ICMI-CYANIDE-CODE
SUMMARY AUDIT REPORT
RE-CERTIFICATION AUDIT

CYANIDE-TRANSPORT
SUPPLY CHAIN #6
FROM THE PORT OF OULU (OULU, FINLAND)
TO THE SITE OF THE AGNICO EAGLE MINE (KITTILÄ, FINLAND)

CYPLUS GMBH
DEUTSCHE TELEKOM - ALLEE 9
64295 DARMSTADT
GERMANY

Submitted to:
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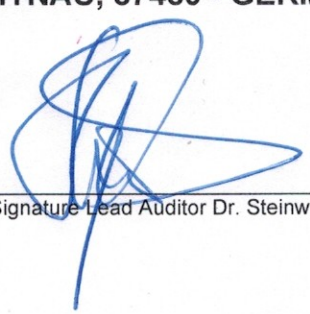

(Signature Lead Auditor Dr. Steinweg)

Name of Cyanide Transportation Facility:	CyPlus GmbH (Röhm Group)
Name of Facility Owner:	CyPlus GmbH (Röhm Group)
Name of Facility Operator:	CyPlus GmbH (Röhm Group)
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Location and description of the establishment:

CyPlus GmbH, a German company within the Röhm Group, manufactures cyanide at its ICMC-certified facility in Wesseling, Germany. Cyanide is distributed from Wesseling in various packaging formats through multiple supply chains to customers, primarily mines located across different continents worldwide.

This report covers Supply Chain No. 6, starting from the Port of Oulu (Oulu, Finland) to the site of the Agnico Eagle Mine (Kittilä, Finland). CyPlus' No. 6 supply chain begins at this point, where CyPlus' No. 1 supply chain, which is also ICMC-certified, ends.

Supply from the production site to the customers / mines

CyPlus' production site in Wesseling, Germany, is ICMC-certified and has been registered since July 24, 2006, without interruption since then. From the Wesseling site, the cyanide is shipped to gold mines all over the world. The company CyPlus also acts as a shipper for cyanide transports. The scope of the CyPlus shipment spans various supply chains. All ICMC-certified CyPlus supply chains are listed on the http://www.cyanidecode.org-Webseite.

Supply Chain No. 6 covers the section from the Port of Oulu (Oulu, Finland) to the site of the Agnico Eagle Mine (Kittilä, Finland).

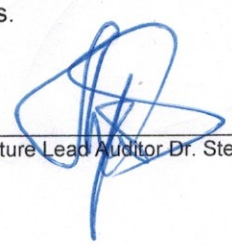
The driving initiator of these activities is the CyPlus organization (a 100% subsidiary of the German Röhm Group), which acts as a mail-order company. CyPlus is the undersigned company that is in the role of consignor of the ICMI Code. The company is not itself operationally active in the transport of cyanide. Other participants in the supply chain (e.g. Consignor CyPlus with its ICMC management system) and, if necessary, others are integrated into the audit as they occur in the context of the audited supply chain. However, they are not the subject of the audit independently, in particular because they are not themselves operationally involved in the physical handling of the hazardous substance.

The organizations involved in this supply chain #6 and their roles or functions are as follows:

1) Port of Oulu: Company and Responsibilities – Herman Andersson Oy

The Port of Oulu is located on the outskirts of the city of Oulu and is connected to the Bothnian Bay, between Sweden and Finland. The terminal of the port has been operated by Herman Andersson Oy since 1902. It connects large parts of the mainland and is well suited for the import and export of industrial goods from and for the region.

In 2020, the port recorded a traffic volume of approx. 1.5 million tons. Around 80 employees generate an average annual turnover of 12 million euros.



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The berths and the adjacent yard are well equipped with modern handling facilities. A crane with a lifting capacity of 50 tons and a mobile crane with a capacity of 700 tons are available.

