ICMI CYANIDE CODE
SUMMARY AUDIT REPORT
CERTIFICATION AUDIT

CYANIDE TRANSPORTATION

CYPLUS GMBH
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DARMSTADT, 64295
GERMANY

Submitted to:
International Cyanide Management
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(Signature Lead Auditor Dr. Steinweg)

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For several years, CyPlus GmbH has held and currently maintains several internationally recognized certifications that form a crucial foundation for hazardous materials production, handling, transportation and energy efficiency: ISO 9001, ISO 14001, and ISO 50001.

CyPlus produces cyanide as a manufacturer in the German Wesseling plant. From Wesseling, Germany the cyanide is distributed in different packaging variations using different supply chains. The customers / the gold mines may be found on different sites across the world. Accordingly, different supply chains are utilized. This report focuses on Supply Chain No. 1, which begins directly at the end of cyanide production in the German plant. It involves various modes of transportation (trucks, trains, loading terminals, ports, and a highly specialized hazardous material depot for interim storage). The supply chain includes the ports of Hamburg and Antwerp, from where various shipping lines serve ports worldwide. The supply chain ends with the unloading of containers at different ports. At this interface, the country-specific supply chains of CyPlus begins, extending to the respective mines in different countries. The additional country-specific supply chains of CyPlus GmbH are not the subject of this report.

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Supply Chain Parties and Summary of Due Diligence Audits

All relevant players and involved organizations of the CyPlus Supply Chain No 1 (Germany) have been inspected by the signatory company CyPlus who have performed due diligence audits on each supplier. The assessments included visits of the locations (interim storage area, inland terminal, port terminals and administration offices of the ocean carriers as well), interviews with the involved partners and employees, inspections of IT systems and checks of documents.

The due diligence reports were provided to the ICMC auditor for review. Each due diligence investigation report concludes that the terminals, railway carriers, shipping lines, ports, and the or other supply chain components can manage cyanide safely. No deviations have been detected by CyPlus.

The following parties are noted:

A) CyPlus GmbH, Darmstadt, Germany

CyPlus GmbH is the signatory company which is in the role of the ICMI Code's Consignor. CyPlus GmbH is a subsidiary of the Röhm Holding GmbH and belongs to the Röhm Group since August 01, 2019. The organization is not active in transporting cyanide but is contracting the full transport service with the help of the internal procurement department logistics (Röhm Group).

B) CyPlus GmbH, Wesseling, Germany

The CyPlus site at Wesseling is the production plant of sodium cyanide. CyPlus manufactures and packs the product into wooden IBCs (Intermediate Bulk Containers). drums and SLS container and prepare them for shipping. The organization is not active in transporting cyanide, but it is the starting point of Supply Chain No. 1.

C) Röhm GmbH, Darmstadt and Wesseling, Germany

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

D) Freight Forwarding Company “Hermann Heinen Transporte”, Blankenheim, Germany

Truck transport from the manufacturer’s CyPlus production warehouse in Wesseling (a) to the external warehouse at Alfred Talke GmbH in Hürth and subsequently to CTS Transloading Terminal Köln Eifeltor, (b) directly to CTS Transloading Terminal Köln Eifeltor, or (c) directly to Antwerp, Port, operated by MPET.

E) Freight Forwarding Company “Alfred Talke GmbH”, Hürth, Germany

Truck transport from the manufacturer CyPlus' production warehouse in Wesseling (a) to the external warehouse at Alfred Talke GmbH in Hürth and subsequently to CTS Transloading

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Terminal Köln Eifeltor, (b) directly to CTS Transloading Terminal Köln Eifeltor, or (c) directly to Antwerp, Port, operated by MPET.

F) CTS Transloading Terminal Köln Eifeltor, Germany.

G) Railway transport RheinCargo, Germany

Transport from CTS Transloading Terminal Köln Eifeltor continuously and directly to (a) Port of Hamburg (Eurogate or HHLA) or (b) Port of Antwerp, Belgium.

