



International Cyanide Management Code Certification Audit

Transportation – Summary Audit
Report

PREPARED FOR



Hebei Chengxin Transport Co., Ltd.

DATE

9 June 2026

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SIGNATURE PAGE

International Cyanide Management Code Certification Audit

Transportation – Summary Audit Report 0782151-02



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APPENDIX A IMPORTANT INFORMATION RELATING TO THIS REPORT

ACRONYMS AND ABBREVIATIONS

Acronyms	Description
ICMC	International Cyanide Management Code
ICMI	International Cyanide Management Institute
CTV	Cyanide Transportation Verification
UNEP	United Nations Environmental Program
BDS	BeiDou Navigation Satellite System
IBC	Intermediate Bulk Container
ERP	Emergency Response Plan
ERT	Emergency Response Team

1.0 OPERATION GENERAL INFORMATION

Name of Production Operation: Hebei Chengxin Transport Co., Ltd.
Name of Facility Owner: Hebei Chengxin Transport Co., Ltd.
Name of Facility Operator: Hebei Chengxin Transport Co., Ltd.
Name of Responsible Manager: Huikai Zhang
Address: Southeast of the Intersection of Yuanzhao Road and Chengxin Street, Yuanshi County
State / Province: Shijiazhuang City, Hebei Province
Country: China
Telephone: +86-311-66500855
Email: swallow.jin@hebeichengxin.com

2.0 OPERATION LOCATION DETAIL AND DESCRIPTION

Hebei Chengxin Transport Co., Ltd. ("Chengxin Transport") was established in 2014 and is in Southeast of the Intersection of Yuanzhao Road and Chengxin Street, Yuanshi County, Shijiazhuang City, Hebei Province, China. Chengxin Transport is approved by the Lianyungang City Bureau of Transport for road transportation and handling dangerous goods. Chengxin Transport employees about 437 people for the transport operation and has a fleet of 222 vehicles that are licensed and certified to transport dangerous goods.

The sodium cyanide product is manufactured and packaged by the production company. Solid cyanide is packaged in 50 kg drums or 1-ton/1.1-ton intermediate bulk containers and then into shipping containers. Liquid cyanide is packaged in iso-containers. All packaging is undertaken by the production company. Once sealed, Chengxin Transport is responsible for collecting and transporting the product.

Chengxin Transport operates 103 primary transport routes, including three ports, to serve customers across China. Cyanide is loaded onto trucks at the production facility and then delivered directly to customers or ports.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

Storage in transit may occur in the event that receipt at the port is delayed. In this event containers will not be removed from the trailers and the vehicles will only be parked for a maximum of 24 hours.

3.0 AUDITOR'S FINDING

This operation is

- ☒ in full compliance
☐ in substantial compliance
☐ not in compliance

with the International Cyanide Management Code.

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

4.0 AUDITOR INFORMATION

Audit Company: ERM (Shanghai) Limited
Lead Auditor and Production Hongtao Hu
Technical Expert Auditor:
Lead Auditor Email: hongtao.hu@erm.com

Names and Signatures of Other Auditors:

Auditor Trainee:

Amy Ding

Name



Signature

Dates of Audit: 9 to 10 April 2026

5.0 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 Cyanide Code Auditors.

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

6.0 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.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 1.1.

Chengxin Transport has implemented a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. Chengxin Transport has developed and implemented a management system for transportation and Cyanide Route Assessment and Selection Procedure that details the process and the parameters to be assessed when identifying, selecting and assessing potential transport routes. The procedure does include the assessment of schools, factories, infrastructure, intersections, towns and city, construction activities, sharp turns and steep gradients, bridges, tunnels, area known for instability, rivers, lakes, speed limits, seasonal weather conditions (snow, ice, flooding, fog), medical facilities and service stations. The roads need to be approved to transport dangerous goods by the local police authority.

