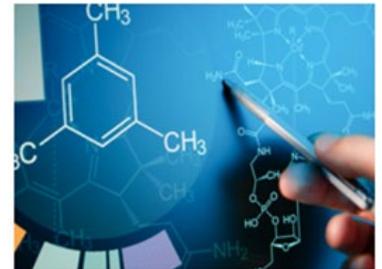


ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

Intermodal Cartage Company, Inc.

2021 Re-Certification Audit



Submitted to:

The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA

www.mss-team.com



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Operation General Information

Name and location of Operation:	Intermodal Cartage Co., Inc. 5707 East Holmes Road Memphis, TN 38141-8206
Names and contact information for this facility:	Randall K. Wright Executive Vice President of Operations rwright@imcg.com Phone: (901) 363-0050

Operation Description

Intermodal Cartage Company, Inc. (IMCG) has been an established trucking operation in Memphis, TN since 1982. The company has thirteen locations in the Midwest and Southern part of the USA. The company has been transporting solid sodium cyanide from the Memphis, Tennessee based cyanide production plant and packaging operation to nearby rail heads in Memphis, Tennessee and Marion, Arkansas since October 2006. Processes for local shipments to railheads were evaluated as part of this audit.

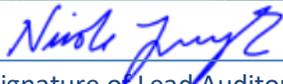
The operation was originally audited and found to be in full compliance with the ICMI Cyanide Code in 2010. The operation was then re-certified in 2013, 2017 and again during this cycle in 2021. Solid sodium cyanide is packed into intermodal containers by shipping personnel at the Memphis Plant and personnel at the adjacent packaging terminal. Cyanide shipments are dispatched from the packaging facility.

At the time of the audit, the producer was the Mining Solutions business of The Chemours Company. As of December 1, 2021, Draslovka a.s. (“Draslovka”) completed the acquisition of this operation. According to Draslovka personnel, all aspects of the supply chain related to IMCG operations remain unchanged. Only the ownership of the cyanide producer has changed.

IMCG is affiliated with a number of companies operating from the same industrial complex including Inland Intermodal Logistics Services (ILS) and River City Capital Leasing, LLC. ILS provides safety and risk management services to IMCG and preventive maintenance is performed by River City Capital Leasing, LLC. Personnel from IMCG, ILS, and River City Capital Leasing were audited during this re-certification audit.

IMCG and its affiliated companies are responsible for route determination, shipment tracking, truck inspections, preventive maintenance, training, safety program management, and emergency response planning. All of these operations were reviewed during this re-certification audit. The ICMI-Approved Transportation Auditor verified that IMCG operations are in Full Compliance with Cyanide Code requirements for transporters.

Intermodal Cartage Company, Inc.
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Signature of Lead Auditor

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Date

Audit Implementation and Conclusions

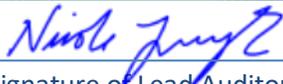
This re-certification audit was conducted through on-site observations, reviews of records and procedures, and interviews with senior management, operations management, engineering, and environmental, health & safety (EH&S) staff. IMCG personnel were involved in the audit. The auditor used the ICMI *Cyanide Transportation Verification Protocol* to evaluate International Cyanide Management Code (Cyanide Code) compliance.

Procedures, equipment condition and records were evaluated during this audit. The assessment was based on random samples of information and therefore deficiencies may exist which have not been identified. The depth to which records, and data were sampled was typical of an environmental, health and safety (EH&S) management system audit. Although legally required, records were sampled to evaluate Cyanide Code compliance, legal compliance with federal, regional, and local regulations was not part of the scope of this evaluation.

The audit was performed by an independent third-party auditor who fulfills all ICMI Cyanide Code Lead Auditor and Technical Auditor requirements for cyanide transportation operations.

All aspects of the cyanide operations were included in this Cyanide Code Re-Certification Audit. The operation was found to be in FULL COMPLIANCE with Cyanide Code Cyanide Transportation requirements.

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Auditor's Finding

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

The Intermodal Cartage Company, Inc. cyanide safety performance for the re-certification period was excellent, there were no cyanide-related safety incidents, accidents, spills, or exposures. The cyanide management practices for IMCG'S transport operation were evaluated for Cyanide Code compliance using the 2021 version of the ICMI Cyanide Transportation Verification Protocol. IMCG's internal standards, policies, practices, and procedures regarding the management of the cyanide operations were reviewed.

The auditor found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was excellent. Management systems upon which the operation is based are mature, and requested records were readily available for review.

The results of this re-certification audit demonstrate that the Intermodal Cartage Company, Inc. cyanide-related transportation is in FULL COMPLIANCE with International Cyanide Management Code requirements.