Significant changes since the last audit in February 2022: a capacity expansion is currently underway. A large company in the vicinity of the port is increasing its export capacities. This is expected to bring turnover back to pre-Covid levels. Herman Andersson Oy has handled similar volumes in the past and does not foresee any capacity shortages in the coming years. Safe operations are ensured. Cyplus is in close contact with the port organization to monitor the expansion of capacities and, if necessary, assess any potential impact on the cyanide container business. The management of the port has changed, but the focus on safety and security remains unchanged – as discussed during Cyplus' due diligence audit on-site.

The Port of Oulu and the terminal (operated by Herman Andersson Oy) are certified according to ISO 9001, ISO 14001, ISO 45001, ISPS, and IMDG.

2) Korsu Oy, Ollinkalliontie 10, FI-98100 Raahe, Finland

The transport company Korsu Oy operates the truck transport of cyanide containers between the port of Oulu and the Agnico Eagle mine site in Kittilä. Korsu Oy is family-owned. They currently operate about 60 trucks and about 250 trailers. The total kilometers of the entire truck fleet amount to approx. 8.0 million km in one year. The focus of the business is on tank transports (powder and grain material, ADR transports), container transports (dry goods, tank and bulk containers, side loaders, ADR transports) and transports of oversized cargoes. Korsu operates road freight transport in the Scandinavian region (Finland, Sweden, Norway and Denmark). Korsu is in possession of the LRQA certificates ISO 9001 and ISO 14001 (valid until September 2025). Korsu employs an external expert to operate the management systems as a quality and environmental manager.

In terms of introducing, understanding and meeting the ICMC code requirements, Korsu Oy has been and is supported by CyPlus and also by the local Finnish Algol Chemicals company www.algolchemicals.com.

As part of the audit, all relevant actors and organisations involved were inspected. These evaluations concerned visits to the sites (Korsus depot incl. own and outsourced repair and maintenance workshop); Port facilities (including IMO area and repair and maintenance workshop) and administrative offices. Interviews were conducted with the partners and employees involved, inspections of IT systems and document reviews were carried out.

Representatives and managers of the port operator Herman Andersson Oy as well as the HSEQ manager of Algol Chemicals Oy participated in the due diligence carried out by CyPlus in the run-up to the ICMC audit. In order to verify the statements of the parties involved, complete cargoes of sodium cyanide along the transport chain from the port of Oulu to the mine site were checked on the basis of documents, records and evidence.

(Signature Lead Auditor Dr. Steinweg)

Auditor's Finding

This operation is

- ☒ in full compliance
- ☐ in substantial compliance *(see below)
- ☐ not in compliance

with the International Cyanide Management Code.

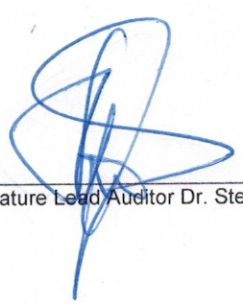
This operation has ensured full compliance with the International Cyanide Management Code during the previous three-year audit cycle.

* For cyanide carriers seeking code certification, the corrective action plan for full compliance with a substantially compliant operation must be attached to this summary audit report. The plan must be fully implemented within one year of the date of this review.

Audit firm.....	LULU Intelligente Organisation
Head of Audit Team	Dr. Benno Steinweg
Email.....	Benno.Steinweg@hs-kempten.de
Names / signatures of other auditors	n/a
Date of the exam	25 - 26 March 2025

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

I attest that this summary audit report accurately describes the results 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 recognized practices for health, safety and environmental audits.



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A) ROAD TRANSPORT:

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.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 1.1
- ☐ not in compliance with

Summarize the basis for this Finding:

CyPlus GmbH operates a certified management system that takes into account the aspects of quality, safety and environmental protection. The system contains the Emergency Response Plan (ERP). Within this ERP, a process for selecting transport routes is maintained in cooperation with supply chain partners. It is designed to reduce potential risks related to accidents and releases. Population density along the potential route, infrastructure (e.g. bridges, road foundations), rivers, streams, ponds, ditches and generally proximity to water are taken into account. It also takes into account the incline or descent of the roads as a criterion for the selection of the route and as a criterion to be paid special attention to during transport. Korsu Oy – the operating transport company – documents the risk mitigation measures that are taken when specific risks are identified as part of the road assessment process (SOP "Cyanide Route Assessment", version 2, Feb 27 2025). The mentioned process provides detailed advice regarding the periodically conducted re-evaluation and selection process. CyPlus does not commission this selection process, but organizes and conducts it in cooperation with the transport company "Korsu Oy".