H) Port terminal operator HHLA, Hamburg, Germany

All handling activities at the terminal; Handling and transshipment storage at the terminal from rail reception to loading onto the ship; Transport modes within the terminal: Trucks, Reach Stackers, Forklifts.

I) Port terminal operator Eurogate, Hamburg, Germany

All handling activities at the terminal; Handling and transshipment storage at the terminal from rail reception to loading onto the ship; Transport modes within the terminal: Trucks, Reach Stackers, Forklifts.

J) Port terminal operator MPET, Antwerp, Belgium

All handling activities at the terminal; Handling and transshipment storage at the terminal from rail reception to loading onto the ship; Transport modes within the terminal: Trucks, Reach Stackers, Forklifts.

K) Alfred Talke GmbH & Co. KG, Hürth, Germany

Interim storage of containers on their own premises (Interim Storage as per ICMC).

L) Sea transport by Hapag Lloyd to various ports in different destination countries; Transport mode: Container ship.

M) Sea transport by Maersk to various ports in different destination countries; Transport mode: Container ship.

N) Sea transport by MSC to various ports in different destination countries; Transport mode: Container ship.

O) Sea transport by CMA-CGM to Alexandria port Egypt (CyPlus's new supply chain no. 9 to Egypt – initially ICMC audited in April 2024); Transport mode: Container ship.

P) Additional participants in the supply chain (e.g., Consignor CyPlus with its ICMC management system and possibly others) were integrated into the audit as they appear within the audited supply chain. However, they are not independently subject to the audit, particularly because they are not directly involved in the physical handling of the hazardous substance operationally.

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Auditor's Finding: This operation is

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

with the International Cyanide Management Code.

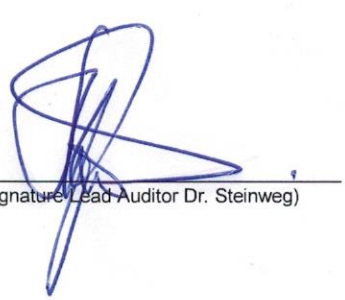
* For cyanide production operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

Audit Company	LULU Intelligent Organization
Audit Team Leader	Dr. Benno Steinweg
Email	Benno.Steinweg@hs-kempten.de
Names / Signatures of other auditors ...	n/a
Date of audit	Feb 12 and 13, June 12, 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.

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 Production Verification Protocol and using standard and accepted practices for health, safety and environmental audits.



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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:

The transporter CyPlus GmbH has implemented processes and procedures for selecting transport routes that minimize the potential and impact of accidents and/or releases. Since CyPlus does not physically carry out the transports itself but contracts qualified freight forwarders, CyPlus has contractually obligated these and all other companies in the supply chain to implement the requirements arising from ICMI regulations. CyPlus continuously monitors the implementation of these requirements, for example, in the form of due diligence audits. The selected routes are the most direct routes with well-developed main roads and avoid roads where dangerous goods are not allowed. CyPlus has developed procedures (SOP, Standard Operating Procedure) and creates route risk assessments that serve as the basis for determining the route. The transporter has implemented processes and procedures to regularly reevaluate the routes used for cyanide deliveries. Route risk assessments are reviewed for changes every two years. Drivers are briefed at the start of each consignment and warned of any issues. The transporter seeks input from stakeholders in developing risk management measures where necessary. Publicly available information on traffic issues is obtained from relevant websites (e.g., Regierungspräsidium Köln). Additional information is obtained from the local police, the Federal Highway Research Institute (BASt), and the ADAC (automobile association). RheinCargo requests a route from Deutsche Bahn and is provided with a timetable based on the available route for the hazardous cargo they handle. Drivers are regularly trained and briefed and are warned of changes in route conditions. CyPlus has developed detailed route instructions that apply to the entire route and describe the distances, speeds, and hazards along the route. Transport from the CTS terminal site to the overseas ports (Hamburg and Antwerp) is completed by rail and operated by RheinCargo. The route, including potential alternatives, is continuously monitored by RheinCargo. Their management system is certified according to ISO 9001 and ISO 45001 standards. RheinCargo was interviewed and reported to follow the same system. CyPlus reports that there are currently no special safety concerns and convoys are not usually used. All transports are monitored by a satellite system (road and rail). The transporter has advised external responders (especially fire brigades), medical facilities, and communities of their roles and/or mutual aid during an emergency response situation. The German (national) ICE Scheme is called TUIS. More than 40 companies participate. They are listed in a manual and can be contacted directly by the competent emergency authorities (police, fire brigade, etc.) in case of transport accidents. TUIS is an association of more than 100 chemical plant fire brigades and specialists with continuous preparedness 365 days a year. In case of an emergency, the TUIS organization (Transport Accident Information and Assistance System), which is part of CEFIC, will be contacted in Germany. They handle chemical emergencies on road, rail, and waterways and become active when contacted. They contact and cooperate with all

