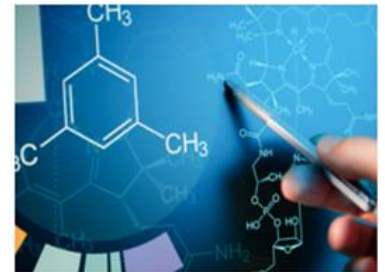


ICMI Transportation Verification Protocol (Revision June 2021)

Summary Audit Report

Hebei Chengxin Transport Co., Ltd., P.R. China

2022 Re-Certification Audit



Submitted to:

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

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Table of Contents

- Operation General Information 3**
- Operation Description 3**
- Audit Implementation and Conclusions 3**
- Auditor’s Finding 5**
 - Compliance Statement 5
 - Auditor Information 6
 - Auditor Attestation 6
- Principles and Standards of Practice - Cyanide Transportation Verification Protocol 7**
 - Principle 1 | TRANSPORT 7
 - Transport Practice 1.1 7
 - Transport Practice 1.2 8
 - Transport Practice 1.3 9
 - Transport Practice 1.4 10
 - Transport Practice 1.5 12
 - Transport Practice 1.6 12
 - Principle 2 | INTERIM STORAGE 13
 - Transport Practice 2.1 13
 - Principle 3 | EMERGENCY RESPONSE 14
 - Transport Practice 3.1 14
 - Transport Practice 3.2 15
 - Transport Practice 3.3 16
 - Transport Practice 3.4 17
 - Transport Practice 3.5 17

Operation General Information

Name and location of Operation:	Hebei Chengxin Transport Co Ltd Yuanzhao Road, Yuanshi County Shijiazhuang City, Hebei Province 051130 CHINA
Names and contact information for this facility:	Name: Jason Li Title: International Sales Department Manager E-mail: jason.li@hebeichengxin.com Tel: +86-311-66500855

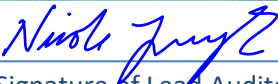
Operation Description

Hebei Chengxin Transport Co., Ltd. (hereinafter referred to as “Chengxin Transport”) was established in 2002 and is located in Yuanshi County approximately 30 km south of the Hebei Province capital of Shijiazhuang City. Chengxin Transport is approved by the Shijiazhuang City Bureau of Transport for road transportation and handling of dangerous goods. Chengxin employees about 412 people for the transport operation and has a fleet of 168 vehicles that are licensed and certified to transport dangerous goods.

The sodium cyanide product is manufactured and packaged by one of the Hebei Chengxin group’s three production facilities. Solid cyanide is packaged in 50 kg drums, 1 tonne intermediate bulk containers, or 1.1 tonne intermediate bulk containers and then into shipping containers. Liquid cyanide is package in iso-containers. All packaging is undertaken by the production company and when sealed, Chengxin Transport collect and transport the product.

Table 1 provides a summary of the main Chengxin Transport routes for both liquid and solid cyanide. Chengxin Transport uses 15 main transport routes (including four ports) to their customers within China. Cyanide is loaded onto the trucks at the production facility and from there is transported directly to the customer or port.

Hebei Chengxin Transportation
Name of Operation

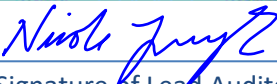

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February 20, 2023
Date

Table 1: Summary of Main Transportation Routes

Destination	Distance	Product	Facility
Shanghai Port	2380 Km	Solid	Inner Mongolia
Qingdao Port	2030 Km	Solid	Guang'an
Lianyungang Port	675 km	Solid	Hebei
Tianjin Port	427 km	Solid	Hebei
Shanghai Port	1 150 km	Solid	Hebei
Qingdao Port	625 km	Solid	Hebei
Anqing City, Anhui Province	1 135 km	Solid	Hebei
Nantong City, Jiangsu Province	1 107 km	Solid	Hebei
Shangyu City, Zhejiang Province	1 270 km	Liquid	Hebei
Shijiazhuang City, Hebei Province	25 km	Solid	Hebei
Xian Tao City, Hubei Province	991 km	Solid	Hebei
Dongyang City, Zhejiang Province	1 392 km	Solid	Hebei
Hangzhou City, Zhejiang Province	1 210 km	Liquid	Hebei
Zhangjiakou City, Hebei Province	545 km	Liquid	Hebei
Baotou City, Inner Mongolia	1170	Liquid	Hebei

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

Audit Implementation and Conclusions

This re-certification audit was conducted through on-site field observations of transportation activities, reviews of records and procedures, and interviews with senior management, operations management, engineering, and environmental, health & safety (EH&S) staff. The audit team used the ICMI “Cyanide Transportation Verification Protocol” to evaluate International Cyanide Management Code (Cyanide Code) compliance.