The road assessment and the selection of routes from the port of entry in Oulu to the mine site showed that alternatives (Route 1, Route 2) were also evaluated. Possible scenarios must be taken into account (e.g. danger point in winter due to short, steep ascent followed by a tight curve) and must be evaluated.

In close cooperation with CyPlus, the transport company "Korsu Oy" contacted the local authorities, other production facilities, the police and hospitals to select the possible routes based on a risk assessment process. This was done intensively during the initial ICMC compliance process and is routinely updated, with a focus on changes.

Under Finnish law, it is not allowed to carry out emergency measures on a private basis, but it is imperative that certified public fire and rescue services are responsible for coordinating and carrying out all emergency measures – in close cooperation with the local police. Except: completely first aid without self-endangerment.

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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**

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 1.2

Summarize the basis for this Finding:

The transport company "Korsu Oy" uses only trained, qualified and ADR licensed drivers for the operation of its hazardous goods trucks. All current drivers (currently 88 people) are fully qualified and certified for cyanide transport, also acc. to national legislation. The operating personnel (driver) do not have to carry out any handling activities with cyanide, but only transport activities with originally sealed containers. The containers are locked in the CyPlus production plant in Germany and only opened at the mine by the responsible employees of the mine. Therefore, Korsu's drivers never have contact with the inliner-filled wooden boxes inside the transport containers.

The picking, loading, handling, transport of the reach stackers and intermediate storage at the port facility in Oulu are carried out by the qualified employees of Herman Andersson Oy. Herman Andersson Oy implements a safety plan that includes, among other things, the training of personnel, e.g. how to handle dangerous goods and how to respond to accidents and other critical/unusual events. The procedures describe on the one hand the intended handling / operation of equipment and on the other hand the reactions to abnormal processes / accidents. All persons are trained in the procedures. Specific procedures and the safety data sheet for cyanide are also part of the training. During the audit, lists of people and their respective training obligations were available.

If action needs to be taken by drivers during transport due to leaks, spills or fires, the instructions in the "Transport Emergency Card" (ADR "written instructions") must be followed immediately. In this particular case, the external emergency services such as the police and the local fire department, the regional medical organization or the local hospitals are well informed about the handling and transport of cyanide and the possible risks of cyanide.

In addition, the shipper CyPlus has implemented a Standard Operating Procedure (SOP) "Supervision – Internal Audits" to ensure that the procedures of the established system for managing cyanide transports (as mentioned above) are reviewed at regular intervals.

Transport Practice 1.3: **Ensure that transport equipment is suitable for the cyanide shipment**

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 1.3

Summarize the basis for this Finding:

CyPlus as an organization does not physically transport cyanide by truck on the road. But their subcontractor "Korsu Oy" does. The means of transport owned by Korsu (trucks and trailers) are mostly as good as new with an average age of about 6 years. In any case, the trucks are heavy-duty trucks, the trailers are each 40-foot trailers, so the pick-up of a typical 20-foot container with a cyanide load is well within resp. far below the intended loading capacity of the facility. There are different maintenance scenarios: (1) pre-transport and post-transport

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checks defined in each individual transport folder, (2) scheduled routine technical inspections and small standard maintenance measures every month, (3) routine expert maintenance activities based on mileage driven and carried out by an external workshop (also subject to the ICMC audit) and (4) an annual inspection by an officially recognized and accredited technical monitoring body for the safety of transport facilities. A supervisor is installed in Korsu's own workshop to help supervise the maintenance of truck equipment. Maintenance schedules are visible using controlled documents. The trucks and the corresponding tools, technical equipment and trailers are of course maintained in such a way that they function within the loads they handle. Korsu uses only its own trucks. The use of heavy-duty trucks ensures that there is no overload.

Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 1.4

Summarize the basis for this Finding:

The company Korsu Oy operates a security program called "Korsu-Security-Plan". It was designed taking into account the main input of CyPlus including various due diligence checks. The safety program leads to the Cyanide Driver's Manual. One tool that is part of the manual is the "Cyanide Checklist", which is part of every basic package of cyanide transport documents. The Cyanide Driver's Guide contains general advice (loading, road control on the road and on the internet in advance, behavior on the road), basic instructions on cyanide, the routes, information about possible safety stops to rest, procedure "behavior in case of problems with the truck/trailer", list of safety equipment, emergency measures to be taken in the event of an accident, safety data sheet and the pre-trip checklist. The "Korsu Security Plan" includes a procedure to preserve the integrity of manufacturers' primary and secondary packaging.

The Cyanide Driver's Manual indicates the maximum service time of the drivers. The Cyanide Driver's Manual includes a section on drug and alcohol policy. The guideline contains specific statements on drug and alcohol use, testing, alcohol and drug dependence, the use of drugs and alcohol on company premises or while driving, and on the consequences of positive test results. The directive also applies to random testing and searches. The policy recognizes alcohol and drug addiction as a treatable condition, and the company will provide appropriate support and assistance under the policy.

Standard operating procedures are available dealing with the topics of modification of transport caused by unexpected incidents, prevention of cargo displacement during all handling activities, postering in accordance with international CLP requirements and carrying out preventive and reactive maintenance activities (through own and contracted workshops and OEM workshops). The records of the evidence demonstrating the functioning of the safety program are archived in accordance with the general standard operating procedures.

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 1.5

Summarize the basis for this Finding:

This section is irrelevant because there is neither sea transport nor air transport within the supply chain.

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Transport practice 1.6: Track cyanide shipments to avoid losses during transport.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 1.6

Summarize the basis for this Finding:

The "Korsu Security Plan" contains detailed and strict regulations on communication with mobile phones. This is based on CyPlus' requirements set out in its contingency plan. The trucks have mobile phones with them, as defined in the operating instructions. Before each start of a cyanide tour, the respective mobile phone is tested. This is specified accordingly in the driver's checklist. In addition, a GPS-based system (AC Panther; http://www.acev.fi) is installed so that any participant with login approval can see the position of the truck - and also: engine on/off status of the truck, loading, unloading, speed in real time.

The route evaluations were/are carried out taking into account the procedure of CyPlus. Thus, checking the availability of mobile phones is part of the route rating, as it can be checked in the route evaluation of Route 1 and Route 2. In both cases, the full mobile phone connection is given all the way

No blackout areas have been designated as defined in the road assessment. This means that no additional activities are necessary, such as satellite telephony or telephony before entering restricted areas. As the audit showed on the basis of a specific internet application, Finland has a very high coverage of mobile phone functionality, especially in the region where both cyanide transport routes are located.

The container is sealed at the production site and the seal is only broken by mine personnel upon arrival at the mine site. Each recipient in the supply chain must verify the integrity and identity of the seal.

Each cyanide shipment is accompanied by a bill of lading, a pre-trip checklist, an alcohol test result, a freight forwarder's invoice, an order, and a cyanide driver's manual – specific to each driver. The current Sodium Cyanide MSDS is always part of the documentation as it is part of the Cyanide Driver's Manual. Bill of lading, checklist, invoice, and order contain the information about the gross weight.

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PRINCIPLE 2 – INTERIM STORAGE

Design, construction and operation of cyanide transhipment depots and interim storage facilities to avoid releases and exposures

Traffic practice 2.1: **Store cyanide in a manner that minimizes the potential for accidental releases.**

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 2.1

Summarize the basis for this Finding:

In CyPlus' Supply Chain No. 6, there is a dedicated location where interim storage can take place as intended. The containers, filled with solid NaCN in 20 wooden boxes weighing approximately 1 ton each, will be transported from the manufacturing facility to the port's facilities (using CyPlus' ICMC-certified No. 1 supply chain). The Port of Oulu offers a total of approx. 60,000 m² of storage space, partly as in-house space. Both the cold and heated storage areas are fenced and monitored. The area is equipped with access control systems. The Port of Oulu also has storage areas for dangerous goods (Open Space). In the event of restrictions on storage capacity on the mine site, containers may be temporarily stored in the designated uncovered outdoor area of the port (called the "IMO area") for dangerous goods. In this case, it can happen that it lasts a maximum of 3 – 4 days, but not longer. In this case, warning signs are placed to alert all relevant local persons to the presence of DG (here: cyanide), the prohibition of eating, drinking, smoking and open flames, and general instructions on the use of PPE. This uncovered outdoor area is designed according to national legal requirements, e.g. to keep possible material leaks away from the ground, and possible mixtures of spills with rainwater are collected in a cul-de-sac channel system that has no connection to the outside and can be used in a similar way as a pump sump. The volume of the area, including the sewer collection system, is sufficient to store storm and potential extinguishing water for a period of time until the local fire brigade arrives at the scene with mitigation equipment. The design, installation and operational functionality are reviewed and qualified by the local authorities and finally approved.
The management system of the Port Organization of Oulu (Herman Andersson Oy) is certified according to ISO 9001, ISO 14001, ISPS, ISO 45001 and IMDG (Kiwa Certified), valid until September 2026 (certification body Kiwa; already for about 20 years). A list for the separation of dangerous goods according to the IMDG code has been installed and maintained. In addition, the Finnish law L 541/2023, officially known as "Laki vaarallisten aineiden kuljetuksesta" (Law on the Transport of Dangerous Goods), must be complied with. It came into force on 1 September 2023 and replaces the previous legislation, including Regulation Asetus 251/2005. It comprehensively regulates the safe transport of dangerous goods in all modes of transport (road, rail, sea and air) as well as their temporary storage, especially in port areas. The main contents of Law L 541/2023 are: Extended obligations for operators, Internal emergency plan for temporary storage facilities, appointment of a safety adviser and increased surveillance. Law L 541/2023 aims to increase safety in the transport of dangerous goods, to define responsibilities more clearly and to improve monitoring. It takes into account international standards and adapts national regulations to current requirements.
Part of the implementation of the law is reflected in the port operator's policy: the material should generally be handed over directly to the customers, without a stopover at the port location.

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PRINCIPLE 3 – EMERGENCY RESPONSE

Protecting communities and the environment by developing emergency strategies and capabilities

Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 3.1

Summarize the basis for this Finding:

As defined in the ICMI Auditor Guide *for the Use of the Cyanide Transportation Verification Protocol* (June 2021), transporters of dangerous goods in developed countries with robust emergency response capabilities can often rely on the established on-site services (e.g., TUIS in Germany). A single phone call can be enough to trigger a quick and comprehensive response by prepared and well-trained personnel who are able to handle cyanide and other hazardous materials emergencies. This response may include a pre-planned command structure, with local fire departments having designated the operations control center once they are on the scene.

Finland and its established national security management system, with police and professional fire brigades as the main actors on the ground, can be clearly classified as an emergency organisation that is highly in line with its highly developed capabilities. Therefore, the nature of the emergency programs of Korsu and Herman Andersson Oy as a port operating organization is highly dependent (because integrated) on the Finnish local conditions, which are very highly developed in terms of emergency preparedness and capabilities.

Korsu's ERP takes into account all aspects of transport infrastructure. Particular attention is paid to road evaluation, which focuses on the specific conditions of the route and the respective facilities (e.g. bridges over waters). The plan takes into account the design of the transport vehicle. Container trailers are specified with minimal load requirements and special adjustment points for fastening the various container floor structures.

Herman Andersson Oy, as a port facilities and terminal operator (which also operates the IMO dangerous goods sector), is implementing an emergency plan. It is drawn up in conjunction with the Port of Oulu's emergency plan, the Port Authority's organisation.

The emergency scenarios, the general emergency statement and the scenario-specific instructions of "Korsu Oy" and Herman Andersson Oy take into account the solid state of the cyanide and its incompatibility with water and other substances.

