

**REPORT**

# ICMI RE-CERTIFICATION SUMMARY REPORT

*CyPlus, GmbH - Supply Chain 6, Finland*

Submitted to:

**International Cyanide Management Institute (ICMI)**

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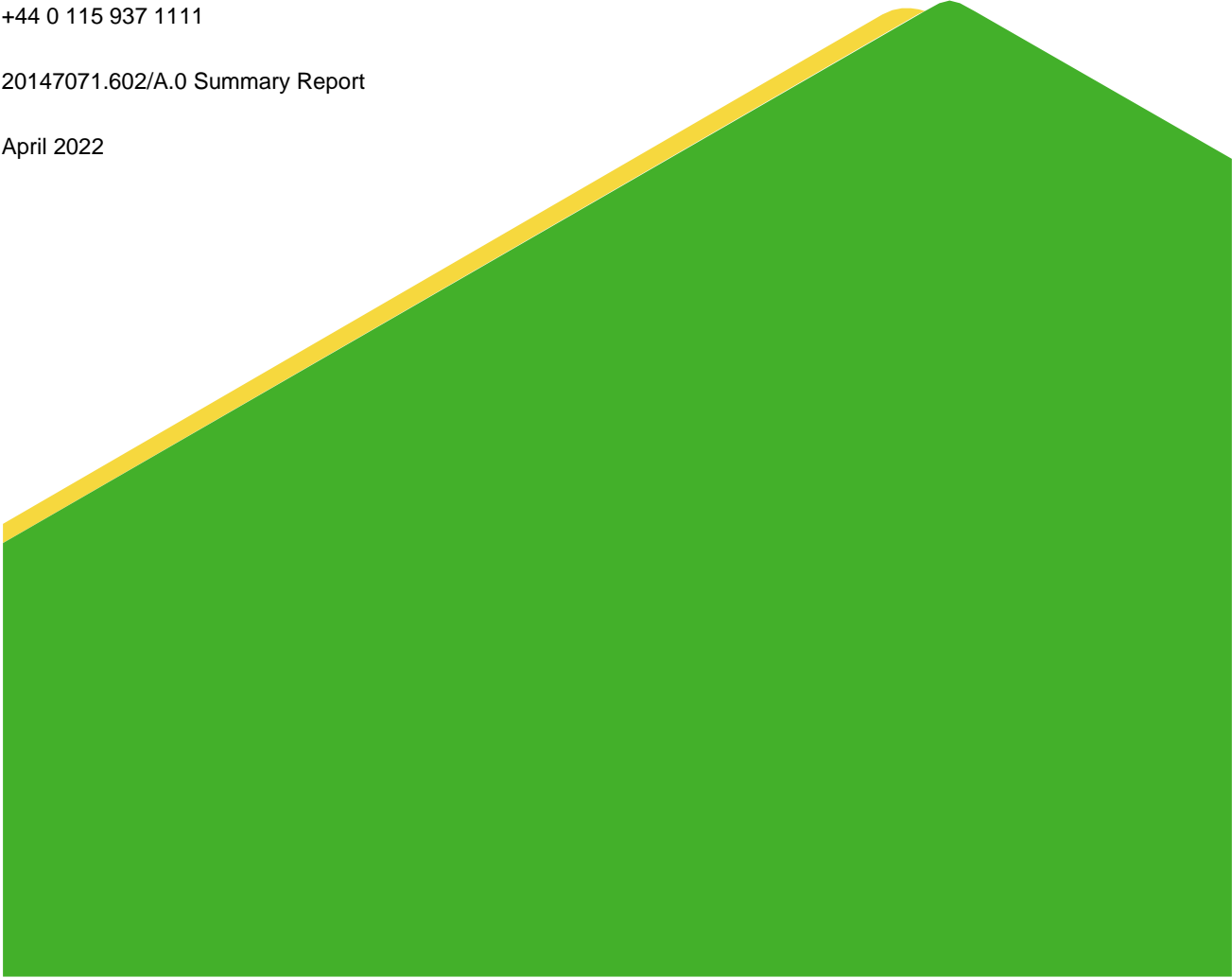
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## 1.0 SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

<b>Name of Cyanide Production Facility:</b>	CyPlus GmbH
<b>Name of Facility Owner:</b>	CyPlus GmbH
<b>Name of Facility Operator:</b>	CyPlus GmbH
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## 2.0 SUPPLY CHAIN OVERVIEW

CyPlus' production site in Wesseling, Germany has been ICMC-certified and registered since July 24, 2006 with no suspension since then. From Wesseling site the cyanide is shipped to gold-mines all over the world. The CyPlus company acts also as a consignor for cyanide transportation. The scope of the CyPlus consignment is covered in different supply chains.

