Due Diligence Investigation

Mersin International Port, Mersin, Turkey

Cyanco USA

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CONFIDENTIALITY

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PROJECT TEAM MEMBERS

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INTRODUCTION

Cyanco Corporation is a global leader in mineral extraction chemicals for the gold and silver industries. The company, headquartered in Sugar Land, Texas, operates production facilities in Alvin, Texas and Winnemucca, Nevada while maintaining distribution centres in Cheyenne, Wyoming, Cadillac, Quebec, Canada and Hermosillo, Sonora, Mexico.

Cyanco is a signatory to the International Cyanide Management Code (ICMC) since 2013. In 2023, it maintained three (3) distinct and certified supply chains:

- Global Ocean Supply Chain;
- North American Rail & Truck Supply Chain, and;
- Western U.S. Supply Chain.

The North American Rail & Truck and the Western U.S. Supply Chains involve transport across the US including Alaska, Canada and Mexico by way of rail and trucks via ports and barges. The Global Ocean Supply Chain is supported by shipment from the port of Houston, Texas to international ports including Callao, Peru; Caucedo, Dominican Republic; Cortes, Honduras; Nouakchott, Mauritania and Tema, Ghana. The Global Ocean Supply Chain was first certified in March 2016 and was recertified in June 2022.

Cyanco is pursuing international business growth opportunities worldwide. Lately, Cyanco shipped solid sodium cyanide in Turkey which triggered the need to conduct a due diligence investigation for port facilities to comply with ICMC practice. To ensure compliance with ICMC requirements, Cyanco USA mandated Terrapex's auditor, Mr. Jean-Marc Leger, to conduct a due diligence investigation for the Mersin International Port (MIP) in Mersin, Turkey.

The due diligence investigation involved a site visit performed by Mr. Leger, accompanied by Cyanco Turkish sales representative, Mr. Oğuz Türe, on January 25th, 2024. The site visit included interviews with MIP representative Mr. Ozan Güler, Sales and Marketing Specialist and Mr. Alper Yilmaz, Health Safety Security Environment & Emergency Response Senior Specialist. Prior to undertaking the due diligence investigation, Mr. Leger contacted ICMI's senior vice president, Mr. Eric Schwamberger, to discuss the due diligence investigation process in a Turkish port context.

The due diligence investigation approach followed by the ICMI auditor respected the "*Guidance for use of the cyanide transportation verification protocol*" recommendations. Of particular interest is the following guidance:

"Supply chain components, in particular rail carriers, ports, and shipping lines, are not audited in the same manner as truck transporters and supply chain consigners.

Full Code audits are not required for rail lines and rail terminals, shipping lines, or ports due to security issues, limited access, and the inability of consigners to affect changes in the operating practices of these transport operations.

Rather than conduct Code audits of these entities, a Due Diligence Investigation must be conducted and documented for each rail carrier, shipping company, and port facility included in the supply chain. The Due Diligence Investigations must be documented in a written report generated by the consigner or by an auditor meeting ICMI requirements for a transport technical expert auditor.

If the Due Diligence Investigation is conducted by the consigner, the Due Diligence Investigation report must be reviewed by an auditor meeting ICMI requirements for a transport technical expert auditor, and the auditor must conclude that the consigner's Due Diligence Investigation reasonably evaluated the facility. Due Diligence Investigations must be conducted on a three-year cycle and should include an inspection of each transport component of a supply chain, with the recognition that access to marine shipping, ports, and rail facilities may be limited.

However, the provisions of Transport Practices 1.2 through 1.6, 2.1 and 3.1 through 3.5 of this Transportation Guidance can be applied in full or in part to rail transport, sea transport, and port activities as a guide for Due Diligence Investigations.

A summary of the Due Diligence Investigation report for each supply chain component must be included in both the Detailed Audit Findings Report and the Summary Audit Report. Each Due Diligence Investigation report must conclude that the rail carrier, shipping line, port, or other supply chain components can safely manage cyanide, based on the Due Diligence Investigation or that, to the extent practical, the consigner has implemented any necessary management measures to ensure the safe management of cyanide by the supply chain component. "

DESCRIPTION OF OPERATION

The Mersin International Port (MIP) is the 92nd largest container terminal in the world and one of the largest ports in Turkey and the East Mediterranean region. With a nearly 2.6 million 20-foot equivalent unit (TEU) container handling capacity, MIP is connected via railways and highways with Turkey's industrialized cities. Due to its location at the centre of the main east-west and north-south routes, MIP serves its hinterland as the crucial logistics hub connecting Turkey with the Far East, Africa, Europe, and the Americas.

Operated by the Turkish Republic State Railway (TCDD) until 2007, MIP is now managed through a partnership between Turkey's Akfen Holding, Singapore's PSA International and Australia's IFM Investors. PSA, the port operator, has an international port management network around the globe and is one of the leader port operators in the world. PSA's Singapore Terminals are among the world's largest transhipment hub. IFM Investors is an Australian infrastructure fund management company. It is a global investment management company with capabilities across debt investments, infrastructure, Listed Equities and Private Equity. Akfen Holding, which has started its activities in 1976, operates primarily in the fields of airport and seaport investment and management, as well as energy and various infrastructure investments and development of real estate investment projects.

In addition to providing primarily container services, MIP also offers dry and liquid bulk, Ro-Ro (Roll on - Roll Off), general cargo, project cargo, CFS (Container Freight Services) services and passenger services as well as pilotage and towage services in the region except for liquid bulk petroleum and derivatives. The container terminal includes full IMDG (International Maritime Dangerous Goods) container services. MIP has 6 lane railways inside the port yard as well as operating length of 700 metres. Five (5) MIP berths are connected to the railway lane system. With this infrastructure, MIP is the largest port in Turkey with the capacity to provide all port services in the same port area.

The MIP extends over 112 hectares with 21 berths. Total berth length is 3,370 metres. Average depth at berth is 15.8 metres. Maximum vessel capacity is 18,000 TEU. MIP relies on eleven (11) SSG (Ship-to-Shore Gantry) cranes, 38 RTG (Rubber Tire Gantry) cranes, five (5) MHCs (Mobile Harbour Crane), 101 terminal truck trailers, 18 reach stackers, 12 ECH (Empty Container Handler) and several other types of mobile equipment including forklifts, mini-loaders and dry bulk cranes (2018 data).

MIP terminal is certified under the ISPS Code (International Ship and Port Facility Security) under level 1, the level for which minimum appropriate protective security measures shall be maintained at all times (certificate number 0933093). The certification is conducted by the Republic of Turkey Ministry of Transport, Maritime Affaires and Communications. The terminal is considered a high-

security facility by the Turkish authorities and as such has a permanent local police and customs presence.

The perimeter of the terminal is fenced. The fence is composed of a concrete base, followed by a metal works structure topped with barbed wire. According to MIP documentation, over four hundred (406) CCTV cameras are installed to ensure no area of the terminal is blacked out. Security of MIP is ensured by 24/7 access to operations via tablets, smart phones, and personal computers through Terminal Operating System (TOS). Entries and exits are restricted through the use of biometric identification cards enabling entrance only to the authorized personnel. Live transfer of port operations to customers' systems through EDI (Electronic Data Infrastructure) system. MIP is certified under ISO 9001 (in 2020), ISO 14001 and ISO 45001 (in 2019 and OHSAS 18001 since 2017) standards. It also implemented management processes aligned with ISO 27001 in 2022 (ref. information security management system).

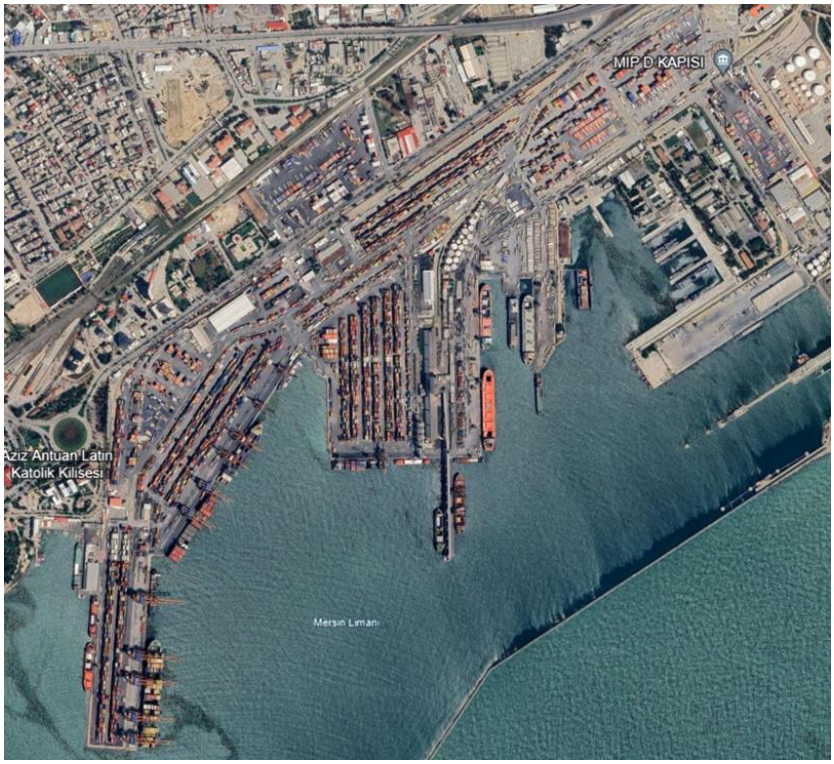
Finally, MIP is undertaking a port expansion project (ref. EMH_2) which when completed will prolong berth by 380 and increase container storage handling from 2,6 to 3,6 TEU and ensure a greater water depth enabling post-Panamax vessel to consider Mersin Port.

