

**ICMI CYANIDE CODE
SUMMARY AUDIT REPORT
CERTIFICATION AUDIT**

**CYANIDE TRANSPORTATION
SUPPLY CHAIN #9 - EGYPT SUPPLY CHAIN**

**CYPLUS GMBH
DEUTSCHE TELEKOM – ALLEE 9
64295 DARMSTADT
GERMANY**

**Submitted to:
International Cyanide Management Institute
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Location detail and Description of operation:

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 focuses on Supply Chain No. 9, which begins at the port of arrival in Alexandria, Egypt, and extends to the final destination in Egypt, the Sukari Gold Mine (SGM) located in the southwest of the country. This supply chain exclusively involves road transportation via trucks.

Note: The segment from Germany to the port of arrival in Alexandria, Egypt, is not part of Supply Chain No. 9 but belongs to CyPlus's ICMC-certified Supply Chain No. 1.

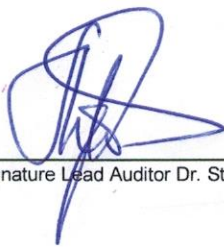
Supply from the production site to the customers / mines

CyPlus's production site in Wesseling, Germany is ICMC-certified and registered since July 24, 2006 with no suspension since then. From Wesseling site the cyanide is shipped to mines all over the world by using SLS¹ containers or containers including 20 wooden boxes. The CyPlus company also acts as a consignor for cyanide transportations. This report is focusing on the Supply Chain #9.

Involved transportation companies in supply chain # 9

Party No.	Name, Address	Function within supply chain # 9
1	TransGlobe Logistics 55 Cairo–Alexandria Desert Rd. Abu El Matamir Beheira Governorate Egypt	Truck Transportation of the cyanide containers from the port to the mine site

¹ also called Isotainer or Iso Tank



(Signature Lead Auditor Dr. Steinweg)

2	Tahya Misr Terminal Unnamed Road Ad Daerah Al Gomrokeyah Governorate 5321001 Alexandria, Egypt Coordinates: 31.1866, 29.8727	Port terminal activities (Transport, storage, loading, unloading etc.)
3	Transportation Management Center 55 Cairo-Alexandria Desert Rd. Abu El Matamir Beheira Governorate Egypt	Maintenance of TGL's trucks and trailers, safety trainings for drivers
4	El-Fiky Corporation El Wezaraa Square 1164 Bldg. 14, App. 1 Sheraton Heliopolis Heliopolis Cairo, Egypt	Acts as representative of CyPlus GmbH in Egypt.

Short description of location detail and description of operation:

The Supply Chain No. 1 of CyPlus GmbH (not subject to the present report) delivers the containers to the port of Alexandria. Supply Chain No. 9 of CyPlus GmbH commences once the containers are lifted from the ship onto trailers and ends with the delivery to the customer Sukari Gold Mines. Transport company TGL, subcontracted by CyPlus GmbH, is responsible for transporting the containers by road from the port of Alexandria to the customer's SGM gold mine site near the city of Marsa Allam, Egypt.

The containers are mainly transported in escorted convoys to the mine and are only opened upon arrival at the mine site by authorized mine personnel.

Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

* For cyanide production operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company	LULU Intelligent Organization
Audit Team Leader	Dr. Benno Steinweg
Email	<u>Benno.Steinweg@hs-kempton.de</u>
Names / Signatures of other auditors ...	n/a
Date of audit	April 16 - 17, 2024

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.

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, has subcontracted TGL supported by. El-Fiky Corporation, CyPlus's representative company in Egypt, assists in planning the transports from the port to the mine, as well as in overall Emergency Response Planning (ERP) management in close coordination with CyPlus GmbH.

All parties are obligated to meet CyPlus's quality and HSE (Health, Safety, Environment) requirements according to service level agreements. This subcontracting scheme is clearly defined in CyPlus's ERP. Within this ERP, there is a process for selecting transport routes to mitigate potential risks related to accidents and releases. Factors considered include population density along potential routes, infrastructure installations (e.g., bridges, road foundations, etc.), rivers, the Suez Canal region, the Red Sea, ponds, and water in general.