Chengxin Transport has established a robust procedure to assess the risks associated with selected cyanide transport routes and to implement effective risk management measures. This process involves safety and dispatch personnel gathering route data and identifying potential hazards by physically driving the proposed routes. Hazards are then evaluated using a standardized scoring system to produce a comprehensive risk assessment. Key factors considered include population density, proximity to water bodies, seasonal weather conditions, and road surface quality. For every customer destination, both a primary and an alternative route are designated. The primary route is chosen based on achieving the lowest overall risk score, while the alternative route serves as a contingency should the primary route become unavailable due to factors such as major construction or accidents.

The assessment is reviewed and endorsed by drivers, coordinators, and safety supervisors. Following this review, the route receives approval from the general manager. Upon completion of the pre-assessment, formal approval must then be obtained from the local government to authorize use of the route.

Chengxin Transport has implemented a procedure for the regular re-evaluation of routes used for cyanide deliveries. In addition, the company has established a process to gather feedback on route conditions directly from its transport operators.

The route assessment is reviewed and updated annually, forming the basis for driver briefings on both the route and associated control measures. Records of these assessments, along with training documentation for the driver briefings, are maintained and readily available.

Attendance records include the agenda for each session, ensuring transparency and accountability. Additionally, drivers and escorts are encouraged to provide feedback through delivery records, supporting continuous improvement in route management.

Annual route assessment documentation was reviewed and confirmed that Chengxin Transport is completing assessment and reviews in accordance with their procedures.

Chengxin Transport addresses risks associated with selected routes through route assessments. These assessments clearly outline the measures implemented to mitigate identified risks. The resulting information is communicated to drivers during dedicated briefing sessions, with attendance documented to ensure accountability and transparency.

The route assessment reports were thoroughly reviewed and confirmed to contain information on control measures, including speed limits and the requirement to use low gears on steep gradients to mitigate identified risks. Furthermore, each vehicle will be equipped with an emergency contact card listing essential contacts—such as hospitals, fire departments, police, the national chemical accident emergency consulting firm, environmental agencies, and the Chengxin 24-hour emergency contact center. This approach ensures clear guidance and swift response in the event of an incident, reinforcing our commitment to safety and preparedness.

Chengxin Transport actively engages with communities, stakeholders, and relevant governmental agencies throughout the route selection process and the development of risk management measures. In alignment with regulatory requirements, local authority approval must be obtained prior to transport, and authorities are provided with a comprehensive route assessment to inform their decision-making.

Each shipment requires a permit “Road Transportation Permission for Highly Toxic Chemicals” to be issued by the local authority allowing transport of cyanide along the designated route within a specified timeframe.

There is also a requirement to inform the local police if the shipment needs to stop overnight. The requirement for noticing local police has been specified on the online application system.

Chengxin Transport has also contacted the hospitals identified along each of its transport routes and provided them with information on cyanide hazards and potential response actions.

Chengxin Transport has assessed its routes and concluded that no routes require additional control measures for special safety or security considerations.

Chengxin Transport assigns two drivers to each vehicle, with the off-duty driver serving as an escort. The emergency response plan is kept in the vehicle cabin, and, in the event of an incident, the local police are to be contacted.

Chengxin Transport does not subcontract cyanide transport or handling.

STANDARD OF 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 ☒ in full compliance with
☐ in substantial compliance with Standard of Practice 1.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 1.2.

Chengxin Transport only uses trained, qualified and licensed operators to operate its transport vehicles.

The Safety Production Management Procedures outline the minimum requirements necessary for operating specific vehicles, including obtaining the appropriate government certification. To operate a transport vehicle, operators must have:

- Dangerous Chemical Transport Vehicle Driving License, issued by Shijiazhuang transportation authority
- Dangerous Chemical Transport Vehicle Driving Training, organized by Shijiazhuang transportation authority
- Annual Training organized by Chengxin Transport
- Three level entry training on safety laws, regulations, cyanide awareness, emergency response measures and protection, organized by Chengxin Transport.