Location details

FIGURE 1 Geographic view

REFERENCE: RAND MCNALLY

FIGURE 2 Satellite view



REFERENCE: GOOGLE EARTH

FIGURE 3 Aerial view 1

REFERENCE: MERSIN MIP PRESENTATION 2024

Mersin International Port (MIP) personnel contacted

- Mr. Ozan Güler – Sales Specialist
- Mr. Alper Yilmaz– Health – Safety – Security - Environment & Emergency Response Senior Specialist

AUDITORS' FINDING

The operation:	Can manage safely cyanide containers has implemented measures to safely manage cyanide.
Audit Company:	**Auditex HSE Inc., a subsidiary of Terrapex Environmental Ltd.** 3615 A, Isabelle Street Brossard, Quebec, Canada
Auditor:	Jean-Marc Léger e-mail: jean-marc.leger@terrapex.ca
Date(s) of Audit:	25 January 2024

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute for Code Verification Auditors. I attest that this Due Diligence Investigation report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Transportation Verification Protocol as applicable, and using standard and accepted practices for health, safety and environmental audits.

1.0 TRANSPORT PRACTICE

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

1.2 TO ENSURE THAT PERSONNEL OPERATING CYANIDE HANDLING AND TRANSPORT EQUIPMENT CAN PERFORM THEIR JOBS WITH MINIMUM RISK TO COMMUNITIES AND THE ENVIRONMENT.

The operation:

- Can manage safely cyanide containers has implemented measures to safely manage cyanide.

1.2.1 DOES THE TRANSPORT COMPANY USE ONLY TRAINED, QUALIFIED AND LICENSED OPERATORS TO OPERATE ITS TRANSPORT VEHICLES?

Interview with Mersin International Port (MIP) management indicates that mobile equipment operators must have a valid and appropriate Turkish state-issued license prior to being considered or hired for a position involving the use of a mobile equipment designed for the handling of containers and bulk merchandise. After hiring MIP will supplement the minimal acquired competency with additional in-house training prior to commencing work as well as throughout the term of employment with refresher training sessions.

MIP confirmed that its operators are also trained on CTU Code (Code of Practice for Packing of Cargo Transport Units). The standard was developed by IMO, ILO and UNECE organizations (International Maritime Organization; International Labour Organization; United Nations Economic Commission for Europe). The CTU Code applies to transport operations throughout the entire intermodal transport chain and provides guidance not only to those responsible for packing and securing cargo, but also to those who receive and unpack such units. The Code of Practice also addresses issues such as training and the packing of dangerous goods. Records of training was not available for review.

MIPs Guide for Handling of Dangerous Goods states the following in section 2.4 of the document:

- *It is assured that the personnel involved in the handling of dangerous cargoes and the planning of this handling are documented by receiving the necessary training and personnel without documents are not assigned in these operations*.

- *It is assured that the dangerous cargo handling equipment in our facility is in working conditions and the relevant personnel are trained and certified for the use of this equipment*.

1.2.2 HAS ALL PERSONNEL OPERATED CYANIDE HANDLING AND TRANSPORT EQUIPMENT BEEN TRAINED TO PERFORM THEIR JOBS IN A MANNER THAT MINIMIZES THE POTENTIAL FOR CYANIDE RELEASES AND EXPOSURES?

Mobile equipment operators are hired based on minimal competency in the form of mobile equipment / forklift license or crane operator license. In addition to CTU Code training, MIP management confirmed mobile equipment operators are trained on IMDG Code (International Maritime Dangerous Goods).

According to an interview, MIP provides additional training and refresher training for mobile equipment operators. Training can be provided internally or subcontracted to specific manufacturers of mobile equipment. For example, specific hydraulic systems on mobile equipment handling containers may require special competencies when being operated or for maintenance reasons. MIP will organize such training when necessary. A list of training requirements for mobile equipment operators was requested while onsite. Unfortunately, the list was not made available for the preparation of the report. The Human Resources Department manages training records, according to interviewed personnel.

1.2.3 IF THE TRANSPORTER CONTRACTS OTHER ENTITIES TO CONDUCT ANY OF THE ACTIVITIES REQUIRED IN TRANSPORT PRACTICE 1.2, DOES IT IMPLEMENT PROCEDURES TO MAKE THE CONTRACTOR AWARE OF THE APPLICABLE CODE REQUIREMENTS AND ENSURE THE CONTRACTOR COMPLIES WITH THOSE REQUIREMENTS?

All container moving and storage-related activities at the Mersin port are performed by MIP personnel. MIP does not subcontract any container handling tasks to outside companies when containers are on the terminal.

The requirement is not applicable according to an interview conducted with MIP management.

1.3 TRANSPORT PRACTICE : ENSURE THAT TRANSPORT EQUIPMENT IS SUITABLE FOR THE CYANIDE SHIPMENT.

The operation:

- Can manage safely cyanide containers has implemented measures to safely manage cyanide.

1.3.1 DOES THE TRANSPORT COMPANY ONLY USE EQUIPMENT DESIGNED AND MAINTAINED TO OPERATE WITHIN THE LOADS IT WILL BE HANDLING?

A MIP *Terminal Details Excel file* was shared with the auditor. The "*Crane Particulars*" tab of the Excel spreadsheet file lists 12 gantry crane and 6 mobile cranes with maximum lifting capacity (with spreaders on) starting at 40 tons (between 40 and 55 tons). Similarly, from visual observation of terminal STS and RTG cranes as well as reach stackers and truck trailers, the mobile equipment appear to be designed to safely handle cyanide containers averaging approximately 21,6 metric tons according to transport manifest. Moreover, STS crane #9 signage indicates 50 tons of SWL (Safe Working Load) and terminal truck-trailers maximum load capacity of 65 tons.

Similarly, according to an interview of the maintenance superintendent, the preventive maintenance program for mobile equipment is based on the manufacturer's recommendations and thus, designed to ensure mobile equipment is operated within their respective load limit. The mobile equipment preventive maintenance program is driven by *Infor AEM* software (see photo log #14).

1.3.2 ARE THERE PROCEDURES TO VERIFY THE ADEQUACY OF THE EQUIPMENT FOR THE LOAD IT MUST BEAR?

MIP has a daily pre-shift mobile equipment inspection process designed to identify abnormal condition or malfunction of mobile equipment by operators that could lead to an incident while handling cyanide containers. Moreover, MIP implements a preventive maintenance program which ensures the equipment's ability to function safely under the load represented by a cyanide container (see photo log #11). Records of non-destructive testing of STS and RTG cranes or other forms of equipment stress tests were not available for review.

1.3.3 ARE THERE PROCEDURES IN PLACE TO PREVENT OVERLOADING OF THE TRANSPORT VEHICLE BEING USED FOR HANDLING CYANIDE (I.E., OVERLOADING A TRUCK, FERRY, BARGE, ETC.)?

As indicated in 1.3.1, ship-to-shore cranes, rubber tire gantry cranes, reach stackers and terminal truck trailers are the only lifting and transfer equipment used for container handling by MIP. The visual observation from port facility tour confirmed terminal truck-trailer maximum load capacity is 65 tons which exceeds the average 22 metric tons cyanide container weight. MIP does not incur the responsibility of assessing load-bearing adequacy for the truck trailers used to transport cyanide containers outside the terminal and to the mining operators.

1.3.4 IF THE TRANSPORTER CONTRACTS OTHER ENTITIES TO CONDUCT ANY OF THE ACTIVITIES REQUIRED IN TRANSPORT PRACTICE 1.3, DOES IT IMPLEMENT PROCEDURES TO MAKE THE CONTRACTOR AWARE OF THE APPLICABLE CODE REQUIREMENTS AND ENSURE THE CONTRACTOR COMPLIES WITH THOSE REQUIREMENTS?

MIP responsibilities regarding container handling operations start when STS crane unloads containerized merchandise from ships and ends when the container is positioned on the external trucking company's trailer equipment. MIP is not responsible for securing or rigging the container once on the truck trailer. The terminal trucks do not require securing when circulating in the terminal.

All container moving and storage-related activities performed by MIP are conducted by its own personnel, using its own equipment, maintained by its own mechanics, according to a predetermined maintenance schedule. According to HSSE manager MIP does not lease any container handling equipment from a third party for use on the terminal.

As a port terminal operator, MIP is closely supervised by Turkish security, transportation and infrastructure and environment government agencies.

1.4 DEVELOP AND IMPLEMENT A SAFETY PROGRAM FOR TRANSPORT OF CYANIDE.

The operation

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

1.4.1 ARE THERE PROCEDURES TO ENSURE THAT THE CYANIDE IS TRANSPORTED IN A MANNER THAT MAINTAINS THE INTEGRITY OF THE PRODUCER'S PACKAGING?

According to reviewed transport manifest, twenty (20) Intermediate Bulk Containers (IBC) of sodium cyanide briquettes are placed in each container when shipped through MIP terminal. Transport manifests attest a weight of 21 600 kg of cyanide per sea container. The interview of MIP's HSSE manager confirms that upon arrival at the dock, STS crane operator will lift containers and visually observe from the operator cabin if the container is damaged. In case of damage, the container is immediately placed in a secondary containment metal structure available. The damaged container will be further assessed and managed according to the received Safety Data Sheet (SDS) and the agency representing the owner of the merchandise will be notified. A secondary containment metal structure was observed near the IMDG interim storage area of the port.

A general inspection procedure for container integrity was presented to the auditor (see MIP / TYUB EK-2 Madde-2 / KTII documents in photo log #15). This inspection process is representative of MIP's oversight regarding the integrity of the producers' packaging.

1.4.2 ARE PLACARDS OR OTHER SIGNAGE USED TO IDENTIFY THE SHIPMENT AS CYANIDE, AS REQUIRED BY LOCAL REGULATIONS OR INTERNATIONAL STANDARDS?

At the time of the site visit, no sodium cyanide containers were observed in the IMDG interim storage area. Time limitation prevented the auditor from consulting the MIP dangerous goods database or CTROOMS container operating software. However, other dangerous goods were stored in the designated area of the terminal. These include UN 1133 (dimethyl ether); UN 3077 (solid hazardous waste); UN 2015 (Hydrogen peroxide stabilized); UN 1486 (potassium nitrate); UN 3358 (refrigeration equipment with flammable gas) and UN 1265 (pentane) among others.

