Design
for a better
future /

Linfox Holdings (Thailand) Limited, Cambodia - ICMC Transport Certification Audit

Summary Audit Report

March 2025

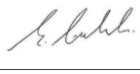
Question today
Imagine tomorrow
Create for the future

Linfox Holdings (Thailand) Limited, Cambodia - ICMC Transport Certification Audit Summary Audit Report

WSP
Lvl 3, Mia Yellagonga Tower 2, 5 Spring St
Perth WA 6000
PO Box 7181
Cloisters Square WA 6850

Tel: +61 8 9489 9700
Fax: +61 8 9489 9777
wsp.com

Rev	Date	Details
A	20 December 2024	Draft
0	10 March 2025	Final

	Name	Date	Signature
Prepared by:	EWC	10 March 2025	
Reviewed by:	LJS	10 March 2025	
Approved by:	EWC	10 March 2025	

WSP acknowledges that every project we work on takes place on First Peoples lands.
We recognise Aboriginal and Torres Strait Islander Peoples as the first scientists and engineers and pay our respects to Elders past and present.

Table of contents

List of appendices

1 Introduction

1.1 Operational information

Name of Transportation Facility:	Linfox Holdings (Thailand) Limited, Cambodia Supply Chain
Name of Facility Owner:	Linfox Holdings (Thailand) Limited, Cambodia
Name of Facility Operator:	Linfox Holdings (Thailand) Limited, Cambodia
Name of Responsible Manager:	Brendon Bangma, Country Manager Laos and Cambodia
Address:	18th Floor, Canadia Tower, No. 315, Monivong Blvd., Corner Street, Ang Duong, Sangkat Wat Phnom, Khan Daun Penh
State/Province:	Phnom Penh
Country:	Cambodia
Telephone:	+855 69917640
Email:	Brendon_Bangma@linfox.com

2 Cyanide transportation

2.1 Linfox Holdings (Thailand) Limited, Cambodia

Linfox was founded in 1956 in Melbourne, Australia. It is Asia Pacific's largest privately-owned logistics company and has more than 24,000 employees across Australia, New Zealand and Southeast Asia. The company delivers food, resources and medicine across road and rail (Linfox, 2024). Linfox commenced operations in Cambodia in 2023 and has three sites across the country with transport and warehousing capabilities. They leverage the Cambodia rail network to provide intermodal transport options to customers (Linfox, 2021).

Linfox transports cyanide from the Port of Cambodia to the Okvau Gold Mine in Mondulkiri, Cambodia. The solid cyanide is transported in isotainers, and it is retained in the transport packaging for the entire supply chain.

2.2 Cambodia Supply Chain

1. **Summary**

Linfox coordinates the transport of cyanide manufactured by Orica Australia from the Port of Sihanoukville in Cambodia to mine sites in Cambodia using rail and road.

The isotainers are shipped by Orica to the Port of Sihanoukville. Linfox conducts the customs clearance and coordinates the onward journey to the Okvau Gold Mine. At the port the isotainers inspected and then accepted by Royal Railway for transport. Royal Railway transports the isotainers from the port to their dry port in Phnom Penh, an interim storage facility. Linfox then picks up the isotainers from the dry port and transports them via trucks to the Okvau Gold Mine.

The Linfox Supply Chain specifically covers:

- Rail transportation between the Port of Sihanoukville and Royal Railways Phnom Penh Dry Port by Royal Railway
- Phnom Penh Dry Port.
- Road transportation by Linfox within Cambodia.

The Port of Sihanoukville, and the unloading (sparging) of trucks at the mine site is not included within this Supply Chain.

2. **Linfox**

Linfox has been contracted by Renaissance Minerals to coordinate the transport of cyanide within Cambodia to their Okvau Gold Mine. The services they have been contracted to perform include Order Management and Customs Clearance, and Cyanide Transportation. Linfox facilitates the transport of cyanide from port to mine via rail, transit storage in Phnom Penh, and subsequent onwards transport via road to Okvau mine.

3. **Royal Railway**

Royal Railway is a Cambodian company that was established in 2006 (Royal Railway, 2023a). It hosts the Phnom Penh – Sihanoukville line, forming a link between the two places. The line mainly services freight trains. They have a terminal at the Sihanouk Ville Port to load cargo going to the Phnom Penh Dry Port and they have a container stacker and a crane to assist with operations. Royal Railways transports approximately 1500 containers per week of both 20' and 40' containers (Royal Railway, 2023b).

Royal Rail transports the isotainers from the Port of Sihanoukville to the Royal Railway Dry Port in Phnom Penh via freight train. The transport route is via their trainline that connects the two ports. Moving hazardous goods via freight rail

is a safe option (AAR, 2024) and Royal Railway is committed to meticulous maintenance of its tracks and adhering to safety standards and protocols (Royal Railway, 2023c).

4. Phnom Penh Dry Port

The Phnom Penh Dry Port is also known as the Royal Railway PLC Dry Port. There are approximately 10 dry ports located in Phnom Penh, however the port specific to this report belongs to Royal Railway. The port is located approximately 16km west of the centre of Phnom Penh and was built in 2013 (Salpiseth, 2018). Royal Railway has its rail line end directly next to the port to allow for easy unloading and storage. The port has three lifters capable of bearing 40-45T loads and are used to unload the isotainers directly from the rail to their designated storage space – a sectioned off outdoor area on cement flooring.

2.3 Transit storage

Within the scope of this audit, the Phnom Penh Dry Port is used as a trans-shipping depot, as defined in the Guidance. Cyanide is stored in sparge isotainers in a designated area within the Dry Port for a period up to7 days.

The journey from the Dry Port to the Mine site requires an overnight stop at O AM, approximately 300km from Phnom Penh. During the overnight stop, the isotainers remain on the trucks which are stored in a designated and secure area.

2.4 Audit scope

The scope of the audit was the Linfox Supply Chain which covers the transportation of cyanide from the Port of Sihanoukville to the Okvau Gold Mine in Mondulkiri, Cambodia. The supply chain covers:

- Railway transport from the Port of Sihanoukville to the Phnom Penh Dry Port (third-party rail provider, see Section 4 for due diligence)
- The Phnom Penh Dry Port (see Section 4 for due diligence)
- Road transportation of cyanide between Phnom Penh dry port and Okvau Gold Mine in Mondulkiri, Cambodia

The Port of Sihanoukville and the unloading (sparging) of trucks at the mine site is not included within this Supply Chain. Loading of cyanide isotainers onto the train at the port is undertaken by the Port and the sparging (unloading) of isotainers at the mine is undertaken by the mine.