Interviews with drivers and a review of training records and delivery records confirmed that drivers had received the designated training and had current driver's licenses.

All personnel operating cyanide transport equipment have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. Chengxin Transport takes responsibility once the container or iso-container has been loaded, checked and sealed. Chengxin Transport's training focuses on managing transport to prevent release and subsequent exposure.

Chengxin Transport develops and implements an annual training plan that provides monthly topics covering elements of their management system on a rotational basis. The content of these sessions includes information and instruction on driving risks, transporting dangerous goods, briefing on cyanide transport route assessment and controls.

A review of training attendance records, training files and interviews with drivers confirmed that training is provided.

Chengxin Transport does not subcontract cyanide transport or handling.

STANDARD OF PRACTICE 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is ☒ in full compliance with
☐ in substantial compliance with Standard of Practice 1.3
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 1.3.

Chengxin Transport has details of each vehicle combination (prime mover and trailer) including the type, registration, and load bearing capacity. Values on the maximum load are provided by the manufacturer and verified through the vehicle certification process.

Pre-inspection will cover roadworthy vehicles including:

- Vehicle number
- Mechanical parameters (brakes, types, lights, alarm, steering, transmission, chassis, fire extinguishers, antistatic, signs, power cut, battery, rain wiper etc.)
- Inspector driver and escort signatures.

Pre-inspection records (checklist) of shipping containers:

- Package, labels
- Seals series number
- Actual loading versus maximum loading capacities
- Emergency response equipment (SDS, anti-dotes, chemical preventive suits, full-face masks, driver physical condition)
- Inspector signature.

Vehicles transporting dangerous goods undergo a 120-day inspection process, known as Level 2 maintenance including prime movers, trailers, and flatbed trucks, which is performed by a licensed third-party provider. Upon completion, each vehicle receives a quality warranty certificate, ensuring compliance and reliability.

Chengxin Transport has established procedures to verify the adequacy of the equipment for the load it must bear. There are procedures for maintenance which include compliance with annual inspection process for vehicle certification for the transport of dangerous goods issued by the local government. Part of the inspection process is to confirm vehicles are meeting manufacturer's specifications for load bearing.

Pre-inspection records clearly indicate both the load-bearing capacity and the actual load for each shipment. A thorough review of completed convoy documentation confirms that all shipments remain within the designated load capacity of the vehicles, ensuring compliance and operational integrity.

The pre-departure checks compare design capacity with actual load together with other required items and recorded in the inspection logbook. A review of the completed logbook confirms that loads were within the capacity of the vehicles.

There are two types of vehicles used for transport of cyanide, ridged flatbed trucks for the transport of small consignments of solid cyanide. Otherwise, prime movers and trailers are

used for consignments of solid and liquid cyanide. Chengxin Transport has different container sizes, the maximum load for a single container and truck does not exceed vehicle capability. Chengxin Transport operates with a single container load per vehicle.

Chengxin Transport does not subcontract cyanide transport or handling.

STANDARD OF PRACTICE 1.4

Develop and implement a safety program for transport of cyanide.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.4

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 1.4.

Chengxin Transport has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging.

The Hebei Chengxin Co., Ltd. (the producer) is responsible for the packaging and labelling of the cyanide product in various manners:

- Solid product into plastic bags and then into metal barrels which are locked and sealed (50 kg).
- Solid product into plastic bags and then into wooden crates which nailed and strapped to form an intermediate bulk container (IBC) (1 ton/1.1 tons). These are then packaged and locked in a shipping container.
- Liquid products into iso-container.

Once the product is secured in the bulk container, responsibility shifts to the transporter.

Established procedures ensure regular inspections of packaging integrity during transit, with any damage or spillage promptly reported. Single-use seals are applied to both the container doors and iso-container valves, and these seals are routinely checked throughout the journey. The unique serial numbers of each seal are documented on inspection check sheets, supporting traceability and accountability at every stage.