The entire transport route from Alexandria port, Egypt, to the Egyptian mine site is clearly defined. Potential risk scenarios are defined and must be considered during transport execution; advice on how to respond to identified risks is provided. The process of "Route Selection" is clearly defined and implemented. During road risk assessment and route selection, input from communities, police, public agencies, and other interested parties (including the military in Egypt) is required to gather all necessary information for risk assessment.

The route selection and evaluation process follows a CyPlus MS Excel-based form, which mandates the definition and implementation of measures to address risks along each segment of the selected route. Routinely, after each transport, a standardized feedback form is completed to report issues, changes, etc., related to the current route. Annually or following a planned change, a periodic reevaluation is conducted during a management review process in cooperation with El-Fiky; corresponding results are discussed and shared with CyPlus. This collaboration also involves authorities as needed.

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 Transport Practice 1.2
 not in compliance with

Summarize the basis for this Finding:

As described in Transport Practice 1.1, transport activity is subcontracted to various parties, specifically to the road transporter in Egypt, Transport Global Logistics (TGL), and the emergency response service provider El-Fiky Corp., who also acts as CyPlus' representative in Egypt. The involved transport and handling companies (including the Port of Alexandria) employ only trained, qualified, and licensed drivers/operators to operate the respective equipment (e.g., TGL's trucks). This is essentially required in CyPlus' ERP and in the service level agreement between the parties. The qualification requirements focus on both routine activities during normal operations and actions/behavior in emergency situations. Special training is planned, scheduled, and executed.

Operating personnel are not required to perform any handling activities with cyanide but only transport activities and handling activities with originally closed containers. The training focuses on scenarios and potential incidents and accidents. Exercises are routinely performed, such as the simulation of spills and the respective response to them. The documentation at the involved companies shows the training history and the respective effectiveness checks of the training. This is supplemented, for example, by specific Egyptian re-qualification documentation for truck drivers, which is mandatory.

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

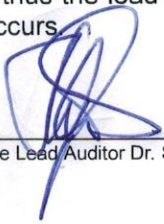
This operation is in full compliance with
 in substantial compliance with Transport Practice 1.3
 not in compliance with

Summarize the basis for this Finding:

TGL is qualified by local authorities for the transport of hazardous goods and has been audited by CyPlus in accordance with the requirements for transport cyanides formulated by CyPlus GmbH.

Various maintenance scenarios for the equipment (including trucks and trailers) are planned: (1) Inspections before and after each transport, documented in each individual transport folder/documentation. (2) Scheduled routine technical inspections and minor standard maintenance activities, as well as routine maintenance by external workshops specialized in the respective truck brands and mostly certified by the respective truck manufacturers. The trucks and the respective tools, technical equipment, and trailers are obviously maintained to operate within the loads they are handling.

The transportation company TGL has procedures in place to verify each individual transport weight. Nonetheless, they use only suitable heavy-duty platform trailers that are (more than) sufficient for the typical load they must carry. The transportation company TGL uses trucks for cyanide transport on transport route No. 9. No ferries, barges, or other means of transportation are used. No unloading/reloading activities are performed by the transportation company. The container, once loaded by CyPlus in Germany, will not be opened, and thus the load amount will not be changed. The use of heavy-duty trucks ensures that no overloading occurs.



(Signature Lead Auditor Dr. Steinweg)

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 Transport Practice 1.4
 not in compliance with

Summarize the basis for this Finding:

The containers are sealed at the CyPlus production facility in Germany and are only opened again at the mine. 9. Egyptian and EU transport regulations regarding marking and placarding are followed. A checklist is completed before the trip—starting at the port of Alexandria, Egypt—for the truck and trailer before the vehicle is loaded with the cyanide containers. The Preventive Maintenance (PM) policy states that preventive maintenance is performed on each vehicle. PM tasks are clearly identified, scheduled, and followed. These tasks are outlined in each scheduled maintenance system of the truck manufacturer's manual.

The management system of the involved transportation company TGL specifies, in accordance with local regulations, the maximum working hours for the drivers. This includes a section on drug and alcohol policy. The policy includes specific statements on drug and alcohol consumption, testing, use of drugs and alcohol on company premises or while driving, and the consequences of positive test results. It is notable that TGL employs a medical doctor on their premises to monitor the health status of all drivers. The policy also covers random tests and searches. The policy and the company recognize alcohol and drug dependence as a treatable condition and provide appropriate support and assistance within the bounds of the policy.