2.5 Auditors findings and attestation

☒ **in full compliance with**

Linfox is: ☐ in substantial compliance with **The International Cyanide Management Code**

☐ not in compliance with

Audit Company:	WSP Pty Ltd
Audit Team Leader:	Ed Clerk, Exemplar Global
Email:	ed.clerk@wsp.com

2.6 Name and signatures of other auditors

Name	Position	Signature	Date
Ed Clerk	Lead Auditor and Transport Technical Specialist		December 2024

2.7 Dates of audit

The field component of the audit was undertaken over 21-22 August 2024. An extension for the submission of the report was sought and granted by the International Cyanide Management Institute (ICMI).

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that 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 verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the *Cyanide Transportation Verification Protocol for the International Cyanide Management Code* and using standard and accepted practices for health, safety and environmental audits.

3 Consignor summary

3.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

3.1.1 Transport Practice 1.1

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

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 1.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

Linfox has developed and implemented a procedure to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases.

The procedure considers numerous hazards including population density, infrastructure construction and condition, road pitch and grade, and prevalence and proximity of water bodies and fog. These hazards are assessed when transporting dangerous goods.

Cyanide is delivered to the Okvau Mine Site located approximately 438km (2 days travel) from Phnom Penh.

Linfox has developed a procedure to evaluate the risks of approved cyanide transport routes and take the measures necessary to manage these risks.

The Risk Assessment Protocol for Cyanide Transportation aims to systematically identify, evaluate, and mitigate risks involved in the transport of this hazardous material. Key steps include pre-assessment preparations involving stakeholder consultation and literature review, risk identification focusing on route analysis, material handling, and security concerns, and risk evaluation utilizing a risk matrix.

The protocol outlines preventive and contingency measures, mandates regular training for involved personnel, and calls for periodic audits and reviews to ensure its continuing effectiveness. Thorough documentation is maintained to ensure compliance with local and international standards. Risk assessments are reviewed annually and in the event of material changes to the route.

Linfox has implemented a process and procedure to periodically re-evaluate routes used for cyanide deliveries.

The Monitoring Procedure for Cyanide requires both annual route assessments and reviews in the event of material changes to the route. All procedures are reviewed annually in consultation with the mine client.

In addition to the route survey review process, Linfox has a process for getting feedback on route conditions during each convoy. The Monitoring Procedure for Cyanide requires the Escort Leader to provide 2-hourly feedback reports on the progress of the convoy and any issues encountered along the route. A toolbox session is also used prior to departure of convoys to discuss new or known hazards along the route.

Linfox has documented measures taken to address risks identified with the selected routes. The hazards (and controls) are documented within the route risk assessment, and the management controls are documented within key operational procedures and processes, as well as contingency procedures.

Linfox indirectly seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. The consultation process is coordinated by the mining client.

Linfox advised that the mine identified relevant community groups and government agencies and conducted a consultation program to address identified concerns and discuss the transportation of cyanide and the relevant controls. An email from the mine confirming this was provided.

Direct engagement of communities by Linfox does not occur for the following reasons:

— The community is not designated a role as part of the planned response to an emergency involving cyanide negating the need for community consultation on this issue.

— The mine maintains community and regulatory liaison programs including the transport of sodium cyanide to the mine site.

Procedures require Linfox to engage with the mine 24hrs prior to a planned convoy to obtain information from the mine on the status of communities and to confirm the convoy can proceed as planned.

Key Linfox procedures are provided to the mine for comment as part of the development and review process.

Police and the fire authority were not engaged by Linfox as these responders are not designated actions outside of their normal roles and duties (i.e. traffic control or responding to fires).

Convoys are used as a means of managing the risks of the road conditions and responding to emergencies. A maximum of 4 isotainers (4 trucks) are transported within each convoy which consists of

— 2 escort vehicles (one lead and one rear). The lead vehicle has signage denoting the convoy. The Escort Supervisor drives one of the vehicles.

— 4 trucks

The vehicles are spaced to allow traffic to pass.

Linfox does subcontract truck drivers. The subcontracted drivers are managed as employees and they are required to be trained in all mandatory requirements associated with the transportation of cyanide. The subcontractor drivers are supervised by Linfox employees and Linfox Escort Supervisor.

Due Diligences

Royal Railway

WSP conducted a due diligence review of Royal Rail in December 2024. The review was based on a site visit and interviews conducted in August 2024, and a desktop review. This review against the ICMC requirements concluded that its operations were aligned to the requirements of the ICMC and additional management measures by Linfox were not considered necessary. The review is included as Section 4.0.

Phnom Penh Dry Port

WSP conducted a due diligence review of the dry port in December 2024. The review was based on a site visit and interviews conducted in August 2024, and a desktop review. This review against the ICMC requirements concluded that its operations were aligned to the requirements of the ICMC and additional management measures by Linfox were not considered necessary. The review is included as Section 4.0.

3.1.2 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.

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 1.2**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Linfox only uses trained and competent operators to drive its trucks. It has 5 dedicated drivers (3 primary and 2 backup) that have appropriate training and vehicle licences to transport cyanide.

The government requires drivers have a truck licence (Class CE) to transport cyanide. There is not dangerous good licencing classification in Cambodia. Linfox maintain a database of licence details and track the expiry dates.

Linfox has developed a training plan based on the risk assessment and a needs analysis. The mandatory modules are delivered by an external party based in Vietnam. The non mandatory modules are delivered internally.

Training modules (and refresher frequencies) are:

— Customer specific training modules (Every 12 months)

— Driver Training Modules (new employees and every 6 months)

— All Personnels Training Modules (Every 6 months)

— Load Restraint Modules (Every 6 months)

— Dangerous Goods Modules (Every 6 months)

— Driver Supervisor Modules (Every 6 months)

— Training Exercise (Every 12 months)

Drivers undertake all modules. Escort drivers and supervisors undertake all modules except for the Driver Training Module.