Placards and signage used to identify cyanide shipments comply with both local and international standards. Diamond-shaped markers are displayed at the front and rear of each vehicle, clearly indicating the presence of cyanide. Additionally, containers are labeled to specify their contents. Vehicle inspections and driver interviews confirmed that this placarding is consistently implemented.

Chengxin Transport has implemented a safety program for cyanide transport that includes:

a) *Vehicle inspections prior to each departure/shipment?*

Before each departure, drivers and escorts conduct thorough vehicle inspections, assessing mechanical roadworthiness and specific key components. The Safety department then reviews and verifies these inspection results prior to every departure or shipment, ensuring all standards are met.

b) *A preventative maintenance program?*

The preventative maintenance plan includes a third-party inspection and service every 120 days, accompanied by certification to ensure government compliance. A monthly schedule is developed to align with required servicing intervals. Maintenance records demonstrate that routine basic maintenance is consistently performed, and pre-convoy checks are conducted as part of standard procedure.

c) *Limitations on operator or drivers' hours?*

The daily driving limit is capped at 16 hours, and drivers may not exceed four consecutive hours behind the wheel without taking a break. An automatic in-vehicle alarm prompts drivers to rest after 3.5 hours of driving. To support safe operations, each vehicle is staffed by two drivers, allowing for regular rotation. All vehicles must be parked between 0 am and 6 am, ensuring both drivers receive sufficient rest. The site's monitoring system provides real-time tracking of driving hours for each vehicle, maintaining strict adherence to these requirements. In practice, actual driving hours on current routes consistently fall well below the established thresholds.

d) *Procedures to prevent loads from shifting?*

The manufacturer packages solid cyanide products into metal drums or intermediate bulk containers (IBCs), which are then loaded into sea containers. These containers are securely fastened to vehicles using twist locks to ensure safe transport. For liquid cyanide, iso-containers are filled to specified levels, with each fill level carefully verified before departure. These containers are also secured to trailers using twist locks, maintaining rigorous safety standards throughout the process.

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

Safety Operation Process in the Safety Production Management Procedures established clear measures for modifying or suspending operations in response to conditions such as severe weather or civil unrest. This procedure details the required actions and specifies the appropriate contacts to ensure a safe and coordinated response.

f) *A drug abuse prevention program?*

A blood alcohol test is conducted before employment, and an alcohol test is performed prior to each convoy. Security personnel observe drivers to assess their fitness for duty.

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

Records confirming the completion of these activities are maintained. Maintenance, inspection, and convoy records sampled from the audit period were reviewed and found to be complete.

Chengxin Transport does not subcontract cyanide transport or handling.

STANDARD OF PRACTICE 1.5

Follow international standards for transportation of cyanide by sea.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.5

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Not applicable. Chengxin Transport does not intend to transport consignments of cyanide by sea within the scope of this audit.

STANDARD OF PRACTICE 1.6

Track cyanide shipments to prevent losses during transport.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.6

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 1.6.

Chengxin Transport vehicles have the means to communicate with the transport company, cyanide producer and emergency responders. Variety of communication systems are in place, guided by the management system, which specifies the methods to be used. Each vehicle is equipped with emergency response plan, detailing contact numbers for relevant provinces and hospitals along the transport route.

The primary means of communication is via mobile phone between vehicles and between the convoy and the office. BDS is used to track progress of the convoy throughout the journey. And the CCTV is planned to use to monitor the behavior of the driver.

The convoy will contact the transport coordinator in the event of an emergency, and the coordinator will handle communication with the customer (mine) and supplier/producer.

There is a 24-hour Monitoring Room that the drivers can contact to initiate emergency response. The contact details for local police and fire authorities are also available to the drivers.

Chengxin Transport conducts regular tests of communication equipment to ensure optimal functionality. As part of pre-departure inspections, comprehensive checks are completed before dispatch. Each day, the transport coordinator in the 24-hour Monitoring Room will check the behavior of the driver and the system. Additionally, all mobile phone numbers are documented in a contact register for efficient communication management.