Standard operating procedures are available, covering topics such as modifying transport due to unexpected incidents, preventing load shifting during all handling activities, etc. Records of evidence demonstrating the operation of the safety program are archived according to the general document control standard operating procedure and were always readily available to the auditor.

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

This operation is in full compliance with
 in substantial compliance with Transport Practice 1.5
 not in compliance with

Summarize the basis for this Finding:

Throughout the entire route of Supply Chain No. 9 in Egypt, no transport by sea occurs. The route begins at the port of Alexandria, Egypt, the moment the containers are unloaded from the arriving ship. Therefore, Transport Practice 1.5 is not relevant.

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

This operation is in full compliance with
 in substantial compliance with Transport Practice 1.6
 not in compliance with

Summarize the basis for this Finding:

Communication along the entire supply chain– is ensured by each participant in the supply chain. Communication with and between TGL vehicles during road transport in Egypt in the cyanide convoy is also carried out using mobile phones and satellite phones (as a backup method) as well as internet-based monitoring of location and selected vehicle conditions. All communication equipment is tested prior to the convoy's departure. Drivers do not use communication equipment while driving. The responsible safety officer of TGL communicates with the convoy leader (who does not drive) and the escort vehicle from El-Fiky Corp. The convoy managers have all relevant phone numbers to communicate with the TGL headquarters and the appropriate emergency responders and services along the convoy route. An up-to-date phone list is part of the ERP and equipment documentation in each vehicle of the convoy.

The Road Assessment SOP requires identifying potential blackout areas regarding the functionality of communication equipment

Drivers have the shipping documentation, including the waybill, with them at all times during transport. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment is consistently entered onto the waybill by the shipper. Drivers also have the sodium cyanide safety data sheet and emergency response guides with them during deliveries.

PRINCIPLE 2 – INTERIM STORAGE

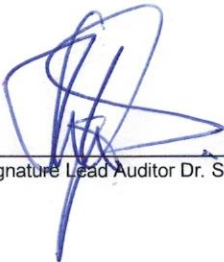
Design, construct and operate cyanide interim storage sites to prevent releases and exposures

Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

This operation is in full compliance with
 in substantial compliance with Transport Practice 2.1
 not in compliance with

Summarize the basis for this Finding:

It has been determined that within the entire supply chain route No. 9, the requirements of Transport Practice 2.1 are not relevant.



(Signature Lead Auditor Dr. Steinweg)

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

Summarize the basis for this Finding:


Local transports in Egypt for Supply Chain No. 9 are organized by CyPlus' partner, El-Fiky Corp., and physically executed by the transport company TGL. This collaboration is coordinated with CyPlus. These companies specialize in handling dangerous goods and their transportation. Together with these main contract partners, emergency response planning along Supply Chain No. 9 is defined. CyPlus verified this during prequalification and due diligence audits (partners have security systems for adequate emergency management systems), and in the case of TGL, emergency requirements were established according to CyPlus' standards.

The local Egyptian transport company TGL has implemented an Emergency Response Plan (ERP) in conjunction with El-Fiky Corp. (emergency service provider). This detailed document includes the organization of the emergency response team, a directory of emergency phone numbers, guidelines for communication channels, emergency scenarios, and instructions for handling specific and general emergency situations.

The ERP considers all aspects of the transport infrastructure, with particular attention to road assessments focusing on specific conditions of routes and related installations (e.g., bridges over water, poor road conditions, etc.). The plan also takes into account the design of transport vehicles, specifying minimum load requirements for container trailers and special adaptation points for fixing various container bottom designs.

The ERP includes descriptions of response measures appropriate for anticipated emergency situations. Trainings are conducted covering these scenarios. The plan also details emergency procedures, phone numbers, and the individuals/functions to be involved in emergencies, spills, etc., as well as addresses of various entities (military, police, hospitals, mayors of different communities along the route, etc.). During the Egyptian road segment of Supply Chain No. 9, all these response measures are actively supported by El-Fiky Corp. (contracted by CyPlus).

The plan identifies the roles of external responders, medical facilities, and communities in emergency management processes/cases. The emergency alerting system is described, defined, and regularly checked and trained.



