ICMI CYANIDE CODE
ADDENDUM AUDIT REPORT

CYANIDE TRANSPORT
SUPPLY CHAIN NO. 6
FROM CYPLUS PRODUCTION IN GERMANY BY TRUCK TO THE SITE OF THE AGNICO EAGLE MINE (KITTILÄ, FINLAND)

CyPlus GMBH
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64295 DARMSTADT
GERMANY

Submitted to:
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ADDENDUM to ICMC SAR - CyPlus Transportation; Supply Chain No. 6
from production in Germany by truck to the site of the Agnico Eagle Mine (Kittilä, Finland)

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 transportation company:

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. This supply chain has two possible starting points: either from the port of Oulu (Oulu, Finland) to the site of the Agnico Eagle Mine (Kittilä, Finland). This section connects directly to CyPlus's Supply Chain No. 1, which starts at the production site in Wesseling and leads to the port of Oulu (Oulu, Finland). Or alternatively, starting from CyPlus' production site in Wesseling (Germany) by truck to the site of the Agnico Eagle Mine (Kittilä, Finland). This second, alternative transport route is justified by the present report: the transporter used is the dangerous goods transporter Maintrans Internationale Spedition GmbH. This transporter and the route it uses will be included in the ongoing supply chain No. 6 by means of an addendum.

This addendum report only deals with the additions to the report, which is still valid. Otherwise, the basic report (published on the ICMI webpage on 16.09.2025) continues to apply unchanged.

The company "Maintrans Int'l Spedition GmbH" was founded in its present form in 2006. It comprises approx. 200 vehicles and approx. 500 employees. In addition to the driving services, other logistical services are also provided, e.g. storage and order picking. The customer structure is mainly focused on the chemical industry. Therefore, many vehicles are equipped according to European ADR regulations and many drivers are qualified according to the same regulations.

The company itself is certified according to ISO 9001:2015, ISO 14001:2015 and SQAS (Overall score of the company: 81%), among others. The documents, procedures and procedures required from ICMC's perspective are integrated into these management methods.

The central depot of the company Maintrans Int'l Spedition GmbH is located in "Am Weiher 8, 63505 Langenselbold, Germany". The tractors and trailers are located there, unless they are on the road for transport orders.

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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. 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 extends across various supply chains. All ICMC-certified CyPlus supply chains are listed on the http://www.cyanidecode.org-Webseite.

Supply Chain No. 6 includes the section from the Port of Oulu (Oulu, Finland) to the site of the Agnico Eagle Mine (Kittilä, Finland) and, alternatively, the route starting from CyPlus' production site in Wesseling (Germany) 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 the shipper. 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:

(At this point, reference should be made to the identical chapter in the valid Basic Report on the existing Supply Chain No. 06. The participants No. 1 to 5 named there are still active in their respective roles).

(6) Part No. 6 of Supply Chain No. 06: The freight forwarder Maintrans Int'l Spedition GmbH coordinates and operates the truck transport of cyanide from the cyanide production site in Wesseling, Germany to the Kittilä mine, Finland.

(7) Part 7 of Supply Chain No. 06: The freight forwarder Bendel Transport GmbH (as a subcontractor for Maintrans) can also carry out the truck transport of cyanide from the cyanide production site in Wesseling, Germany to the Kittilä mine, Finland on behalf of Maintrans. The dangerous goods freight forwarder Bendel Transport GmbH is intended to serve as a backup service provider to ensure fully on-time delivery, including and especially during periods of high capacity utilization. Bendel is fully integrated into Maintrans's quality and safety system. The company is contractually obligated to comply with all relevant requirements of the ICM Code for Carriers.

(8) Part No. 8 of the supply chain No. 06: Maintenance company Scania Vertrieb und Service GmbH, Sprendlinger Landstraße 26, 63069, Offenbach, Germany.