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

The audit was performed by an independent third-party audit team that fulfills all ICMI Cyanide Code Lead Auditor and Technical Auditor requirements for cyanide transportation operations. All aspects of the cyanide operations were included in this Cyanide Code Re-Certification Audit. The operation was found to be in FULL COMPLIANCE with Cyanide Code Cyanide Transportation requirements.

Auditor’s Finding

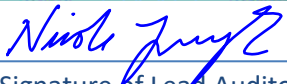
This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

The Chengxin transportation operations were evaluated for Cyanide Code compliance using the 2021 version of the *ICMI Cyanide Transportation Verification Protocol*. Chengxin internal policies, practices, and procedures regarding the management of the cyanide transportation operations were reviewed.

The audit team found that the overall level of preparedness and understanding of ICMI Cyanide Code requirements was excellent. Requested records were readily available for review.

The results of this re-certification audit demonstrate that the Chengxin cyanide transportation operations are in FULL COMPLIANCE with International Cyanide Management Code requirements.

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

Compliance Statement

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

Auditor Information

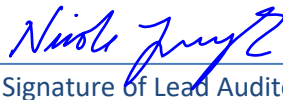
Audit Company:	MSS Code Certification Service, a Division of: Management System Solutions, Inc. www.mss-team.com
Lead / Technical Auditor:	Nicole Jurczyk E-mail: njurczyk@mss-team.com
Technical Auditor:	Liu Yun
Date of Audit:	December 15-16, 2022

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 Detailed 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

Hebei Chengxin Transportation



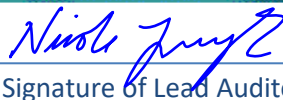
February 20, 2023

Name of Operation

Signature of Lead Auditor

Date

Hebei Chengxin Transportation



February 20, 2023

Name of Operation

Signature of Lead Auditor

Date

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.

Detailed criteria for selection and transport route risk assessment are defined in the "Manual of Management Systems of Chengxin Transportation Co. Ltd." (referred to as the "Manual" hereafter), Chapter 11 - Risk Assessment and Selection Management for Sodium Cyanide Transportation. The following factors are considered: proximity to schools, road infrastructure, population density, road construction projects, pitch and grade, bridges, mountains, rivers, speed limited regions, weather, parking areas, road classification, medical situations, blackout areas, gas stations, and high incident roads. The highways are secure, and drivers sleep on the highway in the trucks. There are government-defined locations for parking trucks with dangerous goods on the highway system.


Detailed criteria for route risk assessment are defined in Manual, Chapter 11 - Risk Assessment and Selection Management for Sodium Cyanide Transportation. Necessary controls are written into the risk assessments. Risk evaluations were confirmed for all transportation routes listed at the beginning of this report. The assessment for the new route since the previous audit from Inner Mongolia to Shanghai was reviewed and included: the name of the evaluator; the date of the assessment; factors covering narrow bridge and tunnel; speed limited; blackout; availability of medical rescue is 15 minutes away; and risk controls. Controls listed include focusing attention on speed and distance. The Driver Planner and Safety Officer signed off on this new route and Driver signatures were included as well.

The Manual requires that assessments are reviewed annually and changed as necessary. The initial assessment for a new route invites 1-2 driver(s) who are assigned to take a round trip along the route for trial transportation and provide feedback. All routes were re-evaluated and re-authorized during the recertification period. Records were found to be complete and readily available.

The risk assessment process includes the risk control measures that are to be taken. These are documented in the route risk assessments. Risk evaluations and details regarding risk controls were confirmed for all transportation routes.

The government provides input as part of the process of issuing the transportation certificate, 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 government issued transportation certificates were

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

reviewed. The certificates include an expiration date and note 22-metric ton total quantity. The certificates describe the route, vehicle, driver license, and escort information.

Although several trucks may travel together, the company generally does not use convoys or have a need to do so. There are no routes that need additional emergency trucks. Every truck has an escort who sits in the truck with the driver. The escort is a company employee and has the following responsibilities: PPE inspections; monitoring the driver for fatigue; and checking the emergency equipment, tools, spare parts, meters, pressure valves, as described in the Manual, Chapter 1 - Descriptions of Respective Positions and Responsibilities. The escort is also a qualified driver, which enables the drivers to perform as a driver team on longer trips. Chengxin Transport does not subcontract any portion of their cyanide transportation operations.