Placards were observed on the dangerous goods containers and ISO tank containers (Isotainers). According to interview conducted dangerous goods storage practices at MIP terminal follow IMDG S*egregation rules*.

Field observations during the port facility tour indicate no specific additional signage is placed to confirm the presence of sodium cyanide. IMDG 26 February 2007 "revised recommendations on the safe transport of dangerous cargoes and related activities in port areas" and segregation rules are considered offering acceptable alternate solution to ICMI requirements.

1.4.3 DOES THE TRANSPORTER IMPLEMENT A SAFETY PROGRAM FOR CYANIDE TRANSPORT THAT INCLUDES (WHERE APPROPRIATE OR APPLICABLE):

a. Vehicle inspections prior to each departure/shipment?

b. A preventive maintenance program?

c. Limitations on operator or drivers' hours?

d. Procedures to prevent loads from shifting?

e. Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered?

f. A drug abuse prevention program?

g. Retention of records documenting that the above activities have been conducted?

According to its Sustainability Report 2022 and MIP's Internet site, MIP is ISO standard certified for Quality management System (ISO 9001 in 2020) Environmental Management System (ISO 14001 in 2022), as well as OHSAS 18001, Health and Safety Management System since 2017. In 2019, MIP migrated its H&S management system to ISO 45001 which was recertified in 2022. In addition, MIP is working together with its main shareholder PSA on a Climate Response Management System (CRMS) to align climate-related initiatives and focus efforts on key areas of climate change. MIP is working in compliance with PSA`s HSS (Health, Safety, Security) Management System and complies with both safety work procedures and standard operation procedures frameworks.

The 2022 sustainability report confirms MIP established safety councils, teams, and training programs for workers as part of the Occupational Health and Safety Management System. The different councils, teams and training include an OHS Supreme Board Council, Advisory Committee (of Union), Risk Assessment Team (OHS Specialists and Union Representatives) Basic HSE, Environment, First Aid and Refresher Trainings. MIP also has Health and Safety Councils, whose meetings are held bimonthly in compliance with the Ministry of Labour regulations. In addition to those, Safety Coordination Meetings are organized every month with relevant management executives to discuss HSE topics. Safety Coordination Meeting notes and action deadlines are reported to Senior Management. Training is provided to employees and contactors and anyone entering the Port.

Reference: MIP_Sustainability_Report_2022_v2.pdf (mersinport.com.tr)

As mentioned previously and illustrated in the photo log (see photo #11 to 14), MIP has implemented a preventive maintenance program for its fleet of mobile equipment and other terminal equipment. The preventive maintenance program is driven by *Infor AEM* software which delivers notifications for maintenance to supervisors and records the maintenance history of all equipment. Preventive maintenance is performed according to mobile equipment manufacturer's recommendations. The maintenance is performed in a main workshop (see photo log #10) for larger equipment and two (2) satellite workshops for smaller equipment. At the time of the visit and according to the software, 56 work orders were being processed and 46 had been opened during the same day.

MIP is a 24 hours a day and 7-days a week operation. The terminal is characterized by three (3) work shifts with different crews of operators per shift. Hence, operators are limited in their ability to work extended hours. The design of terminal truck trailers used for moving containers over short distances does not necessitate load rigging devices.

Interview with HSSE manager confirmed wind conditions is a critical parameter followed for STS crane activities on the wharf. The port headmaster has stopped loading and unloading activities five (5) times in the last year due to wind velocity. The wind velocity threshold limit beyond which STS crane activities are suspended is established at 20 knots (37.04 km/h).

The MIP human resources manager was not available for an interview at the time of the site visit. As such, no document confirming zero tolerance for drugs and alcohol while at work was made available. However, section 7 of the MIP Code of Ethics confirms alcohol and drug use while operating equipment or on MIP ground is strictly prohibited. (The Code of Ethics; Document Code: YS.P106; dated: 12/09/2022 ; The Code of Ethics (mersinport.com.tr).

1.4.4 IF THE TRANSPORTER CONTRACTS OTHER ENTITIES TO CONDUCT ANY OF THE ACTIVITIES REQUIRED IN TRANSPORT PRACTICE 1.4, DOES IT IMPLEMENT PROCEDURES TO MAKE THE CONTRACTOR AWARE OF THE APPLICABLE CODE REQUIREMENTS AND ENSURE THE CONTRACTOR COMPLIES WITH THOSE REQUIREMENTS?

MIP does not contract other organizations to conduct any activities related to the handing and transport of cyanide containers at the port.

1.5 FOLLOW INTERNATIONAL STANDARDS FOR TRANSPORTATION OF CYANIDE BY SEA.

The operation:

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

1.5.1 ARE SHIPMENTS OF CYANIDE BY SEA TRANSPORTED IN COMPLIANCE WITH THE DANGEROUS GOODS CODE OF THE INTERNATIONAL MARITIME ORGANIZATION?

a. Is the cyanide shipment packaged as required by Part 4 of the IMO DG Code and according to the packaging instructions and packaging provisions indicated on the DG List?

As indicated in 1.4.2 no sodium cyanide containers were observed on the terminal interim storage area at the time of the visit. However, other dangerous goods were stored in the IMDG interim storage area of the terminal. The dangerous goods were observed in sea containers as well as Isotainers. Placards were observed on the dangerous goods containers and Isotainers. Interview with MIP representatives confirms MIP is not involved in packaging solid sodium cyanide in shipping containers.

b. Are cyanide packages marked as required by Section 5.2.1 of the IMO DG Code and according to the labelling requirements indicated on the DG List?

Not applicable to terminal authority.

c. Are cyanide packages labelled as required by Section 5.2.2 of the IMO DG Code and according to the labelling requirements indicated on the DG List?

Not applicable to terminal authority.

d. If cyanide is shipped in cargo transport units, are the units placarded and marked as required by Chapter 5.3 of the IMO DG Code?

See a.

e. Has a dangerous goods transport document been prepared with the information required under Chapter 5.4 of the DG Code?

Interview with MIP representative at the port confirms port authorities receive transport manifests associated with cyanide containers and other dangerous goods containers approximately three (3) days prior to vessel arrival at the port. The transport documentation is compliant with IMDG Code prescriptions. The transport manifests are accompanied by a Safety Data Sheet (SDS) of the dangerous good. No manifest was reviewed during the site visit due to limited availability of port authority representatives or was communicated to the auditor after port visits.

f. If the cyanide is packed or loaded into a container, has a “container/vehicle packing certificate” been prepared for meeting the requirements of Section 5.4.2 of the DG Code?

Not applicable to terminal authority.

g. Does the ship carrying the cyanide have a list or manifest identifying the presence and location of the cyanide or a detailed stowage plan including this information, as required under Section 5.4.3.1 of the DG Code?

Not applicable to terminal authority.

h. Does the ship carrying the cyanide have cyanide emergency response information, as required under Section 5.4.3.2 of the DG Code?

Not applicable to terminal authority .

i. Does the ship comply with the stowage and separation requirements of Part 7 of the DG Code?

Not applicable to terminal authority.

1.6 TRACK CYANIDE SHIPMENTS TO PREVENT LOSSES DURING TRANSPORT.

The operation:

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

1.6.1 DO TRANSPORT VEHICLES HAVE THE MEANS TO COMMUNICATE WITH THE TRANSPORT COMPANY, THE MINING OPERATION, THE CYANIDE PRODUCER OR DISTRIBUTOR AND/OR EMERGENCY RESPONDERS, AS APPROPRIATE?

This requirement has limited applicability while the cyanide containers are in interim storage in a dedicated area of the terminal. Nonetheless, as indicated in 1.2.3 and according to an interview with HSSE manager MIP terminal mobile equipment operators (i.e., crane, reach stacker and terminal truck trailers) are equipped with 2-way radio communication systems. In the event of an incident or a hazardous situation, operators can communicate with the port headmaster, port security and HSSE manager on duty.

1.6.2 IT IS THE COMMUNICATION EQUIPMENT (E.G., GPS, MOBILE PHONES, RADIOS, PAGERS) PERIODICALLY TESTED TO ENSURE IT FUNCTIONS PROPERLY?

In the event of a communication (2-way) radio system malfunction, mobile equipment operators within the MIP property can request another radio unit.

1.6.3 HAVE COMMUNICATION BLACKOUT AREAS ALONG TRANSPORT ROUTES BEEN IDENTIFIED? ARE SPECIAL PROCEDURES IMPLEMENTED FOR THE BLACKOUT AREAS?

The MIP's limited geographical footprint does not incur the prospect of a communication blackout.

1.6.4 ARE THERE SYSTEMS OR PROCEDURES TO TRACK THE PROGRESS OF CYANIDE SHIPMENTS?

Section 7 (Documentation, Control and Registration) of the "*Guide to Handling Dangerous Goods*" document prepared by MIP informs on the tracking process of dangerous goods when containers arrive at the port. The ISPS code of practice guides MIP process for tracking IMDG and cyanide containers. Page 45/53 of the above-cited guide summarizes the process as the following:

- *Regarding the IMDG labelled loads, the declarations of the agencies are reviewed by MIP.*

- *The agency that makes the declarations enter the container information into MIP's Terminal Operating System accessible from a secured Internet platform and performs the registration process.*

- *For container with the IMDG label to be discharged from the ship, the agency records the hazard class in the columns and rows determined in the discharge list that it transfers to the Terminal Operating System.*

- *The container agency indicates the number of IMDG labelled containers to be discharged from the ship in the ARF-02 form that it sends by e-mail as an attachment. The shipping agency shows the number of containers and the weight of the IMDG cargo in the ARF-02 form.*

(https://www.mersinport.com.tr/en/Images/pdf/TY_YS_E01_MIP_Dangerous_Goods_Handling_Guide_Rev_8.pdf).