Chengxin Transport has conducted a thorough assessment of high-risk areas along its transport routes. The current routes benefit from robust mobile coverage, with brief signal interruptions identified within tunnels. These blackout zones span relatively short distances—approximately one kilometer—and vehicle tracking is maintained through BDS.

Chengxin Transport has systems and procedures to track the progress of cyanide shipments. There IS BDS tracking system installed on the vehicles, the BDS tracking system is linked to the government tracking system and Chengxin Transport has its own tracking system that provides information on the vehicles performance including speed and fuel consumption.

Vehicle positions are monitored in real time, and the transport coordinator maintains daily communication with the convoy.

Chengxin Transport has implemented inventory controls to prevent the loss of cyanide during shipment. The dispatch records for both solid and liquid cyanide vehicles serve as a

comprehensive register, detailing the quantity delivered, the recipient, and both scheduled and actual delivery times. This register is compiled from completed delivery sheets, ensuring accuracy and traceability throughout the process.

Each vehicle is accompanied by a delivery confirmation docket, detailing the vehicle's date, cargo, weight, unique seal number, and signatures from both the receiver upon arrival and the sales and coordination team at dispatch. Seals, each bearing a unique serial number, are affixed to the ISO-container or shipping container to ensure traceability and security.

Chengxin Transport implements robust procedures for BDS tracking and verification of physical security seals along the route, ensuring completed inventory control.

Shipping records indicating the amount of cyanide in transit and Safety Data Sheets are available during transport. A review of delivery documentation together with pre-departure security checks confirmed that the amount of cyanide on each vehicle is recorded.

There is a copy of the emergency response plan with the SDS booklet held within the cabin of each vehicle.

Chengxin Transport does not subcontract cyanide transport or handling.

PRINCIPLE 2 | INTERIM STORAGE

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

STANDARD OF PRACTICE 2.1

Store cyanide in a manner that minimizes the potential for accidental releases.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 2.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Not Applicable. Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

Storage in transit may occur at the event that transport is delayed. In this event, containers will not be removed from the trailers, and the vehicles will only be parked for a maximum of 24 hours.

PRINCIPLE 3 | EMERGENCY RESPONSE

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



Hebei Chengxin Transport Co., Ltd.

Name of Facility

Hongtao Jia

Signature of Lead Auditor

9 June 2026

Date

STANDARD OF PRACTICE 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is ☒ in full compliance with
☐ in substantial compliance with Standard of Practice 3.1
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 3.1.

Chengxin Transport has hazardous chemical Transport Accident and Response and Rescue Plan herein referred to as the emergency response plan or ERP). The Plan includes information on:

- Scope and targets
- Introduction
- Emergency Plan for Work Safety Accidents of Road Dangerous Goods Transportation Enterprises
 - General provisions
 - Emergency response structure and responsibilities
 - Emergency response
 - Incident reporting
 - Prevention and warning
 - Initiation of Emergency Response Procedures
 - Emergency response
 - Post-disposal after accidents
 - Emergency support and guarantee
- Special Emergency Plan for Work Safety Accidents of Road Dangerous Goods Transport Enterprises
 - Special Emergency Rescue Plan for Road Transportation Accidents
 - Special Emergency Plan for Fire and Explosion Accidents
 - Special Emergency Plan for Leakage Accidents
- On-site Disposal Plan, covering Fire, falls from height, traffic accidents, electric shock, poisoning and leakage scenarios, including accident risk description, emergency job responsibilities, emergency disposal measures and precautions.
- Annex 1: Overview of Production and Business Entity
- Annex 2: Emergency Supplies List
- Annex 3: Emergency Plan System and Coordination
- Annex 4: Risk Assessment Result
- Annex 5: Contact Plan for Emergency Departments, Institutions and Personnel
- Annex 6: List of Important Supplies
- Annex 7: SDS
- Annex 8: Geographical Location and External Traffic Map
- Annex 9: Usage Methods of Emergency Equipment and Supplies
- Annex 10: Common First Aid Methods

- Annex 11: Emergency Traffic Accident Handling Plan Process
- Appendix A: Accident Risk Identification and Assessment Report
- Appendix C: Emergency Resources Investigation Report
- Appendix D: Emergency Response Card

a) The transportation route?