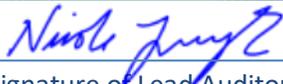
Compliance Statement

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

Auditor Information

Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Date of Audit:	August 16-17, 2021

Intermodal Cartage Company, Inc.
Name of Operation


Signature of Lead Auditor

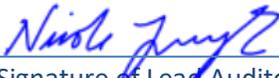
December 30, 2021
Date

Auditor Attestation

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the re-certification audit. I further attest that the re-certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code *Cyanide Transportation Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

Intermodal Cartage Company, Inc.



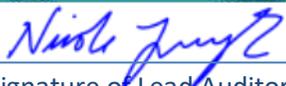
December 30, 2021

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Principles and Standards of Practice - Cyanide Transportation Verification Protocol

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.

IMCG has implemented a procedure to evaluate the risks associated with its cyanide transport routes and takes measures necessary to manage these risks. Routing considerations were found to be consistent with those required by the ICMI Cyanide Code. Risks such as traffic congestion, dangerous turns, and poor road conditions were considered during the development of the routes.

IMCG documents the measures taken to address risks identified with the selected routes. The measures are written into the risk assessment documentation for each route. Route risk assessments for all routes were completed and were found to be acceptable.

Driver input into the route determination is highly valued. Drivers provide feedback on the route at the quarterly safety meetings. If a driver needs to deviate from a route the driver notifies the dispatcher immediately.

Community input regarding the transport of cyanide is incorporated into the route planning through the use of routing software that indicates whether communities have restricted use of specific roadways for the transportation of hazardous materials.

There are no escort requirements on the defined routes used by Intermodal Cartage. The company uses electronic routing software, hands-free cell phones and GPS to keep in contact with drivers and keep updated on the location of the trucks.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.1
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Signature of Lead Auditor

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Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

IMCG drivers are authorized to operate vehicles that transport Cyanide. The IMCG computer dispatch system blocks the assignment of unauthorized drivers. Cyanide Drivers have a U.S. DOT Class A Commercial Driver's License (CDL) with a Hazardous Materials endorsement. Drivers are trained on the hazards of cyanide, the use of established routes, pre-trip inspection procedures, and emergency notification procedures. Cyanide Safety training is given to drivers annually.

The operation is: In full compliance with
 In substantial compliance with Standard of Practice 1.2
 Not in compliance with

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

Transportation equipment is designed by US manufacturer engineers to meet U.S. DOT weight rating standards. Gross Vehicle Weight Rating (GVWR) is certified by the manufacturer and documented on each vehicle with a data plate. All Intermodal Cartage tractors and trailers are rated for weights that exceed maximum loaded weights. A "sixth wheel" system is used to ensure effective distribution of load weight and reduce risk of an unbalanced load.

IMCG transports cyanide in intermodal containers that are loaded onto triple or slide chassis Tractors and chassis used to transport the intermodal containers have all been checked to confirm that the equipment specifications and data plates show that the equipment is capable of safely transporting the load it must bear. A chassis/container and tractor inspection report is completed prior to any load being received. Regular inspections include checks to ensure that the equipment does not show signs of stress or overloading.

The operation is: In full compliance with
 In substantial compliance with Standard of Practice 1.3
 Not in compliance with

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

Pre-trip inspection checklists are used by drivers to confirm that the equipment is safe and in proper operating condition. Mechanical defects identified in the pre-trip inspection are called to the attention of the on-site mechanic. Issues that would affect safety and/or legal compliance are resolved prior to

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movement off-site. The pre-trip inspection is also used to confirm that the intermodal container is properly secured to the chassis and that the chassis is properly secured to the tractor. Intermodal containers are loaded, blocked and braced by LSI employees (the Cyanide Producer's packaging operation in Memphis, TN). The IMCG drivers are only responsible for ensuring that the container is secure and that the transportation equipment is in good working condition. They do not have any direct responsibilities regarding the actual blocking and bracing of the load.

Appropriate placards are displayed on all four sides of the transport vehicles. Drivers visually inspect trailer containers, including placards, prior to each movement.

A preventive maintenance policy is in place that states the frequency at which specific maintenance tasks are to be performed. Pre-defined checklists showing the required maintenance tasks are used to record actions.

The Safety Program includes limitations on drivers' hours in accordance with Federal Motor Carrier Safety Regulations (FMCSR). Drivers are informed of legal requirements and are encouraged to stop driving if they become too tired (empowerment).

A drug abuse prevention program is part of the company's overall safety compliance program. Drivers are randomly required to undergo drug and alcohol random sampling on a regular basis.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.4
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Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.