Supply Chain No. 1 covers the portion from the production site at Wesseling, across the German oversea ports (Hamburg and Bremerhaven) and Netherlands overseas port (Rotterdam) to the respective ports of entry.

This report focuses on Supply Chain No. 6 which includes the following stages:

- Kemi Shipping Oy, Ajoksentie 708, FI-94900 Kemi, Finland
- Korsu Oy, Ollinkalliontie 10, FI-98100 Raahe, Finland

### 2.1 Supply Chain Parties and Summary of Due Diligence Audits

The following parties are noted for Supply Chain No. 6:

- 1) CyPlus GmbH, Darmstadt, Germany

CyPlus GmbH is the signatory company which is in the role of the ICMI Code's Consignor. CyPlus GmbH is a subsidiary of the Röhm Holding GmbH and belongs to the Röhm Group since August 01, 2019. The organization is not active in transporting cyanide but is contracting the full transport service with the help of the internal procurement department logistics (Röhm Group) and Evonik Services GmbH. The procurement is purchasing transportation and logistic services from dedicated suppliers and is following strictly defined processes to evaluate appropriate suppliers who are able to perform cyanide shipment under controlled conditions.

## 2) CyPlus GmbH, Wesseling, Germany

The CyPlus site at Wesseling is the production plant of sodium cyanide. CyPlus manufactures and packs the product into different packaging forms and prepares them for shipping. The organization is not active in transporting cyanide, but it is the starting point of Supply Chain No. 1.

## 3) Röhm GmbH, Wesseling, Germany

Röhm GmbH is a subsidiary of the Röhm Holding GmbH and belongs to the Röhm Group since August 01, 2019. Röhm GmbH is a sister company of CyPlus GmbH performing various services for CyPlus. Röhm GmbH at the Wesseling site provides CyPlus with logistic and handling services such as loading and the control of trucks, preparing the transportation documents, loading or labelling of the containers.

## 4) Kemi Shipping Oy, Ajoksentie 708, FI-94900 Kemi, Finland

Kemi port was founded in 1894. The harbor, comprises two new 178-metre quays with stern ports and Sto-Ro side berths. The maximum permissible loading draught is 10 meters. Kemi Shipping has an annual turnover of 15,4 M€ and handles about 1,3 M tons (appr. 440 vessel calls) with around two vessels handled per day. The operating company (Kemi Shipping Oy) is owned by the forest and paper industry. The main business area is stevedoring, forwarding, ship's agency operations (e.g. ship clearance) and operating a repair shop for heavy machinery (e.g. reach stackers, trucks). Handling of dangerous goods is not a core business; nonetheless a so-called IMO area is established (see scheme). Kemi Shipping is holding current certifications according to ISO 9001, ISO 14001, OHSAS 18001 and ISPS. The IMO area is qualified to be used as an interim storage area for cyanide, but it is Kemi Shipping's policy to have no dangerous goods on site, instead the material should be directly transferred to customers with no stop at the port site.

## 5) Korsu Oy, Ollinkalliontie 10, FI-98100 Raahe, Finland

Transport company Korsu Oy operates the truck transport of cyanide containers between Port of Kemi and Agnico Eagle mine site in Kittila. Korsu Oy is a family-owned business. They operate currently around 55 trucks and >60 trailers. Focus business is tank transport services (powder and grain material, ADR transportations), container transport services (dry cargo, tank and bulk containers, sideloader, ADR transportations) and oversized load transport services. Korsu operates road haulage in the Scandinavian area (Finland, Sweden, Norway and Denmark). Korsu holds ISO 9001 and ISO 14001 BVQI certificates. A new dedicated health, safety, environmental and quality manager is engaged. Regarding the ICMC code requirements, Korsu is supported by CyPlus and also by local Finnish Algol Chemical company (advice and training support).