Upon arrival at the terminal, the ship captain will transfer container transport manifests to MIP. Terminal authority will acknowledge receipt of transport manifests and record containers stored on its premises in its database which is also available to clients from a secured Internet portal (ref. www.mersinport.com.tr). Similarly, section 2.5 (Responsibilities of the Ship (related) person of the MIP "*Guide to Handling Dangerous Goods*" document lists several aspects of dangerous goods documentation for tracking purposes by ship responsible people. These include the following:

- *Provides that the cargo to be carried by the ship is documented as suitable for transportation and that the cargo holds, cargo tanks and cargo handling equipment are suitable for cargo transportation;*

- *Requests all mandatory documents, information and documents related to dangerous goods from the cargo person and ensures that they are present with the cargo during the transportation activity;*

- *Provides that the documents, information and documents required to be found on the ship regarding dangerous goods within the scope of legislation and international conventions are appropriate and up-to-date;*

- *Controls the transport documents containing information that the cargo transport units loaded on the ship are appropriately marked, plated and loaded safely;*

- *Informs the relevant ship personnel on the risks of dangerous cargoes, safety procedures, safety and emergency measures, response methods and similar issues;*

- *Keeps updated lists of all dangerous cargoes on board and declares them to the relevant parties upon request;*
- *Provides that the loading program, if any, is approved and documented and kept in working condition;*
- *Notifies the port authority and the coastal facility about the instant risk posed by the dangerous cargoes on the ship berthing to the coastal facility and the measures taken for it;*
- *Does not accept to carry the dangerous cargo in case of leakage or such a possibility;*
- *Notifies the port authority of the dangerous cargo accidents that occur on the ship while navigating or at the coastal facility;*
- *Provides the necessary support and cooperation in the controls and inspections carried out by the Administration and the port authority;*
- *Does not accept to carry dangerous goods that are not included in the ship certificates issued by the relevant institutions and organizations;*
- *Provides that the people of the ship involved in the handling of dangerous goods use personal protective equipment suitable for the physical and chemical properties of the cargo;*
- *Provides the requirements regarding the loading safety of the loads loaded on the ships.*

1.6.5 DOES THE TRANSPORTER IMPLEMENT INVENTORY CONTROLS AND/OR CHAIN OF CUSTODY DOCUMENTATION TO PREVENT LOSS OF CYANIDE DURING SHIPMENT?

MIP's control and handling of dangerous goods in the port are supported by a "container operating system" (ref. CTROOMS software) that provides storage management, tracking and inventory controls of cyanide as well as other dangerous goods and general merchandise. MIP shared procedure MIP / TYUB EK-2 Madde-7 / KTII to this effect. In addition, as stated in 1.6.4, hard copies of dangerous goods transport manifest documentation are transferred during the different stages of the transport supply chain.

Section 7.5 (Regarding keeping records and statistics of dangerous goods; p. 46/53) of MIP "*Guide to Handling Dangerous Goods*" document confirms the following: "*Records and Statistics of All Dangerous Goods in the MIP Area Are Kept Regularly and Completely by the Documentation Directorate Over the System. It is communicated to the relevant institutions and organizations by our Dangerous Goods Safety Advisor in three (3) monthly periods*".

1.6.6 ARE SHIPPING RECORDS INDICATING THE AMOUNT OF CYANIDE IN TRANSIT AND SAFETY DATA SHEETS AVAILABLE DURING TRANSPORT?

As indicated in 1.5.1.e., interview with MIP representative confirms dangerous goods transport manifests are received prior to vessel arrival at the port. The transport documentation is compliant with IMDG Code prescriptions according to interviews. The transport manifests are accompanied by a Safety Data Sheet (SDS) of the dangerous good. The information between ship and MIP is communicated through the "Electronic Data Exchange System" platform.

Section 7.4 (Regarding the supply and keeping of the safety data sheet – SDS; p. 45/53) of MIP "*Guide to Handling Dangerous Goods*" document confirms the following: "*No action is taken regarding a load that does not have an MSDS/SDS form*".

1.6.7 IF THE TRANSPORTER CONTRACTS OTHER ENTITIES TO CONDUCT ANY OF THE ACTIVITIES REQUIRED IN TRANSPORT PRACTICE 1.6, DOES IT IMPLEMENT PROCEDURES TO MAKE THE CONTRACTOR AWARE OF THE APPLICABLE CODE REQUIREMENTS AND ENSURE THE CONTRACTOR COMPLIES WITH THOSE REQUIREMENTS?

MIP does not contract other entities to conduct any activities related to the handling or transport of cyanide.

2.0 INTERIM STORAGE

2.1 DESIGN, CONSTRUCT AND OPERATE CYANIDE INTERIM STORAGE SITES TO PREVENT RELEASES AND EXPOSURES

The operation :

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

2.1.1 ARE WARNING SIGNS POSTED ALERTING WORKERS 1) THAT CYANIDE IS PRESENT; 2) THAT SMOKING, OPEN FLAMES, EATING AND DRINKING ARE NOT ALLOWED AND 3) WHAT PERSONAL PROTECTIVE EQUIPMENT MUST BE WORN?

MIP stores cyanide containers and other dangerous goods on an interim basis. The interview, documentation (Section 4.5 of MIP "*Guide to Handling Dangerous Goods*" document; p. 36/53) and site observations confirm storage practices implemented follows the prescriptions of the International Maritime Organization's "Revised Recommendations on the Safe Transport of Dangerous Cargoes and related Activities in Port Areas", dated 26 February 2007. The document is a 111-page long list of best management practices covering safe handling, training, and emergency response among other topics. Of particular interest is section 6.3 of the IMO document on "Role of berth operators and cargo interests". The section states that "the berth operator and cargo interests have the prime responsibility for carrying out the transport and handling of dangerous cargoes in a manner which safeguards the health and safety of their employees and others who may be affected by the operations, including the general public."

Field observations and interview suggests MIP does not go to the extent of placing warning signs indicating the presence of cyanide containers. This gap with ICMC is not considered significant as operators are trained on dangerous goods hazard recognition and that an external emergency response team will be involved in any dangerous good-related incident. Smoking signs are addressed by the above cited IMO document in sections 7.3.7.2.

2.1.2 ARE THERE SECURITY MEASURES IN PLACE TO PREVENT UNAUTHORIZED ACCESS TO CYANIDE, SUCH AS LOCKOUTS ON VALVES AND FENCED AND LOCKED STORAGE OF SOLIDS?

According to an interview, only solid form of sodium cyanide transits through the MIP port facility. The field observations confirm several security measures are implemented to prevent access by the public. The perimeter of the terminal is fenced. The fence is composed of a concrete base, followed by a metal works structure topped with barbed wire. According to the MIP Internet site, over the port facility is equipped with 406 CCTV cameras with 360˚rotation capabilities.

The cameras are installed to ensure no area of the terminal is blacked out. The 2022 MIP sustainability report (section 5.6) confirms security investments in the form of Video Analytics for the fences, Biometric Access Control System, CCTV, Under Vehicle Search System, Speed Control System, Body Camera System, Marine Control with Thermal Camera, Patrol with Drone and Carbon Dioxide Measurement Devices.

The terminal was recertified under the ISPS (International Ship and Port Facility Security) Code in 2022. The terminal is considered a high-security facility by the Turkish authorities and as such has a permanent local police and customs presence. Finally, MIP has ISO 27001 aligned Information Security Management System since 2022. The information security management system supports concerns regarding cyber incident response, network security management, vulnerability and patch management as well as server security.

2.1.3 IS CYANIDE SEPARATED FROM INCOMPATIBLE MATERIALS SUCH AS ACIDS, STRONG OXIDIZERS AND EXPLOSIVES WITH BERMS, BUNDS, WALLS OR OTHER APPROPRIATE BARRIERS TO PREVENT MIXING?

The document review and interviews confirmed storage practices implemented by MIP follow the prescriptions of the International Maritime Organization's "Revised Recommendations on the Safe Transport of Dangerous Cargoes and related Activities in Port Areas", dated 26 February 2007. The document is a 111-page long list of best management practices, including storage practices. Table 1 (page 44) refers to a "Segregation Table for Dangerous Goods Cargoes in Port Areas" which provides guidance considered aligned with ICMC requirements.

The above-cited prescriptions are reflected in the MIP document entitled "*Guide to Handling Dangerous Goods*" document; section 4.5; p. 36/53. Similarly, MIPs *Guide for Handling of Dangerous Goods* states the following in section 2.4 of the document:

- *The cargo transport units where dangerous goods are transported are temporarily stored in accordance with the separation and stacking rules, and fire, environmental and other safety measures are taken in accordance with the class of the dangerous cargo in the storage area. Fire extinguishing systems and first aid units are kept ready for use at any time in the areas where dangerous goods are handled, and necessary controls are made periodically*.

2.1.4 IS CYANIDE STORED IN A MANNER DESIGNED TO MINIMIZE THE POTENTIAL FOR CONTACT OF SOLID CYANIDE WITH WATER (E.G., UNDER A ROOF, OFF THE GROUND, OR IN SPECIALLY DESIGNED CONTAINERS)?

The cyanide is stored in sea containers and as such, enclosed interim storage is not required at terminal facilities.

2.1.5 IS CYANIDE STORED WITH ADEQUATE VENTILATION TO PREVENT THE BUILD-UP OF HYDROGEN CYANIDE GAS AND CYANIDE DUST?

As indicated in 2.1.4, the cyanide sea containers are not stored in terminal buildings. Rather, the reagent is kept in its sealed sea containers during the interim storage. The requirement is not considered to be applicable.

2.1.6 ARE THERE SYSTEMS IN PLACE TO CONTAIN ANY SPILLED CYANIDE MATERIALS AND MINIMIZE THE EXTENT OF A RELEASE?

As indicated in 1.4.1, upon arrival at the dock, STS crane operator will lift containers and visually observe from the cabin if the container is damaged. In case of damage, the container is immediately placed in a secondary containment metal structure available nearby. The field observation confirmed the presence of such secondary containment equipment at the port facility's IMDG interim storage area. The photo log #15 illustrates the equipment used to minimize the extent of an accidental release.