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 uses only trained, qualified and licensed operators to operate its transport vehicles. The Manual, Chapter 4 - Qualification of Employees, specifies the professional requirements applicable to the drivers involved in road transportation.

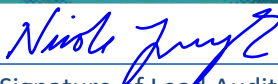
Each driver must hold the following valid qualification licenses prior to proceeding with cyanide transportation:

- Driving license with Road Transportation of Dangerous Goods certificate
- Escort of Road Transportation of Dangerous Goods certificate
- Road Transportation of Highly Toxic Chemicals credential (valid for 6 years)

Drivers take a dangerous good class, pass an exam, medical checks upon license renewal for the first two six-year cycles and then need to do an annual health check thereafter. Drivers have an A2 license and can no longer drive trucks after age 60.

Drivers/escort credentials were sampled to verify qualifications and confirm that all personnel have the required valid licenses and certificates.

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

Chengxin Transport trains all their employees involved in cyanide transportation initially and annually as a refresher.

An annual training program is in place and includes the following topics:

- SOPs and Safety Rules
- Emergency Rescue and On-Site Emergency Response Measures
- Medical Rescue (including hazards of cyanides use of antidotes)
- Occupational Health Awareness
- Safety Knowledge of Dangerous Goods Transportation
- PPE

Training records, including test results, were available for review and found to be complete.

Drivers and escorts who were working the solid cyanide transportation routes to and from the Qingdao port and Inner Mongolia or were off-duty were interviewed to verify their training records and awareness. Records confirmed that they received the above-mentioned training courses and passed the required exams.

Chengxin Transport does not subcontract any portion of their cyanide transportation operations.

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.

The transport company only uses equipment designed and maintained to operate within the loads it will be handling. The maximum weight is designated on the transportation permit and is shown on the tractor. Only standard loads of 22 tons are shipped and all chassis can handle this load.

Equipment loading capacity is indicated in the equipment files and is confirmed during the preventive maintenance program routine inspections. The inspection records were available for review and the equipment records assessed were found to be complete. Transportation equipment was observed as being in very good conditions. No deficiencies were noted.

Standard loads and size-appropriate shipping containers are used to ensure proper loading weights and reduced empty space in the sea container and/or truck to reduce the chance of the packaging being

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

damaged. The loading capacity of domestic ISO tanks is capped at 90% of the volume or 21,000 liters. Weights of loads were reviewed on shipping papers from the recertification period. Records were available to demonstrate that transport equipment is not being overloaded.

Chengxin Transport does not subcontract any portion of their cyanide transportation operations.

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

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

Chengxin has implemented a loading procedure that describes the safety measures that employees need to follow to ensure the integrity of the cyanide packaging during unloading, loading and transportation activities.

Standard loads and size-appropriate shipping containers are used to ensure proper loading weights and reduced empty space in the sea container and/or truck to reduce the chance of the packaging being damaged. Blocking and bracing records (which is done by production) were reviewed and found to be suitable. Liquid ISO tank loading was confirmed at maximum 90% of capacity for sampled domestic tanks.

An inspection entitled "Routine Inspection Records of Container Vehicle Prior to Dispatch" is required to be carried out and recorded by the Company's on-duty safety officer for every shipment. This consists of the completion of two separate inspection forms as follows:


- a. Container Vehicle Performance Inspection Record Form to check vehicle performance - includes the ER equipment inspection, regulatory required vehicle safety markings, antidotes, fire extinguishers, etc.;
- b. Prior to Dispatch Container Cargo Inspection Record Form to inspect cargo securement

A review of shipment records showed appropriate vehicle markings were in place identifying the shipment as cyanide.

An inspection entitled "Routine Inspection Records of Container Vehicle Prior to Dispatch" is required to be carried out and recorded by the Company's on-duty safety officer for every shipment. This consist of two separate inspection forms as follows:

- a. Container Vehicle Performance Inspection Record Form to check vehicle performance - includes the ER equipment inspection, regulatory required vehicle safety markings, antidotes, fire extinguishers,

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

etc.;

b. Prior to Dispatch Container Cargo Inspection Record Form to inspect cargo securement

The vehicles are inspected prior to transportation. The inspection records for vehicles observed during the were checked and it was confirmed that the relevant inspections had been done by the safety officer prior to dispatch and had been properly documented. Records from the recertification period were also sampled and were found to be acceptable.

The company's maintenance workshop is located in the parking area and performs simple tasks (e.g., check and replacement of tires, lubrication). The formal inspections and maintenance for the vehicles are done by authorized third parties on at least an annual basis and inspection reports are provided to Chengxin Transport.