Representatives and managers of both companies took part in the due diligence audits, completed by CyPlus in advance of the ICMC audit. To verify the statements of the involved parties, complete consignments of sodium cyanide along the transportation chain from Kemi port to the mine site were checked partially on-site and on the basis of documents, records and additional evidence made available.

### 3.0 SUMMARY AUDIT REPORT

#### Auditors Findings

CyPlus GmbH  in full compliance with **The International Cyanide Management Code**  
 in substantial compliance with  
 not in compliance with

This operation has maintained FULL COMPLIANCE with the International Cyanide Management Code throughout the previous three- year audit cycle.

**Audit Company:** Golder Associates  
**Audit Team Leader:** Dale Haigh - Lead Auditor  
**Email:** [dhaigh@golder.com](mailto:dhaigh@golder.com)


#### Dates of Audit

The Re-certification Audit was undertaken over 1 day, 24 August 2021 with additional review of documents and questions both before and after the site visit.

The audit was undertaken by Dale Haigh of Golder Associates. Dale Haigh is pre-certified as an ICMI Lead Auditor and ICMC Transport Specialist and he acted in this capacity during the audit.

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

CyPlus Supply Chain No. 6- Finland Supply Chain		
<u>Name of Facility</u> CyPlus GmbH	<u>Signature of Lead Auditor</u> 	<u>Date</u> 5 April 2022

## 4.0 PRINCIPLE 1 – TRANSPORT

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

**Transport Practice 1.1:** Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.1? Explain the basis for the finding.

in full compliance with

The operation is

in substantial compliance with

**Transport Practice 1.1**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The operation is in full compliance with Transport Practice 1.1; select cyanide transport routes to minimize the potential for accidents and releases.

The transporter implements processes and procedures to select transport routes that minimize the potential and potential impacts of accidents and/or releases. The routes selected are the most direct routes with main roads in good condition.

Korsu has developed the procedure and produce the route risk assessments that are used as the basis for determining the route. Ongoing monitoring of the routes is performed every year by Korsu. Drivers are provided with training and briefed on a regular basis and warned of changes in route conditions. Korsu has developed detailed route instructions that apply to the entire route and this describes the distances, speeds and hazards along the route.

Korsu report that there are no special safety or security concerns currently and do not usually use convoys. All transport is monitored by a satellite system.

In case of emergency the Fire Department of Lapland in Finland will manage all emergency measures.

**Transport Practice 1.2:** Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.2? Explain the basis for the finding.

in full compliance with

The operation is

in substantial compliance with

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

CyPlus subcontracts cyanide transport activities to others including Kemi Shipping and Korsu (road transportation). Korsu (road transport) only uses trained and competent operators to drive its vehicles. Training includes HGV Training, ADR training health and safety and cyanide specific training.

Due diligence reports provided by CyPlus for Kemi Shipping also confirm that where operators handle cyanide packages, they undergo relevant training. A due diligence report was also provided for Korsu Oy.

All cyanide handled and transported within this supply chain has already been originally packed, closed and sealed at the manufacturing site.

**Transport Practice 1.3: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.3? Explain the basis for the finding.**

**The operation is**  **in full compliance with** **Transport Practice 1.3**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

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

The transport companies only use equipment designed and maintained to operate within the loads it will be handling. CyPlus do not transport loads directly on roads or sea but engage relevant sub-contractors (Korsu and Kemi Shipping) to carry out this work effectively.

Korsu owns 55 trucks and a significant number of 40 foot trailers that are designed to accept the 21,300 kg load cyanide containers. The trucks and trailers are under a maintenance regime (supported by internal and external garages). In addition, annual inspections are completed by regulatory authorities for trucks and trailers. Prior to the start of each transportation vehicles and trailers (along with their loads) are checked to ensure they are safe to travel. This was confirmed during interview.

The due diligence report for Kemi Shipping confirmed that they use machinery designed to carry the loads they move. Annual inspections of lifting equipment is also carried out.

