

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Summary Audit Report

**For the
International Cyanide Management Code**

Hae Dong Logistics

16 March 2026

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Transportation Summary Audit Report

Operation General Information

Name of Transport Operation : Hae Dong Logistics
Name of Facility Owner : Hae Dong Logistics
Name of Facility Operator : Hae Dong Logistics
Name of Responsible Manager : Sang-Wook Park / Operation and Safety Team Leader
Address : 210 ho, Hanjin Town Sang-ga, 25, Chungnyeol-daero, 200
Bean-gil, Dongnae-gu
State/Province : Busan, 47816
Country : Republic of Korea
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Operation Location Detail and Description

Hae Dong Logistics is a logistic company operating mainly in Korea. The head office is located in Busan Korea. Hae Dong Logistics as a transportation service provider contracted with sodium cyanide manufacture Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant for roadway transportation of sodium cyanide from Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant to Ulsan Rail Center and Pusan New Port in Korea.

According to the contract, they have transported briquette form sodium cyanide packaged in polyethylene inner film, then packaged again by woven bag and box or steel drum. Currently they have transported the sodium cyanide box and steel drum using trucks and trailers.

Hae Dong Logistics was initially ICMC certified during Dec. 2016, recertified during Jan. 2020 and Mar. 2023. Almost 3 years were elapsed since last recertification, so recertification audit was conducted during 12, 13 and 16 March 2026.

The distance from Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant to Ulsan Rail Center is about 4 Km and to Pusan New Port is about 60 Km.

The followings show brief transportation routes.

- (1) Roadway transportation route from Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant to Ulsan Rail Center
 - Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant => Ulsan Petrochemical Complex => Ulsan Rail Center
- (2) Roadway transportation route from Ulsan Rail Center to Pusan New Port
 - Ulsan Rail Center => ChingRyung Interchange => Busan Ulsan Express Way => Haewoondae Interchange => Pusan New Port

Auditor’s Findings

This operation is

- X in full compliance**
- in substantial compliance**
- not in compliance**

with the International Cyanide Management Code.

Compliance Statement

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

Auditor Information

Audit Company : 3Points Co., Ltd.
Audit Team Leader : Mr. SangHo Ahn / Conducted the audit as lead auditor and transportation technical specialist
E-mail : triplepoint@naver.com
Dates of Audit : 12, 13 and 16 March 2026

Auditor Attestation

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 and that 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 verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

During this recertification audit, I confirmed that Hae Dong Logistics has not experienced any significant cyanide incident or compliance problem during the previous three-year audit cycle.

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Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

Select cyanide transport routes to minimize the potential for accidents and releases.

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 1.1**
 not in compliance with

Hae Dong Logistics made contract with Taekwang Ind. Co., Ltd. Ulsan petrochemical No.3 Plant for the transportation of sodium cyanide from Ulsan Plant to Ulsan Rail Center and Pusan New Port in Korea. Hae Dong Logistics prepared and maintained the Cyanide Transportation Route Control Procedure in which the process of route selection for sodium cyanide transportation and control process are defined. According to the procedure, they have checked the possible routes from the sodium cyanide manufacture to their final destination. And then they decided to maintain the sodium cyanide transportation routes as before considering the possibility of potential accident and release including detail check items as population density, infrastructure, pitch, prevalence and proximity of water and fog. The customer requirements and profit were also considered. The minimization of possibility for potential accidents and release is key item in selection of sodium cyanide transportation route. During November 2025, they select again the sodium cyanide transportation routes according to the procedure.

1) Two transportation cases

Hae Dong Logistics need to transport the sodium cyanide for two cases according to contract with Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant.

- (1) Roadway transportation from Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant to Ulsan Rail Center. The distance from Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant to Ulsan Rail Center is about 4 Km.
- (2) Roadway transportation from Ulsan Rail Center to Pusan New Port. The distance from Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant to Pusan New Port is about 60 Km.

2) Selection of transportation routes

According to the requirements of Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant and Cyanide Transportation Route Control Procedure, Hae Dong Logistics evaluated several possible routes and finally selected as below.

