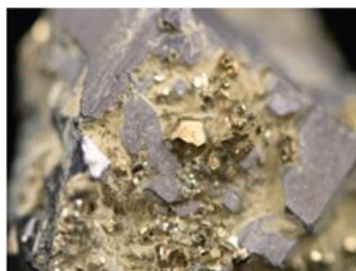
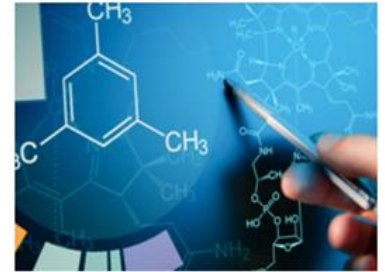


ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

Hebei Chengxin Transport Co., Ltd. Global Ocean Supply Chain



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:	Hebei Chengxin Transport Co., Ltd. Global Supply Chain Yuanzhao Road, Yuanshi County Shijiazhuang City, Hebei Province 051130 CHINA
Names and contact information for this facility:	Jason Li International Sales Department Manager +86-311-66500855 jason.li@hebeichengxin.com

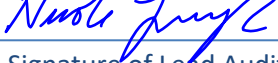
Supply Chain Description

The Hebei Chengxin Transport Co., Ltd. Global Ocean Supply Chain (hereafter called “Chengxin Transport”) was assessed during this audit. The cyanide being transported is produced by one of three Chengxin cyanide manufacturing facilities:

- Hebei Chengxin Co., Ltd. is located 30 km south of the province capital Shijiazhuang City, China. The site manufactures many chemicals using liquid sodium cyanide as a basic feed- stock, including solid sodium cyanide and is one of the largest production bases of cyanide and its derivatives in China. The Hebei Chengxin Co., Ltd. sodium cyanide production facility third-party Cyanide Code re-certification was most recently on April 18, 2023. The Hebei facility ships solid sodium cyanide to international destinations using primarily the ports of Qingdao and Lianyungang in China.
- Inner Mongolia Chengxin Yongan Chemical Co., Ltd. is in the Alxa Economic Development Zone in the Inner Mongolia Autonomous Region. The Inner Mongolia Chengxin Yongan Chemical Co., Ltd. liquid and solid sodium cyanide production facility was initially certified to the Cyanide Code on November 21, 2022. Currently, the Inner Mongolia facility ships solid sodium cyanide for ocean transport primarily using the Qingdao and Lianyungang Ports.
- Guang’an Chengxin Chemical Co., Ltd. is in the Guang’an Economic and Technical Development Zone in Sichuan Province, China. The industrial complex contains multiple manufacturing plants including liquid and solid sodium cyanide production facilities. The Guang’an Chengxin Chemical Co., Ltd. sodium cyanide production facility was also originally certified to the Cyanide Code on November 21, 2022. Currently, the Guang’an facility ships solid sodium cyanide to international destinations using primarily the Qingdao and Lianyungang Ports.

Solid sodium cyanide is transported from the three manufacturing locations over the road to shipping ports by Hebei Chengxin Transport Co., Ltd., a transportation operation most recently recertified to the Cyanide Code on April 18, 2023. Chengxin Transport contracts with Ocean Carriers to transport their products from the Chinese ports of departure to international receiving ports.

Sodium cyanide is mainly exported from the Qingdao Port and the Lianyungang Port due to proximity to

Hebei Chengxin Transport Co., Ltd. Global Ocean Supply Chain		October 11, 2023
Name of Operation	Signature of Lead Auditor	Date

production locations. The Shanghai Port is the furthest from the production facilities, so it is used only when options from other ports are limited.

All global ocean moves of sodium cyanide that originate in China are within the scope of this re-certification audit. Chengxin Transport's management of the ocean transport of its products was evaluated through interview with company personnel, a review of shipping records, and due diligence information gathered for each ocean carriers and each port within the scope of the re-certification. The results of the due diligence evaluations of the ocean carriers are contained within this report. The ocean carriers for which due diligence investigations were performed are:

1. Maersk
2. Mediterranean Shipping Company (MSC)
3. CMA CGM
4. Korea Marine Transport Co. (KMTC)
5. Hapag Lloyd

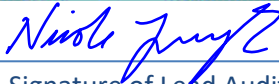
Due Diligence Reviews were also conducted for ports in China used to ship the product and international ports receiving cyanide from Chengxin Transport during the re-certification period. Records were sampled to confirm that Chengxin Transport had either evaluated the ports specifically for cyanide safety handling practices, or that the port had been previously approved and used by Chengxin Transport for hazardous material shipments.

At the time of the audit, the following ports were in use by Chengxin for sodium cyanide shipments to gold mining customers:

Name of Port	Country
Abidjan	Ivory Coast
Aliaga	Turkey
Angamos	Chile
Buenos Aires	Argentina
Callao	Peru
Conakry	Guinea
Da Nang	Vietnam
Dakar	Senegal
Dar es Salaam	Tanzania
Deseado	Argentina
Guaymas	Mexico
Izmir	Turkey
Jakarta	Indonesia
Jeddah	Saudi Arabia
Lazaro	Mexico

Name of Port	Country
Lianyungang	China
Manzanillo	Mexico
Mersin	Turkey
Mombasa	Kenya
Nouakchott	Mauritania
Punta Arenas	Chile
Qingdao	China
San Antonio	Chile
Shanghai	China
Surabaya	Indonesia
Tema	Ghana
Tianjin	China
Trabzon	Turkey
Valparaiso	Chile
Vostochny	Russia

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Name of Operation


Signature of Lead Auditor

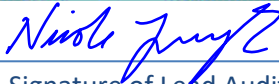
October 11, 2023
Date

Audit Implementation and Conclusions

The audit was performed by an independent third-party auditor who was pre-approved by the ICMI as a Lead Auditor for all types of Cyanide Code audits and as a technical expert for Cyanide Code audits of cyanide transportation and production operations.

Cyanide transportation management practices were evaluated against the Cyanide Code requirements documented in the ICMI Cyanide Code, ICMI Cyanide Code Transportation Protocol, and the ICMI Auditor Guidance for Use of the Cyanide Transportation Verification Protocol. The audit was conducted through discussions and interviews with multiple individuals in cross-functional roles at Chengxin. Additionally, records regarding shipment tracking, cargo labeling practices, and shipping documentation were randomly sampled and found to be acceptable.

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Signature of Lead Auditor

October 11, 2023
Date

Auditor's Finding

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

The cyanide management practices for the Chengxin Global Ocean Supply Chain were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol*.

The results of this re-certification audit demonstrate that the Chengxin Ocean Supply Chain cyanide-related distribution and transportation activities are in **FULL COMPLIANCE** with International Cyanide Management Code requirements.

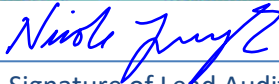
Compliance Statement

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
Technical Auditor:	Liu Yun E-mail: yun.liu@mss-team.com
Dates of Audit:	July 12 and 24, 2023 with Due Diligence Reviews conducted July-September 2023

Hebei Chengxin Transport Co., Ltd. Global Ocean Supply Chain
Name of Operation


Signature of Lead Auditor

October 11, 2023
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.

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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.

Interviews confirmed that Chengxin considers the capabilities of ocean carriers and ports when evaluating the international routes. When selecting an ocean carrier, the following factors are considered: designated route, Dangerous Goods capabilities, container tracking, vessel size and configuration, carrier performance, cost, and client needs. Consideration is given to the following factors when selecting a port: location (proximity to customer), security and safety of the port, handling times, container tracking, Dangerous Goods capabilities, port capacity, ease of access and safety of access routes.

Cyanide Code Due Diligence evaluations were conducted for all Ocean Carriers and Ports that are used by the Ocean Carriers to transport the product while it is under their possession. Chengxin is not involved in the determination of the final marine routes used by the Ocean Carriers.

Due Diligence assessment results are in the *Ocean Carrier and Port Due Diligence Investigation Results* section of this report.


Chengxin Transport maintains very close relationships with its freight forwarder. Ocean carriers submitted extensive due diligence information in response to ICMI Cyanide Code-related Due Diligence information requests. Information, evidence of successful safety audits, and hazardous material handling certifications are maintained by Chengxin.

Chengxin Transport conducts due diligence assessments of ocean carriers and ports once every three years to identify potential risks. The measures taken to address risks identified for carriers are addressed within the due diligence process. The due diligence assessments did not identify any requirement for additional safety or security measures. Each port is in a country that subscribes to the International Maritime Organization (IMO) maritime regulations, including Safety of Life at Sea (SOLAS) and International Ship and Port Facility Security (ISPS) requirements to manage safety and security risks at sea and at ports.

Chengxin Transport obtains necessary governmental approvals and export / import licenses for international shipments. The government also provides input as part of the process of issuing the transportation certificate to the China port, which serves as the permit for the transport of cyanide. The local public security office provides feedback during the permitting process from the government.

The primary risks with the ocean transportation supply chain relate to the possibility of losing track of a shipment due to a trans-shipment or other factors, or the risk of having a container opened en-route by a person who has not been trained in cyanide safety. During the audit Chengxin Transport demonstrated its

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ability to track ocean shipments in real time for shipments on each of the ocean carriers within the scope of this audit. To reduce the chance that an unauthorized or untrained person opens an inter-modal container, the containers are sealed. Records that included the information on container seals were reviewed for each of the ocean carriers for the re-certification period. Information on the shipping records was appropriate and no problems were evident.

Chengxin Transport communicates Cyanide Code requirements to the ocean carriers through its shipping partner (freight forwarder) that arranges the shipments. Personnel from the freight forwarder were involved in this recertification audit and due diligence process. Chengxin Transport ensures that its transportation partners are assessed for Cyanide Code compliance during either internal port audits, Cyanide Code re-certification audits, or due diligence assessments.

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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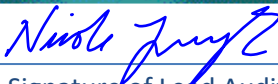
Transport Practice 1.2

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

Chengxin Transport performs due diligence evaluations to ensure that its ocean carriers and ports operate according to recognized EHS standards and are experienced in the handling of hazardous goods. Each ocean carrier and port in the scope of this re-certification was included in the due diligence assessment process.

Chengxin Transport communicates Cyanide Code requirements to the ocean carriers through its shipping partner (freight forwarder) that arranges the shipments. Personnel from the freight forwarder were involved in this recertification audit and due diligence process. Chengxin Transport ensures that its transportation partners are assessed for Cyanide Code compliance during either internal port audits, Cyanide Code re-certification audits, or due diligence assessments.

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 1.2
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Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

Inter-modal containers used for international shipments are owned and controlled by the ocean carrier that will carry the containers to international destinations. Confirmation was made during the audit and due diligence investigations that container maximum allowable weights are well above the maximum weight that is packed into the containers. Chengxin Transport uses standard configurations for the packing of intermodal containers. These standard configurations have standard weights. This was also confirmed through the sampling of shipping paperwork from each ocean carrier within scope of this assessment.

Chengxin Transport ensures authorized packaging is used for the solid sodium cyanide. Package specifications were reviewed and were found to be compliant. The packaging operations of the Hebei, Guang'an and Inner Mongolia sodium production facilities were most recently audited in 2022 as part of their Cyanide Code Production Cyanide Code Certifications and were found to be compliant with requirements.

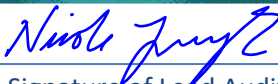
Chengxin Transport performs due diligence evaluations to ensure that its ocean carriers and ports operate according to recognized EHS standards and are experienced in the handling of hazardous goods.

Shipping paperwork was reviewed during the audit and showed the number of packages shipped and the weight of the cargo. This information is used by transportation partners to ensure that overloading does not occur.

Loads on container ships are inspected and controlled according to the International Convention on Load Lines (ICLL), an International Maritime Organization (IMO) Convention that is applicable for all container vessels engaged in international trade. The ICLL defines the maximum allowed draught of the vessel, and how this is to be marked on the side of the vessel. Container ships are required to go through an International Load Line Certification process that verifies that the vessel strength and stability have been approved for the specific loading capacities. Lines are drawn on the sides of ships to mark the height of the freeboard mark that must be maintained. The use of this mark ensures that the vessel has a reserve buoyancy and bow height in compliance with the requirements of the ICLL. The use and monitoring of this ship characteristic ensures that the container ship is not overloaded.

