code requirements and that they are aware of Cyanide Code requirements. C.B. SPED was using three subcontracted companies at the time of the audit. C.B. SPED Management reported that it had assessed the subcontractors for compliance with the Cyanide Code requirements, communicated the requirements to the contracted companies, and confirmed that each company has an ADR Specialist with current qualifications who plans the routes for the cyanide deliveries. Relevant qualification information and contracts were evaluated for each of these sub-contractor companies during the audit.

A sample of subcontractor drivers were interviewed during the audit. All personnel interviewed demonstrated good awareness of Cyanide Code requirements. The loading process at the Cyanide Code-certified cyanide producer, Lucebni zavody Draslovka a.s. (Draslovka) in Kolin, Czech Republic was included in the audit. Draslovka exercises control over all loading activities including the strict confirmation of driver qualifications and truck/trailer suitability before loading the cyanide for shipment. This control process was observed and Draslovka personnel were interviewed.

Cyanide Code requirements mirror ADR (European Transportation) regulations very closely. All Cyanide Code considerations, including pre-trip inspections, emergency equipment being maintained on trucks, preventive maintenance, fitness for duty, limits on hours driven, etc. are included in European regulations.

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Draslovka monitors each truck driver during the loading process. Mature dispatching procedures are used to confirm that drivers have all necessary credentials, emergency telephone numbers, Safety Data Sheets, approved ADR transportation route, and ADR emergency equipment that is required by European regulations.

In addition to these controls, C.B. SPED includes the subcontractors in the Cyanide Code certification audit process to confirm that all Cyanide Code requirements continue to be understood and fulfilled.

The operation is: In full compliance with Standard of Practice 1.1
 In substantial compliance with
 Not in compliance with

Transport Practice 1.2

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

European regulations require that each driver have a commercial driver's license that is valid for five years. Additionally, the transport of Dangerous Goods is performed in accordance with the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) regulations. These regulations require that drivers transporting Dangerous Goods undergo specific training, become authorized specifically for the hazard class that is being transported (6.1 for cyanide) and that the drivers receive periodic health examinations.

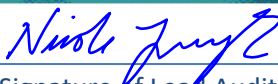
Training and driver qualification records were reviewed and were found to be acceptable.

Interviews and a review of driver credentials for those transporting cyanide showed that drivers have appropriate credentials. Additionally, a representative from Draslovka (cyanide producer / shipper) was interviewed. Confirmation was made that driver license qualifications are checked as part of the dispatch process when the cargo is picked up from the producer. Driver credentials were confirmed during the audit and were found to be in order.

Drivers are trained by an external training organization (DEKRA) that is authorized to provide governmentally required dangerous goods training. The training is designed to train drivers to perform their jobs in a manner that minimizes the potential for chemical releases and exposures.

According to interviews with C.B. SPED management, drivers who transport cyanide are trained every five years, in accordance with ADR regulations. The training is a two-day course in which many topics are addressed through classroom sessions and hands-on practical exercises. Some ADR-required training

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topics include hazard identification, environmental protection, safety and exposure prevention, placard use, handling and stowage of packages, and security awareness. A test is given at the completion of the training to demonstrate competence. A driver's license cannot be renewed unless he or she passes the test.

In addition to C.B. SPED and subcontractor controls, the shipper also maintains strict loading and dispatch controls, which were confirmed through observation.

C.B. SPED does use subcontract trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that subcontract trucking operations fulfill all Cyanide Code requirements. At the time of the audit, three companies had been evaluated by C.B. SPED and were being used for the transport of sodium cyanide between the Czech Republic and European destinations. Relevant qualification information and contracts were evaluated for each of these subcontractor companies during the audit. Driver qualifications and training records for the recertification period were sampled and were acceptable.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.2
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Transport Practice 1.3

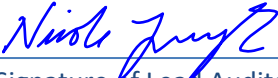
Ensure that transport equipment is suitable for the cyanide shipment.

C.B. SPED uses tractor trucks and trailers to transport solid sodium cyanide. Equipment files were reviewed and specifications for the tractor trucks and trailers were reviewed specifically for weight capacity. The weights of shipments on Bills of Lading (BOL) shipping paperwork were compared to equipment design specifications. The equipment used by C.B. SPED contracted companies can operate at loads greater than the heaviest shipment reviewed. Interviews and a review of ADR regulations confirmed that only specially equipped tractors and trailers are allowed to be used for the transport of Dangerous Goods.