The ERP (Emergency Response Plan) is appropriate for the transportation route and Chengxin Transport does not have an interim storage facility. The ERP includes details on the actions to be taken in the event of:

- Breakdowns
- Incidents on highways, roads and tunnels
- Emergency scenarios where cyanide (liquid or solid) has been released.

The ERP details the emergency numbers for Police, Fire Authority and Ambulance.

b) The physical and chemical form of the cyanide?

The ERP does consider both the physical and chemical form of cyanide. Chengxin Transport delivers solid sodium cyanide in 50 kg steel drums or 1 tonne IBCs and liquid sodium cyanide in iso-containers. The ERP details response actions to incident scenarios for liquid and solid cyanide including the necessary response equipment. Chengxin Transport have equipment to respond including Boots, Gloves, Coveralls, Masks, Antidote, etc. Section 3.4.2 in ERP provides detailed, substance-specific response procedures for chemical releases, with explicit provisions for cyanide as well as other hazardous substances.

The On-site Disposal Plan outlines standardized, hazard-specific procedures—including containment, neutralization, decontamination, and waste handling—for the safe management of accidental releases of all transported chemicals, with particular emphasis on cyanide in its solid and liquid forms.

c) The method of transport?

The ERP does consider the method of transport. ERP is based on the road transportation of solid cyanide in 50 kg drums or IBCs within a shipping container or liquid cyanide within the tanker truck. With a single container per vehicle. Emergency scenarios and response actions are based on the method of transport and the type of packaging.

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

The ERP does consider the aspects of transport infrastructure. The ERP response actions are based on the scenarios developed from the hazards identified through the route assessment process. The ERP has response actions for incidents on different parts of the road infrastructure such as highways, tunnels, or locations close to surface waters.

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

The ERP does consider the design of transport vehicle and Chengxin Transport does not have an interim storage facility. Only the trailer for solid sodium cyanide and the tanker truck for liquid cyanide were present on site. The ERP was developed based on the transportation scenarios.

The ERP does include descriptions of response action for the anticipated emergency situation. In section Special Emergency Plan for Leakage Accidents and onsite handling plan specified the response actions for each scenario. Response actions include initiating emergency shutdown, deploying safety warning signage, evacuating personnel, establishing a secured cordon and isolation zone, reporting the incident (using standardized reporting protocols to convey essential information—including incident time, location, hazardous substance involved,

estimated quantity, affected area, and initial response measures—to both the local ecological and environmental protection authority and the enterprise’s internal emergency command center), donning appropriate personal protective equipment (PPE), isolating and securing the leak source, and containing and remediating the released substances, and so on.

The ERP details response for solid and liquid release and details the actions for the driver and escort at the scene and the emergency response team depending on the scale of the incident.

The ERP does identify the roles of outside responders including Police, Fire Authority and medical facilities. In the event of an incident the driver’s first duty is to contact emergency services. The roles of the emergency services are detailed as follows:

- Transport Police are responsible for keeping the public away from the incident scene and traffic control.
- The Police are responsible for crowd control and communication with media and the public.
- The Fire Authority is responsible for rescue, clearing the scene and cleaning up spills. The Chengxin emergency response team would work with the Fire Authority in cleaning up cyanide.
- Local hospitals and ambulances are responsible for treating cyanide exposure at the scene and in hospital.

STANDARD OF PRACTICE 3.2

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

The operation is ☒ in full compliance with
☐ in substantial compliance with Standard of Practice 3.2
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 3.2.