Chengxin Transport communicates Cyanide Code requirements to the ocean carriers through its shipping partner (freight forwarder) that arranges the shipments. Personnel from the freight forwarder were involved in this recertification audit and due diligence process. Chengxin Transport ensures that its transportation partners are assessed for Cyanide Code compliance during either internal port audits, Cyanide Code re-certification audits, or due diligence assessments.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.3
	<input type="checkbox"/> In substantial compliance with	
	<input type="checkbox"/> Not in compliance with	

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Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

Chengxin Transport ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed during the Chengxin Transport road transportation audit in 2022 (separate audit report and certification) and were found to be compliant. The packaging operations of the Hebei, Guang'an and Inner Mongolia sodium production facilities were most recently audited in 2022, as part of their Cyanide Code Production Cyanide Code Certifications and were found to be compliant with requirements.

Interviews and photos of containers at shipping ports were used to confirm that appropriate signage is used on containers shipped by ocean. During the onsite audit of the production operation in 2022, containers were observed as having the necessary signage and placards, as required by China law. The placards and signage are changed at the China port to be compliant with International Maritime Dangerous Goods (IMDG) laws. The International Maritime Organization (IMO) requirement for the marine pollutant signage to be posted on the container was also confirmed through port photos as being properly placed on the inter-modal containers.


Hebei, Guang'an, and Inner Mongolia operational procedures for loading were also reviewed for this requirement during the production certification and re-certification audits.

A packing inspection is conducted for international shipments by the local Customs Bureau (a government authority) and a performance certificate is issued for each batch of the containers. All documentation (procedures and checklists) requires proper placarding (all 4 sides) to be confirmed prior to the containers being released.

Chengxin Transport does not manage the ocean transport directly, but it does perform due diligence evaluations to ensure that its ocean carriers and ports operate according to recognized EHS standards, safety program expectations, and that they are experienced in the handling of hazardous goods.

The operation is:	<input checked="" type="checkbox"/> In full compliance with	Standard of Practice 1.4
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	<input type="checkbox"/> Not in compliance with	

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Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

Chengxin Transport transports shipments of cyanide by sea in compliance with the Dangerous Goods Code of the International Maritime Organization. Chengxin Transport ships its sodium cyanide on ocean carriers that have demonstrated safety programs and safe performance. Ocean carriers are subject to all International Maritime Organization (IMO) requirements, including those relevant to cyanide shipment safety. The following information was evaluated during the audit:

Ocean carriers were asked for information regarding fulfillment of Cyanide Code requirements using a customized Cyanide Code transportation protocol. Responses and information provided by carriers was deemed to be appropriate by the 3rd-party auditor.

The ocean routes are chosen by the ocean carriers. All ports used in this supply chain have undergone a Due Diligence review. Shipping records from the re-certification period were reviewed. Dangerous Goods certifications for the China ports were available for review during the audit. International (destination) ports were also evaluated for alignment with ICMI Cyanide Code requirements as part of this re-certification audit process.

Packaging specifications were found to be conformant to the packaging requirements of the IMDG Code.

Packaging reviewed during the 2022 Cyanide Code production audits of the Hebei, Guang'an, and Inner Mongolia facilities and the 2022 transportation audit of Hebei Chengxin Transport was appropriately marked and was found to be compliant with Chapter 5.2 of the IMO DG Code requirements.

Loaded inter-modal containers were evaluated and were found to be marked and placarded in accordance with the IMO DG Code during the 2022 ICMI Cyanide Code Transportation audit of Hebei Chengxin Transport.


Shipping documents were reviewed for a sample of cyanide shipments from the re-certification period for each ocean carrier used in this supply chain. All information required by the IMO DG Code is required as standard practice on Chengxin shipping paperwork.

The container packing certificates from shipments during the re-certification period were reviewed during the audit as part of the overall evaluation of shipping papers. All information was found to be conformant to IMO DG Code requirements.

Confirmation was made through the due diligence process that ocean carriers involved in this supply chain use detailed IMDG-Compliant stowage plans for the placement and safe transportation of all hazardous materials, including sodium cyanide shipments. Ocean carriers confirmed that required Dangerous Goods segregation during stowage practices are followed. These practices are in alignment with the Cyanide Code requirements.

Each ocean carrier responded to the Cyanide Code due diligence survey that they are in IMO Dangerous

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Goods compliance and that they have all necessary emergency response information on file and on each ship during transport.

Chengxin Transport confirms that ocean carriers comply with stowage and separation requirements of Part 7 of the DG Code as part of its due diligence review process. Records were available for review during the audit.

The operation is: In full compliance with Standard of Practice 1.5
 In substantial compliance with
 Not in compliance with

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.


Chengxin Transport works together with its ocean carriers to track shipments. Chengxin communicates with Maersk, MSC, CMA CGM, KMTTC, and Hapag Lloyd via phone, email and fax. All Ocean Carriers have computer tracking software and offer online shipment and container tracking capabilities. Appropriate action is taken to ensure that cyanide shipments keep moving, stay on pre-designated routes, and that location can always be confirmed. Personnel at Chengxin Transport demonstrated real-time tracking capability during this audit. Each ocean carrier within scope was confirmed to have this tracking information available online.

Shipping paperwork was reviewed and was found to be conformant to Code requirements, including chain of custody requirements. The use of seals is part of the Chengxin Transport standard security / product custody management practices for hazardous materials. All shipping containers are sealed. Auditors confirmed that seal numbers are recorded on the bills of lading. This enables personnel along any portion of the segment to confirm that the containers have not been opened.

The following documentation is used to track inventory and movement of cyanide: bills of lading and shipping papers indicating the number of packages and amount of material. The above mentioned documents were reviewed during the audit. Ocean carriers reported that they maintain databases with Safety Data Sheet (SDS) information for the products they carry.

Chengxin Transport communicates Cyanide Code requirements to the ocean carriers through its shipping partner (freight forwarder) that arranges the shipments. Personnel from the freight forwarder were involved in this recertification audit and due diligence process. Chengxin Transport ensures that its transportation partners are assessed for Cyanide Code compliance during either internal port audits, Cyanide Code re-certification audits, or due diligence assessments.

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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 1.6
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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.		
<p>Interim storage activities in this supply chain, as defined by ICMI, are limited to those that take place at the ocean ports. Port operations ensure that the storage locations and security access to the ports is in alignment with Cyanide Code requirements.</p> <p>Chengxin Transport evaluated the suitability of interim storage at ports through its due diligence evaluation process. The due diligence assessment results are included later in this report under the Port Due Diligence section.</p>		
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 2.1

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.		
<p>Chengxin Transport has an Emergency Response Plan (ERP) in place. Detailed plans, procedures and information to address all ICMI Cyanide Code emergency response requirements, including transportation related emergencies, are addressed in the ERP. If there were an emergency at a China port, Chengxin Transport is not allowed by government authorities to respond, this is the responsibility of the port and local responders. Ocean carriers reported that they each have extensive emergency response planning</p>		

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documentation.

The operation is: In full compliance with Standard of Practice 3.1
 In substantial compliance with
 Not in compliance with

Transport Practice 3.2

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

Chengxin Transport does not have any direct responsibilities to respond to port or ocean responsibilities. Chengxin Transport does communicate Cyanide Code requirements to the ocean carriers through its shipping partner (freight forwarder) that arranges the shipments. Personnel from the freight forwarder were involved in this recertification audit and due diligence process. Chengxin Transport ensures that its transportation partners are assessed for Cyanide Code compliance during either internal port audits, Cyanide Code re-certification audits, or due diligence assessments.

The operation is: In full compliance with Standard of Practice 3.2
 In substantial compliance with
 Not in compliance with

Transport Practice 3.3


Develop procedures for internal and external emergency notification and reporting.

The Comprehensive Emergency Response Plan for Safety Incidents for Road Transportation Enterprises (last updated April 1, 2022) contains emergency response process notifications for local emergency response bureaus, hospitals, fire brigade, etc. The Appendices contain emergency contact numbers (incl. ERT members, external agencies, national highway ER number for help, medical rescue numbers along the transportation routes). The main numbers for police (110) and ambulance (120) are included and hospital information for the routes is maintained.

It is unlikely, however, that the company would be asked to participate in a port or ocean emergency response.

The Comprehensive and Specific ERPs are reviewed annually, including contact information. The most recent updates of ERPs were in April 2022.

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Chapter 17 in the Manual is associated with incident management. The definitions and reporting requirements were found to be consistent with the ICMI's code and included a statement requiring notification to ICMI within 24 hours of a significant cyanide incident. There were no significant cyanide incidents during the recertification period.

The operation is: In full compliance with Standard of Practice 3.3
 In substantial compliance with
 Not in compliance with

Transport Practice 3.4

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

The ERP provides detailed instructions for the cleanup and disposal of contaminated materials and soil. Anything that is contaminated gets brought back to the facility for rework at the production plant or incineration at the hazardous waste incinerator.

It is unlikely, however, that the company would be asked to participate in a port or ocean emergency response.

A statement prohibiting the use of such chemicals is in the Comprehensive ERP in Chapter 7, Section 4. The prohibition of sodium hypochlorite and peroxide use in surface water is in the ERP.

The operation is: In full compliance with Standard of Practice 3.4
 In substantial compliance with
 Not in compliance with

Transport Practice 3.5

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

The ERPs are reviewed annually. The most recent updates of ERPs were in April 2022.

Two drills are conducted each year: one liquid and one solid drill with exposure as part of the scenario.

Records for drill in July 2020, July 2021, and June 2022 were available for review and included liquid and solid scenarios. The Transportation Bureau (government) participates in the drills.

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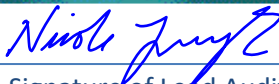
Nicole Jung
Signature of Lead Auditor

October 11, 2023
Date

The drill reports from 2021 and 2022 indicated that more training was needed for using emergency response equipment. Records demonstrating that this improvement were provided, and a drill in December 2022 closed out the action items.

The operation is: In full compliance with Standard of Practice 3.5
 In substantial compliance with
 Not in compliance with

Hebei Chengxin Transport Co., Ltd. Global Ocean Supply Chain
Name of Operation


Signature of Lead Auditor

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Date

Ocean Carrier and Port Due Diligence Investigation Results

All global ocean moves by Chengxin Transport of sodium cyanide are within the scope of this audit of the processes used to manage the ocean transport of Chengxin products. The results of the due diligence evaluations of five (5) ocean carriers identified below are also contained within this report.

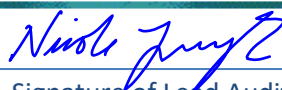
1. CMA CGM
2. Hapag Lloyd
3. Korea Marine Transport Co. (KMTC)
4. Maersk
5. MSC

The Due Diligence Investigations were conducted for all Chinese and international ports identified by Chengxin Transport at the time of the audit. The following ports are used by Hebei Chengxin for sodium cyanide shipments to gold mining customers:

Name of Port	Country
Abidjan	Ivory Coast
Aliaga	Turkey
Angamos	Chile
Buenos Aires	Argentina
Callao	Peru
Conakry	Guinea
Da Nang	Vietnam
Dakar	Senegal
Dar es Salaam	Tanzania
Deseado	Argentina
Guaymas	Mexico
Izmir	Turkey
Jakarta	Indonesia
Jeddah	Saudi Arabia
Lazaro	Mexico

Name of Port	Country
Lianyungang	China
Manzanillo	Mexico
Mersin	Turkey
Mombasa	Kenya
Nouakchott	Mauritania
Punta Arenas	Chile
Qingdao	China
San Antonio	Chile
Shanghai	China
Surabaya	Indonesia
Tema	Ghana
Tianjin	China
Trabzon	Turkey
Valparaiso	Chile
Vostochny	Russia

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Ocean Carrier and Port Background Information

Chengxin ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance.

As part of the Chengxin Transport's due diligence effort, each of the five ocean carriers was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements using a customized ICMI transportation protocol. The results from these evaluations were reviewed by the auditor and were found to be acceptable.

In addition to the Chengxin Transport's efforts to ensure that ICMI Cyanide Code requirements are fulfilled, there are many agencies chartered with the task of confirming that shipping is conducted in a safe and secure manner. One such organization is the International Maritime Organization (IMO). The IMO was established in Geneva in 1948 and it currently headquartered in London, United Kingdom. The IMO is a specialized agency of the United Nations. The IMO's primary purpose is to develop and maintain a comprehensive regulatory framework for shipping. The IMO regulates practices associated with safety, environmental concerns, legal matters, technical co-operation, maritime security and the efficiency of shipping.


One initiative of the IMO is the International Convention for the Safety of Life at Sea (SOLAS), which was enacted in 1974. Each of the five ocean carriers responded that they have current SOLAS certificates for all ships. According to information reviewed during the due diligence investigation, the provisions of SOLAS include: fire protection, life-saving equipment, radio communications, safety of navigation, transportation of dangerous goods, management of safe operations of ships, and maritime security.