Since shipments cross borders between countries, inspections for weight, maintenance of equipment and shipping documentation was evident for most shipments reviewed. No issues were found.

Truck inspections and preventive maintenance actions are performed regularly to ensure the adequacy of equipment to carry the specified loads. Inspections are scheduled, tracked, and documented. Records were sampled to confirm that maintenance activities are being performed as planned. Interviews and a review of ADR regulations confirmed that vehicles and equipment must be regularly maintained and

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inspected as part of the ADR equipment permitting process.

Trailers are loaded by Draslovka, a Cyanide Code certified signatory cyanide producer. Trucking personnel are responsible for ensuring that the trailers are evenly loaded and that all containers are properly blocked and braced. The trucks used to transport the cyanide are heavy-duty commercial tractors pulling trailers that are capable of handling loads that are significantly heavier than these standard-weight shipments. ADR (European Transportation) regulations require that equipment that is authorized for the transport of hazardous materials meets fitness for duty requirements and that it be properly maintained and inspected. Authorities inspect equipment and confirm valid equipment certifications and proper loading practices commonly during road-side inspections throughout Europe.

Shipping papers from the recertification period were sampled. This review of shipping weights and number of packages confirmed that loads are always standard weights that have been predetermined by the shipper as being within equipment capability and legal road weight limits.

C.B. SPED does use subcontracted trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that subcontracted trucking operations fulfill all Cyanide Code requirements. A sample of subcontracted drivers were interviewed during the audit. Equipment certifications and authorizations for the transportation of dangerous goods were also sampled and found to be acceptable. The loading process at the Cyanide Code-certified cyanide producer, Lucebni zavody Draslovka a.s. (Draslovka) in Kolin, Czech Republic was included in the audit. The shipper maintains strict loading and dispatch controls including the need to confirm driver and truck credentials, weigh the shipments, and ensure that loads are blocked and braced by the driver prior to dispatch.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.3
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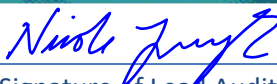
Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

Cyanide packages are loaded by the shipper and blocked and braced by the driver. The loading of a shipment was included in this audit. The driver actively secured the load according to specifications and was held accountable by the shipper who attended the entire loading process. According to interviews, a seal is applied to the shipment upon exit from the shipping facility.

Appropriate placards are displayed on all cyanide transport vehicles. ADR regulations were reviewed, and

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physical confirmation was made that placards are displayed in accordance with the regulations.

According to driver interviews, pre-trip inspections are conducted prior to each departure. Additionally, interviews with a contracted driver and the cyanide producer also confirmed that trucks are visually inspected prior to each movement. Records are maintained in the form of the driving logs used to record that pre-trip inspections were performed.

Vehicles used for transportation of Dangerous Goods in Europe must meet certain technical specifications and must be regularly maintained. ADR vehicle technical certificates are issued for each piece of equipment (tractors and trailers). The vehicle certificates are renewed annually. C.B. SPED equipment is maintained regularly; maintenance records were sampled and were found to be acceptable.

The Safety Program includes limitations on drivers' hours in accordance with ADR regulations. Drivers are informed of legal requirements and are encouraged to stop driving if they become too tired (empowerment). Driver's hours are logged and are monitored to ensure regulatory compliance and adherence to company policy.

Cyanide packages are loaded by the shipper and blocked and braced by the driver. The loading of a shipment was included in this audit. The driver actively secured the load according to specifications and was held accountable by the shipper who attended the entire loading process. The auditor concluded that the use of multiple types of blocking and strapping techniques should sufficiently ensure that the load will not shift during transport.

According to C.B. SPED Safety Instructions drivers are empowered and directed to pull over whenever weather, fatigue or other conditions are unsafe to continue the trip. The Security / Route Plan designates which truck stops are acceptable for stopping and resting during the transport. According to interviews, the drivers maintain close communication with the dispatcher and personnel at the point of delivery. If upset conditions arise, the driver would call the dispatcher to inform him or her of the situation.

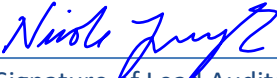
A drug abuse prevention program has been implemented and drivers are refreshed on the information periodically.