Personnel operating cyanide transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

Linfox does subcontract truck drivers. The subcontracted drivers are managed as employees and they are required to be trained in all mandatory requirements associated with the transportation of cyanide. The subcontractor drivers are supervised by Linfox employees and Linfox Escort Supervisor.

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 1.3**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

Linfox only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. The company has prime movers and trailers suitable for dangerous goods transportation. The prime movers have

a 6 × 3 configuration and an appropriate vehicle power rating. The trailers carry 1 isotainer (21.6 tonnes) and the vehicles have a gross limit of 47 tonnes.

The company has a preventative maintenance programme based on truck engine hours, milage and convoy schedules with checks done before and after each convoy. The inspection includes visual observations on the prime movers and trailers for signs of stress.

Complementing the preventative maintenance program is a maintenance request program where faults can be logged. The driver is interviewed after each trip.

The maintenance of vehicles is coordinated by Linfox to ensure compliance with the leasing arrangements and the Code. Maintenance is conducted by a third party company.

Procedures are in place to verify the adequacy of the equipment for the load it must bear. Equipment consists of prime movers and trailers that were purchased to a design specification appropriate for the cyanide transport task.

Linfox has implemented a preventative maintenance program, vehicle inspections and reactive maintenance procedures to ensure the load bearing capacity and adequacy of the vehicles are maintained.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide.

Delivery documentation, completed during each convoy, record the number of the truck and the containers carried by the truck.

Linfox does subcontract truck drivers. The subcontracted drivers are managed as employees and they are required to be trained in all mandatory requirements associated with the transportation of cyanide. The subcontractor drivers are supervised by Linfox employees and Linfox Escort Supervisor.

The maintenance of vehicles is coordinated by Linfox to ensure compliance with the Code and conducted by a third party company.

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 1.4**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

Linfox has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging.

The condition of the isotainers and the seal numbers are checked at each stop, including the port, dry port, loading onto the trucks and at the mine site. A record of the inspections is noted on the delivery documentation. Undocumented visual inspections of the isotainers are conducted at the conclusion of each break during the road transportation to confirm they are intact prior to restarting the journey.

All isotainers are held in place on the vehicles using twist locks and speed limits are enforced throughout the journey.

Placards and signage used to identify the shipment as cyanide meet local and international standards. The convoy escort vehicles have placards denoting the presence of a convoy of dangerous goods and the number of trucks in the convoy. Each truck also displays an emergency information panel denoting the product and an emergency number to call.

An inspection of the vehicles and interviews with drivers confirmed that placarding is used.

Linfox has implemented a safety program for cyanide transport that includes (where appropriate or applicable) the following:

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

Pre-departure inspections are completed prior to departure. The checks are included within the delivery documentation. Undocumented visual inspections of the isotainers and vehicles are conducted at the conclusion of each break during the road transportation.

b) *A preventative maintenance program.*

The company has a preventative maintenance programme based on truck engine hours and convoy schedules with checks done before and after each convoy. The inspection includes visual observations on the prime movers and trailers for signs of stress.

Complementing the preventative maintenance program, is a maintenance request program where faults can be logged. The driver is interviewed after each trip.

The maintenance of vehicles is coordinated by Linfox to ensure compliance with the Code and conducted by a third party company.

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

During each convoy, drivers must take a minimum continuous break of 30mins after driving 5.30 hours, or two separate 15min continuous breaks prior to the 5.5 hour work/drive period lapsing. Total working hours of drivers are not to exceed 12.5 hours in any 24 hour period and rest periods are included in the calculation of total work hours. Rest locations are predetermined and included in the journey plan.

In addition, Linfox monitor and maintain Global Positioning System (GPS) units include fatigue cameras fatigue and unsafe event pop-up alert system

d) *Procedures to prevent loads from shifting.*

Isotainers are secured using twist locks, which are designed and constructed to international transport standards. The engagement of the twist locks is prompted in the pre-departure documentation and regularly checked on route.

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

Linfox suspends operations during inclement weather. Suitable stopping locations have been identified as part of the route survey process. In the event that the convoy needs to be stopped, it is parked in a preapproved location and the mine is informed. In the event of delay or suspension, the Linfox Country Manager is responsible for notifying the mine customer to inform them of the decision.

f) *A drug abuse prevention program.*

Linfox has a zero tolerance of drug and alcohol. Its zero drug and alcohol policy extends to all Linfox employees and subcontractors and it conducts pre-employment, random and incident-based testing. Drivers and convoy personnel are also breathalysed as part of the prestart inspection process and the results are recorded.

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

Records are maintained and were inspected for relevant parts of this element.

Linfox does subcontract truck drivers. The subcontracted drivers are managed as employees and they are required to be trained in all mandatory requirements associated with the transportation of cyanide. The subcontractor drivers are supervised by Linfox employees and Linfox Escort Supervisor.

The maintenance of vehicles is coordinated by Linfox to ensure compliance with the Code and conducted by a third party company.

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

3.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 1.5**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Linfox.

Linfox does not and does not intend to transport consignments of cyanide by sea or air within the scope of this audit.

3.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 1.6**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

Linfox vehicles have means to communicate between vehicles, with the Depot, mine, cyanide producer and emergency responders.

The convoy is equipped with satellite phones, GPS trackers and radio communications. The convoy remains in communication with every vehicle and notifies each other of passing vehicles, hazards or any other potential risks.

Linfox operations centre is responsible for maintaining contact with the mine on the schedule and can also contact the supplier is required.

All truck movements are tracked via a GPS system which is monitored by Linfox.

Communication equipment is periodically tested to ensure it functions properly. The GPS tracking system continuously transmits position and other data from each truck throughout the trip. The testing is conducted as part of the pre departure inspection process and through continual use.

The pre departure inspection forms are included within the delivery documentation.

Linfox has identified communication blackout areas along transport routes as part of the route assessment process. Approximately 5 phone blackout areas have been identified. These areas have been geotagged and alerts setup in the event the convoy does not emerge from the geotagged location within a specified timeframe. In this event the GPS provider contacts Linfox who intern attempts to contact the escort commander or police to investigate.

Linfox has systems to track the progress of cyanide shipments. The GPS tracking system continuously transmits position and other data from each truck throughout the trip. In addition the escort commander provides updates every 2 hours.