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contributors, including hospitals, communities, and relevant authorities. This is clearly organized and safeguarded by membership in TUIS.

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:

CyPlus, along with its entire organization of Supply Chain No. 1, fully complies with Transport Practice 1.2 and ensures that personnel involved in cyanide handling and transport can perform their duties with minimal risk to communities and the environment. As mentioned above, CyPlus contracts cyanide transport activities to other companies: Hermann Heinen and Alfred Talke (road transport) only use trained and competent personnel to operate their vehicles. CTS (Cologne, Port of Rhine) and Alfred Talke (interim storage) use only trained, qualified, and licensed operators to man the cranes, reach stackers, and forklift trucks. RheinCargo employs only trained, qualified, and licensed operators to transport cyanide containers by train to the respective ports. The due diligence reports developed and provided by CyPlus confirm that the operators handling cyanide packages hold the relevant training, qualifications, or licenses. All cyanide handled and transported within this supply chain has already been originally packed, closed, and sealed at the manufacturing site. Site managers and operators (especially in the interim storage of Alfred Talke) handling the material undergo a range of training to support the safe handling and transport of cyanide. The CTS personnel responsible for handling and transporting cyanide receive relevant health and safety training every year, which includes dangerous goods. Hermann Heinen and Alfred Talke (road transporters) periodically offer dangerous goods training for the relevant personnel. RheinCargo also provides dangerous goods training, and this training is refreshed regularly.

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:

CyPlus, along with its entire organization of Supply Chain No. 1, fully complies with Transport Practice 1.3 and ensures that the transport equipment is suitable for cyanide transport. CyPlus does not directly transport loads on roads, rail, or sea but engages relevant subcontractors to perform this work effectively. Hermann Heinen and Alfred Talke (road transporters) confirmed that they use 20-foot double-axle trailers and double-axle trucks to transport cyanide loads. The total weight of the truck, trailer, and load is 31 to 33 tons, which is below the legal limit on German roads of 40

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tons (or 44 tons on a limited number of roads). Alfred Talke (interim storage) and CTS use reach stackers (minimum 45-tonne capacity) to load and unload the road vehicles. RheinCargo uses train carriages designed to carry the loads. They use software to monitor the load for each carriage to ensure the carriage can handle the load. CyPlus and its subcontractors have procedures in place to verify the adequacy of the equipment for the loads they bear. The procedures are reviewed periodically. CyPlus and its transporters have procedures to ensure that vehicles are checked before and during the transportation of cyanide. The loads each vehicle carries are verified at the start of transport by CyPlus during the ordering process, by each transporter during the planning of the transport, and during the collection of the cyanide at each stage. Containers are weighed after loading, and the loads are documented within the bill of lading. Inspections are carried out during the transport process, and several examples were observed during the audit.