Records were available to demonstrate that the requirements of each of the abovementioned sections (1.4.3 a) through f)) had been fulfilled.

C.B. SPED does use subcontracted trucking companies for the transport of cyanide. Procedures and contractual agreements are in place to ensure that subcontracted trucking operations fulfill all Cyanide Code requirements and that they are understood.

Signed Cyanide Code-related agreements, formal procedures that are part of the company's ISO 14001/9001 management system, transportation orders (contracts) with Cyanide Code requirements stated in them, records of communications between C.B. SPED and its subcontract transportation partners, legal authorizations, shipping paperwork showing chain of custody requirements being met, shipping weight information, placarding practices, driver awareness, and equipment suitability were evaluated

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during the audit. Contractor safety programs and equipment maintenance practices were found to be acceptable.

The operation is: In full compliance with
 In substantial compliance with
 Not in compliance with

Standard of Practice 1.4

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

C.B. SPED does not ship cyanide by sea or by air. This section of the Cyanide Code does not apply to the operation.

The operation is: In full compliance with
 In substantial compliance with
 Not in compliance with

Standard of Practice 1.5

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

C.B. SPED equipment location is monitored using GPS tracking equipment. Shipments being transported by subcontractors is tracked by GPS and via regular telephone communications directly with the driver during stops, and at the point of pick-up and delivery. Dispatch activities and communications were observed over the course of the audit. Dispatchers demonstrated that they had a very detailed understanding of shipment status and cargo location.


Equipment used by the drivers includes cell phones and GPS tracking. Trucks GPS locations are regularly checked by the dispatcher, including prior to departure. Phones are used and tested prior to departure during the pre-trip inspection.

There were no identified communication blackout areas for the routes evaluated during this audit.

Drivers are required to check in with dispatch each morning, during breaks, after loading, prior to arrival at the delivery point, and after unloading. Interviews confirmed this practice.

An active mapping program shows the current position and speed of every shipment.

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Dispatchers demonstrated that they had a very detailed understanding of shipment status and cargo location.

Trailers are sealed upon exit from the shipper facility and are not opened by C.B. SPED. Shipping records were reviewed and the seal numbers on containers and the weight of the shipment are confirmed at the point of transfer of custody. Shipping paperwork was reviewed and was found to be conformant to Code requirements, including chain of custody requirements. Records were reviewed and found to be complete.

Drivers have shipping documentation including the Bill of Lading with them at all times during a shipment. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment is consistently entered onto the Bill of Lading by the shipper. A review of records confirmed this practice. Drivers always have the Safety Data Sheet available with them.

A sample of subcontracted drivers were interviewed during the audit. Equipment certifications and authorizations for the transportation of dangerous goods were also sampled and found to be acceptable.

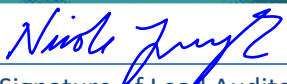
The loading process at the Cyanide Code-certified cyanide producer, Lucebni zavody Draslovka a.s. (Draslovka) in Kolin, Czech Republic was included in the audit. The shipper maintains strict loading and dispatch controls including the need to confirm driver and truck credentials, weigh the shipments, and ensure that loads are blocked and braced by the driver prior to dispatch.

A sample of shipping papers from the recertification period was evaluated during the audit. This review of shipping weights and number of packages (chain of custody) confirmed that loads are always standard weights that have been predetermined by the shipper as being within equipment capability and legal road weight limits.

GPS tracking capability was demonstrated during the audit. Cyanide shipment tracking activities and records were found to be acceptable.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.6
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Principle 2 | INTERIM STORAGE


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

Transport Practice 2.1		
Store cyanide in a manner that minimizes the potential for accidental releases.		
At the time of the audit C.B. SPED was not storing any cyanide. Cargo was being transported directly from the Cyanide Producer to customers in Europe. C.B. SPED management confirmed that no cyanide storage is not within scope of their services that are offered to Draslovka.		
C.B. SPED does not provide storage for sodium cyanide. This practice does not apply.		
The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 2.1