Linfox implements chain of custody procedures to prevent loss of cyanide during shipment. The Escort Supervisor conducts a visual inspection of the containers once they are loaded onto the trucks at the Port to ensure they are intact and seal present prior to departure.

The condition of the isotainers and the seal numbers are checked at each stop, including the port, dry port, loading onto the trucks and at the mine site. A record of the inspections is noted on the delivery documentation. Undocumented visual inspections of the isotainers are conducted at the conclusion of each break during the road transportation to confirm they are intact prior to restarting the journey.

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

Linfox does subcontract truck drivers. The subcontracted drivers are managed as employees and they are required to be trained in all mandatory requirements associated with the transportation of cyanide. The subcontractor drivers are supervised by Linfox employees and Linfox Escort Supervisor.

Royal Railway

WSP conducted a due diligence review of Royal Rail in December 2024. The review was based on a site visit and interviews conducted in August 2024, and a desktop review. This review against the ICMC requirements concluded that its operations were aligned to the requirements of the ICMC and additional management measures by Linfox were not considered necessary. The review is included as Section 4.0.

Phnom Penh Dry Port

WSP conducted a due diligence review of the dry port in December 2024. The review was based on a site visit and interviews conducted in August 2024, and a desktop review. This review against the ICMC requirements concluded that its operations were aligned to the requirements of the ICMC and additional management measures by Linfox were not considered necessary. The review is included as Section 4.0.

3.2 Principle 2 – Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

3.2.1 Transport Practice 2.1

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

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 2.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Interim storage occurs during the road transportation section at the O AM depot.

The O AM depot is a fenced, secure depot. The supervisor of the facility is notified prior to the convoy arrival to open the gates and allow access. Once inside the vehicles are parked in a designated area and the isotainers remain on the trucks. Driver rest facilities and ablutions are available. Temporary signage is displayed noting cyanide is present and that open flames and smoking are prohibited. Personal protective equipment (PPE) requirements are specified in the facility induction.

The convoy staff are trained in emergency response and the emergency response documentation addresses cyanide released during storage.

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

3.3 Principle 3 – Emergency Response

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

3.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 3.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

Linfox has developed an Emergency Response Guide to ensure a structured and coordinated response to any incident involving sodium cyanide during its transport by Linfox. The guide details procedures to minimise risks to personnel, the public, property, and the environment in the event of an emergency involving cyanide.

The emergency response procedures include descriptions of response actions, as appropriate for the anticipated emergency situation. The Emergency Response Guide provides procedures for the following emergency scenarios:

— Dry sodium cyanide spill – roadway/transit area

— Dry sodium cyanide spill – interim storage area

— Response to a fire near stored cyanide

— Roll-over of shipping container

— Sodium cyanide spill to waterway

— Handling wet sodium cyanide

The roles and responsibilities for Linfox personnel and each of the scenarios are detailed in the Emergency Response Guide and include the following:

— Dangerous Goods Transport Manager

— Escort Supervisor

— Support Staff

— Other Key Personnel (e.g. Drivers, On-Scene Commander)

Outside responders and medical facilities are not allocated roles within the Linfox emergency documentation outside of their normal duties. Emergency drills and mock exercises are conducted in collaboration with external emergency services. The community is not designated a role as part of the planned response to an emergency.

Due Diligences

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

3.3.2 Transport Practice 3.2

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

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 3.2**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

Linfox provides emergency response training of appropriate personnel.

The training requirements are specified within the Cyanide Personnels Training Plan and the Contract Management Plan Okvau Gold Project.

The training program for new drivers runs for 2 months. Every six months refresh training and reassessment will be completed.

As noted previously, the roles and responsibilities (including duties) for Linfox personnel are detailed in the Emergency Response Guide.

The Dangerous Goods Transport Manager is responsible for ensuring the Emergency Response Guide is kept up-to-date and for assigning roles to the relevant staff.

Linfox maintains a list of all of the emergency response equipment that should be available during the transport route in their Emergency Response Guide and the Linfox Monitoring Procedure for Cyanide Convoy.

The emergency response equipment, including truck fitted GPS's, is inspected against the Cyanide Transport Inspection Checklist to ensure it is in good order. The checklist is completed as part of the preparations for each convoy of cyanide deliveries. Paper copies of all checks are to be kept by Linfox in the Phnom Penh office, photographs of prestart checks and cyanide checklist are to be sent to an allocated contact prior to departure, and all other documents are kept on the Linfox SharePoint page.

Linfox has the necessary emergency response and health and safety equipment, including personal protective equipment during transport. During the site inspection, the equipment was compared to Linfox's checklists. The Cyanide Transport Inspection Checklists included completed checklists for the specified emergency equipment.

Linfox maintains a transportation inspection checklist that includes checking that the emergency response equipment is available and working in the escort car that is accompanying the convoy during the transport route. The checklist is completed as part of the preparations for each convoy of cyanide deliveries and the Phnom Penh office contains copies of the completed checklists.

Linfox does subcontract truck drivers. The subcontracted drivers are managed as employees and they are required to be trained in all mandatory requirements associated with the transportation of cyanide. The subcontractor drivers are supervised by Linfox employees and Linfox Escort Supervisor.

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 3.3**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 3.3 requiring that it develops procedures for internal and external emergency notification and reporting.

There are procedures and current contact information for notifying the cyanide producer, the customer, regulatory agencies, external response providers, medical facilities and potentially affected communities of an emergency.

Linfox maintains their procedures and current contact information in their Emergency Response Plan (ERP) Processes Report. The procedures, also found in the Emergency Response Guide, detail the procedures for notifying the respective entities depending on the emergency.

The ERP Processes Report is reviewed yearly.

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current. The ERP Processes Report is reviewed yearly and Linfox requires their Emergency Response Guide to be reviewed and audited regularly, keeping up-to-date with things such as regulatory changes and lessons learned.

The Emergency Response Guide contains a process for notifying the ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No such incidents occurred during the audit period.