A "Register of Transportation Vehicle Primary & Secondary Maintenance" is maintained by the Transportation Planner. The register includes the vehicle number, category of permissible transportation, dates of last and next inspection. The system automatically alerts the dispatcher when there are 10 days until the inspection expiry date. The dispatcher then notifies the concerned driver to bring his vehicle to the third party for maintenance and inspection. Records were sampled for the recertification period and were found to be complete.

The ISO tanks inspections are also contracted out to a government-authorized third party, the China Classification Society. This organization performs the integrity inspection every 2.5 years. The inspection includes the tank wall thickness measurement, pressure testing, etc. Inspection certificates were sampled and the integrity results were concluded as acceptable.

The Manual, Chapter 1 - Descriptions of Respective Positions and Responsibilities: Dangerous goods are not allowed to be transported at night. The Chapter states that drivers are limited to 8 hours. Each 4 hours they need to rest for at least 20 minutes. The overall limitation on hours driven for the week is 44 hours. In the summer, transport must be done before 11 am or after 2:30 pm to avoid the hot part of the day.


There are two drivers assigned to each delivery. Each person drives for 3.5 hours and then takes a 20-minute rest before switching off with the secondary driver (escort).

Blocking and bracing is done by production and the cyanide solution is loaded to 90% to prevent sloshing; there are also baffles in the ISO tanks. The "Prior to Dispatch Container Cargo Inspection" is used to inspect cargo securement prior to dispatch. Records were complete. Awareness of process requirements was very good.

The drivers were interviewed and reported that they can stop the shipment if weather conditions, or road conditions are unsafe. Local police would manage any civil unrest situation. Drivers stay with the loaded truck until assistance arrives.

Alcohol testing is done before every shipment and recorded in the "Driver's Pre-Trip Alcohol Testing

Hebei Chengxin Transportation
Name of Operation



Signature of Lead Auditor

February 20, 2023
Date

Records" form by the duty safety officer. The records were sampled on a random basis for the recertification period and records demonstrated that the testing was done for each shipment.

Records were found to be complete.

Chengxin Transport does not subcontract any portion of their cyanide transportation operations.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 1.4
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Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

Chengxin Transport is involved only in ground transportation of cyanide within the scope of this audit.

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 trucks are equipped with a 4G On-Line Monitoring System and a GPS tracking system. The driver can receive instructions and/or warnings from the Duty Administrator through the communication system and the GPS is monitored 24 hours a day. These systems are monitored in real time by Chengxin Transport Service Station personnel. Drivers also have mobile phones.

The communication equipment is confirmed to be functional during the pre-trip inspection. The proper functioning of the GPS signal is also tracked by the local authorities.

The only blackout areas for communications are in tunnels which are reportedly short in length. However, the duty administrator is still able to monitor the vehicle movement in the tunnels using the 4G On-Line Monitoring System.

Chengxin Transport has implemented controls to prevent loss of cyanide during shipment. Chengxin Transport maintains a cyanide inventory. Each time a cyanide shipment is received by Chengxin Transport,

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

the following information is included in the inventory system: purchase number order, date of receipt of cyanide, and shipment weight. For each shipment that Chengxin Transport delivers, the following information is captured in the inventory records: client's name (mine site or port), amount of cyanide transported, delivery date, order number and remaining amount in stock. Records showing the quantities and destination of the cyanide are maintained.

Chengxin Transport keeps the transportation shipping documents required by Chinese regulations. The transportation shipping documents include information on the truck, the net load, and the consignee. Documentation is prepared by the GPS monitoring personnel; truck drivers are responsible for returning the signed (by customer or port) transport shipping documents back to Chengxin Transport following the delivery to ensure that there is a chain of custody record maintained.

A Cyanide Safety Card is carried in each truck. A driver involved in a delivery during the audit was interviewed and records were found to be complete.

Chengxin Transport does not subcontract any portion of their cyanide transportation operations.

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.

Chengxin Transport does not provide storage for sodium cyanide. This practice does not apply.

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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Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

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.