Procedures are in place to verify the adequacy of the equipment for the load it must bear. Korsu explained the approach adopted during interview. Procedures are reviewed every year. The due diligence report for Kemi Shipping confirmed that procedures are used to check equipment is suitable for the loads it must bear.

There are procedures in place to prevent overloading of the transport vehicle being used for transporting the cyanide. CyPlus and its transporters have procedures to ensure that vehicles are checked prior to and during transportation of cyanide. In addition, the specification of vehicles is compatible with the loads they carry and this was confirmed during the review process.

The safety of loads each vehicle carries is verified at the start of transport by Korsu. Inspections are carried out during the transport process and examples were observed during the audit. The due diligence report for Kemi Shipping confirmed that procedures are in place to prevent overloading of equipment.



**Transport Practice 1.4: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.4? Explain the basis for the finding.**

**The operation is**  in full compliance with **Transport Practice 1.4**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

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

Cyanide is transported by road. Boxes and containers are fitted with placards as attached by CyPlus, in accordance with the IMDG Code. These placards remain on the boxes and on all sides of the containers until the containers are unpacked at the mine sites.

These provisions and the attachment of the IMO marine pollutant label ensure that all consignments comply with international standards.

The safety program implemented by the transporters includes the following: Vehicle inspections prior to departure/shipment; a preventative maintenance program; limitations on operator/driver hours; procedures to prevent loads from shifting; procedure to modify or suspend transportation if conditions require it; a drug abuse prevention program; and retention of records documenting that the above activities have been conducted.

**Transport Practice 1.5: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.5? Explain the basis for the finding.**

**The operation is**  in full compliance with **Transport Practice 1.5**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

Not Applicable to Supply Chain No 6.

**Transport Practice 1.6: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.6? Explain the basis for the finding.**

**in full compliance with**

**The operation is**  in substantial compliance with **Transport Practice 1.6**

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The operation is in full compliance with Transport Practice 1.6; track cyanide shipments to prevent losses during transport.

Transport vehicles have the means to communicate with the transport company, the mining operation, the cyanide producer/distributor and emergency responders.

Trucks have mobile phones with them, as defined in the driver's manual. The drivers are not allowed to use them whilst moving because of safety reasons but are able to use them when stopped and in case of emergency. The relevant phone is tested before each and every start of a cyanide tour. This is required in the in the driver's checklist. Additionally, a GPS based system (AC Panther) is installed, so that a truck's position can be monitored in real time. During interview with drivers it was confirmed that communication is possible throughout the route. Korsu also maintain a mobile text-based system (Logo Apps) that allows drivers to confirm that a specific stage of activity has been completed and this can be observed by Korsu management.

In accordance with Korsu procedures and associated pre-transport checks, communication equipment is checked prior to the start of each trip. As part of the pre-start check all communication equipment is checked including mobile phones and the GPS system. All checks are documented as part of the prestart procedures.

Communication blackout areas along transport routes have been assessed (from road trips) and none have been identified in the routes that Korsu will use.

Korsu have developed procedures in agreement with CyPlus to track the progress of cyanide shipments.

Procedures include:

- Advance planning is completed for all shipments.
- Advising the mine when shipments leave the departure point and estimated time and date of arrival of the consignment.
- Logging of convoy movements using telephone calls and Logi Apps (described above).
- GPS (which is actively monitored) is also used to track progress along the routes.
- Mobile available in case of emergency.

The transporter uses inventory controls and chain of custody documentation to prevent the loss of cyanide during shipment.

Chain of custody (Delivery Notes) forms completed by the mine also confirm that the material has been received in an effective state. Examples were seen during the audit. Shipping records indicate the amount of cyanide in transit and Materials Safety Data Sheets are available during transport.

## 5.0 PRINCIPLE 2 – INTERIM STORAGE

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

**Transport Practice 2.1:** Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 2.1? Explain the basis for the finding.

The operation is  in full compliance with **Transport Practice 2.1**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

No interim storage is involved in this supply chain and so this section is not applicable.

## 6.0 PRINCIPLE 3 – EMERGENCY RESPONSE

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

**Emergency Response Practice 3.1:** Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.1? Explain the basis for the finding.

The operation is  in full compliance with **Transport Practice 3.1**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The operation is in full compliance with Transport Practice 3.1; prepare detailed emergency response plans for potential cyanide releases.