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

3.3.4 Transport Practice 3.4

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

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 3.4**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 3.4 requiring that it develops procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Linfox has procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

The procedures describe the decontamination and remediation processes for both minor and major spills and different scenarios. The procedure outlines the following basic response actions:

— First Response

— Establishing Control of the Incident

— Decontamination of a Spill of Cyanide into Soil

— Use of Sodium Hypochlorite for Decontamination Purposes

It then details the different procedures for remediation of cyanide for different scenarios they have identified as potential risks. The Emergency Response Guide details how cyanide is neutralised or recovered in different recovery scenarios. Recovered cyanide is placed in recovery containers and all contaminated materials are labelled and disposed of. Minor incidents are managed by the convoy or transport team however moderate and severe incidents require assistance from external emergency services and response teams.

Linfox ensures that Local Emergency Services are aware of the possible emergency situations that can arise; they communicate the type of equipment that is used, the effects from hazardous substances, and the quantities and locations of hazardous substances. They will ensure that full information is available and regular communication occurs to ensure preparation is adequate in the event of an emergency.

Linfox's emergency response guide states that chemical neutralisation should not be used in the event of a Sodium Cyanide Spill to waterway. Their ERP Processes explicitly prohibits the use of sodium hypochlorite and ferrous sulphate to treat cyanide that has been released into natural surface water bodies.

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

3.3.5 Transport Practice 3.5

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

	☒ **in full compliance with**	
Linfox is	☐ in substantial compliance with	**Transport Practice 3.5**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Linfox is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

There are provisions for periodically reviewing and evaluating Linfox's emergency procedures adequacy and they are being implemented.

The Emergency Response Guide is reviewed and evaluated annually at a minimum. It is also reviewed after any significant incident or exercise, if there are regulatory changes, or if there are any changes in transport routes or risk scenarios.

The Emergency Response Guide was reviewed in 2024 and mock drills have been undertaken as planned. The mock drills have covered both cyanide spills and cyanide exposure events. The mock drill process includes a debrief process and review of what went well and opportunities to improve response.

There are provisions for periodically conducting mock emergency drills and they are implemented. Linfox commits to conducting regular emergency drills and mock exercises. The mock drill process includes a debrief process and review of what went well and opportunities to improve response. A review of mock drill reports and interviews confirmed that mock drills have been completed in accordance with commitments.

There is a procedure to evaluate the emergency performance after its implementation and revise if necessary. The Emergency Response Guide will be reviewed and audited annually or after any significant incident or exercise. It will also be reviewed if there are regulatory changes, or any changes in transport routes or risk scenarios.

No incidents involving cyanide transport have occurred during the audit period.

Royal Railway

WSP conducted a desktop due diligence of Royal Railway and the route between the Port of Sihanoukville and their dry port in Phnom Penh. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

Phnom Penh Dry Port

WSP visited the dry port on 21 August 2024 and conducted a due diligence based on the findings and desktop research. The assessment found that the company meets Linfox's cyanide transportation requirements. Refer to Section 4 for the due diligence.

4 Due Diligence

Introduction

Linfox Logistics (Cambodia) Company Limited (Linfox) recently engaged WSP to conduct due diligence assessments of Royal Rail and Royal Railway Dry Port in accordance with the International Cyanide Management Institute (ICMI). These entities form part of Linfox's Supply Chain.

Scope and Method

The scope of these desktop due diligences includes the management, interim storage, and emergency response capacity in relation to cyanide transported by a carrier on a vessel. A due diligence assessment is provided for the carrier and port listed.
As detailed in ICMI's Guidance for Use of the Cyanide Transportation Verification Protocol (Guidance) (ICMI, 2021b), the following items are addressed within each assessment:

- Overview of the shipping company
- International Cyanide Management Code (ICMC) Transport Verification Protocol Assessment
  - Transport Practice 1.2-1.4
  - Transport Practice 1.6
  - Transport Practice 2.1
  - Transport Practice 3.1-3.5
- Conclusion
- References

The ICMI's June 2021 version of the Cyanide Transportation Verification Protocol (CTVP); (ICMI, 2021), was adopted to guide the Desktop Due Diligence process. The Guidance was used to interpret the CTVP questions and aid in evaluating the measures taken to meet the Transportation Practices. The assessment was conducted as a site visit and desktop process using publicly available online information.

ICMC Transport Verification Protocol Assessment

The ICMI's Auditor Guidance for Use of Cyanide Transportation Verification Protocol, General Guidance states:

> *Supply chain components, in particular rail carriers, ports, and shipping lines, are not audited in the same manner as truck transporters and supply chain consigners. Full Code audits are not required for rail lines and rail terminals, shipping lines, or ports due to security issues, limited access, and the inability of consignors to affect changes in the operating practices of these transport operations. Rather than conduct Code audits of these entities, a Due Diligence Investigation must be conducted and documented for each rail carrier, shipping company, and port facility included in the supply chain. The Due Diligence Investigations must be documented in a written report generated by the consigner or by an auditor meeting ICMI requirements for a transport technical expert auditor.*
>
> *The provisions of Transport Practices 1.2 through 1.6, 2.1 and 3.1 through 3.5 of this Transportation Guidance can be applied in full or in part to rail transport, sea transport, and port activities as a guide for Due Diligence Investigations.*

4.1 ROYAL RAIL

CARRIER DUE DILIGENCE EXECUTIVE SUMMARY

WSP Pty Ltd (WSP) conducted a due diligence of Royal Rail on behalf of Linfox. The assessment was reviewed by Ed Clerk who meets the International Cyanide Management Institute's (ICMI) requirements for a Transport Technical Specialist.
The following items, as detailed in the ICMI's Auditor Guidance for Use of Cyanide Transportation Verification Protocol (ICMI, 2021), were addressed within the due diligence:

- Transport Practice 1.2 – 1.4
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1 – 3.5

The ICMI's Auditor Guidance for Use of Cyanide Transportation Verification Protocol (ICMI, 2021) was used to conduct the due diligence assessment. Royal Rail was inspected by Ed Clerk as part of the Linfox Transport audit. The review is based on this visit, and publicly available online information. Based on the evidence reviewed, this due diligence did not find issues of material concern regarding the management of solid sodium cyanide product. This assessment should not be a final acceptance for future work; rather it is recommended that Linfox continue to review and monitor performance periodically and implement an adaptive management process.