As part of the Addendum audit, all three players mentioned above were inspected. Interviews were conducted with the partners and employees involved, inspections of IT systems and document reviews were carried out.

In order to verify the statements of the parties involved, complete shipments of sodium cyanide from the CyPlus cyanide production facility to the mine site were checked against documents, records and evidence.

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Determination of the auditor

This process is

- ☒ in full agreement
- ☐ in substantial compliance *(see below)
- ☐ non-compliant

with the International Cyanide Management Code.

* 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.

Auditing company	LULU Intelligent Organization
Head of the Audit Team	Dr. Benno Steinweg
E-mail.....	Benno.Steinweg@hs-kempten.de
Names / signatures of other auditors	n/a
Date of the audit	28. April 2026

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 Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the 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.

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Note:

This report is an addendum report to a Basis Report (CyPlus Supply Chain No. 06; published from ICMI's webpage, valid until 15 Sep 2028). Therefore, the following presentation of the audit results and assessment will only deal with the expansion of the supply chain as described in the above-mentioned chapter "Location and description of the transportation company".

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 process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 1.1
- ☐ not in accordance with

Summarize the basis for this insight:

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. Maintrans Int'l Spedition GmbH – the transport company involved – documents the risk mitigation measures that are taken when specific risks are identified as part of the road assessment process. The mentioned process provides detailed advice regarding the periodically conducted re-evaluation and selection process. CyPlus does not commission this selection process, but organises and carries it out in cooperation with the transport company "Maintrans Int'l Spedition GmbH".

The road evaluation and route selection, starting in the production of cyanide at CyPlus in Wesseling (Germany) and ending at the mine site, showed that alternatives were also evaluated. Possible scenarios must be taken into account (e.g. bad weather or storms in the area of the North Sea and Baltic Sea) and must be evaluated.

In close cooperation with CyPlus, the transport company "Maintrans Int'l Spedition GmbH" contacted relevant local authorities 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 EU law, it is not allowed to carry out emergency operations on a private basis, but it is imperative that certified public fire and rescue services are involved in the coordination and implementation of 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 process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 1.2
- ☐ not in accordance with

Summarize the basis for this insight:

The transport company "Maintrans Int'l Spedition GmbH" uses only trained, qualified and ADR-licensed drivers for the operation of its hazardous goods trucks. All current drivers are generally fully qualified and certified for cyanide transport. 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 sealed at CyPlus' manufacturing plant in Germany and only opened at the mine by the responsible employees of the mine. Therefore, the drivers never come into contact with the filled wooden crates inside the transport containers.

Training courses are carried out on the basis of defined procedures (e.g. dealing with emergency situations). 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 (especially the drivers) 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 persons and their respective training obligations as well as the fulfilment of these obligations were available.

If action needs to be taken by drivers during transport due to leaks, spills or fires, the instructions in the "Driver's Manual" (ADR "written instructions") must be followed immediately. In this particular case, the external emergency services such as the police and the local fire brigade must be informed. A communication sequence is established for emergencies, it has been practiced and is consistent.

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 process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 1.3
- ☐ not in accordance with

Summarize the basis for this insight:

CyPlus as an organization does not physically transport cyanide by truck on the road. But their subcontractor "Maintrans Int'l Spedition GmbH" does. The means of transport owned by Maintrans (trucks and trailers) are usually as good as new with a low average age. 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 the intended loading capacity of the facility. There are several maintenance scenarios: (1) pre-transport and post-transport 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 recognised and accredited technical monitoring body for the safety of transport facilities. Maintenance schedules are visible using controlled documents. The trucks and the corresponding tools, technical equipment and trailers are maintained in such a way that they function within the loads they handle. Maintrans only uses its own trucks. The use of heavy-duty trucks ensures that there is no overload.