Chengxin Transport does provide emergency response training of appropriate personnel. Training is provided monthly and topics include:

- Applicable laws, regulations, and mandatory/technical standards governing occupational safety and health
- Risk identification, classification, and hierarchical control methodologies; requirements for hazard identification, assessment, and remediation
- Position-specific operating procedures and safety work instructions
- Enterprise-level occupational safety and health management systems and internal rules
- Specialized safety protocols for hazardous materials transportation during flood season and under adverse meteorological conditions (e.g., heavy rain, fog, ice, snow)
- Approved emergency response plans for incidents
- Foundational medical first aid competencies and occupational health awareness training

- Administrative provisions and quantified incentive criteria for reporting potential safety hazards or violations
- Fire prevention principles, vehicle pre-trip inspection protocols, and critical safety precautions for transport operations
- Winter-specific driving safety practices and defensive driving techniques
- Case studies of representative hazardous materials transportation incidents and empirically validated safe driving principles

A review of driver training files and the annual training plan confirmed that drivers received training in emergency response. Interviews with drivers confirmed that they have received training about emergency response procedures and demonstrate a clear understanding of the hazards associated with cyanide.

Drivers are trained in the administration of cyanide antidotes, and the antidote is produced by China People Army Medicine Science Institute and has instructions that state that it should be stored at room temperature and out of the sun.

Chengxin Transport provides initial and periodic refresher training in emergency response procedures including implementation of the emergency response plan.

Drivers attend training specifically for emergency responses annually. The training course will be delivered daily during the scheduled week to ensure full workforce participation. A review of driver training files confirmed that drivers attended the training and that the training was conducted on an annual basis. Interviews with drivers confirmed that they were aware of the actions to take in the event of an emergency.

Chengxin Transport does provide descriptions of the specific emergency response duties and responsibilities of personnel. The duties of the two drivers include:

- Calling the emergency services
- Clearing the public from the scene
- Contacting Chengxin Transport's control center
- Administering first aid
- Assisting emergency services
- Responding, containing and cleaning up small scale spills.

Also, the drivers have received training in administering intramuscular injections of the antidote.

For larger scale incidents the emergency response team (ERT) are deployed and will assist emergency services at the scene. The plan outlines the responsibilities of the ERT.

The emergency contact center is responsible for contacting the Managing Director who assumes responsibility for liaising with the government and other stakeholders.

There is a list of emergency response equipment that should be available during transport.

Based on Site observation, a copy of the Safety Data Card for Road Transport of Dangerous Goods is kept in each vehicle that is used to transport cyanide as well as the emergency response equipment as below:

Emergency response equipment listed in the Safety Data Card include wheel chocks, warning tripods, warning tapes, fire extinguishers, eye wash stations, eye wash water, anti-cyanide needles, emergency buckets, portable lighting equipment, reflective backgrounds, safety helmets, acid and alkali resistant protective gloves, protective glasses, protective suits, gas masks, high-waisted corrosion-resistant rain boots, emergency plastic sheets, etc.。

Also, the pre-inspection has been conducted for each vehicle which includes:

- Emergency response equipment (SDS, anti-cyanide injections, chemical preventive suits, full-face masks, driver physical condition)
- Inspector signature.

Chengxin Transport has the necessary emergency response and health and safety equipment available, including personal protective equipment during transport.

A range of transport vehicles was inspected, confirming that all required emergency response equipment was present and in good working order. Additionally, a current copy of the Emergency Response Plan (ERP) was readily available.

A review of the Emergency Response Vehicle confirmed that all essential response equipment, including personal protective equipment, was present and in good condition. Additionally, a current copy of the Emergency Response Plan was readily available.

There are procedures to inspect emergency response equipment to assure its availability when required. The inspections are completed as in the pre-departure checks and there is a checklist that details each item of emergency response equipment that is signed by the driver and transport dispatcher. A review of completed checklists and interviews with drivers confirmed that procedures are in place and being followed.

Chengxin Transport does not subcontract cyanide transport or handling.