Additionally, Maersk participates in the voluntary Chemical Distribution Institute – International Marine Packed Cargo Audit System (CDI-IMPCAS). Carriers in this program undergo a management systems safety audit using the CDI-mpc protocols that were created in cooperation with the United States American Chemical Council under its Responsible Care® initiatives. The CDI-IMPCAS certificates are issued to individual ships.

Regarding port safety and security, new amendments to the SOLAS Convention were enacted in 2002. These amendments gave rise to the International Ship and Port Facility Security (ISPS) Code, which went into effect on 1 July 2004. The concept of the code is to provide layered and redundant defenses against smuggling, terrorism, piracy, stowaways, etc. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans.

Reviews and investigations included a review of emergency response capabilities, environmental policies, security practices, and adherence to Maritime Transportation Security Act requirements.

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Ocean Carrier Due Diligence Reviews:

1. CMA CGM

CMA CGM has a presence in 160 countries through 400 offices, 750 warehouses, 155,000 employees and a fleet of 593 vessels¹. CMA CGM serves 420 of the world's 521 commercial ports and operates 257 shipping lines. As part of the Chengxin due diligence effort, CMA CGM was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements. The results from this evaluation were reviewed by the auditor and were found to be acceptable. Additionally, the auditor reviewed records on file that showed that CMA CGM is an authorized carrier for hazardous. CMS CGM also reported that it maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis.

2. Hapag-Lloyd

Hapag-Lloyd has 258 ships, 13,800 employees in more than 399 offices in 135 countries². As part of the Chengxin due diligence effort, Hapag Lloyd was asked to perform a self-evaluation against the Cyanide Code Transportation Protocol requirements. Hapag Lloyd reported that they are certified to ISO 14001, ISO 9001, and ISO 45001 as well as CTPAT. This information was reviewed by the auditor and was found to be acceptable. Additionally, the auditor reviewed records on file that showed that Hapag Lloyd is an authorized carrier for hazardous materials. To be in legal compliance, Hapag Lloyd must also pass a 3rd-party Safety of Life at Sea audit and maintain current certification.

3. Korea Marine Transport Co. (KMTC)

Established in 1954, KMTC offers a global logistics network with calling ports in Korea, Japan, China, Southeast and Southwest Asia, Middle East and Africa, and Russia³. As part of the Chengxin due diligence effort, KMTC was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements. The results from this evaluation were reviewed by the auditor and were found to be acceptable. KMTC is certified to ISO 9001. Additionally, the auditor reviewed records on file that showed that KMTC is an authorized carrier for hazardous materials. KMTC maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis.

4. Maersk

Founded in 1904, Maersk operates in 130 countries with over 100,000 employees and more than 700 container vessels deployed⁴. As part of the Chengxin due diligence effort, Maersk was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements. The results

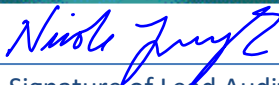
¹ <https://www.cma-cgm.com/about/the-group> accessed 2023

² <https://www.hapag-lloyd.com/en/company.html> accessed 2023

³ <https://www.kmtc.co.kr/> accessed 2023

⁴ <https://www.maersk.com/about> accessed 2023

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from this evaluation were reviewed by the auditor and were found to be acceptable. Maersk maintains a formally documented environmental, health and safety management system which includes ISO 14001 and CTPAT certifications. The auditor reviewed records on file that showed that Maersk is an authorized carrier for hazardous materials. Maersk also reported that it maintains a current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis. Additionally, Maersk participates in the voluntary Chemical Distribution Institute – Marine Packed Cargo program (CDI-mpc). Carriers in this program undergo a management systems safety audit using the CDI-mpc protocols that were created in cooperation with the United States American Chemical Council under its Responsible Care® initiatives. The DCI-mpc certificates are issued to individual ships. Maersk provided a number of these certificates of examples.

Maersk has a formally documented Security Plan that is maintained on vessels at all times. Maersk offers customers the ability to track their shipments in real time.

Chain of custody paperwork is maintained by Maersk in their data systems. Formal stowage plans that segregate incompatible Dangerous Goods are implemented for each shipment in accordance with IMDG Code Table 7.2.4 for segregation of cargo in Containerized Transport Units (CTU). These segregation requirement from table 7.2.4 are built into the Maersk stowage planning system.

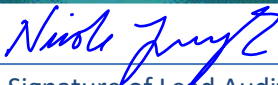
Maersk personnel are trained to handle Dangerous Goods through an extensive e-learning program that includes competency testing. Emergency response drills and spill response activities are conducted on a regular basis, in accordance with the company’s formal emergency response plans. Maersk also maintains a formal drug and alcohol policy that includes a random testing component.

Intermodal service providers used by Maersk are contractually required to have and maintain the required authorizations to ensure that they are authorized to transport hazardous materials and that they have safe and secure operations. Maersk requires these providers to segregate incompatible materials during transport or storage. Procedures are in place for emergency response and communications in the event an intermodal provider has an incident or spill.

5. Mediterranean Shipping Company (MSC)

MSC is a global container shipping company with 760 vessels and 180,000 employees⁵. As part of the Chengxin due diligence effort, MSC was asked to perform a self-evaluation against the ICMI Cyanide Code Transportation Protocol requirements. The results from this evaluation were reviewed by the auditor and were found to be acceptable. MSC maintains a formally documented environmental, health and safety management system which includes ISO 14001, ISO 9001, and ISO 45001 and CTPAT certifications. The auditor reviewed records on file that showed that MSC is an authorized carrier for

⁵ <https://www.msc.com/> accessed 2023

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hazardous materials. MSC also reported that it maintains current SOLAS certification which is achieved by successfully passing a 3rd-party Safety of Life at Sea audit on a regular basis.

MSC has a formally documented Security Plan that is maintained on vessels at all times. MSC offers customers the ability to track their shipments in real time.

Chain of custody records are maintained by MSC in their electronic data systems. Formal stowage plans that segregate incompatible Dangerous Goods are implemented for each shipment in accordance with IMDG Code requirements.

MSC shipboard officers are trained regularly to handle Dangerous Goods in accordance with IMDG Code requirements. Emergency response drills are conducted annually, and spill response activities are tested on a regular basis, in accordance with the company's formal emergency response plans. MSC also maintains a formal drug and alcohol policy.

Intermodal rail and trucking service providers used by MSC are required to meet Class 1 standards and have HazMat certification, respectively to ensure that they are authorized to transport hazardous materials and that they have safe and secure operations. MSC requires these providers to segregate incompatible materials during transport or storage. Dangerous Goods documents are provided to the intermodal partners and seal numbers are recorded and confirmed. EDI is used to exchange information with rail providers. Rail shipments are tracked through tracking and tracing software provided by the railroad. Communication processes for shipper notification are in place in the event an intermodal provider has an incident or spill.

Port Due Diligence Reviews:

As required by the ICMI⁶, the due diligence investigation report must conclude that ports can safely manage cyanide or that, to the extent practical, the consigner has implemented any necessary management measures to ensure the safe management of cyanide by the port. Based on the evidence reviewed for the ports in the Chengxin Global Ocean Supply Chain, no significant issues of concern were identified with respect to the ports' management of solid sodium cyanide. A summary of the due diligence review for each port in the Chengxin Global Ocean Supply Chain are included below.

Departure Ports

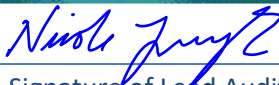
Solid sodium cyanide is transported by truck from the manufacturing operations to one of four departure ports by Hebei Transport Co., Ltd., an ICMI certified transportation operation (recertified April 18, 2023).

1. Lianyungang, China⁷

⁶ ICMI *Guidance for Use of the Cyanide Transportation Verification Protocol* (June 2021), pg. 8

⁷ www.worldportsource.com accessed 2023

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The Port of Lianyungang lies near the mouth of the Qiangwei River in northern Jiangsu Province in eastern China about 620 kilometers southeast of Beijing. The Port of Lianyungang handles a wide variety of cargoes that include containers; bulk grain, coal, coke, and alumina; breakbulk cargoes; and roll-on/roll-off cargoes. Trading partners for the Port of Lianyungang are in Europe, Southeast Asia, Northeast Asia, the Middle East, and the Americas.

China is a Category A member of the International Maritime Organization (IMO) Council and a signatory to the Tokyo MoU, and as such performs its Port State obligations, supervises foreign ships in Chinese waters, and promotes compliance with international conventions among Flag States through Port State Control (PSC). As a member of the IMO and to comply with IMSBC Code, vessels are required to declare dangerous cargo to the MSA by submitting the MSA's Transport Document for Goods by Sea (package) form to the MSA before arriving/leaving port.

ISPS Code Certificate has been obtained for the Port of Lianyungang by fulfilling the provisions of the ISPS Code Contract. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans.

2. Qingdao, China^{8,9}

The Port of Qingdao commenced operations in 1892 and is one of the largest comprehensive ports in the world. Qingdao Port is a super-large port cluster located in Qingdao, China. It is located on the shore of Jiaozhou Bay in the Shandong Peninsula, and the throat of the northern Yellow Sea. It has 15 terminals and 73 berths. It has trade relations with more than 450 ports in more than 130 countries and regions in the world. It is an important international trade port and maritime transportation hub on the west coast of the Pacific Ocean.

The Qingdao Port Group is the primary operator of the Port of Qingdao and operates four port areas in Qingdao, including Qingdao Qianwan Port Area, Huangdao Oil Port Area, Dongjiakou Port Area and Dagang Port Area. It is mainly engaged in the handling of different types of cargoes such as container, metal ore, coal and crude oil and the provision of ancillary services, logistics and port value-added services, port ancillary services and financial services¹⁰.

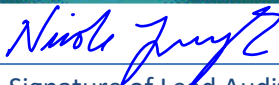
China is a Category A member of the International Maritime Organization (IMO) Council and a signatory to the Tokyo MoU, and as such performs its Port State obligations, supervises foreign ships in Chinese waters, and promotes compliance with international conventions among Flag States through Port State Control (PSC). As a member of the IMO and to comply with IMSBC Code, vessels are required to declare dangerous cargo to the MSA by submitting the MSA's Transport Document for Goods by Sea (package)

⁸ www.qingdao-port.com accessed 2023

⁹ www.ufsoo.com/port/qingdao accessed 2023

¹⁰ www.qingdao-port.com accessed on 2023

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form to the MSA before arriving/leaving port.

ISPS Code Certificate has been obtained for the Port of Qingdao by fulfilling the provisions of the ISPS Code Contract. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans.

Emergency response plans are in place and maintained at the port. These plans are reviewed by the municipal government to ensure they are compliant with local regulatory requirements. Emergency response drills are conducted at the port. The Shandong Search and Rescue Center is responsible for coordinating all search and rescue operations in the port's waters.

The production schedule (ship movement plan) is arranged by the Qingdao Port International Co Ltd Dispatch Control Center in coordination with the wharf operators, the MSA, and the pilot center. The Dispatch Center organizes ship movements, tracks pilotage operations, and supervises terminal operations via real-time CCTV monitoring.

The port of Qingdao has restricted access and dedicated storage areas for specialized products including dangerous goods. The port operations for dangerous goods are registered and licensed by the government. Containers departing from the port are checked against documentation for matching container numbers and product detail.

3. Shanghai, China¹¹


The Port of Shanghai is the intersection of the T-shaped water transport network comprising the Yangtze River and coastal transport channels. It enjoys access to the southern and northern part of China's coastal area, oceans across the world, as well as the Yangtze River basin, inland rivers of Jiangsu, Zhejiang and Anhui provinces, and Taihu Lake basin. Served by well-connected road and railway networks, and fully-developed cargo collection and distribution systems, the Port of Shanghai occupies an important geographic location with superior natural conditions and a robust economy.

Shanghai International Port (Group) Co., Ltd. (SIPG), operates the public terminals in the Port of Shanghai. SIPG is currently the biggest listed company in port operation in the Chinese mainland, and one of the biggest in the world. The main businesses of SIPG include port handling operation, integrated logistics service, port-related service and port investment business. An industrial chain of port logistics encompassing stevedoring, warehousing and storage, shipping, land transportation and agent service has been put in place.

ISPS Code Certificate has been obtained for the Port of Shanghai by fulfilling the provisions of the ISPS Code Contract. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security

¹¹ www.sipgbayport.com accessed 2023

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Plans and Port Facility Security Plans.

China is a Category A member of the International Maritime Organization (IMO) Council and a signatory to the Tokyo MoU, and as such performs its Port State obligations, supervises foreign ships in Chinese waters, and promotes compliance with international conventions among Flag States through Port State Control (PSC). As a member of the IMO and to comply with IMSBC Code, vessels are required to declare dangerous cargo to the MSA by submitting the MSA's Transport Document for Goods by Sea (package) form to the MSA before arriving/leaving port.