(Signature Lead Auditor Dr. Steinweg)

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 Transport Practice 3.2
 not in compliance with

Summarize the basis for this Finding:

Emergency response trainings are offered to all involved parties' respective personnel. Driver training requirements include information on how to respond to emergencies, as well as specific training on the product cyanide. The training plans follow concepts that are also based on CyPlus' requirements.

Descriptions of specific emergency response duties and responsibilities of personnel along Supply Chain No. 9 are detailed in El-Fiky Corp.'s documentation. This documentation is subject to El-Fiky Corp.'s quality and HSE system and has been reviewed by CyPlus as part of due diligence audits and contractual agreements. According to this arrangement, control over the above-mentioned processes (especially training) and accompanying documents is exercised to ensure that each involved party can consistently meet the requirements.

There is a list of all emergency response equipment that must be available during road transport and along the transportation route. El-Fiky Corp., the emergency service provider (contracted by CyPlus), is responsible for maintaining the correct and complete list and ensuring that the defined equipment and materials are fully operational and available. The emergency kit includes all necessary items according to the Code and the corresponding legal requirements in Egypt

Vehicle operators receive initial and periodic refresher training in emergency response measures, including implementation of the emergency plan, as relevant. TGL – in collaboration with El-Fiky Corp. – has established a system of initial and refresher training that takes into account individual training and experience backgrounds. TGL's sister company (Transport Management Center) consolidates all relevant trainings for TGL and conducts these trainings with appropriate instructors specifically relevant to the transport of cyanides for the drivers.

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

This operation is in full compliance with
 in substantial compliance with Transport Practice 3.3
 not in compliance with

Summarize the basis for this Finding:

El-Fiky Corp.'s ERP (derived from CyPlus guidelines) includes a communication process description that ensures complete information sharing among all involved parties in case of emergency. This includes, among other aspects, lists of members of the internal response team (including manufacturer CyPlus, El-Fiky Corp., the mine site, and TGL) as well as external emergency responders (military, police, fire department, hospitals, authorities, etc.) along the supply chain. Emergency notification and reporting procedures, especially communication with ICMI, are also part of CyPlus's emergency response plan and are included in the derived ERPs of partners along the supply chain.

The corresponding documentation is governed by El-Fiky Corp.'s quality and HSE system. Changes in this regulatory documentation are fundamentally coordinated with CyPlus. Under this regulation, control of the mentioned documents is conducted to ensure that each involved party always possesses the



current version of the documentation. This is also regularly verified during internal audits.

Transport Practice 3.4: Develop 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 Transport Practice 3.4
 not in compliance with

Summarize the basis for this Finding:

Descriptions of specific emergency tasks and responsibilities of personnel are precisely defined. Measures and actions during a spill are detailed and prescribed. Methods for decontaminating the environment/spill are described, such as preventing the spread and entry of spills into waterways, sewers, basements, or enclosed areas.

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

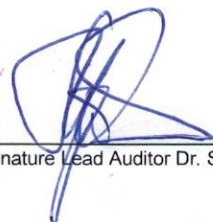
This operation is in full compliance with
 in substantial compliance with Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding:

The required provisions for the regular review and evaluation of TGL / EI-Fiky Corp.'s ERP are clearly defined and mandated (at least once per year or driven by events). In conjunction with a potential adjustment or change, all other corresponding response procedures and requirements must be adapted (e.g., appendices, attachments, and/or forms of TGL / EI-Fiky Corp.'s ERP or instructions from TGL within their Quality and HSE system). Examples of change requests arising from events have been reviewed. In the event of an incident, an entry in the order folder would potentially trigger an update of the emergency plans of the various parties.

Provisions for the regular conduct of emergency drills have been established. The respective content of the drills is defined by CyPlus. The training concept aims to involve all relevant parties, especially the mine site, which organizes and conducts its own trainings with a high degree of quality and practical orientation. It is planned and scheduled to conduct emergency drills at least once a year, also in close cooperation with the mine site.

The revision system of TGL / EI-Fiky Corp.'s ERP is defined. It is required to conduct revisions annually or as triggered by events. Revisions or recommendations are to be implemented accordingly. It is also planned to conduct regular management reviews and performance evaluations of the plan itself.



(Signature Lead Auditor Dr. Steinweg)