Both plans also define the role of outside responders, medical facilities, and communities in emergency processes/cases. The alarm system in an emergency has been described, is trained again and again and is robust.

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Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 3.2

Summarize the basis for this Finding:

Both relevant parties in CyPlus' No. 6 supply chain – Korsu Oy and Herman Andersson Oy – have nominated dedicated emergency response personnel and sufficient emergency response training resources will be provided.

Korsu's ISO 9001 and ISO 14001 management system requires specific processes and specifications to designate responsibility for responding to emergencies during the transportation of dangerous goods, as well as an effective organization that is reliable and effective in terms of emergency response. As a specialist in the handling of dangerous goods, a local Finnish dangerous goods consulting company is commissioned to set up cyanide-specific training for the respective persons and functions (e.g. drivers). This cyanide-specific training is derived from the current CyPlus training system. Truck drivers receive initial and regular refresher training in emergency response, including how to implement the emergency plan. In addition, all dangerous goods drivers must have ADR certification anyway and complete refresher training every 5 years after the basic qualification.

In both companies, key roles for emergency response are defined.

Korsu's Cyanide Driver's Manual (derived from the "ADR Safety Plan") contains, among other things, the pre-trip checklist that must be completed before each cyanide transport. The checklist requires full ADR equipment. Korsu's truck drivers must check their equipment before each cyanide transport. This is mandated in Korsu's Cyanide Driver's Manual and documented in a checklist that is used in each individual hazardous goods transport case. A list of all resources that must be available during transport and along the transport route is available in every truck. This is also clearly defined in the ADR Regulation. Overall, "Korsu" must have an emergency kit in every hazardous goods transporter.

Herman Andersson Oy's management system according to ISO 9001, ISO 14001, ISO 45001, ISPS and IMDG also requires specific processes and specifications to designate responsibility for responding to emergencies in the handling and intermediate storage of dangerous goods, as well as an effective organization that is reliable and effective in the event of an emergency. In particular, the new law L 541/2023 (since September 2023) aims to increase safety in the port when transporting dangerous goods, to define responsibilities more clearly and to improve monitoring.

All trainings are planned via a database, the training protocols are made available in this database. Examples of topics to be trained: basic training for new personnel, annual basic update training, occupational safety, fire extinguishing work. The van offers emergency training for the appropriate personnel. The training matrix requires different types of training. Driving training on how to act and react as well as information on the product cyanide will be carried out.

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Transport Practice 3.3: Development procedures for internal and external emergency notification and reporting

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 3.3

Summarize the basis for this Finding:

Both relevant parties in CyPlus' No. 6 supply chain – Korsu Oy and Herman Andersson Oy – use certified management systems. All of them, whether ISO 9001 or the other management system standards ISO 14001, ISO 45001, require specifications and relevant documents or information to be up-to-date. Korsu's procedure, for example, requires that the validity of telephone numbers be routinely checked.

Both relevant parties have processes, procedures, and specifications on how to notify in the event of an emergency. These procedures are set out in the response plans and relevant documents, and include a description of when, who, and how communication is to take place.

"Korsu Oy": the process is described in the Cyanide Driver's Manual, which also covers the organization "Korsu". A list of phone numbers is included. This list is also available on the trucks. The manual contains, among other things, information on "emergency measures in the event of an accident" and refers to a mandatory telephone number list (police, medical assistance, safety manager, mine, CyPlus and fire brigade).

The emergency plan "Herman Andersson Oy" describes in detail the contacts of the security organisation, in particular all relevant contact information (telephone numbers) of internal and external parties (police, medical support, security manager, mine site, CyPlus and fire brigade). In any case, communication with the ICMI in the event of an emergency is always carried out by CyPlus, which in turn is one of the first organizations to be informed of a potential emergency. This communication chain is tested again and again in the context of exercises, but has never been necessary in the context of an emergency.