- (1) Roadway transportation route from Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant to Ulsan Rail Center
 - Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant => Ulsan Petrochemical Complex => Ulsan Rail Center
- (2) Roadway transportation route from Ulsan Rail Center to Pusan New Port
 - Ulsan Rail Center => ChingRyung Interchange => Busan Ulsan Express Way => Haewoondae Interchange => Pusan New Port

Hae Dong Logistics established and implemented Risk Evaluation Procedure. During November 2025, they implemented again the hazard identification and risk evaluation for their two road transportation routes

1) Hazard identification

Survey the detail courses from Taekwang Ind. Co., Ltd. Petrochemical No.3 Plant to Ulsan Rail

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Center and Pusan New Port. And issued possible hazards and risks as upset of truck and trailer, traffic accident, leakage of sodium cyanide and robbery etc.

2) Risk evaluation

Evaluate the possibility and consequence for the identified hazards.

According to risk evaluation results, below were determined as high risks.

1) Route from Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant to Ulsan Rail Center

- Release to road and land by truck and trailer capsized during roadway transportation

2) Route from Ulsan rail Center to Pusan New Port

- Release to road, land and surface water by truck and trailer capsized during roadway transportation

- Release to sea by truck capsized during Gwang An Bridge transportation

Hae Dong Logistics prepared control measure and applied to those high risk items as below.

1) Release to road, land and surface water by truck and trailer capsized during road transportation

- Prepare and implement Cyanide Transportation Route Control Procedure in which driving speed, prevention of over loading and vehicle inspection etc. were defined.

- Prepared emergency response plan for the release of sodium cyanide to road, land and surface water.

2) Release to sea by truck and trailer capsized during Gwang An Bridge transportation

- Prepare and implement Cyanide Transportation Route Control Procedure in which driving speed, prevention of over loading and vehicle inspection etc. were defined.

- Prepared emergency response plan for release of sodium cyanide to sea water.

According to Cyanide Transportation Route Control Procedure, Hae Dong Logistics have re-evaluated their two transportation routes every year periodically. And for some changes related to route, road, vehicle and legal requirement etc., they should re-evaluate non-periodically. And also they defined the process for getting feedback on route condition from driver, reviewing the information and identification of additional risks. They should prepare additional control measure if any additional risk identified. Since March 2023 when they recertified lastly, there is no information from driver that can influence the identified risks and control measures.

Hae Dong Logistics documented the control measure in Cyanide Transportation Route Control Procedure and emergency response plan as below.

- Truck and trailer driving speed, maintenance of package, prevention of over loading and vehicle inspection etc. were defined

- Detail control measure for release to road, land and water surface

And also the procedure and emergency response plan were communicated and trained to employee and driver.

Hae Dong Logistics received comments from below stakeholders and relevant government bodies as below.

- Sodium cyanide manufacture Taekwang Ind. Co., Ltd. Petrochemical No.3 Plant

- Sodium cyanide exporters

- Korea health and safety agency

- Fire fighting agency

- Ulsan and Busan Local Government Offices

They also checked the relevant legal requirements as below.

- Industrial health and safety act

- Chemical control act

- Land contamination prevention act

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The comments from above stakeholders and legal requirements were reviewed and reflected to route selection and development of control measures for high risk items as below.

- 1) Comments from Taekwang Ind. Co., Ltd. Petrochemical No.3 Plant
 - Property of sodium cyanide, response for release and communication channel for emergency situation
- 2) Samsung C & T Corporation
 - Handling manual and communication channel for emergency situation
- 3) Korea health and safety agency
 - Handling and treatment manual, MSDS and communication channel for emergency situation

Hae Dong Logistics reviewed the overall detail courses for the two roadway transportation routes. According to the review results, they decide that convoys, escorts or additional measures are unnecessary as justified below.

- 1) From sodium cyanide manufacture “Taekwang Ind. Co., Ltd. Ulsan Petrochemical No. 3 Plant” to Ulsan Rail Center
 - Road transportation is about 4 Km
 - Paved road condition is good and no sever curved area
 - Some segments are curved, but the risk can be controlled by drivers.
 - Security condition is good and no social disturbance
- 2) From Ulsan Rail Center to Pusan New Port in Korea
 - Road transportation is about 60 Km
 - Paved road condition is good and no sever curved area
 - As main road is express way, road condition is good
 - Some segments are curved, near the high population density and surface water areas but those risks can be controlled by drivers.
 - Security condition is good and no social disturbance

According to the Cyanide Transportation Route Control Procedure, Hae Dong Logistics will use escort or convoy for special cases as social disturbance, strike by driver and if requested by government.