The Port of Shanghai has a dedicated dangerous goods transit area for dangerous goods awaiting loading to arriving vessels. The port operations for dangerous goods are registered and licensed by the government. Appropriate signage is displayed in this area. All cyanide transited through the Port of Shanghai remains withing sealed containers and is placed in a well-ventilated area to prevent the buildup of cyanide gas.

The port maintains minimum standards for personal protective equipment that includes the requirement for suitable protective footwear, hardhat where required, and readily visible clothing. An electronic card access system is in place to enable only authorized user access to facilities. Containers departing from the port are checked against documentation for matching container numbers and product detail.

The Port of Shanghai has an emergency response plan that is in line with IMO DG requirements. Facility specific emergency response plans indicate the port has internal emergency response capabilities able to provide basic response to incidents involving dangerous goods. Dangerous goods are stored in the Yangshan Port area, which has an emergency management committee to manage emergency related issues such as drills, control of risks and emergency supplies. The Safety Production Supervision and Administration Bureau of Shanghai reviews emergency response plans to ensure they are compliant.

4. Tianjin, China¹²

The Port of Tianjin lies at the head of the Hai River about 26 nautical miles inland from the Bohai Gulf off the Yellow Sea on China's east coast. About 160 kilometers southeast of Beijing, the Port of Tianjin is 225 nautical miles west across the Bohai Gulf from the Port of Dalian. It is also connected to the Yangtze River by the Grand Canal. The Port of Tianjin is a complete full-service port that handles all types of cargoes including containers, liquid and dry bulk, general cargo, and vehicles. It also serves passengers. The municipal government supervises and administers the activities of the Port of Tianjin.

The Tianjin Port Group (TPG) is the holding company and ultimate controlling body for most Port of Tianjin operations. TPG is the port landowner and the primary port operator in the Port of Tianjin, and it holds some of the Port Authority's supervisory roles. Through its 69 subordinate or affiliated units, the Tianjin Port Group runs nearly all Port of Tianjin operations, and it employs about 40 thousand

¹² www.worldportsource.com accessed 2023

people.

The Port of Tianjin is open again for hazardous goods shipments, including sodium cyanide¹³. Chengxin, is not yet using the port for sodium cyanide due to logistic reasons, however, it has chosen to retain this port as part of its certified supply chain in preparation for when the port is brought back into use.

ISPS Code Certificate has been obtained for the Port of Tianjin by fulfilling the provisions of the ISPS Code Contract. The ISPS Code required most ships and port facilities engaged in international trade to establish and maintain strict security procedures as specified in ship and port specific Ship Security Plans and Port Facility Security Plans.

China is a Category A member of the International Maritime Organization (IMO) Council and a signatory to the Tokyo MoU, and as such performs its Port State obligations, supervises foreign ships in Chinese waters, and promotes compliance with international conventions among Flag States through Port State Control (PSC). As a member of the IMO and to comply with IMSBC Code, vessels are required to declare dangerous cargo to the MSA by submitting the MSA’s Transport Document for Goods by Sea (package) form to the MSA before arriving/leaving port.

The TPG Operations Department coordinates the operation of the port and must be informed of all ship movements and major operations. The production schedule (ship movement plan) is arranged by TPG Dispatch Control Center in coordination with wharf operators, the MSA, and the pilot center. The Dispatch Center organizes ship movements, tracks pilot operations, and supervises terminal operations via real-time CCTV monitoring.

The port of Tianjin has restricted access. The port operations for dangerous goods are registered and licensed by the government. Containers departing from the port are checked against documentation for matching container numbers and product detail. The Tianjin Maritime Safety Bureau is the local agency of the MSA and is responsible for enforcing regulations on the MSA’s behalf at the Port of Tianjin. This includes conducting inspections of containers holding dangerous goods.

The City of Tianjin has an emergency response plan that includes response procedures for the incidents of fire, explosion, and leakage during the transport of hazardous chemicals at sea. The plan details the procedures for evacuation, maintaining vigilance, rescue methods, traffic, and fire control, leakage containment, monitoring and clean up in the event of an emergency. The Tianjin Maritime Search and Rescue Center is responsible for coordinating all rescue activities inside the port. The Port of Tianjin PSB Fire Services Detachment holds the firefighting equipment and is responsible for fire prevention duties for both the land and water areas of Tianjin. The Port of Tianjin Hospital is the primary provider of emergency medical care and resources.

¹³ <https://www.sino-shipping.com/shipping-hazardous-goods-china/> accesses 2023

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Destination Ports

1. Abidjan, Ivory Coast¹⁴

The Port of Abidjan, open to navigation since July 1950, is the main port and largest city of the Cote d'Ivoire (Ivory Coast) in Africa. Lying on the Ebrie Lagoon, it is linked to the Gulf of Guinea and Atlantic Ocean by the Vridi Plage sandbar. The port is West Africa's biggest, most modern port. With a central location and a well-developed infrastructure, it is a major point for transshipments to West and Central Africa over the Cote d'Ivoire's modern rail and road systems.

2. Aliaga, Turkey¹⁵

The Port of Aliaga lies on the southern shores of the Bay of Aliaga off the Gulf of Candarli about 24 kilometers northwest of Izmir, Turkey. The port authority for the Port of Aliaga is Aliaga Liman Baskanligi. The Port of Aliaga can accommodate vessels to 250 thousand DWT with maximum length of 338 meters and maximum draft of 16 meters.

Within the Port of Aliaga, the Petkim Terminal is operated by Petkim Petrokimya Holdings A.S. Pilotage is required for all vessels entering the harbor. The Petkim Terminal contains five berths, three berths for products and gas ships, one berth for naphtha, one berth for caustic soda, and one berth for general cargo. The Tupras Refinery is operated by Tupras Refinery Mudurlugu Aliaga which processes crude oil exports and imports a wide range of petroleum products. The terminal contains two berths for liquefied petroleum gas, four berths for petroleum products, and two berths for crude oil. Pilotage is required for all vessels. The private Total Terminal – Aliaga is operated by Total Oil Turkiye A.S. and does not handle third-party cargoes.

In general, Port and vessel security are managed through the International Ship and Port Facility Security Code (ISPS Code). An ISPS Code Certificate has been obtained for the Port of Aliaga by fulfilling the provisions of the ISPS Code Contract.

3. Angamos, Chile¹⁶

Puerto Angamos is located in Mejillones, in the heart of the Chilean mining region, just 1400 km from Santiago and 65 km from Antofagasta. It is a mono-operated multipurpose terminal with four berths for vessels with a maximum draft of 13.7 meters, 155,000 tons displacement and 366 meters long. The company has self-sustaining operations and constantly monitors the flora and fauna within its area of influence. Puerto Angamos is a founder and active member of the Peruvian Tern Sustainability Foundation, together with other important companies in the bay.

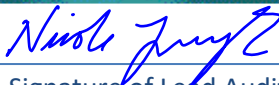
The port has 6 mobile harbor cranes with a lifting capacity of 100 tons, 12 reach stacker cranes for full

¹⁴ www.worldportsource.com accessed 2023

¹⁵ www.worldportsource.com accessed 2023

¹⁶ www.puertoangamos.cl accessed 2023

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containers and 5 toplifter cranes for empty containers. Extensive storage capacity exists on site for containers, general/special cargo and bulk goods, as well as good interconnectivity options for transshipment via rail or road. Complejo Portuario Mejillones (CPM) functions as a Landlord Port authority.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port aims to have dangerous cargo placed directly onto a trailer and removed from the facility via an ICMI certified transporter, and under escort of the Port Authority. However, when this cannot occur, the port has a dedicated storage area for specialized products including dangerous goods. Cyanide containers are segregated and stacked separately according the provisions of the Code and all sodium cyanide remains sealed within its container at all times preventing contact with water and other incompatible materials.

4. Buenos Aires, Argentina^{17,18,19}

The Port of Buenos Aires rests on an estuary of the Rio de la Plata in Argentina about 240 kilometers from the river's mouth to the Atlantic Ocean. An important seaport, the Port of Buenos Aires is about seven kilometers north-northwest of the Port of Dock Sud and about 56 kilometers west-northwest of the Port of La Plata.

Argentina's Administracion General de Puertos (General Ports Administration), overseen by the Undersecretary for Ports and Waterways, is the port authority for the Port of Buenos Aires. As a state entity, the General Ports Administration is responsible for the administration, operation, and maintenance of all sea and river ports in the country and the enforcement of port-related laws and regulations.

The General Ports Administration (AGPSE) maintains an Integrated Management System that includes current certifications to ISO 9001:2015 (quality), ISO 14001:2015 (environment), and ISO 45001:2018 (safety). The AGPSE maintains an EHS Policy which commits it to compliance with current legislation and regulations regarding the environment, safety and health at work, and other commitments to which it adheres. The port Monitoring Center operates a video surveillance technology system of 246 dome, fixed, and thermal cameras covering all areas of the port including port operations and docking sites. Additionally, unmanned aerial vehicles (drones) are used to survey and take images.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

¹⁷ www.worldportsource.com accessed 2023

¹⁸ <https://www.argentina.gob.ar> accessed 2023

¹⁹ Golder ICMI Hebei Chengxin Co., Ltd. Global Ocean Supply Chain Re-certification Summary Audit Report 2020

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- A Harbor Master oversees the overall operation of the Port of Buenos Aires. Management of the Port protocols exists for docking of vessels (e.g., use of Pilots, use of tugboats, management of different weather conditions, tides, currents and safety and general Port operations). Containers of dangerous goods discharged by vessels at the container terminal are currently being moved to various areas within the Port for storage until customs clearance has been completed and transport is arranged. Containers of cyanide are segregated from other classes of dangerous goods.
- In general, Port and vessel security are managed through the International Ship and Port Facility Security Code (ISPS Code). An ISPS Code Certificate has been obtained for the Port of Buenos Aires by fulfilling the provisions of the ISPS Code Contract. Argentina is a member State of the IMO and it therefore is required to comply with the requirements of the IMO DG Code.

5. Callao, Peru^{20, 21,22,23,24}

The Port of Callao is Peru's biggest and most important port. As part of the Lima metropolitan area, the Port of Callao is a key part of the country's commercial network and a major distribution center for imports and exports. The Port of Callao handles about 20% of all ocean-borne cargo in Peru. The Port of Callao contains eight docks and 18 docking facilities that serve container ships, bulk carriers, roll-on/roll-off vessels, oil tankers, general cargo ships, and passenger ships. ENAPU and private loading companies have container-handling equipment that includes 14 reach stackers, 26 terminal trucks, and five mobilizers.

The Empresa Nacional de Puertos S.A. (ENAPU) is the administrator for the Port of Callao and its two terminals. The South Terminal, the largest container terminal in Peru, is operated by DPW Callao. DPW is currently certified to ISO 14001 (environmental), ISO 28000 (supply chain security), and ISO 9001 (quality). DPW segregates cargo at unloading according to its nature. The North Terminal is operated by APM Terminals Callao and is a multipurpose terminal. The terminal has Special Port Facility certification that empowers it to receive IMO cargo for loading, unloading or transshipment, and guarantees the safe handling of dangerous goods that pass through the port facility. APM Callao is also certified to ISO 1400 (environmental) and ISO 9001 (quality). The Port has ISPS certification that the Management System is implemented in accordance with the ISPS Code.

The Port of Callao is located beside Peru's Central Highway, which connects it with the country's interior regions. It also has immediate access to the Panamericana Highway that links Peru's north and south regions. The Central Railroad of Peru serves the Port of Callao and connects with Lima and interior

²⁰ www.worldportsource.com accessed 2023

²¹ www.enapu.com.pe accessed 2023

²² www.portstrategy.com accessed 2023

²³ www.dpworld.com accessed 2023

²⁴ www.apmterminals.com/en/callao accessed 2023

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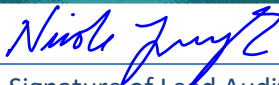
areas, crossing the Andes Mountains.

ENAPU, through Safety and Risk Supervision, has implemented an Environmental Management Plan in all its cargo and passenger ports, in accordance with the regulations required by the National Port Authority and the Environmental Policy guidelines that govern Companies that are under the scope of FONAFE (National Fund for the Financing of State Business Activity).