Principle 3 | EMERGENCY RESPONSE

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

Transport Practice 3.1		
Prepare detailed emergency response plans for potential cyanide releases.		
C.B. SPED has documented emergency response procedures for transportation accidents. The procedures are maintained in the trucks by the drivers and are updated on at least an annual basis. Aside from a general emergency response fact sheet and Significant Cyanide Incident reporting procedure, each ADR road risk assessment document contains all necessary information for managing a transportation incident. Each road risk assessment with its emergency procedures and notification contact information is updated at least annually, or as necessary. All road assessments were most recently updated in 2023. The Significant Cyanide Incident Reporting procedure is new and was issued in 2023.		
Drivers are to secure the scene and make several notifications. The plan was found to be appropriate for the company routes driven, and the type of (solid) cyanide shipments made by C.B. SPED. C.B. SPED does		

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not transport cyanide solution.

Detailed information regarding the chemical and physical forms is on a fact sheet that is always kept in the truck with the shipping paperwork. Only solid sodium cyanide is transported by C.B. SPED.

C.B. SPED only transports cyanide via truck and all scenarios considered in the emergency planning documents were related to truck accidents or small cyanide spills from packaging. Solid sodium cyanide (the only physical form transported), roadway infrastructure differences, and the roles of the different emergency responders are discussed in the planning information.

As there are not multiple modes of transportation, the different road types such as highway and secondary were considered.

The emergency response procedures do not refer to the design of the transport vehicle, but C.B. SPED only transports solid sodium cyanide by truck. The emergency procedures are appropriate for the equipment and types of cargo and were found to be acceptable.

The emergency response procedures and the security plans explain that the C.B. SPED drivers are to secure the scene by blocking public access to the accident scene and make notifications in the event of an emergency situation. The universal emergency response number to be used for a crash is 112. This number can be dialed in the European Union free of charge from any telephone or any mobile phone in order to reach emergency services. In addition to the 112-emergency number, the driver is to contact the transportation emergency response network ICE, as well as the dispatcher. Each subcontractor is required by ADR regulations to plan the route and emergency response information specifically for each delivery of hazardous goods. Drivers are required to have this in the truck during deliveries.

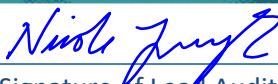
The emergency and security plans were found to be appropriately detailed. The response to transportation emergencies is managed and coordinated by authorities in each of the European countries through which cyanide is transported. Due to the strong emergency response infrastructure, information beyond the definition of roles for C.B. SPED personnel, the driver, and the emergency responders was deemed unnecessary by the auditor.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.1
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Transport Practice 3.2

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

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All drivers receive emergency response training through a government-mandated Dangerous Goods training program every five years. This training is required as part of the license renewal process and includes hands-on emergency response training. Additionally, C.B. SPED personnel (dispatchers and office personnel) are trained and refreshed on company emergency procedures periodically. The information in the emergency and security plans was reviewed and was found to be appropriately detailed.

European ADR regulations define what emergency response equipment must be in a truck at all times during the transport of Dangerous Goods. Emergency equipment maintained on a cyanide shipment truck that was evaluated during the audit included the following equipment: portable ABC fire extinguisher, wheel chocks, warning signs, personal protective equipment (goggles, gloves, boots, and chemical suit), a tarp, spill equipment, eye rinse, emergency vest, flashlight, shovel, and bucket.

Driver awareness of the need to regularly inspect the equipment as part of the pre-trip inspection process, and have it available at all times, was excellent. The shipper confirms that drivers have necessary equipment in order to be legally transporting Dangerous Goods.

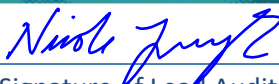
Additionally, the driver indicated that government authorities check for this equipment during routine truck stops and inspections. Penalties apply to drivers who do not have the equipment with them during transport. Equipment was observed as being available during transport.

Spill equipment is maintained in the trucks. The condition and availability of the equipment is checked during the pre-trip inspection. Driver awareness of the need to regularly inspect the equipment as part of the pre-trip inspection process and have it available at all times was excellent. The shipper confirms that drivers have necessary equipment in order to be legally transporting Dangerous Goods. Government authorities check for this equipment during routine truck stops and inspections. Penalties apply to drivers who do not have the equipment with them during transport. According to C.B. SPED Safety Instructions, C.B. SPED drivers must confirm that the emergency response equipment is available during transport. Records of the pre-trip inspection are maintained by the driver in the driver log.