Since November 2021, they have used Bukwang Logistics Co., Ltd. as a subcontractor for the sodium cyanide roadway transportation. The Bukwang Logistics Co., Ltd. is ICMC certified transporter, so they have implemented relevant cyanide transportation procedures and comply with ICMC requirements.

During October 2025, Hae Dong Logistics have communicated the risk evaluation result, control measure of high risk and emergency response plan to Bukwang Logistics Co., Ltd.

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.

The operation is **X in full compliance with** **Standard of Practice 1.2**
 in substantial compliance
 not in compliance with

Hae Dong Logistics use only licensed drivers according to road traffic safety act. The drivers shall have license admitted the operation and driving for truck and trailer. According to Cyanide Transportation Route Control Procedure and Industrial Safety and Health Act,

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the truck and trailer drivers should receive minimum 16 hours training before undertaking the handling and transportation work for dangerous substance as chemicals, gas and radioactive material. Hae Dong Logistics have trained their drivers and operators minimum 16 hours for sodium cyanide safety issues as emergency response plan, wearing of personnel protective equipment and Cyanide Transportation Route Control Procedure. Hae Dong Logistics have registered driver and operator names, license numbers, effective dates of license and training results. Then Hae Dong Logistics use the trained and licensed drivers and operators in the register. Hae Dong Logistics also has implemented 2 hours monthly training to their drivers and operators for safety issues related to transportation and sodium cyanide handling.

Hae Dong Logistics have used subcontractor Bukwang Logistics Co., Ltd. for the sodium cyanide roadway transportation. The Bukwang Logistics Co., Ltd. is ICMC certified transporter, so they have implemented the use of licensed drivers, control of drivers, safety training and comply with ICMC requirements.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 1.3**
 not in compliance with

Hae Dong Logistics have used trucks and trailers originally designed for road transportation. The maximum load bearing capacity as 20 tons is defined in Cyanide Transportation Route Control Procedure with the reflection of requirements from road traffic safety act. Hae Dong Logistics have preventive maintenance schedule for trucks and trailers. The maintenance period, inspection item, last and next inspection dates were defined in maintenance schedule. The maintenance records including inspection results, part and oil exchange results were retained in Busan Head Office and in each truck and trailer. During the maintenance, the load bearing capacity and adequacy considering the maximum weight of transportation were checked and repair results were recorded.

Hae Dong Logistics defined the process of verification in Cyanide Transportation Route Control Procedure. According to the procedure, the adequacy of trucks and trailers for the road those must bear can be checked during preventive maintenance implemented every 6 months. The tire air pressure, tire abrasion, tire exchange date and running kilometer and distortion of frame should be checked to identify sign of stress and overloading. The inspection and maintenance results were recorded in each equipment history card retained in Busan Head Office. According to the maintenance records, recently there is no special case signing the stress and overloading. The overloading is prohibited in Korea by road traffic safety act. So the truck and trailer can't transport more than 20 tons.

According to road traffic safety act and Cyanide Transportation Route Control Procedure, the maximum weight for road transportation is 20 tons. To comply with manual and safety act, Hae Dong Logistics have transported only one container in which 16 ton of sodium cyanide can be fully inserted. Usually Hae Dong Logistics have transported by trailer the 20 feet standard container in which 16 Ton of sodium cyanide fully inserted. And also the sodium cyanide manufacture Taekwang Ind. Co., Ltd. Petrochemical No.3 Plant ordered only one container transported for each transportation order. So Hae Dong Logistics were prevented automatically the overloading for sodium cyanide

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transportation.