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

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 1.4
- ☐ not in accordance with

Summarize the basis for this insight:

The company Maintrans Int'l Spedition GmbH operates a security program. It has been in operation for a long time and is primarily geared towards the transport of dangerous goods and transports with high safety requirements (e.g. food industry). Taking into account the input of CyPlus, the safety program was expanded in 2025 to include the transport of cyanides and the corresponding requirements of the ICMC. The safety program refers, among other things, to the driver's manual, which also maps aspects of an emergency response plan. 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 safety program includes a procedure to maintain the integrity of manufacturers' primary and secondary packaging.

The driver's manual indicates the maximum service time of the drivers. It includes a section on drug, medication, 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.

Other standard operating procedures are available that address the topics of modification of transport caused by unexpected incidents, prevention of cargo displacement during all handling activities, labeling in accordance with international CLP requirements, and carrying out preventive and reactive maintenance activities (through contracted workshops or OEM-approved workshops). The records of the evidence demonstrating the functioning of the safety program are archived in accordance with the general standard operating procedures. The security program is administered in accordance with the rules of ISO 9001 or 14001 (there: Chapter 7.5).

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

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 1.5
- ☐ not in accordance with

Summarize the basis for this insight:

This section is irrelevant because there is no sea transport within the supply chain.

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

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 1.6
- ☐ not in accordance with

Summarize the basis for this insight:

The driver's manual contains detailed and strict regulations on communication with mobile phones. This is based on CyPlus' requirements set out in its emergency 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 (Maintrans uses Yellowfox and plans to add more functions to the system in the course of the year) is used, so that every participant with login approval can see the position of the truck - and also: engine on/off status of the truck, loaded, unloaded, speed in real time, etc.

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 evaluation, as it can be checked in the route evaluation of the selected route. From DE, DK and S to FIN, 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, Germany and Scandinavia have a very high coverage of mobile phone functionality, especially in the regions where the cyanide transport route is located.

The container is sealed at CyPlus' production site in Germany, and the seal is only broken by mine personnel upon arrival at the mine site. Each cyanide shipment is accompanied by a bill of lading, a pre-trip checklist, a freight forwarder's invoice, an order, and a cyanide driver's manual – specific to each driver. The current NaCN MSDS is always part of the documentation as it is part of the driver's manual. Bill of lading, checklist, invoice, and order contain the information about the gross weight.

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.

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 2.1
- ☐ not in accordance with

Summarize the basis for this insight:

During the entire route from Germany via Denmark and Sweden to Finland, no intermediate storage is carried out. The truck with the cyanide material drives the entire route (including the breaks required by law). The drivers spend several nights on the route at predetermined overnight accommodations. The drivers spend the night in their trucks, which are equipped for this purpose in accordance with national workplace regulations. The trucks are parked in such a way that access to the doors of the trailer or container is not possible – if this is feasible. Therefore, questions No. 1 to 6 of Transport Practice 2.1 are not relevant for the new carrier Maintrans Int'l Spedition GmbH and its route.

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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.

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 3.1
- ☐ not in accordance with

Summarize the basis for this insight:

As defined in the ICMI Auditor's Guide *to 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 or ICE – Intervention in Chemical Transport Emergencies in Europe). A single phone call is enough to trigger a quick and comprehensive response by prepared and well-trained personnel capable of handling cyanide and other hazardous materials emergencies. This response includes a pre-planned command structure, with local fire departments coordinated by a professional operations control center.

The Scandinavian countries and the respective established national security management systems with police and professional fire brigades as the main actors on the ground can be clearly classified as an emergency organisation that corresponds to the highest degree of highly developed capabilities. Therefore, the type of emergency programs of dangerous goods carriers navigating these countries is highly dependent (because integrated) on local conditions, which are very highly developed in terms of emergency preparedness and capabilities.

The driver manual and route evaluation of Maintrans Int'l Spedition GmbH takes into account all aspects of the 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 bodies of water and tunnels). 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.

The emergency scenarios, the general emergency instruction and the scenario-specific instructions of "Maintrans Int'l Spedition GmbH" take into account the solid state of the cyanide and its incompatibility with water and other substances. The alarm system in an emergency has been described, is trained again and again and is robust.