OVERVIEW OF ROYAL RAIL

Royal Railway is a Cambodian company that was established in 2006 (Royal Railway, 2023a). It hosts the Phnom Penh – Sihanoukville line, forming a vital link between the two places. The line mainly services freight trains. They have a terminal at the Sihanouk Ville Port to load cargo going to the Phnom Penh Dry Port and they have a container stacker and a crane to assist with operations. Royal Railways transports approximately 1500 containers per week of both 20' and 40' containers (Royal Railway, 2023b).

Royal Rail transports Linfox's material from the Port of Sihanoukville to the Royal Railway's dry port in Phnom Penh via freight train. The transport route is via their trainline that connects the two ports. Moving hazardous goods via freight rail is generally a safer option than road transport (AAR, 2024) and Royal Railway notes in its communications that it has a track and fleet preventative maintenance program that adheres to relevant safety standards and protocols (Royal Railway, 2023c).

ICMC TRANSPORT VERIFICATION PROTOCOL ASSESSMENT

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

Limited information was available on the specific training provided by Royal Rail, however Royal Rail operators do not interact with the product. The Isotainers are loaded directly onto the rain by Port staff and unloaded from the train by dry dock staff. Linfox also advised that they will respond to incidents involving the product in the event of a rail accident.

Linfox staff and contractors involved in the transport of sodium cyanide are required to undergo specific training on the properties and hazards of cyanide, as well as the appropriate emergency response procedures (Linfox, 2024b). Training programs are updated regularly to incorporate lessons from past incidents or new regulatory requirements. Linfox's Cyanide Personnels Training Plan outlines the required training for all personnel involved in cyanide transport and handling (Linfox, 2024a). The plan also states that any subcontractor drivers and fleet operating in the Linfox network

will require assessment prior to commencement to ensure they hold the necessary competencies to perform their jobs with minimal risk.

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

Royal Railway notes in its communications that it has a track and fleet preventative maintenance program that adheres to relevant safety standards and protocols (Royal Railway, 2023c). Cyanide isotainers are inspected upon arrival in Sihanoukville by Linfox and a Cyanide Inspection Checklist will be completed prior to acceptance by Royal Railway for transit. Linfox has Load Restraint Modules that provide training for the restraining, loading and unloading of cargo (Linfox, 2024a). The Royal Rail wagons have a carrying capacity 50T which can transport the 21.6 tonnes isotainers.

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

Linfox requires their subcontractors to operate in accordance with the Linfox Subcontractor Handbook and Linfox procurement policies (Linfox, 2023a). Cyanide tanks and containers will be inspected upon arrival in Sihanoukville by Linfox's Contractor and a Cyanide Inspection Checklist will be completed prior to acceptance by Royal Railway for transit (Linfox, 2023b). The Contract Management Plan states that Royal Railway will be responsible for provision of all lashing, tarps and other safety equipment required for transport of product on the railways (Linfox, 2023a). Linfox commits to inspecting all Personal Protective Equipment (PPE), Emergency Response (ER) Equipment and Spill Kits on the Royal Railway trains to ensure that they have the required equipment to be fully compliant with their Emergency Response Plan (Linfox, 2023b). All staff and contractors involved in the transport of sodium cyanide are required to undergo specific training on the properties and hazards of cyanide, as well as the appropriate emergency response procedures (Linfox, 2024b). Training programs are updated regularly to incorporate lessons from past incidents or new regulatory requirements. The Linfox Personnels Training Plan (Linfox, 2024a) details Load Restraint Modules that outlines the expectations for loading and unloading cargo, as well as restraints, lashings and strapping training. There is also a Dangerous Goods Identification & Truck Signage module and all personnel are required to complete the Transportation of Cyanide training module.

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport

Linfox has prepared their cyanide transport plans aligned to the ICMI Cyanide Transportation Verification Protocol. A Cyanide Inspection Checklist will be completed prior to acceptance by Royal Railway for transit and Royal Railway representatives are required by Linfox to accompany all Cyanide transported by train to the dry port in Phnom Penh (Linfox, 2023b). Royal Railway is advised on the Cyanide delivery schedule into the Sihanoukville Rail Station and Linfox confirms booking by rail with Royal Railways. Royal Railways is to confirm with Linfox once Cyanide has arrived at the Phnom Penh Dry Port and is available for collection and Linfox then sends a pre-alert to Royal Railways to inform them of the collection date of the Cyanide (Linfox, 2023b). The transportation takes under half a day and the cyanide shipment goes straight to the Royal Railway dry port, allowing for easy tracking between the shipment and the port. Royal Railways is responsible for managing the transport by rail and is required to put in place the relevant management plans (Linfox, 2023b)

Transport Practice 2.1: Store cyanide in a manner that minimises the potential for accidental releases

Linfox's Personnels Training Plan (Linfox, 2024a) requires all personnels to undergo training that includes Transportation of Cyanide and Transport Cyanide Hazards & Controls. They have a range of Dangerous Goods and Load Restraint Modules that outline the expectations for loading and unloading cargo, as well as restraints, lashings and strapping training. The solid cyanide product is transported and stored in isotainers. They are specially designed for holding the product, labelled to the required standards, and stores the cyanide in a way that minimises the potential for accidental releases.

Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases

Cyanide spills in a public area (e.g. along a transportation route) will typically involve the civil emergency response authorities (Linfox, 2023c). Cambodia has been a member state of International Maritime Organisation (IMO) since 1961 (IMO, 2024c) and it complies with the requirements of the International Maritime Dangerous Goods (IMDG) Code. The product transferred through the railway remain sealed within the containers which significantly reduces the potential for a cyanide release scenario and the product must be transported out of the port operational area upon discharge.
Royal Railways is required to put in place the relevant management plans (Linfox, 2023b), however Linfox required all contractors to abide by their policies and therefore Royal Railway is required to have an ICMI standard emergency response plan.

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response

Cyanide spills in a public area (e.g. along a transportation route) will typically involve the civil emergency response authorities (Linfox, 2023c). Linfox ensures that Local Emergency Services are aware of the possible emergency situations that can arise; they communicate the type of equipment that is used, the effects from hazardous substances, and the quantities and locations of hazardous substances. They will ensure that full information is available and regular communication occurs to ensure preparation is adequate in the event of an emergency (Linfox, 2023c). The Personnels Training Plan (Linfox, 2024a) requires all personnels to undergo Emergency Response Planning, Transportation of Cyanide and Spill Prevention and Response Training. Linfox also requires that any subcontractor drivers and fleet operating in the Linfox network undergo assessment prior to commencement.