A qualified IMCG material handler located at the Lemm packaging facility applies placards and appropriate marine pollutant markings to containers that will eventually be shipped by ocean carrier. The placards are supplied by the shipper. Additionally, the IMCG drivers confirm that containers are compliant before transport. The IMCG material handler and drivers responsible for placarding the sea containers were audited to verify practices are compliant with the Dangerous Goods Code of the International Maritime Organization.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.5
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Transport Practice 1.6: Track cyanide shipments to prevent losses during transport.

Truck shipments are tracked by the dispatcher. Drivers have the a software system on a tablet that is maintained on the truck and cell phones. IMCG has live 24 hour vehicle tracking with accessibility to the fleet manager and senior staff of IMCG and on-board live video streaming.

Truck location is tracked continuously by GPS. Truck shipments are tracked by the dispatcher who is in contact with drivers throughout each shift. Each truck is also equipped with an onboard fleet management system that tracks the trucks' location and a live 24-hour video feed. The tracking is accessible to the fleet manager and senior staff of IMCG. Additionally, there are on-board event recorders.

Black out areas are not a problem on the routes. All routes are on public roadways and the drivers have multiple tracking and communication systems available to them.

All IMCG deliveries are made to either rail heads or ports. The chain of custody paperwork is scanned into the computer following the delivery. Bills of lading (BOLs) provided by the shipper show the number of packages and the weight of the cargo. Each driver has detailed information with him at all times regarding cyanide hazards (provided by the Shipper) and emergency response.

The operation is: In full compliance with Standard of Practice 1.6
 In substantial compliance with
 Not in compliance with

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.

IMCG does not store cyanide at its site. This requirement does not pertain to the organization.

The operation is: In full compliance with Standard of Practice 2.1
 In substantial compliance with
 Not in compliance with

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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.

IMCG has documented emergency response plans (ERPs) for transportation accidents on local deliveries. There are no long-distance routes. The ERP document last updated in 2021 is the “Cyanide Transportation Emergency Response Plan”. The ERPs were found to be appropriate for the transportation routes, the solid sodium cyanide being transported via truck, the infrastructure of the local route, and the design of the transportation equipment. All parts of the routes are within normal city limits with U.S. typical emergency response services.

The Cyanide Transportation Emergency Response Plan is maintained in the truck at all times and contains detailed information about response actions. The IMCG drivers are to secure the scene and make notifications. The IMCG Cyanide Transportation Emergency Response Plan lists out the notification telephone numbers. The emergency planning documents identify the roles of local responders (Fire and Police). As a registered U.S. Department of transportation (DOT) Pipelines and Hazardous Material Safety Administration (PHMSA) hazardous materials transporter, IMCG also relies on the national network of trained emergency responders from the communities through which they travel.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.1
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Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

The cyanide training includes emergency response procedures and is done initially and annually. The roles and responsibilities of relevant internal personnel are clearly described in IMCG’s procedures. IMCG drivers are to secure the scene and make a number of notifications. The dispatcher training included instructions on what to do in case a driver calls in with an emergency situation.

IMCG maintains emergency equipment in trucks used for Cyanide shipments. There is a written checklist of emergency equipment that is checked on a quarterly basis. The presence of the emergency equipment is checked during the pre-trip inspection process. Tractors used to transport solid cyanide containers are dedicated to this task. Equipment was available for review.

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The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.2
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Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

Notification procedures are listed in the emergency plan and include contact information for notifying shipper, receiver/consignee, regulatory agencies, outside response providers (fire and police), medical facilities and potentially affected communities through approved channels. The emergency response documents have the following emergency numbers listed: Safety Risk Management number, after hours number, Shipper emergency cyanide hotline number, and Chemtrec. The ERP includes the internal and external notification and reporting instructions. It is to be reviewed in its entirety at least annually.

Emergency procedures include the requirement to notify ICMI if a significant cyanide incident occurs. There have been no significant cyanide incidents (spills or exposures) since the operation first started.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.3
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Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanidreatment chemicals.

IMCG would employ the services of a professional emergency response team to address an emergency and provide remediation as necessary. The contracted emergency response company would perform remediation and/or clean-up areas. Additionally, the Shipper is immediately notified of any emergency via the Cyanide Hotline and would serve as a critical information point to advise on emergency response and remediation actions. The Shipper's emergency response plan would be used to manage a cyanide incident. All aspects of recovery and neutralization are addressed. The Shipper's ERP specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide for treating a cyanide spill into surface water. Shipper representatives would interact directly with the firm contracted to provide response and recovery services and ensure understanding of these restrictions.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.4
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Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

Emergency response procedures are reviewed at least annually. Routine drills are conducted to determine if response procedures are adequate, equipment is appropriate, and personnel are properly trained. The emergency procedures are also reviewed after a deployment of the plan and after emergency response drills. There were no emergency situations during the recertification period.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.5
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Intermodal Cartage Company, Inc.
Name of Operation

Nicole J...
Signature of Lead Auditor

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