3.0 EMERGENCY RESPONSE

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

3.1 PREPARE DETAILED EMERGENCY RESPONSE PLANS FOR POTENTIAL CYANIDE RELEASES.

The operation

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

3.1.1 DOES THE TRANSPORTER HAVE AN EMERGENCY RESPONSE PLAN?

MIP developed an emergency response plan in 2010 which was last updated 2nd June 2022. The ERP document is referred to as TY.YS.PL01 and is in its 12th revision (145 pages). MIP shared a Turkish language table of contents of the ERP. The document demonstrates a structured response plan with sections on roles and responsibilities, task and duties risk assessment process, emergency scenarios including sea-based emergencies, medical first aid intervention, emergency response equipment. Many elements of the emergency response plan are also briefly discussed in section 8 of the "*Guide to Handling Dangerous Goods*". The topics include the following: fire plan of areas where dangerous goods are handled; facility general fire plan; emergency plan; muster points; emergency management chart; leakage areas and equipment for cargo transport units (CTU); emergency response equipment against marine pollution; personal protective equipment; and dangerous cargo event notification form.

According to an interview with MIP representative, Turkish government (Ministry of Transport and Infrastructure) issued the port with a certificate of compliance for handling dangerous goods. This certification process involves a review of existing ERP measures implemented at the port facility. The current MIP certificate (#UDH0322091201714951) is valid until September 2025 according to documents provided. The ERP and mock drill documents provided confirm a local capacity to manage land and water-based spills including hydrocarbon accidental release in port waters as required by SOLAS (Safety of Life at Sea) convention of which Turkey is a signatory.

As mentioned previously in 1.4.3, MIP is certified ISO 14001 and ISO 45001 among other standards. Such certification also entails the development and implementation of an emergency response management process aligned with its operational risks.

3.1.2 IS THE EMERGENCY RESPONSE PLAN APPROPRIATE FOR:

a. The transportation route?

As indicated in 3.1.(1), MIP's emergency response capability is designed to cover the terminal as well as a sea-based emergency. The plan is designed to ensure a proper response to a solid cyanide spill on a concrete surface. There is no alternate route delivery at the port facility. A traffic management plan with monitored speed limits is implemented at MIP.

b. The physical and chemical form of the cyanide?

Emergency response planning accounts for various dangerous goods found in interim storage on the terminal and not only cyanide. At the time of the due diligence investigation, only solid sodium cyanide shipment had been received at the terminal. The cyanide containers are normally loaded onto local transport companies' truck trailers for delivery at mine sites within days after unloading from the ship.

According to an interview, MIP has emergency response equipment in the terminal and emergency response planning considers land and water-based spill as emergency scenarios. A water-based spill would originate from a ship's fuel tank system.

c. The method of transport?

Cyanide containers are handled by STS and RTG cranes, reach stackers and terminal truck trailers. The distance covered between ship unloading area and interim storage is less than 500 metres according to satellite image and field observations.

d. The transport infrastructure (e.g., condition of the road, railway, port)?

According to an interview with MIP representative, speed limits at the port are implemented to ensure a high level of safety related to mobile equipment presence in the terminal. The terminal access road infrastructure is made of concrete and considered in satisfactory condition, according to field observation.

e. The design of the transport vehicle or interim storage facility?

The IMDG interim container storage area is found within the container storage yard. It consists of a concrete surface considered in satisfactory condition. As discussed in 1.3.3, terminal truck-trailers maximum load capacity is 65 tons which exceeds cyanide container weight according to reviewed transport manifests.

3.1.3 DOES THE PLAN INCLUDE DESCRIPTIONS OF RESPONSE ACTIONS, AS APPROPRIATE FOR THE ANTICIPATED EMERGENCY SITUATION?

As indicated in 3.1.1, MIP shared its ERP table of contents. Interview with MIP representative suggests the emergency response capability is comprehensive and refers to respond scenarios for various dangerous goods found in interim storage including toxic material such as sodium cyanide in solid form. The MIP representative also confirmed that its IMDG handling authorization from the Turkish Transport and Infrastructure department involves a local agency review. The Turkish Ministry of Transportation and Infrastructure certificate was shared with the auditor. The ERP's scenario identification includes the topic of chemical spills as discussed in section 8 of the "*Guide to Handling of Dangerous Goods*" (ref. TY.YS.E01 documents).

3.1.4 DOES THE PLAN IDENTIFY THE ROLES OF EXTERNAL RESPONDERS, MEDICAL SERVICES OR COMMUNITIES IN EMERGENCY RESPONSE PROCEDURES AND HAVE THEY BEEN ADVISED OF THEIR ROLES?

Section 8.6 of the "Guide to Handling of Dangerous Goods" (ref. TY.YS.E01 document) confirms cooperation and coordination between MIP and Mersin Harbour Master. The Mersin Harbour Master may elect to request support and cooperation of the provincial / district fire brigade (known as AFAD): "*In case of a fire, the local fire brigade is notified, and intervention is made by the people in the fire team until the fire brigade teams arrive. In case of emergencies caused by sabotage or terrorist activities, coordination is ensured with local security units. In case of a spill at sea, coordination is ensured by contacting the Main Search and Rescue Coordination Centre."*

Interview confirmed MIP has onsite emergency and first aid response capabilities. As mentioned previously in 1.4.3, MIP is certified ISO 14001 and ISO 45001 among other international standards and as such, has implemented an emergency response management process aligned with its operational risks.

3.2 DESIGNATE APPROPRIATE RESPONSE PERSONNEL AND COMMIT NECESSARY RESOURCE, FOR EMERGENCY RESPONSE.

The operation:

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

3.2.1 DOES THE TRANSPORTER PROVIDE INITIAL AND REFRESHER EMERGENCY RESPONSE TRAINING OF APPROPRIATE PERSONNEL?

MIP provides training to its emergency response team members. Interview with MIP representative suggests Turkish authorities oversee emergency response capacity at port terminals as part of its authorization to handle dangerous goods. Similarly, legal requirements regarding ER training and mock drill requires two emergency simulations per year (ref. December 2023 drill final report. MIP. 14 pages). Emergency response team members training matrix or MIP ERT training requirement program was not available for review.

Lastly, ISO 14001 and 45001 standard certification requires the implementation of management processes to address emergency scenarios and necessary response capabilities including emergency response training of MIP ERT members.

3.2.2 ARE THERE DESCRIPTIONS OF THE SPECIFIC EMERGENCY RESPONSE DUTIES AND RESPONSIBILITIES OF PERSONNEL?

According to the table of contents of the emergency response plan provided, the organization as well as the duties and responsibilities of the emergency team members are presented in sections 3 and 4 of the ERP (ref. "*Acil durum Yönetimi / organizasyon semasi & acil durum ekipleri görevleri*").

As indicated above, MIP's ISO 14001 and 45001 standard certification requires the implementation of management processes to address emergency scenarios and necessary response capabilities including definition of roles and responsibilities for ERT members.

3.2.3 IS THERE A LIST OF ALL EMERGENCY RESPONSE EQUIPMENT THAT SHOULD BE AVAILABLE DURING TRANSPORT OR ALONG THE TRANSPORTATION ROUTE?

According to the table of contents of the emergency response plan provided, the organization as well as the duties and responsibilities of the emergency team members are presented in section 11 of the ERP (ref. "Ekler"). Also, according to interviews, field observations and documentation, two fire trucks, emergency spill kits and secondary containment for damaged containers are available for emergency response.

As indicated above, MIP's ISO 14001 and 45001 standard certification requires the implementation of management processes to address emergency scenarios and necessary response capabilities including emergency equipment.

3.2.4 DOES THE TRANSPORTER HAVE AVAILABLE THE NECESSARY EMERGENCY RESPONSE AND HEALTH AND SAFETY EQUIPMENT, INCLUDING PERSONAL PROTECTIVE EQUIPMENT DURING TRANSPORT?

Section 9.2 of MIP's "*Guide to Handling of Dangerous Goods*" confirms personal protective equipment is provided by MIP's Logistics Department to ERT members. MIP provided a document with a list of personal protection equipment that included full face mask, five (5) different gloves type, two full-body disposable overalls as well as a firefighting SCBA reference. PPE articles with internal or manufacturer's equipment code is included in the Turkish description. The MIP representative also confirmed that its IMDG handling authorization from the Turkish Transport and Infrastructure department involves a local agency review. The Turkish Ministry of Transportation and Infrastructure certificate was shared with the auditor. It is expected that the review involves adequacy and fit for purpose of emergency response health and safety equipment, including personal protective equipment.

3.2.5 ARE THERE PROCEDURES TO INSPECT EMERGENCY RESPONSE EQUIPMENT AND ASSURE ITS AVAILABILITY WHEN REQUIRED?

MIP provided an overview of personal protective equipment (ref. MIP / TYUB EK-1 Madde-17 / KTII) adapted to a solid cyanide spill including self contained breathing apparatus (SCBA). MIP representative also provided inspection evidence of the SCBA equipment by qualified external vendors (ref. RMN Marine vendors for SCBA certification).

Also as indicated in 3.2.1, MIP is required by national regulation (i.e., Law No. 5312) to conduct mock drills twice a year. Mock drills are documented for improvement purposes. As an ISO 14001 and 45001 standard certified organization, MIP is required for its implementation of management processes to address emergency scenarios and necessary response capabilities including emergency response equipment readiness.

3.2.6 IF THE TRANSPORTER CONTRACTS OTHER ENTITIES TO CONDUCT ANY OF THE ACTIVITIES REQUIRED IN TRANSPORT PRACTICE 3.2 OR HAS DESIGNATED OTHER ENTITIES TO CONDUCT EMERGENCY RESPONSE ACTIVITIES, DOES IT CLEARLY DELINEATE ITS ROLES AND RESPONSIBILITIES AND THOSE OF THE CONTRACTOR OR OTHER ENTITY DURING AN EMERGENCY RESPONSE?