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:

CyPlus, along with its entire organization of Supply Chain No. 1, fully complies with Transport Practice 1.4 and develops and implements a safety program for the transport of cyanide. Since CyPlus does not physically carry out the transport itself but contracts qualified transport companies to do so, CyPlus has contractually obligated these and all other companies in the supply chain to implement the requirements arising from the ICMI regulations. Cyanide is transported by road, rail, and sea. Boxes and (SLS) containers are labeled by CyPlus in accordance with the IMDG Code. These labels remain on all sides of the containers until they are unpacked at the mine sites. These provisions and the attachment of the IMO marine pollutant label ensure that all shipments comply with international standards.

The safety program implemented by the transporters includes the following measures: vehicle inspections prior to departure/shipment; a preventative maintenance program; limitations on operator/driver hours; procedures to prevent loads from shifting; procedures to modify or suspend transportation if conditions require it; a drug abuse prevention program; and retention of records documenting that the above activities have been conducted. CyPlus and its partners follow written procedures to ensure that the cyanide leaves the site and is transported in a manner that maintains the integrity of the producer's packaging. Outgoing and incoming SLS containers at the Alfred Talke site (interim storage) are checked according to a checklist. Containers and loads leaving the CyPlus production site are also checked according to a checklist. The route risk assessments ensure that routes are selected to minimize damage to vehicles and transported cyanide. The route for this supply chain follows high-quality roads. Vehicles selected by Hermann Heinen and Alfred Talke (road transport) and RheinCargo (rail) are designed to carry the loads safely. Inspections carried out at the start of and during each transportation also ensure that the integrity of the producer's packaging is maintained. The chain of custody (bills of lading, waybills, etc.) is also verified by the mine and confirms that the material has been received in good condition. Vehicles carrying cyanide are also tracked using a GPS system. Delivery notes are also provided to the mine and retained by CyPlus. All parties have a drug abuse prevention program. The policy is implemented by all operators of equipment transporting cyanide (drivers as well as crane and forklift operators). The drug policy is also discussed during cyanide training.

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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:

CyPlus, especially with its organization of maritime transport within Supply Chain No. 1, fully complies with Transport Practice 1.5 and adheres to international standards for the transport of cyanide by sea. The quality, health, safety, security, and environmental management systems of the four shipping companies used in CyPlus' Supply Chain No. 1 were evaluated during the same period as the ICMC audit (early/mid-2024). Due diligence audit reports demonstrate conformity with the Cyanide Code and particularly with the Dangerous Goods Code of the IMO.

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:

CyPlus, along with its entire Supply Chain No. 1 organization, fully complies with Transport Practice 1.6 and tracks cyanide shipments to prevent losses during transport. Agreements between CyPlus, CTS, and road transporters Hermann Heinen and Alfred Talke include detailed and stringent requirements regarding communication via mobile phones. All vehicles transporting cyanide are equipped with GPS and tracked live. Communication equipment undergoes regular testing to ensure proper functionality. During audit interviews (including due diligence audits), it was confirmed that radio communication for rail transport is maintained continuously, allowing connection with dispatchers at any time. There are no dead zones for GPS, mobile phones, or radio systems along the routes used by CyPlus and its partners.

Shipments are inspected at the start and periodically during transport, including visual integrity checks. Shipping records indicate the amount of cyanide in transit, and safety data sheets are available during transport. CyPlus and CTS have developed procedures, in accordance with CyPlus guidelines, to monitor the progress of cyanide shipments. These procedures include:

- Advanced planning for all stages of each delivery. Road, rail, and sea transport must be agreed upon in advance in accordance with specific schedules.
- Notifying the mine when shipments depart from the origin and providing estimated arrival time and date of the consignment.
- Logging of transports using telephone calls and radio communication.
- Active monitoring of GPS to track progress along the routes.
- Virtual monitoring of containers and ships, with additional access to international radio communication.

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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:

The operational practices fully comply with Transport Practice 2.1. Cyanide containers are stored in a manner that minimizes the risk of accidental releases. The interim storage occurs at the site of Alfred Talke GmbH in Hürth, Germany. The company has years of specialization in the transport and storage of chemical goods, particularly hazardous materials. Alfred Talke plays a dual role in CyPlus' supply chain No. 1: as a road transporter and as an operator of a hazardous substance storage facility. In this capacity, Alfred Talke manages the storage of cyanide containers on behalf of CyPlus ("Interim Storage" as defined in ICMI's definitions guidelines).