Hae Dong Logistics have used subcontractor Bukwang Logistics Co., Ltd. for the sodium cyanide roadway transportation. The Bukwang Logistics Co., Ltd. is ICMC certified transporter, so they have implemented the control of transport equipment, preventive maintenance, prevention of overloading and comply with ICMC requirements.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is **X in full compliance with** **Standard of Practice 1.4**
 in substantial compliance
 not in compliance with

In the Cyanide Transportation Route Control Procedure, Hae Dong Logistics defined the handling and inspection method for the container of sodium cyanide. The loading of sodium cyanide to container was controlled and implemented by Taekwang Ind. Co., Ltd. Ulsan Petrochemical No.3 Plant. After the loading to container, the amount and appearance were checked by Taekwang Ind. Co., Ltd. Ulsan Petrochemical No.3 Plant and drivers. And the container was locked by drivers. The amount of sodium cyanide and appearance inspection results were recorded in dispatch order sheets communicated from Taekwang Ind. Co., Ltd. Petrochemical No.3 Plant to Hae Dong Logistics and shipping company by computer network system. The process to maintain the integrity of producer's packaging was defined and implemented by truck and trailer drivers.

Taekwang Ind. Co., Ltd. Ulsan Petrochemical No.3 Plant have used sodium cyanide containers on which the mark of toxic chemical presence were attached and easily identified during transportation. According to Industrial safety and health act, the marking of toxic chemical presence and maintaining of MSDS were required during transportation. Hae Dong Logistics have transported the sodium cyanide container marked the toxic chemical presence by Taekwang Ind. Co., Ltd. Ulsan Petrochemical No.3 Plant and maintained MSDS by drivers. Those marking of toxic chemical presence and maintaining MSDS complied with Korea legal requirement and Cyanide Transportation Route Control Procedure.

Hae Dong Logistics have defined and implemented the safety processes related to sodium cyanide handling and transportation in Cyanide Transportation Route Control Procedure.

- 1) Truck and trailer inspection prior to departure
- 2) Preventive maintenance schedule was prepared and implemented for trucks and trailers.
- 3) The maximum working time of truck and trailer driver is defined as 8 hours in Cyanide Transportation Route Control Procedure
- 4) Process to prevent load from shifting
- 5) Process to maintain the integrity of producer's packaging
- 6) The process of suspension and modification of sodium cyanide transportation
- 7) A drug abuse prevention program
- 8) Hae Dong Logistics defined the retention period as five years for records originated from inspection, preventive maintenance, transportation log sheet, dispatch order sheet etc.

Hae Dong Logistics have used subcontractor Bukwang Logistics Co., Ltd. for the sodium cyanide roadway transportation. The Bukwang Logistics Co., Ltd. is ICMC certified transporter, so they have

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implemented the integrity maintenance of producer's packaging, use of signage during cyanide transportation, safety program and comply with ICMC requirements.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is	<input checked="" type="checkbox"/> X in full compliance with	Standard of Practice 1.5
	<input type="checkbox"/> in substantial compliance	
	<input type="checkbox"/> not in compliance with	

Hae Dong Logistics do not operate the sea and air transportation for sodium cyanide. So the transportation practice 1.5 is not actually applicable.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is	<input checked="" type="checkbox"/> X in full compliance with	Standard of Practice 1.6
	<input type="checkbox"/> in substantial compliance	
	<input type="checkbox"/> not in compliance with	

The drivers have pager and mobile phone. So during transportation they can communicate with the Busan Head Office of Hae Dong Logistics and also they have communication channel sheet in which telephone numbers of Hae Dong Logistics, safety team of Taekwang Ind. Co., Ltd. Ulsan Petrochemical No.3 Plant, Industrial safety and health agency, police, hospitals in Ulsan and Busan and fire fighting agency were defined.

Hae Dong Logistics provided the pagers to each driver, recorded the pager number and tested once per month. The test results were recorded in log sheets. Usually the drivers communicate with Busan Head Office during transportation. Each driver has mobile phone and the number of mobile phone was registered to emergency communication channel of Hae Dong Logistics. The mobile phone controlled by driver individually. And according to Cyanide Transportation Route Control Procedure, the driver should control the mobile phone properly, so that can be used in emergency situation and transportation.

Hae Dong Logistics surveyed the two roadway main transportation routes for sodium cyanide transportation. They can't find any communication blackout area along the two roadway transportation routes.

Hae Dong Logistics defined the tracking of sodium cyanide transportation in Cyanide Transportation Route Control Procedure. For each transportation by truck and trailer, the progress of transportation can be checked by mobile communication between driver and Busan Head Office. The Busan Head Office have maintained the transportation log sheets in which the transportation order number, truck and trailer number, driver names, departing time and arriving time were recorded.