Linfox inspects all PPE, ER Equipment and Spill Kits on the Royal Railway trains to ensure that they have the required equipment to be fully compliant with their Emergency Response Plan (Linfox, 2023b).

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

Linfox has procedures and current contact information for notifying the cyanide producer, the customer, regulatory agencies, external response providers, medical facilities and potentially affected communities of an emergency.

They procedures and current contact information in their Cyanide Transportation Summary Audit Report Template – ERP Processes (ERP Processes Report). The procedures, also found in the Sodium Cyanide Emergency Response Guide, detail the procedures for notifying the respective entities depending on the emergency. The ERP Processes Report is reviewed yearly.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide and treatment chemicals

Linfox has procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. As a cyanide spill along the rail route would be considered in a public area, the civil emergency response authorities will typically be involved in response and cleanup.

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

Linfox's Emergency Response Guide for Sodium Cyanide is required to be reviewed and audited regularly. Linfox conducts regular emergency drills and mock exercises to ensure all personnel are familiar with the emergency response plan and are capable of executing it effectively (Linfox, 2024b). Royal Railways is responsible to put in place their own relevant management plans.

CONCLUSION

Based on the evidence reviewed, this due diligence did not find issues of material concern regarding the management of solid sodium cyanide product. This assessment should not be a final acceptance for future work; rather it is recommended that Linfox continue to review and monitor performance periodically and implement an adaptive management process.

4.2 Phnom Penh Dry Port

PORT DUE DILIGENCE EXECUTIVE SUMMARY

WSP Pty Ltd (WSP) conducted a due diligence of Phnom Penh Dry Port on behalf of Linfox. The assessment was reviewed by Ed Clerk who meets the International Cyanide Management Institute's (ICMI) requirements for a Transport Technical Specialist.

The following items, as detailed in the ICMI's Auditor Guidance for Use of Cyanide Transportation Verification Protocol (ICMI, 2021), were addressed within the due diligence:

- Transport Practice 1.2 – 1.4
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1 – 3.5

The ICMI's Auditor Guidance for Use of Cyanide Transportation Verification Protocol (ICMI, 2021) was used to conduct the due diligence assessment. Royal Rail was inspected by Ed Clerk as part of the conducted Transport audit. The review is based on this visit, and publicly available online information. Based on the evidence reviewed, this due diligence did not find issues of concern regarding the management of solid sodium cyanide product. This assessment should not be a final acceptance for future work; rather it is recommended that Linfox continue to review and monitor performance periodically and implement an adaptive management process.

OVERVIEW OF PHNOM PENH DRY PORT

The Phnom Penh Dry Port is also known as the Royal Railway PLC Dry Port. There are approximately 10 dry ports located in Phnom Penh, however the port specific to this report belongs to Royal Railway. The port is located approximately 16km west of the centre of Phnom Penh and was built in 2013 (Salpiseth, 2018). Royal Railway has its rail line end directly next to the port to allow for easy unloading and storage. The port has three lifters capable of bearing 40-45T loads and are used to unload the isotainers directly from the rail to their designated storage space – a sectioned off outdoor area on cement flooring. The dry port was visited by Ed Clerk on 21 August 2024 as part of the Linfox Transportation Audit.

ICMC TRANSPORT VERIFICATION PROTOCOL ASSESSMENT

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

Limited information was available on the specific training provided by Royal Railway, however, Linfox provide training to Royal Railway. All staff and contractors involved in the transport of sodium cyanide are required to undergo specific training on the properties and hazards of cyanide, as well as the appropriate emergency response procedures (Linfox, 2024b). Training programs are updated regularly to incorporate lessons from past incidents or new regulatory requirements. Linfox's Cyanide Personnels Training Plan (Linfox, 2024a) outlines the required training for all personnel involved in cyanide transport and handling.

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

The dry port has three lifters to unload and load the 21.6 tonne (T) cyanide isotainers, capable of bearing 40-45T loads. The dry port has a weighbridge that can be used to verify the weights of the containers. The cyanide product is stored at the dry port in its transport containers.

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

Linfox is responsible for implementing the safety program for transporting the cyanide once they pick it up from the dry port. These measures are covered in the audit and can be found in Transport Practice 1.4.

The PPE requirements for the dry dock are specified in site induction for the dry dock.

Transport Practice 1.6: Track cyanide shipments to prevent losses during transport

Royal Railway representatives are required by Linfox to accompany all Cyanide transported by train to the Phnom Penh Dry Port (Linfox, 2023b). Royal Railway is advised on the Cyanide delivery schedule into the Sihanoukville Rail Station and Linfox confirms booking by rail with Royal Railways. Royal Railways is to confirm with Linfox once Cyanide has arrived at the Phnom Penh Dry Port and is available for collection and Linfox then sends a pre-alert to Royal Railways to inform them of the collection date of the Cyanide (Linfox, 2023b). The transportation takes under half a day and the cyanide shipment goes straight to the Royal Railway dry port, allowing for easy tracking between the shipment and the port.

Transport Practice 2.1: Store cyanide in a manner that minimises the potential for accidental releases

Transhipping storage is conducted at the Phnom Penh dry port. This intermodal facility is used to store cyanide isotainers delivered by Royal Railway before they are collected by Linfox for the onward road journey to the mine site. Isotainers are stored at this facility for up to seven days (approximately).

The solid cyanide product is stored in isotainers which is unloaded from the trains, specially designed for holding the product, labelled to the required standards, and stores the cyanide in a way that minimises the potential for accidental releases. They are stacked two high on a concrete pad. The facility is fenced to prevent unauthorised access, and it is guarded by three security guards and an armed police officer. As stated in the ICMI Transportation Guidance, secondary containment is not needed for cyanide containers built specifically for outside storage such as isotainers (ICMI, 2021b).

The convoy trucks are loaded directly at the dry port and proceed from there to the mine.

Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases

Linfox's Sodium Cyanide Emergency Response Guide addresses potential spillage at the Dry Port as it has been identified as a risk area. The audit report addresses this in more detail. The site will typically be required to have a specific cyanide emergency response plan (Linfox, 2023c). Linfox ensures that Local Emergency Services are aware of the possible emergency situations that can arise; they communicate the type of equipment that is used, the effects from hazardous substances, and the quantities and locations of hazardous substances. Cambodia has been a member state of IMO since 1961 (IMO, 2024c) and it complies with the requirements of the IMDG code. The product transferred through the port remain sealed within the containers which significantly reduces the potential for a cyanide release scenario and the product must be transported out of the port operational area upon discharge. Accordingly, it is considered likely that Linfox will need to provide technical assistance, advice and potentially deploy resources in the unlikely event of that a cyanide release scenario at the port.

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response

Response to a minor spill at a site where cyanide is normally handled will typically be managed using the sites own personnel experienced in the safe handling of cyanide. The site will typically be required to have a specific cyanide emergency response plan (Linfox, 2023c). Linfox will ensure that full information is available and regular communication occurs to ensure preparation is adequate in the event of an emergency (Linfox, 2023c). Linfox requires all contractors involved in the transportation of sodium cyanide undergo specific training on the appropriate emergency response procedures. The dry port has been identified as a risk area for a spill and has been addressed as a specific scenario in the Sodium Cyanide Emergency Response Guide with the responsibilities during the spill detailed. Personnel are required to notify the appropriate personnel, including contact supervisors and emergency services if required. Accordingly, it is considered likely that Linfox will need to provide technical assistance, advice and potentially deploy resources in the unlikely event of that a cyanide release scenario at the port.

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

Linfox has procedures and current contact information for notifying the cyanide producer, the customer, regulatory agencies, external response providers, medical facilities and potentially affected communities of an emergency.

They procedures and current contact information in their Cyanide Transportation Summary Audit Report Template – ERP Processes (ERP Processes Report). The procedures, also found in the Sodium Cyanide Emergency Response Guide, detail the procedures for notifying the respective entities depending on the emergency. The ERP Processes Report is reviewed yearly.

Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide and treatment chemicals

Linfox has procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. As a cyanide spill along the rail route would be considered in a public area, the civil emergency response authorities will typically be involved in response and cleanup.

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

Linfox's Emergency Response Guide for Sodium Cyanide is required to be reviewed and audited regularly. Linfox conducts regular emergency drills and mock exercises to ensure all personnel are familiar with the emergency response plan and are capable of executing it effectively (Linfox, 2024b). Royal Railways is responsible to put in place their own relevant management plans.

CONCLUSION

Based on the evidence reviewed, this due diligence did not find issues of material concern regarding the management of solid sodium cyanide product. This assessment should not be a final acceptance for future work; rather it is recommended that Linfox continue to review and monitor performance periodically and implement an adaptive management process.

5 Important information

Your attention is drawn to the limitations statement, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The limitations statement does not alter the obligations WSP has under the contract between it and its client.

Appendix A

Limitations

This Report is provided by WSP Australia Pty Limited (*WSP*) for Linfox Logistics (Cambodia) Company Limited (*Client*) in response to specific instructions from the Client and in accordance with WSP's proposal dated 22 May 2024 and agreement with the Client dated (*Agreement*).

A1 Permitted purpose

This Report is provided by WSP for the purpose described in the Agreement and no responsibility is accepted by WSP for the use of the Report in whole or in part, for any other purpose (*Permitted Purpose*).

A2 Qualifications and assumptions

The services undertaken by WSP in preparing this Report were limited to those specifically detailed in the Report and are subject to the scope, qualifications, assumptions and limitations set out in the Report or otherwise communicated to the Client.

Except as otherwise stated in the Report and to the extent that statements, opinions, facts, conclusion and / or recommendations in the Report (*Conclusions*) are based in whole or in part on information provided by the Client and other parties identified in the report (*Information)*, those Conclusions are based on assumptions by WSP of the reliability, adequacy, accuracy and completeness of the Information and have not been verified. WSP accepts no responsibility for the Information.

WSP has prepared the Report without regard to any special interest of any person other than the Client when undertaking the services described in the Agreement or in preparing the Report.

A3 Use and reliance

This Report should be read in its entirety and must not be copied, distributed or referred to in part only. The Report must not be reproduced without the written approval of WSP. WSP will not be responsible for interpretations or conclusions drawn by the reader. This Report (or sections of the Report) should not be used as part of a specification for a project or for incorporation into any other document without the prior agreement of WSP.

WSP is not (and will not be) obliged to provide an update of this Report to include any event, circumstance, revised Information or any matter coming to WSP's attention after the date of this Report. Data reported and Conclusions drawn are based solely on information made available to WSP at the time of preparing the Report. The passage of time; unexpected variations in ground conditions; manifestations of latent conditions; or the impact of future events (including (without limitation) changes in policy, legislation, guidelines, scientific knowledge; and changes in interpretation of policy by statutory authorities); may require further investigation or subsequent re-evaluation of the Conclusions.

This Report can only be relied upon for the Permitted Purpose and may not be relied upon for any other purpose. The Report does not purport to recommend or induce a decision to make (or not make) any purchase, disposal, investment, divestment, financial commitment or otherwise. It is the responsibility of the Client to accept (if the Client so chooses) any Conclusions contained within the Report and implement them in an appropriate, suitable and timely manner.

In the absence of express written consent of WSP, no responsibility is accepted by WSP for the use of the Report in whole or in part by any party other than the Client for any purpose whatsoever. Without the express written consent of WSP, any use which a third party makes of this Report or any reliance on (or decisions to be made) based on this Report is at the sole risk of those third parties without recourse to WSP. Third parties should make their own enquiries and obtain independent advice in relation to any matter dealt with or Conclusions expressed in the Report.

A4 Disclaimer

No warranty, undertaking or guarantee whether expressed or implied, is made with respect to the data reported or the Conclusions drawn. To the fullest extent permitted at law, WSP, its related bodies corporate and its officers, employees and agents assumes no responsibility and will not be liable to any third party for, or in relation to any losses, damages or expenses (including any indirect, consequential or punitive losses or damages or any amounts for loss of profit, loss of revenue, loss of opportunity to earn profit, loss of production, loss of contract, increased operational costs, loss of business opportunity, site depredation costs, business interruption or economic loss) of any kind whatsoever, suffered or incurred by a third party.