Chengxin Transport has two emergency response procedures that are required to be submitted to the local Transportation Bureau, Yuanshi County, as per Chinese transportation regulations. The procedures are named as follows and include:

1. Comprehensive Emergency Response Plan for Safety Incidents for Road Transportation Enterprises.

The information includes:

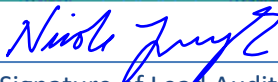
- Emergency Response organization and responsibilities
- Actions to be taken by drivers and escorts
- Emergency response process (incident reporting, emergency response initiating, responding, resources, and closure of emergency response)
- Post-emergency actions (disposal, decontamination, recovery, medical treatment, incident investigation)
- Actions to be taken in response to potential scenarios, including a cyanide transportation incident
- Appendices: Safety Data Sheets (SDSs), emergency contact numbers (including Emergency Response Team (ERT) members, external agencies, national highway emergency response contact number for help, medical rescue numbers along the transportation routes), list of emergency response equipment, maps of main transportation routes, etc.

2. Specific Emergency Response Plan of Safety Incidents for Road Transportation Enterprises, with more detailed actions on how to respond to a cyanide transportation incident. The information in this plan includes:

- Organization & responsibilities of responders
- Emergency response process (incident reporting, emergency response initiating, responding, resources, and closure of emergency response)
- Post-emergency actions (disposal, decontamination, recovery, medical treatment, incident investigation)
- Emergency response training and drills

The specific Emergency Response Plan (ERP) identifies several different scenarios for a leak of cyanide solution including large and small leaks; a spill of solid cyanide including large and small spills; the type of

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

roadway where the leak or spill occurs; and action to be taken if there is a leak or spill at the mine. The ERP was found to be appropriate for the operation.

The ERP contains specific mitigation and notification response actions for the driver based on the significance of the incident. Incidents are categorized as Level 1 (handled by the driver), Level 2 (small release of cyanide from a container), or Level 3 (large release or incident like an overturned truck). Detailed steps are also outlined for the cleanup and disposal of contaminated materials and soil. The ERP instructs the driver by Level when the police are to be contacted. These activities are coordinated through the permitting process with the Government.

Examples include covering a solid spill with a tarp to keep the briquettes dry. Detailed steps are also outlined 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.

The ERP includes a detailed description of the roles of outside responders and is coordinated through the permitting process with the government.

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.

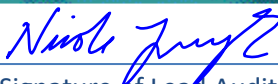
Chengxin Transport trains their employees involved in cyanide transportation initially and annually as a refresher. The training program is pre-planned and includes Emergency Rescue and On-Site Emergency Response Measures and Medical Rescue (including hazards of cyanides use of antidotes).

Training records from the recertification period were available for review and were found to be complete.

The ERP establishes the specific responsibilities for the members of the response team (communication, decontamination, logistics manager, traffic controller, and other internal roles during the emergency).

There is a List of Emergency Response Equipment including personal protective equipment (PPE) items maintained in transportation vehicle. The equipment is inspected by a safety officer prior to dispatch. The emergency response equipment includes a large plastic tote (emergency kit) with antidote, eye wash, two sets of PPE, a first aid box (liquid injections). A safety card for the road transportation of dangerous goods

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

is also maintained in the truck; the safety card calls for fire extinguishers, eye wash, two emergency drums, emergency triangle, PPE, corrosive resistant gloves, suit, face mask, cartridge, tarp, and shovel.

The equipment in the trucks was confirmed to match the List of Emergency Response Equipment during the audit.

An emergency response truck is maintained at the Company's designated parking area trucking facility for responding to road emergencies. A list of equipment and records were available to show that the equipment on the emergency response truck is inspected on a weekly basis.

A pre-trip inspection is used to check emergency equipment and the pre-trip inspection results are recorded. Chengxin Transport does not subcontract any portion of their cyanide transportation operations.

The operation is:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.2
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Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The Comprehensive Emergency Response Plan for Safety Incidents for Road Transportation Enterprises (last updated in 2022) contains emergency response process notifications for local emergency response bureaus, hospitals, fire brigade, etc. The Appendices contain emergency contact numbers (including 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.


The company's ER contact/control room number is also printed on a metal plate and fixed on the truck.

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

Chapter 17 in the Manual is associated with incident management. The definitions and reporting requirements were found to be consistent with the International Cyanide Management Institute's (ICMI's) Cyanide 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:	<input checked="" type="checkbox"/> In full compliance with <input type="checkbox"/> In substantial compliance with <input type="checkbox"/> Not in compliance with	Standard of Practice 3.3
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Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date

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.

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 In substantial compliance with Not in compliance with Standard of Practice 3.4

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. Three of the 6 people sampled have participated in drills and the others attended the annual classroom ER training.

Records for the drills 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.

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 In substantial compliance with Not in compliance with Standard of Practice 3.5

Hebei Chengxin Transportation
Name of Operation


Signature of Lead Auditor

February 20, 2023
Date