The inventory control was defined in Cyanide Transportation Route Control Procedure. Taekwang Ind. Co., Ltd. Ulsan Petrochemical No.3 Plant input the dispatch amount, container number and date for individual transportation order in their computer network system. And also the information was

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informed to Hae Dong Logistics and shipping companies by computer network system. After the loading of sodium cyanide to container, the inspection of lock on door and container appearance were implemented by drivers and Taekwang Ind. Co., Ltd. Petrochemical No.3 Plant. The inspection results were recorded in log sheets and maintained by driver and informed to Busan Head Office.

The dispatch and transportation control were defined in Cyanide Transportation Route Control Procedure. Taekwang Ind. Co., Ltd. Ulsan Petrochemical No.3 Plant input the dispatch amount, container number and date for individual transportation order in their computer network system. The results were informed to Hae Dong Logistics and shipping company. During the audit, it was confirmed that the amount of sodium cyanide in container and transportation order were recorded in computer network system of Taekwang Ind. Co., Ltd. Ulsan Petrochemical No.3 Plant and transportation log sheets in Busan Head Office of Hae Dong Logistics. The Material Safety Data Sheet was available during roadway transportation and Busan Head Office. The driver, operator and office member maintain Material Safety Data Sheet in trailer, truck and Busan Head Office.

Hae Dong Logistics have used subcontractor Bukwang Logistics Co., Ltd. for the sodium cyanide roadway transportation. The Bukwang Logistics Co., Ltd is ICMC certified transporter, so they have implemented the control of communication equipment, tracking the cyanide shipment, inventory control, record control and comply with ICMC Requirement.

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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.

The operation is **X in full compliance with** **Standard of Practice 2.1**
 in substantial compliance
 not in compliance with

Hae Dong Logistics have conducted only roadway transportation for sodium cyanide. They do not use and control the interim storage area. So the transportation principle 2 is not actually applicable.

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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.

The operation is	X in full compliance with	Standard of Practice 3.1
	<input type="checkbox"/> in substantial compliance	
	<input type="checkbox"/> not in compliance with	

Hae Dong Logistics identified possible emergency cases as sodium cyanide release to road, land, surface water and robbery during transportation and prepared emergency response plan. They defined what they should do, wearing of personnel protective equipment, using of treatment equipment for spilled sodium cyanide, communication channel and relevant external responders such as sodium cyanide manufacture, shipping companies, exporters, Korea safety and health agency, police, hospitals and local government offices in Ulsan and Busan.

The emergency response plan considered transportation from sodium cyanide manufacture to Ulsan Rail Center and to Pusan New Port. Hae Dong Logistics have transported solid sodium cyanide. The plan considered the solid sodium cyanide packaged in film, drum and box and transported in container. So considering the spillage of solid sodium cyanide, they defined the preparation of treatment equipment, personnel protective equipment and neutralization method in emergency preparedness plan. According to the plan, they will use sawdust, cement powder and sand to collect and neutralize the spilled sodium cyanide. The emergency response plan considered the transportation methods as roadway transportation, loading and unloading in Ulsan Rail Center and Pusan New Port. During the preparation of emergency response plan, they traced two roadway transportation routes. They checked the infrastructure of the two roadway transportation routes. The check results of road condition, proximity of water, bridge condition and road traffic condition were reflected to the emergency response plan. The emergency response plan considered the design of the transportation truck and trailer. They have used double walled transportation trucks and trailers. The containers were fixed as designed in trailers with twist rock system. The containers were temporary stored in Ulsan Rail Center. The storage area was concrete paved. That was also considered and reflected to the emergency response plan.

Hae Dong Logistics prepared detail emergency response processes in the emergency response plan. They defined steps from starting of emergency to finalizing the emergency cases. The detail response action, responsibility and relevant external responder were defined in each step.

Hae Dong Logistics identified outside responders in the emergency response plan as customers, exporters, shipping companies, government bodies as fire fighting agency, Korea Industrial safety and health agency, local government office, polices and hospital in Ulsan and Busan. They have defined the general role and detail response action, responsibility and relevant external responders in the emergency response plan. And Hae Dong Logistics informed their emergency response plan and MSDS of sodium cyanide and advised their roles to relevant external responders.

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Transport Practice 3.2

Designate appropriate response personnel and commit necessary resources for emergency response.