As indicated in 3.1.4, MIP has onsite capacity to respond to various emergency scenarios including solid cyanide spill. At the same time, MIP must report any event to Mersin Harbour Master. The Mersin Harbour Master may elect to request support and cooperation of the provincial / district fire brigade (known as AFAD). MIP does not contract with other entities. Instead, the local fire brigade may assist MIP if the emergency requires such external support. A water-based spill which could involve external assistance (ref. *Main Search and Rescue Coordination Centre)*, is more likely to refer to a hydrocarbons spill event.

Again, as mentioned previously in 1.4.3, MIP is certified ISO 14001 and ISO 45001 among other standards. As such, it has implemented an emergency response management process aligned with its operational risks.

3.3 DEVELOP PROCEDURES FOR INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING.

The operation

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

3.3.1 ARE THERE PROCEDURES AND CURRENT CONTACT INFORMATION FOR NOTIFYING APPROPRIATE ENTITIES SUCH AS THE CYANIDE PRODUCER, THE CUSTOMER, REGULATORY AGENCIES, EXTERNAL RESPONSE PROVIDERS, MEDICAL FACILITIES AND POTENTIALLY AFFECTED COMMUNITIES OF AN EMERGENCY?

As indicated in 3.1.1 and 3.1.4, MIP prepared a *Guide to Handling of Dangerous Goods* (Document ref.: ref. TY.YS.E01). Sections 8.4 and 8.5 of the *Guide to Handling of Dangerous Goods* discusses the notification. In addition, appendices 3, 16, 17 and 19 of the *Guide to Handling of Dangerous Goods* provides respectively “contact information”; “dangerous cargo events notification form”; “control results notification form for dangerous good / cargo transport units” (understood as an event follow-up process) and “dangerous goods handling guide additional cargo notification (When necessary)”.

Under any circumstance, a cyanide-related incident would trigger a notification of the “Mersin Harbour Master” and government agencies. The MIP emergency response plan is expected to have detailed and updated contact information of the government agencies concerned by a cyanide-related incident, namely Transport and Infrastructure and Environment Ministries. Any damaged container will involve a notification of the agency managing its transportation. ICMI would receive a notification from Cyanco, the shipper of the reagent material following the transportation agency’s communication to the shipper and owner of the merchandise.

3.3.2 ARE SYSTEMS IN PLACE TO ENSURE THAT INTERNAL AND EXTERNAL EMERGENCY NOTIFICATION AND REPORTING PROCEDURES ARE KEPT CURRENT?

As per ISO management systems implementation for health and safety, environment as well as quality, it is expected that MIP regularly updates external emergency notification and reporting procedures. The MIP notification procedure was not available at the time of the audit or after the site visit.

3.3.3 DOES THE OPERATION HAVE A PROCEDURE FOR NOTIFYING ICMI OF ANY SIGNIFICANT CYANIDE INCIDENTS, AS DEFINED IN ICMI'S DEFINITIONS AND ACRONYMS DOCUMENT? HAVE ALL SUCH SIGNIFICANT CYANIDE INCIDENTS THAT HAVE OCCURRED BEEN REPORTED TO ICMI?

MIP is not expected to directly contact ICMI in the event of a cyanide-related incident. As indicated in 3.3.1, the responsibility of MIP is limited to notifying the agency responsible for the management of cyanide product transportation, the consignee (ex. mining companies in Turkey) and the shipper (ex. agent of Cyanco). Cyanco will inform ICMI of a significant cyanide incident according to definitions and Acronyms document found on ICMI's Internet site, Cyanide Code Training / Document Library menu.

https://cyanidecode.org/wp-content/uploads/2021/06/04-Definitions-Acronyms-JUNE-2021.pdf

3.4 DEVELOP PROCEDURES FOR REMEDIATION OF RELEASES THAT RECOGNIZE THE ADDITIONAL HAZARDS OF CYANIDE TREATMENT CHEMICALS.

The operation:

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

3.4.1 ARE THERE PROCEDURES FOR REMEDIATION, SUCH AS RECOVERY OR NEUTRALIZATION OF SOLUTIONS OR SOLIDS, DECONTAMINATION OF SOILS OR OTHER CONTAMINATED MEDIA AND MANAGEMENT AND/OR DISPOSAL OF SPILL CLEAN-UP DEBRIS?

MIP handles and temporarily stores several different hazardous substances and as such, does not develop specific remediation procedures for each chemical substance likely to be found on the terminal. According to an interview conducted, the safety data sheet is the basis for intervention in the event of a spill. The *Guide to Handling of Dangerous Goods* document prepared by MIP, does not have a specific remediation procedure to support a spill event. However, other procedures are implemented to manage hazardous substances including cyanide. These include the following:

- Procedure for the safe handling of packed dangerous goods;
- Procedure for chemical substances management;
- Procedure for loading, discharging and transporting dangerous cargoes within the port;
- Port area dangerous cargo separation and stacking instruction;

- Waste management procedure;
- Accident loss of property notification procedure;
- Dangerous goods traffic management plan instruction;
- Dangerous liquid and liquid bulk cargo equipment cleaning and maintenance instruction.

These procedures were not made available during or after the site visit. Section 6 of Cyanco's SDS provides rational in case of accidental release measures. It is expected that the government agency accreditation involves a review of the procedures for remediation including recovery or neutralization of solids, decontamination contaminated media if any, and management and/or disposal of spill clean-up debris.

3.4.2 DOES THE PROCEDURE PROHIBIT THE USE OF CHEMICALS SUCH AS SODIUM HYPOCHLORITE, FERROUS SULPHATE, AND HYDROGEN PEROXIDE TO TREAT CYANIDE THAT HAS BEEN RELEASED INTO SURFACE WATER?

The detailed emergency response plan was not available for review during or after the site visit. Interview suggests MIP is authorized by the Turkish government agency to handle dangerous goods. It is expected that the government agency accreditation involves the verification of the chemicals used for the neutralization of cyanide on surface water. The likelihood of a cyanide spill over surface water at MIP terminal is limited to contact with stormwater runoff to the drainage system.

3.5 PERIODICALLY EVALUATE RESPONSE PROCEDURES AND CAPABILITIES AND REVISE THEM AS NEEDED.

The operation

- Can manage safely cyanide container has implemented measures to safely manage cyanide.

3.5.1 ARE THERE PROVISIONS FOR PERIODICALLY REVIEWING AND EVALUATING THE PLAN'S ADEQUACY AND ARE THEY BEING IMPLEMENTED?

As per ISO management systems implementation for health and safety, environment as well as quality, it is expected that MIP regularly reviews and evaluate its ERP. Similarly, it is expected that the government agency issued authorization to MIP as a port facility with dangerous goods interim storage capacity involves regular verification of its ERP adequacy in addition to the required conduct of mock drills.

3.5.2 ARE THERE PROVISIONS FOR PERIODICALLY CONDUCTING MOCK EMERGENCY DRILLS AND ARE THEY BEING IMPLEMENTED?

As indicated in 3.2.1 and 3.2.5, MIP is required by regulation to conduct two (2) mock drills annually. Mock drills are documented for improvement purposes. Two recent mock drill reports we shared with the auditor, a fire (6 October 2023 in Turkish) and a maritime pollution scenario (8 December 2023 in English). Mock drill reports and photo log confirms significant number or emergency response team members participating in the exercise. The exercise involved the use of emergency equipment such as a fire truck, portable fire extinguishers, and emergency rescue technique such as evacuation of injured personnel or the cooling of a petroleum above-ground storage tank or in the case of the diesel spill on water, the deployment of sea pollution floating barriers.

Between legal requirements and MIP ISO 14001 certification, it is expected that mock drills are planned and conducted at the site on a regular basis and are reviewed to determine their effectiveness and how emergency response can be improved although terminal activities are not known to change significantly over time. Similarly, the government agency's oversight of terminal activities is likely interested in assessing emergency response planning adequacy and ensuring mock drills are conducted and post-mortem recorded for future reference.

3.5.3 IS THERE A PROCEDURE TO EVALUATE THE PLAN'S PERFORMANCE AFTER ITS IMPLEMENTATION AND REVISE IT AS NEEDED, AND HAVE THEY BEEN IMPLEMENTED?

See above response.

CONCLUSION

A due diligence investigation involving a site visit performed by Mr. Leger, accompanied by Cyanco Turkish sales representative, Mr. Oğuz Türe, was performed on January 25th, 2024. The site visit included interviews with MIP representatives Mr. Ozan Güler, Sales and Marketing Specialist and Mr. Alper Yilmaz, Health Safety Security Environment & Emergency Response Senior Specialist.

Based on site observations, interviews with key personnel and limited document review, it is the opinion of the auditor that the MIP has implemented safe cyanide handling, interim storage and emergency response procedures as well as necessary training and mobile equipment maintenance management processes.

Appendix A
List of Documents Consulted

List of documents consulted

Source	Title / description
MIP	MERSİN ULUSLARARASI LİMAN İŞLETMECİLİĞİ A.Ş. (MIP). Sea pollution emergency intervention drill. December 2023 Final Report.
	Emergency Response Plan (TY.YS.PL01 Acil Durum Plani) Table of content.
	Port area emergency intervention drill. October 2023 final report in Turkish.
	Container Operating System (CTROOMS) PDF 1 page.
	Ministry certificate for dangerous goods handling in Turkish.(Kiyi Tesisi Tehlikeli Yuk Uygunluk Belgesi). Reference # DGM.993207.TYUB.579. 1 page
	Personal Protective Equipment and Clothing. Table in Turkish. 3 pages
	Emergency fixed and portable body / eye shower. 1 page
	Damaged container pool. 1 page
	MIP Terminal Details.xlsx file (technical data file of port infrastructure and equipment)
	MIP brochure May 2018
	EMH II port expansion project.
SOCAR Internet site	https://www.mip.com.tr/
IMO - ILO	REVISED RECOMMENDATIONS ON THE SAFE TRANSPORT OF DANGEROUS CARGOES AND RELATED ACTIVITIES IN PORT AREAS. Ref. T3/1.02
	Code of practice on security in ports

Appendix B
Photo Log

Photo 1: View of Mersin International Port (MIP) main light vehicle entry area with security control.