At the Alfred Talke site, relevant warning signs were observed, alerting workers: 1) that cyanide is present, 2) that smoking, open flames, eating, and drinking are prohibited, and 3) specifying the required personal protective equipment. Access to the Alfred Talke site is restricted and allowed only through a manned security gate, operational 24 hours a day, every day of the week. Additionally, the site is fenced and monitored around the clock with security inspections and patrols, including active checks of the cyanide storage area (an outdoor storage facility at the site area approved by authorities).

Cyanide is stored separately from all other materials, as required by the site's environmental permit, as confirmed during the audit interviews. The SLS cyanide containers (designed for outdoor use; filled with material resp. coming back from the mine site with some liquid residuals) are stored in a separate, non-roofed outdoor area with secondary containment. These containers are secured using a lock-out-tag-out system and additional seals.

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PRINCIPLE 3 – EMERGENCY RESPONSE

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

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

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.1
- ☐ not in compliance with

Summarize the basis for this Finding:

CyPlus, along with its entire Supply Chain No. 1 organization, fully complies with Transport Practice 3.1 by maintaining detailed emergency response plans for potential cyanide releases. CyPlus has an Incident Management Plan and a Mutual Aid Scheme, which define the mutual assistance framework the company participates in. Alfred Talke, responsible for interim storage of cyanide containers, operates on a site subject to the legal requirements of the European Seveso Directive, necessitating an emergency response plan for operations.

CyPlus' ERP (Emergency Response Plan) covers all transportation routes, with each relevant subcontractor having an ERP specifically tailored to their part of the transport route. These plans include descriptions of response actions appropriate for anticipated emergency situations. The Mutual Aid Scheme Plan outlines response levels and actions, addressing various release scenarios such as containment, prevention of HCN (hydrogen cyanide) releases, soil excavation, material transport, and detoxification—all coordinated with the respective professional fire brigade.

CTS operates an emergency response plan, while road transporters Hermann Heinen and Alfred Talke each maintain a plan detailing 24-hour emergency contact numbers and information for CyPlus and CTS. RheinCargo also maintains an emergency response plan. These documents contain relevant sections specific to the selected transport route or interim storage, including attached road risk assessments, contact details, safety data sheets, and more.

The emergency scenarios, general response measures, and scenario-specific instructions account for both solid and liquid (in returning containers) states of cyanide and its incompatibility with water and other substances. The emergency plans encompass requirements for all modes of transport and for interim storage, addressing all facets of the transport infrastructure relevant to CyPlus' activities—from the transfer of solid sodium cyanide from the production site in Wesseling to mine sites via road, rail, and port.

Road transport is managed through route risk assessments, while rail transport is covered under RheinCargo's emergency plan. Emergency plans for port and shipping are also available across the entire supply chain. They consider the relevant transport vehicles and modes, and include a communication plan outlining emergency service telephone numbers and local hospital contacts. Specific responsibilities for stakeholders during emergencies, including police, fire brigade, emergency medical services, and the CyPlus Emergency Team, are clearly defined within the plans.

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

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.2
- ☐ not in compliance with

Summarize the basis for this Finding:

CyPlus, along with its entire Supply Chain No. 1 organization, fully complies with Transport Practice 3.2 by designating appropriate emergency personnel and providing necessary resources for emergency response. All participants in CyPlus' supply chain conduct emergency response training. CyPlus offers training in accordance with its Cyanide ERP and other internal guidelines, which also cover emergency procedures. Employees at Alfred Talke's hazardous goods facility undergo annual training on ERP requirements. CTS, along with road transporters Hermann Heinen and Alfred Talke, undergo regular training on hazardous goods and safety, which includes emergency response protocols. Relevant personnel at RheinCargo also undergo annual training, encompassing hazardous goods and train driver training, which includes emergency response protocols.