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- Both the DP World and APM Terminals have surveillance systems that monitor the security of goods via CCTV coverage. Both terminals operate in a pedestrian free environment and are brightly lit at night. Safety signage and on-site security measures are evident. Containers are placarded in accordance with IMDG labelling requirements and storage areas show relevant signage regarding no smoking, no open flames, eating and drinking is not permitted and the PPE requirements.
- During transshipping, manifests are handed over from the vessel to the terminal operators which include the weight and any hazards associated with the containers. This information is captured in the terminal operator's computer systems, which has the ability to identify dangerous goods consignments, determine the class of dangerous goods and establish the segregation requirements for that product as required by the IMO DG Code.
- Containers are stored at the port with adequate ventilation to prevent build-up of hydrogen cyanide gas. The product remains sealed in containers at all times and the area of storage is suitable to effectively contain any spillage that may occur. Local specialized responders are on hand to provide assistance in the event of a serious incident.
- The Port of Callao operator procedure calls for confirmation that the United Nations ID numbers, Department of Transport and National Fire Protection Association (NFPA) diamond number placards are present on the three visible sides of cyanide containers before they can be transferred to trucks and dispatched. This is required by Peruvian law when transporting hazardous materials.
- Transshipping depots and interim storage sites are associated with the Port of Callao. During unloading, containers of cyanide may be stored temporarily in designated transshipping depots within the confines of the Port. These depots are managed and administered by the terminal operators DP World and or APM respectively. It is the policy of the Port that all containers of sodium cyanide are to be removed from the Port within forty-eight hours following discharge of the vessel.
- Should the containers of cyanide not be cleared through customs within the forty-eight-hour period, the terminal operators may transfer the containers to an inland clearance depot operated by Licsa under the authority of the Peruvian National Customs and Tax Administration (SUNAT). The Clearance Depot is located a short distance outside of the Port confines. The containers remain under customs control until clearance has been arranged and collection from the Clearance Depot can be made by the importers.

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6. Conakry, Guinea^{25,26,27,28}

Located on the Island of Tombo Island on the southwestern coast of Guinea, it is the largest seaport in Guinea, and one of the largest seaports in West Africa. Founded in 1895, it straddles Tombo Island and the Kalum Peninsula. Port of Conakry is Guinea's main commercial port, through which 90 percent of foreign trade is carried out. The port is a major transport hub, connected to the mainland by sea walls and railway bridges. One of the main east-west railway lines goes directly to Kankan, and the other railway can go to Fria in the north. The highway connects it with major domestic towns and reaches neighboring countries such as Mali, Senegal and Côte d'Ivoire. The port is about 15km away from the international airport.

There are 9 main berths in the port area, with four terminals including a container terminal. The loading and unloading equipment include various pneumatic cranes, forklifts, conveyors, floating cranes, tugboats and ro-ro facilities. The warehouse area in the port area is 59,000 square meters, and the shed area is 25,000 square meters. In 2018, a 25-year contract was signed with Albayrak Group to expand, modernize, manage, operate and make the port more competitive on an international scale. Conakry Terminal, a subsidiary of Bolloré Ports, has operated the container terminal at the Port of Conakry since 2011. Conakry Terminal is ISO 9001 certified.

The role of the port authority is to regulate, monitor and control activities on the port platform. All vessels calling on the Port of Conakry must be reported to Guinean Maritime Administration, Customs and the Police. The pilotage plan and the plan of ships alongside are prepared by Conakry Port S.A. Marine Operations Department. The Harbor Master Office controls navigation safety and inspects the implementation of maritime safety regulations. The pre-calls and calls of arriving vessels including HAZMAT notification for hazardous goods and notification on the compulsory extended inspection are executed by the Port State Officers directly controlled by the Harbor Master's Office. Police notification requirements are implemented in accordance with the provisions of the Port Police that require itinerary of the voyage in timely manner.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- All solid sodium cyanide that transits the Port of Conakry is collected by the relevant carriers as soon as possible after arrival. Express clearances are initiated where possible to minimize the transit period. During periods of transit, containers of solid sodium cyanide are segregated from other containers and that the area is signed alerting the presence of the product and prohibiting smoking, drinking and eating outside set areas in the Port. All personnel, outside

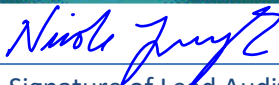
²⁵ www.ufsoo.com/port/conakry/ accessed 2023

²⁶ www.africaoutlookmag.com/company-profiles/1518-port-of-conakry accessed 2023

²⁷ <https://conakryport.com/> accessed 2023

²⁸ www.bolloré-transport-logistics.com accessed 2023

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- those operating top lift forklifts, are warned to keep away from the containers. All signage is provided in French, the national language of the country. All cyanide remains sealed within shipping containers at all times. The area of transit storage is well segregated and in an open area to prevent the build-up of hydrogen cyanide gas.
- In general, Port and vessel security are managed through the International Ship and Port Facility Security Code (ISPS Code). All operating terminals in Port of Conakry must prepare a security plan based on a risk analysis. The security system of each terminal needs to be accurately described. Employees need to be trained and each terminal needs to have an appointed safety officer. All the security plans from the terminals need to be recorded in Port Facility Security Plan. A team of experts from the police, customs and port authority assesses the plan that is subject to approval of local governance in Conakry.

7. Da Nang, Vietnam^{29, 30}

Da Nang Port lies at the south end of a bay off the South China Sea in east central Vietnam some 622 kilometers north-northeast of Saigon Port in Ho Chi Min City. As the gateway to trade for the East-West Transport Corridor that includes Myanmar, Laos, Thailand, and Vietnam, Da Nang Port is an import-export center serving central Vietnam and the country's highlands. Located near the Danang International Airport and the national railroad station, Da Nang Port has easy access to the nation's transportation networks and the surrounding area. Da Nang Port consists of two major ports, Tien Sa and Song Han, with 1,493 meters of berths, loading, and unloading facilities. The Vietnam Maritime Corporation (VIMC) is the port authority for Da Nang Port.

In general, Port and vessel security are managed through the International Ship and Port Facility Security Code (ISPS Code). An ISPS Code Certificate has been obtained for the Port of Da Nang by fulfilling the provisions of the ISPS Code Contract. Vietnam is an IMO Member State it therefore is required to comply with the requirements of the IMO DG Code.

8. Dakar, Senegal^{31,32}

The Port of Dakar is the capital of Senegal and one of the major seaports in West Africa. Established in 1857, the Port of Dakar is strategically located on the western-most point of the continent of Africa near busy international trade routes. The Port Autonome de Dakar is the port authority for the Port of Dakar. The port authority is certified to ISO 9001 (quality), ISO 14001 (environmental), and ISO 45001 (safety).

The Port of Dakar has two separate zones. The northern zone contains Piers 4, 5, 8, and 10, the

²⁹ www.danangport.com accessed 2023

³⁰ <https://vimc.co/> accessed 2023

³¹ www.worldportsource.com accessed 2023

³² www.portdakar.sn accessed 2023

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container terminal, and the oil wharf. The southern zone contains Piers 1, 2, and 3. The piers in the Port of Dakar's northern zone have depths of from 9 to 10 meters, and they specialize in containers, solid bulk, and liquid bulk cargoes. The Port of Dakar's southern zone piers have depths from 8.5 to 10 meters. The southern zone handles general cargo, about one-fifth of the container traffic, passengers, and vehicles. The Port of Dakar contains 112.5 thousand square meters of open surface storage, 48.8 thousand square meters of covered storage space, and 15 thousand square meters of cold stores. In addition, it has 13 hectares of surface for storing containers, and capacity to store 290 thousand cubic meters of hydrocarbons.

The Autonomous Port of Dakar was one of the first ports in Africa to apply the provisions of the ISPS Code (International Ship and Port facility Security), which was entered effective July 1, 2004. The Port of Dakar has thirteen (13) port facilities which comply with the provisions of the ISPS Code. Declarations of conformity were issued in December 2014 by the Designated Authority, the National Agency for Maritime Affairs (ANAM), National Port Security Authority (ANSP).

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port has made all financial and material arrangements to align its facilities and operations with the directives emanating from the International Convention for the Safety of Life at Sea (SOLAS) 1974, convention. Therefore, every ship applying for permission to enter, and every port facility operator working in the Port of Dakar must ensure compliance with the security and safety requirements for ships and port facilities as issued by the IMO.
- The Port Security Steering Committee (CDSP) defines the security policy and maintains the security action plan for the port. The Local Port Security Committee (CLSP) monitors the implementation of the ISPS Code at the port, ensures security assessments and facility security plans are up to date, and carries out regular security inspections of port facilities. The Multipurpose Operational Center (COP) assists the Port Commander in managing safety, security and environmental protection as well as incident management and training. The COP monitors the transit of dangerous goods in conjunction with the National Group of Firefighters, the Maritime Customs Subdivision, the Special Port Commission and the Maritime Gendarmerie Company.

9. Dar es Salaam, Tanzania^{33,34}

Tye Port of Dar es Salaam is located on the shores of eastern Africa off the Indian Ocean, about 41 nautical miles south-southeast of the Port of Zanzibar and 170 nautical miles south of Kenya's Port of Mombasa. Dar es Salaam port has a rated capacity of 14.1 million (MT) dry cargo and 6.0 million (MT) bulk liquid cargo. The Port has a total quay length of about 2,600 meters with eleven deep-water berths.

³³ www.worldportsource.com accessed 2023

³⁴ www.ports.go.tz accessed 2023

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Dar es Salaam port handles about 95% of the Tanzania international trade. The port serves the landlocked countries of Zambia, Democratic Republic of Congo, Burundi, Rwanda, Malawi, Uganda and Zimbabwe. The port is strategically placed to serve as a convenient freight linkage not only to and from East and Central Africa countries but also to middle and Far East, Europe, Australia and America. The port is connected to the surrounding area by two railways.

The port has a general cargo terminal, container terminal, grain terminal, and oil terminal as well as open and covered storage areas and yards. Port terminals operate with Ship to Shore Gantry cranes (SSGs), Rubber Tired Gantry cranes (RTGs) and Rail Mounted Gantry Crane (RMG), Gottwalds, highway trucks, folk lift trucks, Highway trailers, Terminal tractors and Trailers. The port is served with berthing tugs, pilot boats mooring boats and surveillance / patrol boat. Moreover, there are navigation aids to facilitate movement of vessels in the port. These include; buoys, beacons, leading marks and lighthouse.

The Tanzania Ports Authority (TPA) serves as landlord and operator of the Port of Dar es Salaam. At the Dar es Salaam Port, there are two Container Terminals Operated by TPA: Container Terminal I (Berths Numbers 5 to 7) and Container Terminal II (Berths Number 8 to 11). The Container Terminal II has a quay length of 725 meters and capacity and capacity to handle over 660,000 TEU per annum depending on, amongst others, type of equipment deployed, ICT Systems, and yard configuration.

10. Deseado, Argentina^{35,36,37,38}

The Port of Deseado is in southern Argentina, in the province of Santa Cruz, on the north bank of the mouth of the Deseado River in the Atlantic Ocean, integrated into the city of Puerto Deseado. It is a natural, multipurpose port, suitable for overseas and cabotage vessels, container ships, tourist cruises, freezer-type fishing boats, trawlers, beam boats, jiggers and longliners. It constitutes the gateway to the world of Santa Cruz and Patagonian products. It is a mandatory pilotage zone for foreign-flagged vessels.

The port of Deseado is for public use, owned by the province of Santa Cruz. It has been administered by the Santa Cruz Port Executive Unit (UNEPOSC) since 1992. There are three adjoining wharfs, all lying at an angle to each other: Berths 1 to 4 are used by ocean going vessels and berths 5 and 6 by fishing vessels, with fresh water, electric power and firefighting systems. The port has 50 ton, 45 ton, and 41 ton mobile cranes. Private contractors working in the port also operate mobile cranes and forklift trucks. The port has 10,000 square meters of open storage, paved and fenced container storage area of 5,095 square meters, and a 650 square meter bonded warehouse. Puerto Deseado is connected by highways N° 3 in a north-south direction, N°281 and by N°25 towards the west.

³⁵ <https://antareshshipping.com/south-patagonia-ports/puerto-deseado/> accessed 2023

³⁶ www.uneposc.com.ar/web/ptodeseado.php accessed 2023

³⁷ www.legal500.com/guides/chapter/argentina-shipping/ accessed 2023

³⁸ www.itopf.org/knowledge-resources/countries-territories-regions/argentina/ accessed 2023

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Argentina is a member of the International Maritime Organization (IMO), and signatory to the Latin American Agreement on Port State Control of Vessels. For the purposes of exercising the Port State Control, the Argentine Maritime Authority verifies whether foreign vessels visiting Argentine ports comply with requirements, including SOLAS Protocols. The Argentine Maritime Authority, through Inspectors specially trained to do so, is empowered to conduct on board, inspections, check the validity of the pertinent certificates and documents, as well as the general condition of the vessel, her equipment and crew.