Photo 2: View of MIP exterior fence design.

Photo 3: View of MIP interior fence with Free Zone Corridor within the port area.

Photo 4: View of SSG (Ship-Shore Gantry) crane and MIP truck-trailer container loading.

Photo 5: View of MIP container unloading with truck-trailers.

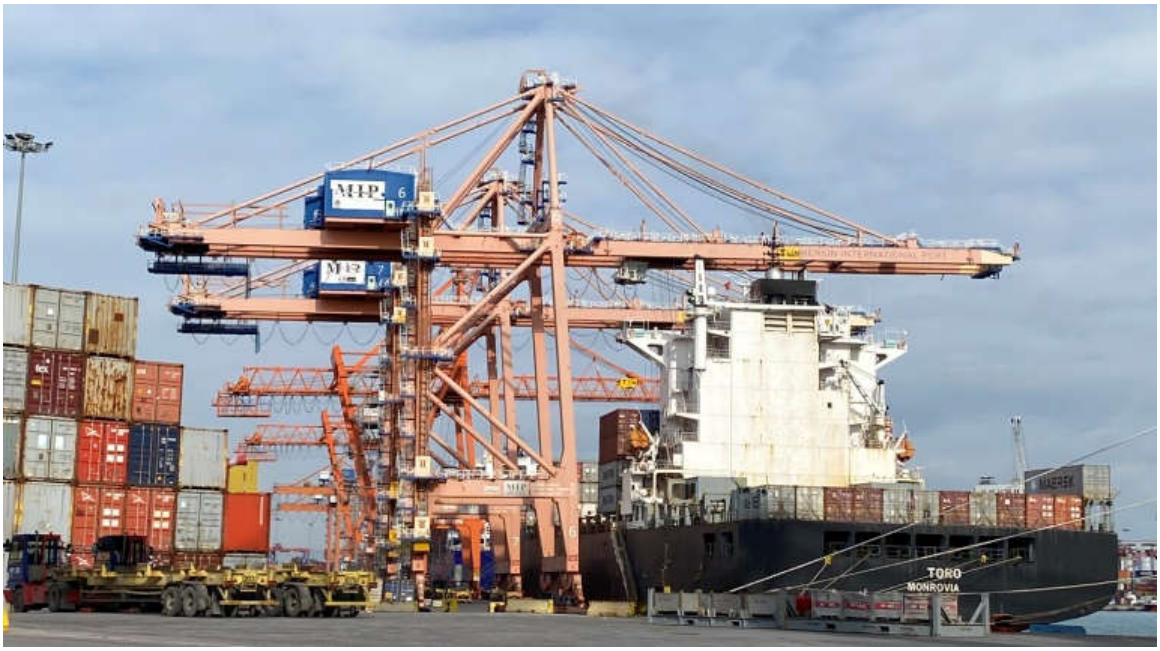


Photo 6: View of SSG cranes at MIP dock.

Photo 7: View of signage at dangerous goods interim container storage area entry.

Photo 8: View of dangerous goods interim container and isotainer dedicated storage area.

Photo 9: View of container with UN number and hazard category references as well as seal.

Photo 10: View of MIP main mobile equipment maintenance workshop.

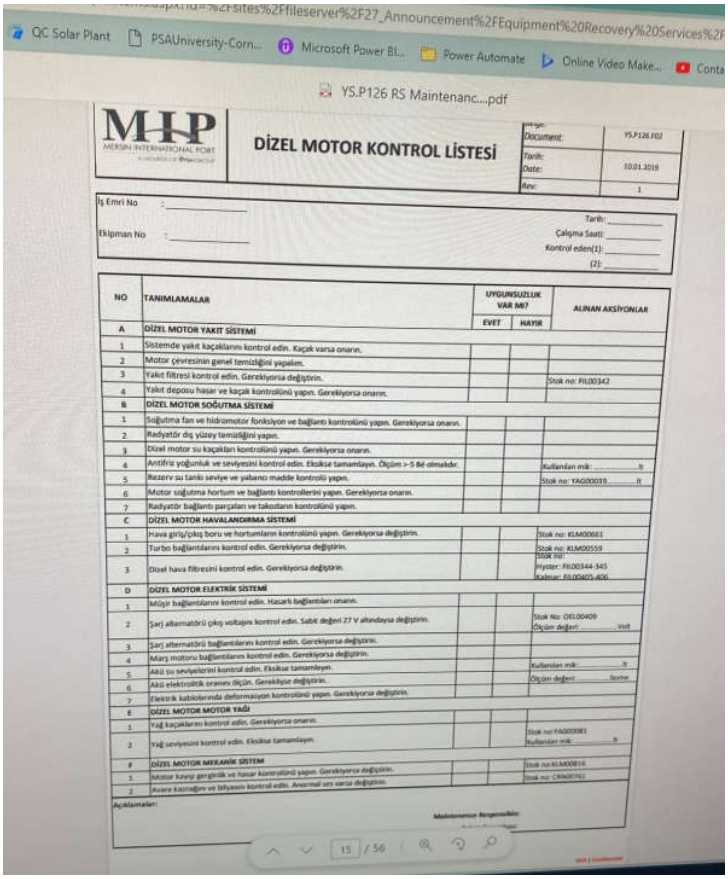


Photo 11: Computer screen view of diesel engine equipment checklist.

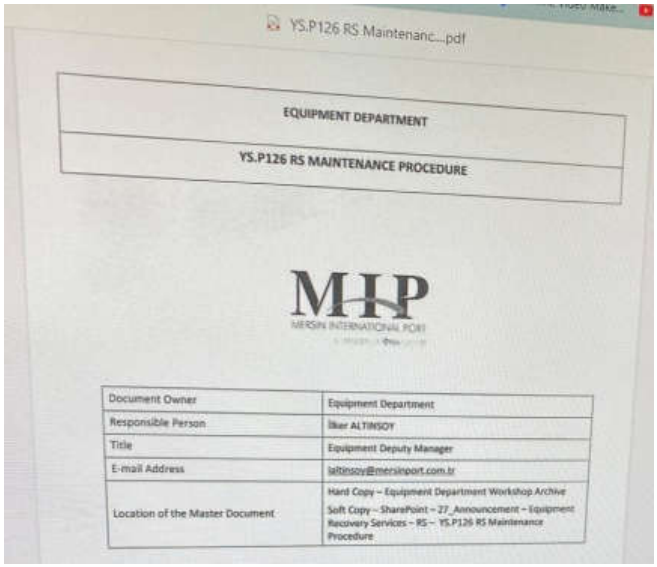


Photo 12: Computer screen view of reach stacker maintenance procedure.

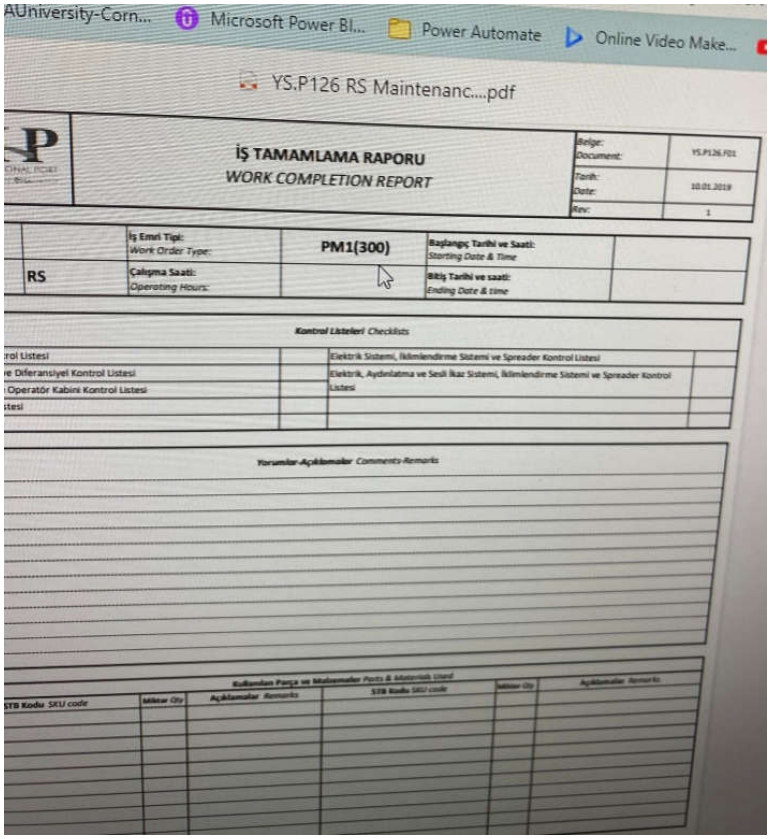


Photo 13: Computer screen view of preventive maintenance work completion report form.