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

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 3.2
- ☐ not in accordance with

Summarize the basis for this insight:

The company Maintrans Int'l Spedition GmbH has nominated special personnel for emergency response and sufficient training resources are provided for emergency response.

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Maintrans's ISO 9001 and ISO 14001 management system requires specific processes and specifications to designate responsibility for responding to emergencies during the transport of dangerous goods, as well as an effective organization that is reliable and effective in terms of emergency response.

The company Maintrans is fully integrated into an emergency organization consisting of government agencies such as the police, professional fire brigades, etc. Therefore, an independent emergency organization is almost not necessary, because based on the call of a dangerous goods driver, the state emergency organization functions almost completely independently of the company Maintrans. Nevertheless, there is an internal organization at the company that supports this emergency response. This includes the Quality Management Officer, who ensures that emergency response processes are defined and updated. Furthermore, there are dispatchers at the company who are available 24/7 for the drivers as first reporters. Furthermore, the head of the organization is also available as a contact person 24/7. These persons are responsible for the processes of the emergency organization from the time they receive an emergency call from the drivers. However, these processes largely consist of recording the driver's first call, forwarding this information to the professional emergency services and then being available as an information provider for the operational emergency organizations.

A German association (specialising in logistics and dangerous goods transport) is engaged as a specialist in the handling of dangerous goods, which conducts dangerous goods-specific training for the respective persons and functions (especially the drivers). This training is also derived from CyPlus' current 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.

Full ADR equipment is required for cyanide transport. Truck drivers must check their equipment before each cyanide transport. This is prescribed in the driver's manual and documented in a checklist that is used in each individual dangerous 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, the company must have an emergency kit in every dangerous goods transporter.

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

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the
- ☐ not in accordance with

Transport Practice 3.3

Summarize the basis for this insight:

Maintrans Int'l Spedition GmbH operates certified management systems in accordance with ISO 9001, 14001 and SQAS. These systems require specifications and relevant documents or information to be up-to-date. For example, Maintrans's procedure requires that the validity of telephone numbers be routinely checked. The company has 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.

This procedure is described in detail in the driver's manual. 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 list of telephone numbers (police, medical assistance, Maintrans security manager 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 about 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.

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

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 3.4
- ☐ not in accordance with

Summarize the basis for this insight:

In Germany, Denmark, Sweden and Finland, there are no plans to carry out remediation measures 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 direct the operation on the ground once they are on the scene. The countries mentioned and the respective established national security management systems with police and professional fire brigades as the main actors on the ground can be clearly classified as an emergency organisation that has highly developed capabilities. Therefore, the nature of Maintrans's emergency programs is highly dependent (because integrated) on the respective local conditions, which are very sophisticated in terms of emergency preparedness and capabilities.

The driver's manual contains, among other things, detailed descriptions on the topic of "What to do in case of problems with the truck / trailer". EU 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 response – in close cooperation with the local police. Except: very first aid without self-endangerment. Therefore, drivers are obliged to call the fire brigade (EU-wide uniform telephone number 112) and then the security manager of the Maintrans base.

Finally, these company-specific (here: Maintrans) 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.

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

This process is
- ☒ in full compliance with the
- ☐ essentially in accordance with the Transport Practice 3.5
- ☐ not in accordance with

Summarize the basis for this insight:

CyPlus' emergency management system consists of a sum of documents, with the ERP being only 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.

Maintrans's driver's manual as well as applicable documents and regulations: same practice. Revision not by time, but by event / change. Maintrans defines provisions for the conduct of simulated emergency drills, although ADR regulations do not require regular emergency drills based on regular planning.

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

B) RAIL TRANSPORT

No rail transport during the No. 6 supply chain

C) TRANSPORTATION BY SEA

No sea transportation during supply chain No. 6

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