STANDARD OF PRACTICE 3.3

Develop procedures for internal and external emergency notification and reporting.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 3.3

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 3.3.

There are procedures and current contact information for notifying the shipper, transportation company management team, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency. Upon receipt of an incident notification, the shipper shall promptly inform the receiver (consignee). The contact information is provided within the ERP and includes contact information for emergency services and hospitals along the route.



Hebei Chengxin Transport Co., Ltd.

Name of Facility

Hongtao Jiu

Signature of Lead Auditor

9 June 2026

Date

Drivers are required to notify the Chengxin Control Centre, which will, in turn, escalate the matter to the Managing Director. The managing director is responsible for liaising with the government and other stakeholders, including the mine and supplier. This escalation process together with contact details is provided in the ERP. Personnel interviewed described the escalation process provided in the ERP and contact numbers are updated during the annual route assessment process.

Following the completion of the emergency drill, an on-site review will be conducted to assess the alignment between the Emergency Response Plan (ERP) and actual operational emergency requirements.

The ERP undergoes an annual review, during which personnel confirm that contact details are verified and updated as necessary. As there have been no plan activations or changes to contact information, the ERP remains current and unchanged.

According to the Accident Reporting Process in Safety Production Management Procedures, the Facility will notify ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No significant cyanide incidents have occurred during last three years.

STANDARD OF PRACTICE 3.4

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

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 3.4

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 3.4.

The ERP details the actions to be taken in the event of a solid or liquid cyanide spill. The ERP provides that solid cyanide is to be collected and placed back into container and taken back to the production facility for disposal.

The ERP describes neutralization techniques using hydrogen peroxide for spills onto soils or ground. It provides the amount of hydrogen peroxide per metric ton of spilt cyanide. All neutralized soil is to be excavated and taken back to the production facility for disposal.

The ERP does prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

Section 4.3.4.2 of the ERP states "When sodium cyanide is released into water body, it is prohibited to use bleaching powder, hydrogen peroxide, sodium hypochlorite, or ferrous sulfate etc. chemical to do water disinfection".

STANDARD OF PRACTICE 3.5

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

The operation is ☒ in full compliance with
☐ in substantial compliance with Standard of Practice 3.5
☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation is in FULL COMPLIANCE with Transportation Practice 3.5.

There are provisions for periodically reviewing and evaluating the Plan's adequacy and they are being implemented. The ERP was revised in May 2025, and practical operational drills have been undertaken within the designated operation area of the transportation company as planned over the three-year period. The practical operational drills process includes a debrief process, emergency response operations and review of what went well and opportunities to improve response.

Under the Emergency Response Plan (ERP), Chengxin Transport is required to conduct annual specialized emergency drills for all categories of hazardous chemicals. A review of the emergency drill plan and supporting documentation confirms that these exercises are carried out consistently, including scenario-based drills for both liquid and solid cyanide handling. This approach demonstrates a rigorous commitment to safety and operational excellence, ensuring comprehensive preparedness across all hazardous materials.

The Emergency Response Plan (ERP) is designed to be updated following any incident or whenever changes occur in processes or equipment. After each annual operational drill, the ERP undergoes a review and is revised as necessary to ensure ongoing effectiveness. During the audit period, no incidents related to cyanide transport were reported.

7.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in **Appendix A** of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations ERM (Shanghai) Limited has under the contract between it and its client.



APPENDIX A IMPORTANT INFORMATION RELATING TO THIS REPORT

The document ("Report") to which this page is attached and which this page forms a part of, has been issued by ERM (Shanghai) Limited ("ERM") subject to the important limitations and other qualifications set out below.

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The scope of ERM's Services and the period they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by ERM regarding it.

At any location relevant to the Services conditions may exist which were not detected by ERM, in particular due to the specific scope of the investigation ERM has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation, and which have not therefore been considered in this Report.

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Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed ERM to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the



information collected by ERM or otherwise made available to ERM. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to ERM when the Services were performed and this Report was prepared. ERM has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

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