The Prefectura Naval Argentina (PNA) is the competent authority (specifically the Directorate for Environmental Protection) and administers the National Contingency Plan (NCP) for dealing with pollution by oil and other noxious substances in marine and freshwater environments. The PNA consists of two branches; one section deals with policy and implementing the international Conventions; the other has an operational role and is responsible for planning and responding to pollution incidents. This department has 19 Rescue, Firefighting and Environmental Protection stations (SIPA) located in the principal ports.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port operates under a suite of International and National regulations that ensure its compliance with regards to the handling and storage of dangerous goods. PNA Regulations No.9/97 Transport by vessels of dangerous goods, safety standards for transport by charcoal vessels and No.3/96 Standards for the approval of packaging and packaging containing dangerous goods outline the requirements for ports.
- Cyanide transited through the port of Puerto Deseado is temporary and remains on site for less than a day. This is a management measure to minimize potential for accidental releases during storage. All sodium cyanide transited through the port of Deseado remains contained within its sealed containers at all times preventing contact with water and other incompatible materials.


11. Guaymas, Mexico³⁹

The port of Guaymas is located in the north of Mexico on the shores of the Pacific Ocean. The port is located at coordinates 27 degrees 55 minutes north and 110 degrees 54 minutes west of the State of Sonora, Mexico. The port is 1.8 km from the four-lane federal highway # 15 and is part of the Canamex corridor only 400 km away. In the northern part is the city of Nogales, which borders the United States. The port of Guaymas is sheltered by an internal bay, the rainfall in the region and its minimal tidal variation make the port one of the safest in the Pacific.

The Guaymas Integral Port Administration (API) is the port authority for the Port of Guaymas. The port contains 1.2 thousand meters of wharves with five docks. The major cargoes include containers,

³⁹ www.puertodeguaymas.com.mx accessed 2023

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mineral bulk, agricultural bulk, general cargo, and fluids.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The port of Guaymas must adhere to the requirements of Official Mexican Standard NOM-010-SCT2/2009, Compatibility and Segregation Provisions for the Storage and Transportation of Hazardous Substances, Materials and Waste and NOM-023-SCT4-1995, Conditions for the Management and Storage of Dangerous Goods in Ports, Terminals and Sea Units. These standards state that ports, terminals and offshore units must establish areas for management, storage and adequate segregation of dangerous goods in bulk or packed form from other cargo. There is a compatibility and segregation table for dangerous substances, materials and waste. These storage areas must have the appropriate infrastructure, facilities and signage on display in accordance with the inherent risks of the products. Surveillance equipment and protection system (automated CCTV systems) are equipped in the Port.

12. Izmir, Turkey^{40,41}

The Port of Izmir lies at the head of the Gulf of Izmir on the Aegean Sea on Turkey's west central shores, about 40 kilometers southeast of the Turkish Port of Aliaga. TC State Railways General Directorate (TCDD) is the port authority for the Port of Izmir. The port handles all types of cargo, and it is well connected with Turkey's rail and highway networks. Pilotage is required for all vessels leaving or entering the Port of Izmir with services provided by the Turkish Maritime Organization.


The cargo-handling facilities in the Port of Izmir include 24 berths with a total length of 3.3 thousand meters. The berths are well-equipped to handle all types of cargo with a 200-ton capacity floating crane, five 40-ton quayside gantry cranes, nine shore cranes, and 14 mobile cranes as well as numerous stackers, forklifts, loaders, and trailers. The port also has ample storage facilities, with almost 216 thousand square meters of open yards and almost 27 thousand square meters of covered areas, including a warehouse for hazardous cargoes. The Port of Izmir's Container Terminal has seven berths with alongside depth of 13 meters. The berths total 1050 meters, and the container terminal covers 152 thousand square meters. The quays are served by five 40 ton gantry cranes, three 100 ton MHC cranes, fourteen 35-40 ton rubber-tired transtainers, fifteen 25-42 ton full container mobile cranes, and fourteen 8-10 ton empty container mobile cranes.

In general, Port and vessel security are managed through the International Ship and Port Facility Security Code (ISPS Code). An ISPS Code Certificate has been obtained for the Port of Izmir by fulfilling the provisions of the ISPS Code Contract.

⁴⁰ www.worldportsource.com accessed 2023

⁴¹ www.tcdd.gov.tr accessed 2023

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13. Jakarta, Indonesia^{42,43,44}

The Port of Jakarta, commonly called Tanjung Priok, is the busiest and most advanced Indonesian seaport, handling more than 50% of Indonesia's trans-shipment cargo traffic. Located at Tanjung Priok, North Jakarta, this port is the gateway to the country's capital. It is located in the northwest of Java Island in the central part of the country, northeast of the port city, and faces the Java Sea. It is 70 nautical miles west of Sunda Strait, 523 nautical miles away from Singapore Port, and 392 nautical miles east of Surabaya (Surabaya Port). The port area stretches from east to west, and the wharf is on the shore of the harbor basin dug into the land bank. There are three north-south docks in the main port area. From west to east, the total length of the first dock line is 2543 meters, the second harbor basin wharf line is 1900 meters, and the pier line on the west bank of the third harbor basin is 1080 meters. Of that, 650 meters are container terminals with 3 container berths.

The port is operated by The Indonesia Port Corporation/PELINDO II. Jakarta International Container Terminal (JICT), a joint venture between Hutchison Port and Pelabuhan Indonesia (Persero) is the largest container terminal in Indonesia. JICT operates container service for ocean going vessels at Tanjung Priok. The JICT has 8 berths and a 46 hectare container yard. Equipment includes fifteen quay container cranes and numerous forklifts, trucks, reach stackers, side loaders, and gantry cranes. The New Priok Container Terminal (NPCT) project to increase port capacity is underway with NPCT Terminal One commencing operations in 2016.

In general, Port and vessel security are managed through the International Ship and Port Facility Security Code (ISPS Code). An ISPS Code Certificate has been obtained for the Port of Jakarta by fulfilling the provisions of the ISPS Code Contract. Indonesia is a member State of the IMO and it therefore is required to comply with the requirements of the IMO DG Code.

14. Jeddah, Saudi Arabia^{45,46,47,48}

Jeddah Port is located in the middle of the west coast of Saudi Arabia, on the east side of the Red Sea, and is the largest container port in Saudi Arabia. There are roads leading to the urban area and extending eastward to important towns such as Mecca, Taif and Riyadh. Outside the port, it is 209 nautical miles to Yanbu Port in the north, 628 nautical miles to Suez Port, and 602 nautical miles to the Mandeb Strait in the south. There is a large international airport nearby.

The port is operated by the Saudi Ports Authority (Mawani). It has 62 multi-purpose berths (containers,

⁴² www.jict.co.id accessed 2023

⁴³ www.npct1.co.id accessed 2023

⁴⁴ www.ufsoo.com/port/jakarta/ accessed 2023


⁴⁵ www.ufsoo.com/port/jeddah/ accessed 2023

⁴⁶ www.arabnews.com/node/2241041/business-economy accessed 2023

⁴⁷ <https://mawani.gov.sa/ports> accessed 2023

⁴⁸ <https://rsgt.com/> accessed 2023

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general cargo, livestock, passengers, bulk grains, cars) as well as warehouses, yards, and a direct trucking system to and from the port. The port has two specialized container handling stations with a handling capacity of 7.5 million standard containers. The South Harbor Basin is the main port area, along which there are 28 berths with a water depth of 11-12 meters. No. 34-37 berths on the west side of the south jetty are used for container loading and unloading. The loading and unloading equipment includes various shore cranes, movable cranes, gantry cranes, container cranes, portal vacuum suction pipes for unloading ships, conveyors, forklifts and roll-on-rolling facilities, among which the maximum lifting capacity of the movable cranes is 40 tons. In early 2023 the port received three additional ship to shore cranes to increase operational efficiency. The Red Sea Gateway Terminal (RSGT) is the newest container terminal at Jeddah Port. RSGT is an international terminal operator representing a partnership between the Red Sea Gateway Terminal of Saudi Arabia and the Malaysian Mining Company (MMC). The combined assets, handling capacity and experience place the terminal operations among the ten largest container terminal operators globally.

In general, Port and vessel security are managed through the International Ship and Port Facility Security Code (ISPS Code). An ISPS Code Certificate has been obtained for the Port of Jeddah by fulfilling the provisions of the ISPS Code Contract. Saudi Arabia is a member State of the IMO and it therefore is required to comply with the requirements of the IMO DG Code.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:


- The Port Authority states no person shall access any port area as defined by its boundaries, via water, air or land unless the person obtained a permit from the Port Authority for accessing a port. A Port Authority may have signs, fences or barriers arranged to ensure the security and safety of persons, ships and property, the environmental protection or the management of the infrastructure and the services of Jeddah Port. Every person in Jeddah Port shall obey the instructions on signs posted and respect the functions of fences and barriers established by the port authority.
- The Port of Jeddah has dedicated storage areas for specialized products including dangerous goods. The Port Authority has a process to ensure dangerous goods are registered and licensed by the government. Containers departing the port are checked against documentation for matching container numbers and product detail. All sodium cyanide transited through the Port of Jeddah remains sealed within containers.

15. Lazaro, Mexico⁴⁹

The Lázaro Port is a leading international maritime access in the Mexican Pacific. The position of the port favors access to the nations of the Pacific Basin and allows participation in international maritime

⁴⁹ www.puertolazarocardenas.com.mx accessed 2023

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transport chains. The micro zone of the Balsas delta, where the Lázaro Cárdenas port is located, is located, in turn, in a strongly economic region, made up of the states of Michoacán, Guerrero, Querétaro, Mexico, the Federal District and Morelos. The region has 31,581 kilometers of highways and 36,576 kilometers of railways, with the port having a direct connection with a railway terminal. The nearest local airport is only 15 minutes from the port, while an international airport is only one hour away.

The facilities of Lázaro Port are equipped and qualified to efficiently, safely and productively cover all the activities included in an industrial and commercial port of its magnitude. The port is conditioned to receive large ships and all types of cargo. The entrance, the access channel and the four secondary navigation channels of the port comply with international safety standards for navigating in only one direction. The Port has public and private terminals including two specialized container terminals, three multipurpose terminals, and terminals for automotives, bulk grain, bulk minerals, fluids, metal and minerals, fertilizers, coal, and vegetable oil.

The Port Administration of Lazaro Cardenas (APILAC) operates the port. The APILAC is certified to ISO 9001 (quality), ISO 14001 (environmental), and ISO 28000 (security in supply chain). APILAC has completed the action plan derived from the environmental auditing practiced in their processes and facilities, ensuring compliance with environmental legislation, based on the Article 26 of Regulations of the General Law of Ecological Equilibrium and Environmental Protection in the Field of Environmental Audit. The Port Administration of Lazaro Cardenas is compliant with the International Code for the Protection of Ships and Port Facilities (ISPS Code).

APILAC has requirements in place for the handling and storage of dangerous goods. The Shipping Agent must provide the dangerous goods declaration and list of dangerous cargoes in transit. Packing and labeling are verified at the time of receipt and containers are segregated according to International Maritime Dangerous Goods segregation requirements. Sodium Cyanide is stored in a well-ventilated area. Access to the storage areas is controlled by port personnel. Basic PPE is required when loading, unloading, or transporting sodium cyanide in the port and staff are adequately trained on how to proceed in the event of an emergency. Disposal of waste from leaks, spills, or accidents is treated under the Rules of the General Law of Ecological Balance and Environmental Protection in Hazardous Waste with the Administration and / or specialists of SETIQ for waste disposal. NOM-031ECOL-1993 and NOM-052-ECOL-1993 on wastewater discharges and hazardous waste are also followed.

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16. Manzanillo, Mexico^{50,51,52,53}

The Port of Manzanillo is the largest containerized port in Mexico and is considered the country's most important due to its infrastructure and technology. The port functions as a main hub for Asian importers and exporters. It is also the port with the largest tonnage of foreign cargo shipping in Mexico. The port ranks 83rd on the United Nations Port Liner Shipping Connectivity Index, making it Mexico's best-connected port. The port includes four terminals, 46-foot harbor depths and 17 berths for general cargo ships, bulk carriers, container ships, and tankers.

The port has two primary routes to transport goods. By road, it connects to more than 285 kilometers of roadway in the Colima region. By rail, the Ferromex service serves the U.S., Canada, Guatemala, Columbia and Chile. The port is a streamlined maritime path over the Pacific Ocean to Japan, China, India, Malaysia and Singapore.