The responsibility for managing emergency situations in Finland legally rests with the national Fire and Rescue Service/Police and private services are not allowed to be involved. Parts of the emergency response requirement are therefore not applicable.

Responsibilities of the drivers in an emergency situation are detailed in the Emergency Plan included within the Drivers Manual. These responsibilities include direct communication with emergency services and Korsu management.

**Emergency Response Practice 3.2: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.2? Explain the basis for the finding.**

in full compliance with  
**The operation is**  in substantial compliance with **Transport Practice 3.2**  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The operation is in full compliance with Transport Practice 3.2; designate appropriate response personnel and commit necessary resources for emergency response.

The responsibility for managing emergency situations in Finland legally rests with the national Fire and Rescue Service/Police and private services are not allowed to be involved. A number of requirements of the need to designate appropriate response personnel and commit necessary resources for emergency response are therefore not relevant.

Cyanide training is provided to Korsu staff by Algol Chemical Oy (on behalf of CyPlus). This training includes emergency response and the Drivers Manual.

Kemi Shipping also obtain training in handling hazardous materials including cyanide but their staff do not handle emergency situations.

The responsibility for managing emergency situations in Finland legally rests with the national Fire and Rescue Service/Police and private services are not allowed to be involved. Training provided does not therefore including the handling of emergency situations and instead focuses on communication in the event of an emergency situation.

All training is planned using databases with due-date and follow-up functions. Transport operators receive initial and refresher training in emergency response procedures including implementation of the Cyanide Procedures.

The procedures for Korsu and Kemi Shipping therefore focus on communication in the event of an emergency situation.

Korsu carry a small amount of emergency equipment and have a list that describes this which is checked prior to transport. The equipment includes high visibility jacket, protective glasses, respiratory cartridges with ABEK filter, protective gloves, eye wash, fire extinguisher, chocks, emergency triangle, torch and warning tape.

**Emergency Response Practice 3.3: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.3? Explain the basis for the finding.**

**The operation is**  in full compliance with **Transport Practice 3.3**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

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

The responsibility for managing emergency situations in Finland legally rests with the national Fire and Rescue Service/Police and private services are not allowed to be involved.

Korsu emergency procedures require drivers to call the emergency services directly and also to call Korsu management who would then contact CyPlus.

The due diligence report for Kemi Shipping confirms that in the event of an emergency they would also contact the national emergency number.

National and Local Government responders (Police, Fire, Health Emergency, etc.) have one direct code (112). This number has remained the same over recent years. The contact numbers include CyPlus and it would be CyPlus who contact ICMI in the event of an incident in accordance with the CyPlus Emergency Plan.

The contact details in the Emergency Plan are reviewed by on an annual basis by Kemi Shipping. As noted above there is only one national number (112) and this has not changed in recent years.

**Emergency Response Practice 3.4: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.4? Explain the basis for the finding.**

**The operation is**  in full compliance with **Transport Practice 3.4**  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The responsibility for managing emergency situations in Finland legally rests with the national Fire and Rescue Service/Police and private services are not allowed to be involved. This question is not therefore fully applicable.

CyPlus ERP provides some general information on remediation requirements which can be provided if required, but due to liability reasons, does not give any detailed recommendations.

**Emergency Response Practice 3.5: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.5? Explain the basis for the finding.**

**The operation is**  **in full compliance with**  
 in substantial compliance with **Transport 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; periodically evaluate response procedures and capabilities and revise them as needed.

Korsu performed an emergency drill focusing on a communication exercise in 2021. They plan to get involved with emergency drills at the mine when this becomes possible after covid restrictions.

Kemi Shipping get involved with the annual drills led by Kemi Port. The due diligence report shows that these went ahead each year between 2017 and 2020.

The CyPlus plan is reviewed on a three yearly basis.

The Korsu Emergency Plan is reviewed on an annual basis and records indicate this review has been completed.

Kemi Shipping also review their plan each year according to the due diligence report.

## Signature Page

### Golder WSP



Dale Haigh  
*Lead Auditor*



Lisa Mitchell  
*Reviewer*

Date: 5 April 2022

DH/LM/ab

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