The respective emergency plans identify key roles and responsibilities during emergencies. Specific tasks are defined for each emergency scenario considered. Road transporters Hermann Heinen and Alfred Talke comply with European ADR regulations by maintaining an emergency kit in every truck transporting cyanide, containing essential items and a checklist to verify availability and functionality. CTS vehicles transporting hazardous goods on their premises are equipped with an ADR bag, and checklists are used to verify contents before use. Similarly, all vehicles at Alfred Talke's hazardous goods facility are equipped with an ADR bag, with contents verified using a checklist before use. Checklists ensure that equipment on vehicles is readily available. Initial training is provided to all parties involved in road, rail, and interim storage (e.g., Alfred Talke, CTS, Hermann Heinen, RheinCargo), and this training is annually updated.

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:

CyPlus, along with its entire Supply Chain No. 1 organization, fully complies with Transport Practice 3.3 by developing procedures for internal and external emergency notification and reporting. CyPlus has established procedures and mandated all parties in the supply chain to ensure that everyone knows how to notify and promptly report incidents. The relevant supply chain team has access to these procedures and would contact CyPlus in case of an emergency. ICMI's rapid contact in an emergency is always coordinated by CyPlus. National and local authorities and emergency

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responders (police, fire, health services, highways, etc.) have direct emergency numbers, which often remain unchanged and are also listed in the relevant contact lists for land transport. CyPlus and the relevant supply chain partners regularly review and update these contact details in their individual plans. The functionality of these processes is also subject to CyPlus' due diligence investigations with its contractors in the supply chain.

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 Transport Practice 3.4
- ☐ in substantial compliance with Transport Practice 3.4
- ☐ not in compliance with Transport Practice 3.4

Summarize the basis for this Finding:

CyPlus, along with its entire Supply Chain No. 1 organization, fully complies with Transport Practice 3.4 by developing procedures for remediation of releases that acknowledge the additional hazards posed by cyanide treatment chemicals. It is not intended for transporters or their truck/train drivers to perform remediation activities themselves. In developed countries like Western Europe, including Germany, national professional emergency response teams typically assume responsibility as swiftly as possible. In the described Supply Chain, this responsibility falls to professional TUIS fire brigades or the chemical company's internal fire departments. The driver's role (provided they are not injured during the incident) is to be available for information sharing and communication (e.g., handing over SOS signals or other transport-related information). The transporter's role aligns similarly. Remediation activities or cleanup of releases are conducted by professional emergency response teams, predominantly by professional fire brigades. According to the CyPlus Emergency Response Plan, procedures for treating cyanide released into surface waters must be carried out in collaboration with local authorities and in accordance with applicable laws.

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

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

Summarize the basis for this Finding:

CyPlus and its entire Supply Chain No. 1 are fully compliant with Transport Practice 3.5 by regularly evaluating response procedures and capabilities, and revising them as needed. The CyPlus (Röhm Group) Incident Plan undergoes periodic reviews. All parties involved in road, rail, and interim storage also conduct regular reviews of their plans and update them as necessary (e.g., hazardous materials storage specialist Alfred Talke, CTS, road transporters Hermann Heinen and Alfred Talke, RheinCargo). Port and sea transporters were assessed in a due diligence exercise by CyPlus, confirming that plans are in place and are reviewed either periodically or in response to incident

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findings or drills.

Simulation exercises are regularly conducted by audited parties, encompassing simulated evacuation calls for buildings and terminals due to incidents, theoretical drills, and practical outdoor exercises during training. Exercises during this period included release scenarios similar to cyanide (e.g., release of hazardous solids or liquids during transport) and exposure scenarios related to hazardous materials, which can lead to dangerous dust and gases.

The Emergency Response Plan Revision History documents the publication date, new revision number, and typically includes a description of the revision. The documentation history indicates multiple changes implemented over the past three years. During this period, there have been no specific releases of cyanide.

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