The port is operated by the Integral Port Administration (API) of Manzanillo. Manzanillo has 14 operating companies that correspond to 100% private capital investments, national and foreign, for handling all types of cargo. The Specialized Container Handling Terminal (TEC1) is operated by SSA Mexico. TEC1 has 5500 square meters of warehouse space and a 6 hectare bonded area for containers. TEC1 is equipped with four STS Post-Panamax cranes, 14 Super Post-Panamax cranes, and 52 E-RTG/E-RMG cranes. SSA Mexico is certified to ISPS, ISO 9001 (quality) and ISO 14001 (environmental).

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port must adhere to the requirements of Official Mexican standard NOM-010-SCT2/2009, Compatibility and segregation provisions for the Storage and transportation of hazardous substances, materials and waste and NOM-023-SCT4-1995, Conditions for the management and Storage of dangerous goods in ports, terminals and sea units. These standards state that ports, terminals and offshore units must establish areas for management, storage and adequate segregation of dangerous goods in bulk or packed form, from other cargo. There is a compatibility and segregation table for dangerous substances, materials and waste. These storage areas must have the appropriate infrastructure, facilities and signage on display in accordance with the inherent risks of the products. The port will also ensure that in such area's signage is displayed to show smoking is prohibited, sources of ignition are avoided and proper precautions are taken with regards to personal protective equipment for the handling of dangerous goods.


⁵⁰ www.cbre.com/insights/local-response/2022-global-seaport-review-manzanillo accessed 2023

⁵¹ www.puertomanzanillo.com.mx accessed 2023

⁵² www.ufsoo.com accessed 2023

⁵³ www.ssamexico.com accessed 2023

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17. Mersin, Turkey^{54,55}

Mersin International Port (MIP) is about 25 kilometers southwest of the city of Tarsus and about 90 nautical miles northwest of the Port of Lattakia in Syria. The Mersin Free Zone, the first of its kind in Turkey, is adjacent to the port. Cargoes including containers, general cargoes, project cargoes, Ro-Ro, dry bulk and liquid bulk, passenger services and direct dry bulk handling services from ship to container are handled at MIP, the largest multi-purpose port in Turkey. Accommodating 21 berths, the port is able to conduct loading-discharging services to 30 vessels simultaneously. MIP has 12 gantry cranes and 5 mobile cranes at the berths. Mersin is linked by rail to the Istanbul-Baghdad railway and by ferry to the island of Cyprus.

MIP provides services aligned to international standards and within the scope of International Ship and Port Facility Security Code (ISPS) and fulfils the responsibility of port security measures. MIP also applies the rules stated in the "Mersin International Port Inc. Security Plan", approved by the Republic of Turkey Ministry of Transport, Maritime Affairs and Communication. MIP is certified to ISO 45001 standards since 2017 and ensures the safety of life and property. MIP has made technological investments to ensure full security inside the port. Some of those are Video Analytics for the fences, Biometric Access Control System, CCTV, Under Vehicle Search System, Speed Control System, Body Camera System, Marine Control with Thermal Camera, Patrol with Drone and Carbon Dioxide Measurement Devices. MIP regularly provides required training programs to its personnel regarding security. ISPS training and security training were given to all security guards and other security staff and X-Ray device users were trained as well. MIP successfully passed all security audits in 2021 including ISPS Audit and Drills.

18. Mombasa, Kenya⁵⁶

Due to its strategic location, midway between South Africa and the Gulf of Aden, the Port has experienced tremendous traffic through the years. The Port of Mombasa is the gateway to East and Central Africa and is one of the busiest Ports along the East African coastline. The Port provides direct connectivity to over 80 Ports worldwide and is linked to a vast hinterland comprising Uganda, Rwanda, Burundi, Eastern Democratic Republic of Congo, Northern Tanzania, Southern Sudan, Somalia and Ethiopia by road. A railway line also runs from the Port to Uganda and Tanzania.


The port is divided into two sections designated for conventional cargo operations comprising nine berths and container handling terminals comprising eleven berths, bringing the total berths at Mombasa to twenty. The container section is served by two terminals which are adequately equipped with shore and yard equipment to ensure fast and efficient movement of cargo. The Port of Mombasa operates specialized berths for express handling of specified cargo within the port such as Bulk Grains, Bulk Soda Ash, Bulk Clinker & Coal, Titanium, Bulk Liquid & Gas Cargo.

⁵⁴ Sustainability at Mersin International Port 2021

⁵⁵ www.mersinport.com.tr accessed 2023

⁵⁶ www.kpa.co.ke accessed 2023

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The port is managed and operated by Kenya Ports Authority (KPA). KPA responds to rescues, hazardous materials incidents and possible emergency activities. KPA works with other government agencies to minimize the impact of fires, floods, landslides, building collapses, motor vehicle accidents and other emergencies. KPA also runs prevention and preparedness programs to prevent these emergencies and reduce their impact on the port community. The Port Fire service also offers 24 hour ambulance services.

The KPA Authority has put in place a Health and Safety Management System which defines the roles and responsibilities of all employees, port users and contractors aimed at inculcating best work practices, accident prevention and environmental conservation. The Port of Mombasa is a center for maritime search and rescue in the region. The center is manned by multi-agency team led by the Kenya Maritime Authority.

KPA complies with the International Ship and Port Facility Security Code (ISPS) as prescribed by the International Maritime Organization (IMO). Security measures include an electronic surveillance system covering all port areas, Coastguard surveillance, and a Search and Rescue Centre operated jointly by KPA, other security agencies and IMO to supplement sea surveillance. Port entry is strictly controlled with all port users and visitors required to display a valid Port Pass at all times, entrance to container terminals and other key areas is restricted, and security patrols are conducted. A cargo scanning system allows containers to be checked without stripping and continuously manned watch towers are operated in the car handling area and container terminal. KPA is certified to ISO 9001 (quality) and ISO 27001 (information systems).

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- Cyanide is placed in a segregated area whilst awaiting relevant clearances. This area is clearly signed providing appropriate warning to all port personnel. Collection of the cargo by the approved carrier is direct from this area. Vehicles collecting cargo from the port environs are subject to port checks to ensure that approvals for collection are in place and that documentation and container details match prior to egress from the port. Additionally, signage is displayed prohibiting smoking and the consumption of foodstuffs and liquids in the areas where hazardous goods are being stored.

19. Nouakchott, Mauritania^{57,58,59,60}

The Autonomous Port of Nouakchott, known as the Port of Friendship (PANPA), is the first public


⁵⁷ www.port-nouakchott.com accessed 2023

⁵⁸ <https://tcn-mauritanie.com> accessed 2023

⁵⁹ www.b2bers.com accessed 2023

⁶⁰ www.marinetraffic.com accessed 2023

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commercial port south of the Sahara and a crossroads between Europe, Africa and North America. The port is located in the middle of the west coast of Mauritania, in the middle of the Sahara, at the southern end of the desert, about 250 nautical miles south of Dakar Port.

PANPA is responsible for the application of IMDG Code requirements for the handling and storage of hazardous materials and emergency response. Additionally, the port is subject to the MARPOL Convention waste requirements. PANPA has been certified in accordance with the ISPS Code since 2008 to ensure the safety and security of port facilities.

TNC operates the new container and hydrocarbon terminal with a 570 meter long quay that started operations in April 2022. There are five berths total at the port, with three being in the new container terminal.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port is accredited under the ISPS Code and has a continual security presence. Security is provided at the entrance and exit to the port and also includes armed security patrols. Cyanide products remains within the sealed containers at all times. Warning signage is erected prohibiting non-authorized personnel in the area where the contains are stored. The area in which containers are located, if warranted, is well segregated and ventilated to prevent the build- up of hydrogen cyanide gas.

20. Punta Arenas, Chile⁶¹


Punta Arenas is situated in southern Chile in the Strait of Magellan. The port handles a limited amount of general cargo and containers. However, it is an important replenishment port for vessels making the transit between the Atlantic and Pacific Oceans. Empresa Portuaria Austral (EPAUSTRAL) operates the three port areas of Arturo Prat and José de los Santos Mardones in the city of Punta Arenas, and the Ferry Terminal in the city of Puerto Natales. The Mardones Terminal was constructed in 1995 as a response to the need for a port area that would meet the growing needs for loading and unloading of products that arrive in the region and, that due to volumes, made their transfer through the center of the city of Punta Arenas difficult. The Mardones Terminal receives container ships, fishing vessels and additionally serves as a support and service platform and wharfing for the large ships of the tourist cruise lines, when they can be attended at Terminal Prat. There are three berthing sites at the Mardone Terminal.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- Loading and unloading equipment has a variety of shore cranes, loaders and tugboats. The Port

⁶¹ <https://shipnext.com/port/punta-arenas-clpuq-chl> accessed 2023

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aims to have dangerous cargo placed directly onto a trailer and removed from the facility under escort of the Port Authority. However, when this cannot occur, the port has a dedicated storage area for specialized products including dangerous goods; cyanide containers are segregated and stacked separately according to the provisions of the Code and all sodium cyanide remains sealed within its container at all times preventing contact with water and other incompatible materials. The port has full CCTV coverage, is fully lit at night and the whole of the port area has controlled access.

21. San Antonio, Chile^{62, 63}

Port of San Antonio is Chile's largest port and the busiest port on South America's west coast. Located on the shores of central Chile, it is nearest the country's capital, Santiago. The port covers 495 hectares, including 353 hectares of water and 142 hectares of land. Puerto San Antonio has excellent access to roads and rail to Santiago, southern Chile, and Argentina. It is connected to Santiago by the Freeway of the Sun, a high-speed highway.

The Port has three concessionaries: San Antonio Terminal Internacional, DP World, and Puerto Panul. Even though San Antonio is a multipurpose port, the main activity is the transfer of container cargo.

1. San Terminal Antonio International (STI) operates the South Molo Terminal which specializes in handling containerized cargo. STI has 735 meters of continuous wharf. The terminal contains 31 hectares of paved storage for containerized and bulk cargoes and 11 thousand square meters of warehouses. The terminal offers rail and road access and 24-hour security services.

2. Puerto Panul SA operates the North Terminal dedicated to solid bulk cargoes. The terminal has wharf of 230 meters with alongside depth of 11 meters. While the terminal specializes in solid bulk, it is not limited to that cargo type. Panul Port specializes in handling imports of solid bulk cargo, and Terminal Vopak specializes in liquid bulk cargoes.


3. The Policarpo Terminal Toro is administered by the Portuaria Compania de San Antonio. It handles bulk cargoes and has transport access to ship, train, and truck.

4. TEM, Terminal Multioperado, is administered by Portuaria Compania de San Antonio. It contains four wharves for handling solid and liquid bulks, containerized cargo, and loose cargo. Twenty companies and 14 shipping agencies use this terminal. Terminal Multioperado which is operated by several companies and administered by EMPORCHI. It offers over 200 reefer connections for containerized cargo, direct rail access, and five hectares of storage areas.

⁶² www.aivp.org accesses 2023

⁶³ www.worldportsource.com accessed 2023

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22. Surabaya, Indonesia^{64,65,66}

Also known as Tanjung Perak, the Port of Surabaya is the second busiest seaport in Indonesia, located at Surabaya, East Java. It is the main port for the eastern part of the island of Java. The port is accessed from the North through the Madura Strait, a 25 mile long, 100m wide and 9.5m deep channel between East Java and Madura Island. The port is equipped to accommodate tankers, general cargo vessels and container vessels. The container terminal at the port is known as Terminal Petikemas and is operated by Pelindo PT Terminal Petikemas Surabaya (TPS). The terminal has a 35 hectare international container yard, 10,000 square feet of warehouse with 6500 square feet of dangerous goods space, and a two track railway connection. The terminal has 12 container cranes, numerous RTGs, reach stackers, sky stackers and other handling equipment. A terminal operations system is used to manage all container movements at the port and allows for real time data to be monitored by TPS.

TPS was the first terminal in Indonesia to implement the ISPS Code in 2004. PTS is also committed to the application of its Integrated Management System of ISO 9001 (quality), ISO 14001 (environmental), ISO 28000 (security), ISO 27001 (information security), and Indonesian regulation PP No. 50/2012 (occupational safety and health).

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port of Surabaya operates under a suite of national regulations which the port is required to comply with. In particular, for the handling and storage of dangerous goods, these regulations ensure that shipments of cyanide are authorized for discharge from the vessel, handled by appropriately trained personnel, stored in designated and secured areas, segregated according to dangerous goods classes, and removed from the port in a timely manner. The port has restricted access and the Dispatch Center organizes ship movements, tracks pilot operations, and supervises terminal operations via real-time CCTV monitoring. All sodium cyanide transited through the Port of Surabaya remains sealed within containers at all times. Security requirements are also addressed under National regulations and the Port of Surabaya satisfies the conditions set out for security personnel and check points, monitoring and surveillance systems.