Transport Practice 3.4: Development procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 3.4

Summarize the basis for this Finding:

In Finland, there is no provision for rehabilitation measures to be carried out by hauliers or their truck drivers. As defined in the ICMI Auditor Guidance for the Use of the Cyanide Transportation Verification Protocol *(June 2021)* in Developed Countries with robust emergency response capabilities, transporters of dangerous goods can often rely on the established on-site services. A single phone call is all it takes to trigger a quick and comprehensive response from prepared and well-trained personnel capable of handling cyanide and other hazardous materials emergencies. This response includes a pre-planned command structure, where local fire departments have designated the operations control center as soon as they are on the scene. Finland and its well-established national security management system, with police and professional fire brigades as the main actors on the ground, can clearly be classified as an emergency organisation with highly developed capabilities. Therefore, the nature of the emergency programs of Korsu and Herman Andersson Oy is highly dependent

(because integrated) on the Finnish local conditions, which are very highly developed in terms of emergency preparedness and capabilities.

Korsu's Cyanide Driver's Manual contains, among other things, detailed descriptions on the topic of "What to do in case of problems with the truck / trailer". Under Finnish law, it is not allowed to carry out emergency operations on a private basis, but it is imperative that the police, certified public fire and rescue services, and local medical ambulances are responsible for coordinating and carrying out all emergency measures – in close cooperation with the local police. Except: very first aid without self-endangerment. Therefore, the advice to drivers in general is to call the police (national uniform number 112) and then the security manager of the Korsu base.

Herman Andersson Oy's emergency plan includes, among other things, detailed descriptions of the safety organisation's contact persons, job descriptions, emergency workflows including prevention and mitigation measures, how to deal with special risks associated with cyanide and first aid advice. But again, Finnish law does not allow emergency operations to be carried out on a private basis, but it is imperative that the police, certified public fire and rescue services, and local medical ambulances are responsible for coordinating and carrying out all emergency measures – in close cooperation with the local police. Except: very first aid without self-endangerment. Therefore, the advice to all terminal employees in general is to call the police (national uniform number 112) and then the dangerous goods safety advisor of Herman Andersson Oy

Finally, these definitions and requirements are almost irrelevant, as first responders (police, professional fire brigade) play a key role in chemical accidents, including the remediation, decontamination and disposal of spilled material – including state-regulated tendering for spilled critical material to the only Finnish disposal facility in southern Finland.

Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.5
- ☐ not in compliance with

Summarize the basis for this Finding:

CyPlus' emergency management system consists of a sum of documents, with the ERP being just one of many documents (e.g. "emergency management list"). It is necessary that all documents are kept up to date. This "staying up to date" is not driven by time, but by events. For example, a revision is carried out if necessary (e.g. the telephone number in the ER organization changes). A general time-controlled review is not planned. Most of the documents in the emergency management system are no more than a year old, especially the ERP itself (Umbrella Document Character). So far, no emergency has occurred that would have made an overhaul of the ERP necessary.

Korsus Cyanide Driver's Manual and the associated "ADR Safety Plan": same practice. Revision not by time, but by event / change.

Oulu Shipping Oy: ERP and related documents are available and subject to documentation control or auditing. There is a mix of time- and event-driven review and revision if necessary.

Both parties in CyPlus' No. 6 supply chain define provisions for conducting simulated emergency drills, although ADR regulations do not mandate regular emergency drills based on regular planning.

Korsu's approach is to conduct the annual cyanide safety training of the drivers and training on the procedures outlined in the safety report, and possibly participate in the mine and port emergency drills in the future. The latter is never easy, because the Korsu drivers are only present at the mine site for a very short time.

Oulu Shipping Oy: mock drills are planned, scheduled and carried out, also due to the requirements of ISO 14001, ISO 45001 and ISPS. The last exercise was carried out in May 2024. The next exercise is already scheduled and will take place in 2026.

B) RAIL TRANSPORT

No rail transport during Supply Chain No. 6 (from the Port of Oulu to the site of the Agnico Eagle Mine (Kittilä, Finland))

C) TRANSPORTATION BY SEA

No sea transport during Supply Chain No. 6 (from the Port of Oulu to the site of the Agnico Eagle Mine (Kittilä, Finland))

(Signature Lead Auditor Dr. Steinweg)