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 3.2**
 not in compliance with

Hae Dong Logistics have established and implemented training procedure in which the preparation of annual training plan, initial and refresher training for emergency response related to sodium cyanide transportation were defined.

According to the training procedure, they completed initial training of emergency response for their drivers and employees. And they have prepared safety training plan every year for their drivers and employee. In the training plan, detail training items were defined for every month. The emergency response training was planned once per 6 months. During the training, they have used the emergency response plan as training material.

Hae Dong Logistics prepared the emergency response plan appropriate to overall emergency cases and can be applicable for such cases as sodium cyanide release to road, land, surface water and robbery during transportation. In the emergency response plan, the roles and responsibilities of driver, Busan Head Office team leader, team member, other relevant team and external agency were defined. Hae Dong Logistics defined the emergency response equipment in emergency response plan.

Hae Dong Logistics have defined the emergency response equipment in the emergency response plan. And they prepared list of emergency response equipment as personnel protective equipment and treatment equipment for two roadway transportation routes. The drivers should maintain the list and emergency response equipment as in list in truck and trailer during transportation. During the audit, it was confirmed that the drivers have maintained personnel protective equipment and treatment equipment as defined in list and emergency plan.

According to emergency response plan, Busan Head Office manager as safety representative should inspect emergency response equipment in driver's trucks and trailers. The inspection should be implemented once per month and results were recorded. Main inspection items are maintaining of emergency response equipment as in list and effective function of the equipment. During 2025 and 2026, they have inspected emergency response equipment monthly base and results were recorded.

Hae Dong Logistics have used subcontractor Bukwang Logistics Co., Ltd. for the sodium cyanide roadway transportation. The Bukwang Logistics Co., Ltd. is ICMC certified transporter, so they have implemented the emergency response training, control of emergency equipment and comply with ICMC requirements.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 3.3**
 not in compliance with

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Hae Dong Logistics prepared and maintained the emergency response plan appropriate to overall emergency cases. They identified outside responders as below.

- (1) Producer, customer and consigner : Taekwang Ind. Co., Ltd. Petrochemical No.3 Plant, Samsung C & T Corporation and Shipping Companies
- (2) Regulatory agencies : Fire fighting agency, Korea industrial safety and health agency, Local government office as Ulsan city office and Busan city office and Police
- (3) Hospital : Hospital in Ulsan and Busan

According to emergency response plan, they have contacted once per year the relevant personnel of outsider responders and updated the contact personnel and information.

Hae Dong Logistics Co., Ltd. revised emergency response plan during September 2022 to define the notification of ICMI of any significant cyanide incidents and have maintained until March 2026 to comply with ICMC requirement. There was no cyanide incident related to cyanide transportation since August 2016 when they started cyanide transportation.

Transport Practice 3.4

Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The operation is	<input checked="" type="checkbox"/> X in full compliance with	Standard of Practice 3.4
	<input type="checkbox"/> in substantial compliance	
	<input type="checkbox"/> not in compliance with	

Hae Dong Logistics prepared and maintained the emergency response plan appropriate to overall emergency cases. In the emergency plan, the remediation as recovery and protect for released sodium cyanide, decontamination of soil and water, control and disposal of wastes etc. were defined.

The prohibit of the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat sodium cyanide that has been released into surface water was defined in the emergency response plan.

Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is	<input checked="" type="checkbox"/> X in full compliance with	Standard of Practice 3.5
	<input type="checkbox"/> in substantial compliance	
	<input type="checkbox"/> not in compliance with	

According to emergency response plan, Hae Dong Logistics should check the emergency response plan once per year and revise the contact information and detail process with the reflection of changes in two transportation routes. During November 2025, the emergency response plan was reviewed, evaluated and updated.

According to emergency response plan, they should do the mock emergency drill once per year. The mock emergency drill was implemented in Busan Head Office during November 2025. The

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simulation of cyanide exposure to drivers during transportation and cyanide release to land and surface water was presented and response follow up was conducted during the mock emergency drill.

They checked the overall process and adequacy of emergency response plan and recorded the results.

According to emergency response plan, they should evaluate the emergency response plan after its actual application for incidents and once per year after the mock emergency drill, and revise it as needed. There was no incident requiring application of emergency response plan occurred during the three-year recertification period. During November 2025, they have checked and evaluated the emergency response plan after the mock drill.

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