23. Tema, Ghana⁶⁷

The Port of Tema is the largest port in Ghana. Situated on the eastern coast of the country, it covers over 3.9 million square meters of land area. The port serves container vessels, general cargo vessels,


⁶⁴ www.indonesia.travel/cruise/en/cruise/tanjung-perak accessed 2023

⁶⁵ www.shipnext.com accessed 2023

⁶⁶ www.tps.co.id accessed 2023

⁶⁷ <https://ghanaports.gov.gh/> accessed 2023

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tankers, Ro-Ro and cruise vessels amongst many others. Tema Port has a capacity of 21 berths: currently Terminal 1 and 2 have 16 multipurpose berths and Terminal 3 is a dedicated container terminal operating 3 berths. Tema Port has 53,270 square meters of paved and covered storage area with and additional 92,200 square meters of open storage. The port operates five 40 tonne ship-to-shore container cranes, two 70 tonne mobile harbor cranes, and four 144 tonne mobile cranes. Set within the industrial city of Tema and 30 km from the capital city of Ghana, the port area serves as a logistic point for activities of Inland Clearance Depots (ICDs), Warehouses, Transport and Haulage companies, Freight Forwarders, Factories and related service centers.


The Ghana Ports and Harbor Authority (GPHA) is responsible for managing and operating the Port of Ghana. The GPHA implements an Integrated Management System which incorporates certifications to ISO 9001 (quality), ISO 14001 (environmental), ISO 45001 (safety) and ISO 27001 (information security). All vessel handling services are provided by the Port Authority. The Harbor Master has oversight of nautical operations within the port. This comprises of operational tasks related to the safety and efficiency of vessel management within the boundaries of the port. The Harbor Master's office allocates berths and coordinates all services necessary to berth and un-berth a vessel. Stevedoring services are provided by the Port Authority and twenty-two private stevedoring companies. Shore handling (receipt, storage and delivery services) are provided by GPHA and four others.

The Port of Tema is ISPS complaint, operating at MARSEC LEVEL 1 with consistent seaside and land side surveillance. The port has automatic gating systems where users are biometrically verified before entering the port. Closed circuit television has been installed throughout the port including ship berths, stacking and loading areas, and transit areas. Optical character recognition (OCR) cameras are positioned at entry and exit gates to monitor and control the movement of cargo, vehicles, port users, workers, and operations in general. The port works closely with the police, the navy, the Bureau of National Investigations, and other security agencies to maintain port security. The port is part of the Marenda AIS project, an African, Caribbean, Pacific, and EU program to enhance information on ship movement, position and cargo, to ensure maritime safety and security, and to set up emergency response mechanisms.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port of Tema has dedicated storage areas for specialized products including dangerous goods. Cyanide containers are segregated and stacked separately. All cyanide transited through the Port of Tema always remains within sealed containers. Seals are individually numbered and tamper evident. The Port provides a dedicated area for workers to eat and drink which is well away from the area in which the product is located. Containers departing from the port are checked against documentation for matching container numbers and product detail.

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24. Trabzon, Turkey^{68,69}

Due to its strategic location on the coast of the Black Sea, at the start of the transit route to Iran, Iraq, Russia and the Turkic Republics, Trabzon Port plays a key role in connecting these countries to all European and Global markets. The port is operated by Trabzon Port Management Inc.

The Port of Trabzon has a dedicated dangerous goods storage area where appropriate packaging and labeling is confirmed. All staff handling hazardous goods are required to have IMDG Code Training and port HSE Training. All sodium cyanide transited through the Port of Trabzon remains within sealed containers and is placed in a well-ventilated area to prevent the buildup of cyanide gas.

In general, Port and vessel security are managed through the International Ship and Port Facility Security Code (ISPS Code). An ISPS Code Certificate has been obtained for the Port of Trabzon by fulfilling the provisions of the ISPS Code Contract.

25. Valparaiso, Chile^{70,71}

The Port of Valparaiso is located on the southeast side of the Atlantic Ocean. It is the largest seaport in Chile and the largest port on the Pacific coast of South America. Founded in 1536, it is the maritime gateway to the capital Santiago, about 100 km away. The Port of Valparaiso is the western bridgehead of the South American Continental Bridge, with a 1,000 km east-west railway running from the port of Buenos Aires in Argentina on the east coast. In addition to the electrified railway that goes directly to Santiago, there are also railways, roads and air transport connecting it to various parts of the country. There are a total of 10 deep-water berths in the port, with water depths ranging from 9 to 10.5 meters. Four of them are used for container loading and unloading. More than half of Chile's foreign trade imports pass through this area.

The port is managed by Empresa Portuaria Valparaiso (EPV), an entity that is 100% owned by the Chilean government. The port has three terminals with 11 berths. TPS Valparaiso is the container terminal at the port and is ISPS certified. TPS has implemented an Optical Character Recognition (OCR) system at the gates, to verify and track cargo. The terminal has certified ISO 14001 (environmental) and ISO 45001 (safety) management systems.

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port of Valparaiso operates under a suite of National regulations that ensure compliance with the above. In particular, for the handling and storage of dangerous goods, these regulations ensure that shipments of cyanide are authorized for discharge from the vessel,


⁶⁸ <https://trabzonport.com.tr> accessed 2023

⁶⁹ *Trabzon Port Management Inc. Dangerous Cargo Handling Guide*, January 30, 2023

⁷⁰ www.ufsoo.com/port/valparaiso/ accessed 2023

⁷¹ www.puertovalparaiso.cl accessed 2023

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- handled by appropriately trained personnel, stored in designated and secured areas, segregated according to dangerous goods classes, and removed from the port in a timely manner. Security requirements are also addressed under these National regulations and the Port of Valparaiso satisfies the conditions set out for security personnel and check points, monitoring and surveillance systems.
- All transshipping operations are carried out in a dedicated dangerous goods area by suitably trained personnel. The transshipping operations are monitored by the port's CCTV system and the containers are tracked to record the positioning of the containers within the dangerous goods storage areas.

26. Vostochny, Russia^{72,73}

Vostochny Port is located in Wrangell Bay on the northwest coast of the Sea of Japan. It is 18 kilometers away from Nakhodka Port in the west. Vostochny specializes in coal transshipment, although it also provides warehousing, stevedoring, and forwarding. Container ships make up approximately 12% of the vessels that call on the port. The Vostochnaya Stevedoring Company (VSC) specializes in the handling of containerized cargo. The Port terminals have direct rail access. Vostchny Port is certified to ISO 14001 (environmental).

During the previous Due Diligence Review, performed by another Cyanide Code certification company, the following information regarding this port was obtained:

- The Port operates under a suite of International and National regulations that ensures its compliance with regard to the handling and storage of dangerous goods. The Port of has dedicated storage areas for specialized products including dangerous goods and operations for dangerous goods are registered and licensed by the government. Containers departing from the port are checked against documentation for matching container numbers and product detail. All sodium cyanide transited through the Port of Vostochny remains sealed within containers at all times.

⁷² <https://credo-trans.com/russias-port-port-of-vostochny/> accessed 2023

⁷³ <https://nhk-maritime.com/ports/vostochny-port> accessed 2023

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Ocean Carrier Due Diligence Evaluations

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.

All Ocean Carriers:

Ocean routes are chosen by the ocean carriers and are regulated by a number of international organizations. Each ocean carrier responded to the Cyanide Code due diligence survey that they choose routing to minimize risk and transport the cargo as efficiently as possible.

According to interviews, Chengxin gives strong preference to ocean carriers that have been evaluated as part of a Cyanide Code due diligence investigation. Ports that have been found to be acceptable are chosen based on proximity to end customer. Only in cases where a closer port has unacceptable infrastructure or security is the shipment routed using a longer over-the-road segment.

The operation is: In full compliance with In substantial compliance with Not in compliance with Standard of Practice 1.1

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.

All Ocean Carriers:

According to the responses to a questionnaire modeled after the Cyanide Code Transportation Protocol, all ocean carriers reported that they comply with IMO requirements and are in compliance with International Maritime Dangerous Goods (IMDG) requirements concerning the transportation of the hazardous materials, including the training of employees.

Inter-modal moves once the shipment reaches the port are controlled by the ocean carrier. Ocean carriers self-reported that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel.

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

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

All Ocean Carriers:

All ocean carriers responded that they maintain their equipment according to the requirements of the local authorities and to the requirements of the Safety of Life at Sea (SOLAS) regulations. SOLAS was confirmed to include requirements regarding the appropriate maintenance of equipment. All ocean carriers responded that they are subject to period regulatory inspections throughout the year and across the globe.

Chengxin Transport ensures authorized packages are used for solid sodium cyanide. Package specifications were reviewed and were found to be compliant.

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

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

All Ocean Carriers:

Ocean carriers self-reported that they train their personnel on hazardous materials handling. Information from the carriers also indicated that they have systems in place to ensure that inter-modal moves are performed by appropriately licensed and qualified personnel.

In their response to the ICMI Cyanide Code due diligence protocol questionnaire, ocean carriers reported that they have robust safety programs which are mandated by international laws. All safety programs apply to all employees.

The operation is: In full compliance with In substantial compliance with Not in compliance with Standard of Practice 1.4

Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.

Chengxin Transport ships its sodium cyanide on main line ocean carriers that have demonstrated safety programs and safe performance. The ocean carriers sign standard contractual agreements that require that the carrier adhere to applicable EHS regulations and have “organized safety programs.” Each carrier was asked for information regarding fulfillment of Cyanide Code requirements using a customized ICMI

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transportation protocol. Responses and information provided by all carriers was deemed to be appropriate by the 3rd-party auditor.

The ocean routes are chosen by the ocean carriers.

See the Chengxin Transport protocol question 1.5 earlier in this report for the responses to this section of the protocol.

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.

All Ocean Carriers:

Ocean carriers reported that they have computer systems that are used for the tracking and management of all freight containers within their system. This was confirmed through a real-time demonstration of tracking capability for each of the five ocean carriers. The online data systems provide among other items the date, time, location, and carrier involved in the last interchange, transport action, or gate move. The Chengxin Transport and its freight forwarder have access to this information via the internet web sites.

The sodium cyanide shipments for this segment are containerized loads. All shipping containers are sealed. Shipping papers were reviewed. Auditors confirmed that seal numbers are recorded on the bills of lading. This enables personnel along any portion of the segment to confirm that the containers have not been opened.

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 1.6
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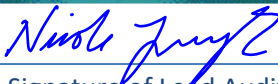
Principle 2 | INTERIM STORAGE

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.

All Ocean Carriers:

Ocean carriers reported that during transport, the storage of cyanide both on land and on vessels is in accordance with the applicable stowage and segregation requirements in the IMDG regulations. The

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terminal must segregate containers similar to the segregation onboard vessels.

The packaging used for solid cyanide conforms to IMO requirements.

All Ports:

Each international port within the scope of this re-certification audit has been evaluated for its ability handle materials safely. Confirmation was made through interview that there have been no cyanide exposure or environmental release incidents during the re-certification period. Chengxin Transport confirms due diligence information with ports every three years.

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 2.1
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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.

All Ocean Carriers:

Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. Chengxin provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. Ocean carrier responses confirmed that emergency response planning is an integral part of their certified programs.

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.

All Ocean Carriers:

Ocean carriers responded that they contract with professional emergency response contractors for landside emergencies. Onboard vessels, the emergency response would be conducted by trained crew members with shore side support and guidance.

The operation is: In full compliance with
 In substantial compliance with
 Not in compliance with
Standard of Practice 3.2

Transport Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

All Ocean Carriers:

Ocean carriers reported that they and their affiliates have emergency response plans in place which include the prompt notification of all involved parties. Chengxin provides shipping papers showing the emergency contact information which is then transferred to the hazardous cargo declaration.

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. Ocean carrier responses confirmed that emergency response planning is an integral part of their certified programs.

The operation is: In full compliance with
 In substantial compliance with
 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 cyanide treatment chemicals.

All Ocean Carriers:

Ocean carrier responses confirmed that they extensive emergency response programs under their SOLAS certifications.

The operation is: In full compliance with Standard of Practice 3.4
 In substantial compliance with
 Not in compliance with

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

All Ocean Carriers:

The due diligence questionnaire responses from the ocean carriers confirmed their understanding of emergency response requirements. Emergency response planning and the performance of frequent emergency drills are required by international laws. All ocean carriers reported that they are certified by third-party auditing organizations for environmental, health, and/or safety programs. Ocean carrier responses confirmed that emergency response planning is an integral part of these programs.

The operation is: In full compliance with Standard of Practice 3.5
 In substantial compliance with
 Not in compliance with

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