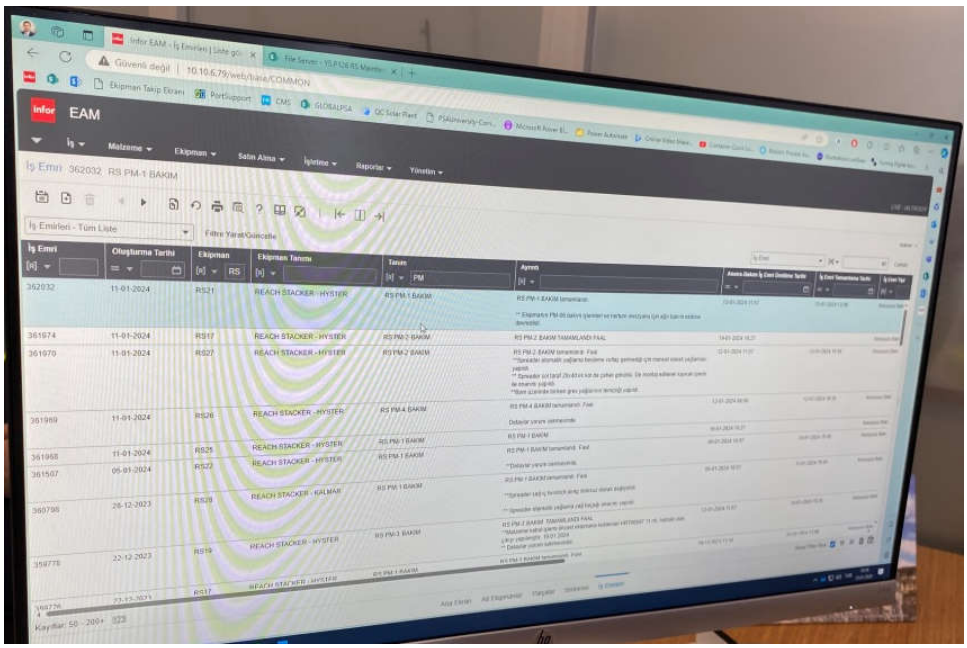
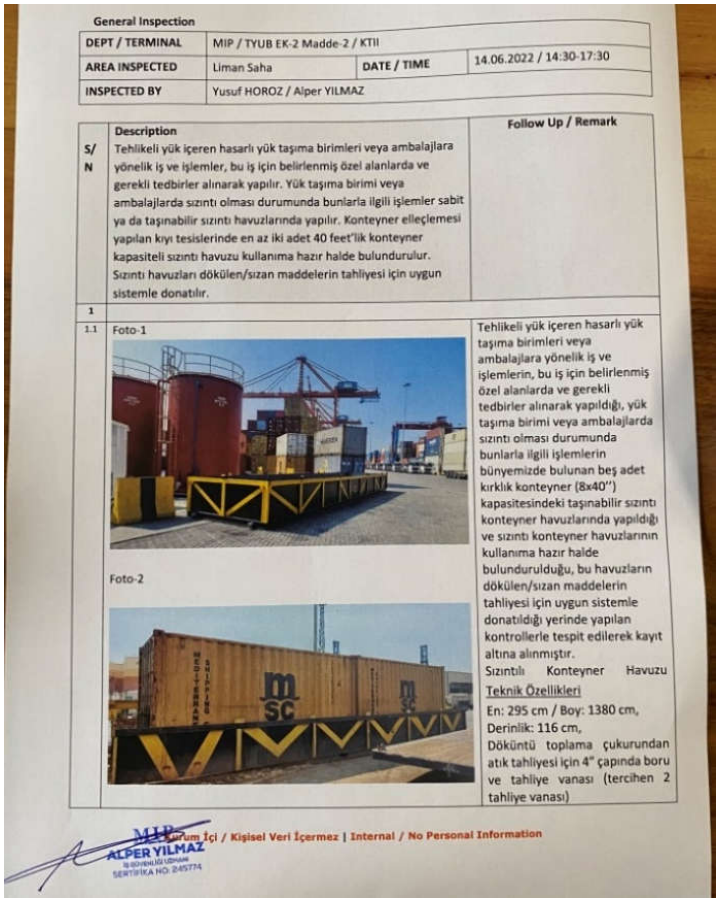


Photo 14: Computer screen view of preventive maintenance software (i.e. *Infor AEM*).



General Inspection

DEPT / TERMINAL	MIP / TYUB EK-2 Madde-2 / KTII		
AREA INSPECTED	Liman Saha	DATE / TIME	14.06.2022 / 14:30-17:30
INSPECTED BY	Yusuf HOROZ / Alper YILMAZ		

S/N	Description	Follow Up / Remark
	Tehlikeli yük içeren hasarlı yük taşıma birimleri veya ambalajlara yönelik iş ve işlemler, bu iş için belirlenmiş özel alanlarda ve gerekli tedbirler alınarak yapılır. Yük taşıma birimi veya ambalajlarda sızıntı olması durumunda bunlarla ilgili işlemler sabit ya da taşınabilir sızıntı havuzlarında yapılır. Konteyner elleçlemesi yapılan kıyı tesislerinde en az iki adet 40 feet'lik konteyner kapasiteli sızıntı havuzu kullanıma hazır halde bulundurulur. Sızıntı havuzları dökülen/sızan maddelerin tahliyesi için uygun sistemle donatılır.	
1		
1.1	Foto-1 Foto-2	Tehlikeli yük içeren hasarlı yük taşıma birimleri veya ambalajlara yönelik iş ve işlemlerin, bu iş için belirlenmiş özel alanlarda ve gerekli tedbirler alınarak yapıldığı, yük taşıma birimi veya ambalajlarda sızıntı olması durumunda bunlarla ilgili işlemlerin bünyemizde bulunan beş adet kırklık konteyner (8x40'') kapasitesindeki taşınabilir sızıntı konteyner havuzlarında yapıldığı ve sızıntı konteyner havuzlarının kullanıma hazır halde bulundurulduğu, bu havuzların dökülen/sızan maddelerin tahliyesi için uygun sistemle donatıldığı yerinde yapılan kontrollerle tespit edilerek kayıt altına alınmıştır. Sızıntılı Konteyner Havuzu Teknik Özellikleri En: 295 cm / Boy: 1380 cm, Derinlik: 116 cm, Döküntü toplama çukurundan atık tahliyesi için 4" çapında boru ve tahliye vanası (tercihen 2 tahliye vanası)

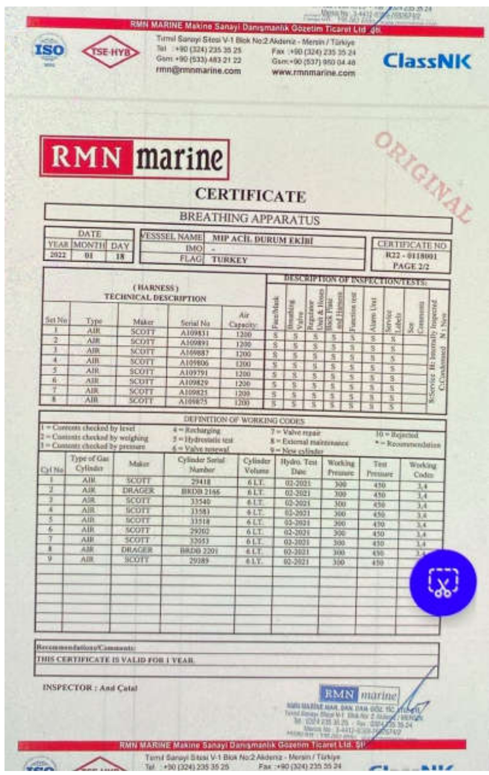
Kurum İçi / Kişisel Veri İçermez | Internal / No Personal Information

ALPER YILMAZ

Photo 15: View of "Inspection procedure" with secondary containment photo for damaged containers.

Photo 16: View of emergency response mock drill water-based scenario.

Photo 17: View of emergency response team training exercise.



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ISO TSE-HYB ClassNK

RMN marine

ORIGINAL

CERTIFICATE

BREATHING APPARATUS

DATE			VESSSEL NAME	MIP ACİL DURUM EKİBİ	CERTIFICATE NO
YEAR	MONTH	DAY	IMO	-	R22 - 0118001
2022	01	18	FLAG	TURKEY	PAGE 2/2

(HARNESS) TECHNICAL DESCRIPTION / DESCRIPTION OF INSPECTION/TESTS:

Set No	Type	Maker	Serial No	Air Capacity	Face/Mask	Breathing Valve	Regulator Unit & Hoses	Back Plate and Harness	Function test	Alarm Unit	Service Labels	See Comments
1	AIR	SCOTT	A109831	1200	S	S	S	S	S	S	S	
2	AIR	SCOTT	A109891	1200	S	S	S	S	S	S	S	
3	AIR	SCOTT	A109887	1200	S	S	S	S	S	S	S	
4	AIR	SCOTT	A109806	1200	S	S	S	S	S	S	S	
5	AIR	SCOTT	A109791	1200	S	S	S	S	S	S	S	
6	AIR	SCOTT	A109829	1200	S	S	S	S	S	S	S	
7	AIR	SCOTT	A109825	1200	S	S	S	S	S	S	S	
8	AIR	SCOTT	A109875	1200	S	S	S	S	S	S	S	

S:Service IR: Internally Inspected C:Condemned N: New

DEFINITION OF WORKING CODES
1 = Contents checked by level 4 = Recharging 7 = Valve repair 10 = Rejected
2 = Contents checked by weighing 5 = Hydrostatic test 8 = External maintenance * = Recommendation
3 = Contents checked by pressure 6 = Valve renewal 9 = New cylinder

Cyl No	Type of Gas Cylinder	Maker	Cylinder Serial Number	Cylinder Volume	Hydro. Test Date	Working Pressure	Test Pressure	Working Codes
1	AIR	SCOTT	29418	6 LT.	02-2021	300	450	3,4
2	AIR	DRAGER	BRDB 2166	6 LT.	02-2021	300	450	3,4
3	AIR	SCOTT	33540	6 LT.	02-2021	300	450	3,4
4	AIR	SCOTT	33583	6 LT.	02-2021	300	450	3,4
5	AIR	SCOTT	33518	6 LT.	02-2021	300	450	3,4
6	AIR	SCOTT	29202	6 LT.	02-2021	300	450	3,4
7	AIR	SCOTT	32053	6 LT.	02-2021	300	450	3,4
8	AIR	DRAGER	BRDB 2201	6 LT.	02-2021	300	450	3,4
9	AIR	SCOTT	29389	6 LT.	02-2021	300	450	[illegible]

Recommendations/Comments:
THIS CERTIFICATE IS VALID FOR 1 YEAR.

INSPECTOR : Anıl Çatal

RMN marine

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Photo 18: View of oxygen cylinder inspection record performed by third party.

Photo 19: View of MIP #96 truck-trailer maximum load capacity rating information.

Photo 20: View of MIP # 9 SSG crane nominal lifting capacity information.