Procedures and contractual agreements are in place to ensure that subcontracted trucking operations fulfill all Cyanide Code requirements and that they are aware of Cyanide Code requirements. The roles and responsibilities of the contractor versus C.B. SPED are clearly delineated in the ADR route assessment / emergency response plans.

CB SPED, its subcontracted companies, and Draslovka participate in combined emergency response drills. These drills are used to ensure that all parties understand their role during an emergency. Records were available from the recertification period.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	
	<input type="checkbox"/> In substantial compliance with	Standard of Practice 3.2
	<input type="checkbox"/> Not in compliance with	

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Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The notification procedures, including current telephone numbers, are described in the Security and Route Plan that is always carried by drivers. The documents were reviewed during the audit and found to be appropriately detailed. Office personnel reference the emergency response procedures, which are also updated at least annually and were found to have up-to-date notification information for notifying the shipper, receiver, regulatory agencies, outside responders, and medical facilities. Potentially affected communities would be notified by authorities.

The Security and Route Plan is established when a new delivery route is established. According to interviews the Security and Route Plans and emergency procedures are reviewed at least annually and are updated as necessary. Detailed route assessment documents were found to be acceptable.

C.B. SPED developed a new Significant Cyanide Incident reporting procedure in 2023 and communicated the procedure to its subcontractors. The definitions and reporting requirements were found to be consistent with the ICMI's code and included a statement requiring notification to ICMI within 24 hours of a significant cyanide incident. There were no significant cyanide incidents during the recertification period.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.3
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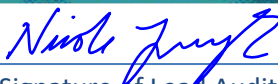
Transport Practice 3.4

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

According to European law, the managing of emergency transportation situations is the responsibility of the Competent Emergency Authorities in each country. These Competent Emergency Authorities are supported by an extensive emergency response network of companies and responders known as ICE (International Chemical Environment). This European emergency response network of national programs has been chartered to provide information, advice, and emergency response resources to respond to transportation emergencies.

ICE was established by the European Chemical Industry. Each European country maintains country-level emergency response networks and resources and all countries work together to manage emergency response. ICE provides trained emergency responders to provide three levels of emergency response: Level 1 (remote product information and general advice), Level 2 (Advice from an expert at the scene), and

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Level 3 (Assistance with personnel and equipment at the scene of an incident). In this way, rapid and effective emergency response at the scene is assured for chemical shipments made in Europe.

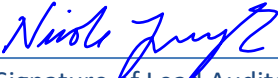
In the Czech Republic the national emergency response network is called TRINS (Transport Information and Accident System). Emergency response to transportation emergencies involving chemicals is further supported directly by the Association of Chemical Industry of the Czech Republic - SCHP. The Cyanide consignor (Czech Republic Producer) is a Cyanide Code certified Signatory company what maintains emergency plans for on-site and off-site emergency response, including transportation. The ICMI Certification Report from 2022 details the "External Emergency Response Plan" for these shipments and stated that the Plan was current and included in the certification audit. Additionally, the Czech Producer (Lučební závody Draslovka, a.s. Kolín) is a member company of mutual aid agreements in Europe and would respond to any transportation incident involving their products.

C.B. SPED is not authorized to remediate spilled materials. The cyanide and the spilled materials are owned by the consignor. Remediation activities are coordinated through ICE.

Emergency response procedures prohibit the use of cyanide treatment chemicals to treat cyanide that has been released into surface water. C.B. SPED is not authorized or trained to perform remediation tasks or activities. Remediation is managed through each European's Competent Authority for emergency response to transportation incidents.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.4
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Transport Practice 3.5

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

The emergency procedures are reviewed as necessary, and contact information is reviewed at least annually. All documentation reviewed as part of this evaluation was updated in 2023.

The emergency plan states that an emergency drill is conducted at least every three years. C.B. SPED confirmed that moving forward, they will be testing their emergency response procedures annually. Records were available to demonstrate that C.B. SPED was involved in a joint Draslovka emergency drill with its subcontractor in 2023.

According to the emergency plan, the results of the drill are evaluated immediately following the exercise. A record was available to show that the 2023 drill was reviewed and that no changes to the written plan were deemed necessary.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.5
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C.B. SPED a.s.
Name of Operation

Nicole Jung
Signature of Lead Auditor

February 10, 2024
Date