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INTERNATIONAL CYANIDE MANAGEMENT CODE

Orica Australia Pty Ltd, New Zealand Supply
Chain, Summary Audit Report

Prepared for Raghu Pathireddy
Orica Australia Pty Ltd
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International Cyanide Management Institute
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1 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Orica New Zealand Supply Chain
Name of Facility Owner:	Not applicable
Name of Facility Operator:	Orica Australia Pty Ltd
Name of Responsible Manager:	Raghu Pathireddy
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2 SODIUM CYANIDE TRANSPORTATION

2.1 Orica Australia Pty Ltd

Orica is an Australian-owned, publicly listed company with global operations. Orica is managed as discrete business units that produce a wide variety of products and services. The Mining Chemicals unit is based in Australia and exports products to Asia, Africa and the Americas, as well as supplying the local Australian industry. This unit's main product is sodium cyanide, which is manufactured at Orica's Yarwun Production Facility (Yarwun Facility) in Queensland, Australia. Orica Mining Chemicals is the world's second largest producer of cyanide.

2.2 Yarwun Production Facility

Orica's Yarwun Facility, which is located approximately 8 km by road from Gladstone, Queensland, commenced operations in 1989 and is engaged in the manufacture of cyanide (both solid and liquid forms), ammonium nitrate, nitric acid, chlorine, sodium hydroxide, sodium hypochlorite, hydrochloric acid and expanded polystyrene balls. The Yarwun Facility was originally certified in 2006 and was last recertified as being compliant with the Code on 31 October 2023.

2.3 Australian Supply Chain

Orica's Australian Supply Chain covers the transport by road and rail within Australia to customers and to ports for export. Orica's Australian Supply Chain was originally certified in 2010 and was last recertified as being compliant with the Code on 6 October 2025

2.4 Global Marine Supply Chain

Orica's Global Marine Supply Chain covers the transport of cyanide via shipping lines to Ports around the world. The Global Marine Supply Chain includes the Port of Brisbane, Port of Melbourne and Port of Gladstone in Australia and the Ports of Auckland, Port of Tauranga, Port of Chalmers and Port of Lyttelton in New Zealand.

Orica's Global Marine Supply Chain was recertified as being compliant with the Code on 2 December 2024.

2.5 New Zealand Supply Chain

Orica is the consignor and subcontracts Walters Transport for the movement of solid cyanide in intermediate bulk containers (IBCs) shipping containers or sparge tanks from the ports in New Zealand to Waihi Gold Mine on the north island. Walters have been transporting cyanide for Orica since October 2020. The transport operation for cyanide is relatively limited with approximately 1 shipment per month to the mine.

Containers arrive at on of three ports on the north island:

- Port of Auckland
- Port of Tauranga
- North Port, Marden Point

Orica added Mainfreight in Dunedin to the scope of the supply chain in October 2024 but has withdrawn this component of the supply chain.

2.6 Transit storage

Within the scope of this audit, transit storage is associated with port operations where containers of cyanide are removed from the vessels and may be temporarily stored and then placed on road vehicles for the next part of the journey. These transit storage depots are managed by the relevant port authorities and due consideration of relevant protocol requirements has been made through the due diligence process.

There is no interim storage outside of the Port operations included by Orica within the scope of this supply chain certification.

Ad-hoc storage of product may occur at ChemCare, located at 259 James Fletcher Drive, Ōtāhuhu, Auckland 2024, New Zealand. The facility is a licenced, specialised hazardous goods storage for a range of dangerous goods, but at the time of the audit had not been added to the supply chain.

2.7 Auditors Finding and Attestation

in full compliance with

Orica is:

in substantial compliance with

the International Cyanide Management Code

not in compliance with

No significant cyanide exposures or releases were noted to have occurred during ORICAs recertification audit.

Audit Company: Enpoint

Audit Team Leader: Mike Woods, Exemplar Global (113792)

Email: mikewoods@enpoint.com.au

2.8 Name and Signatures of Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		05.02.2026

2.9 Dates of Audit

The Audit Team was undertaken by Mike Woods of Enpoint, an ICMI pre-certified Lead Auditor and Technical Specialist. The field component of the audit was completed on 15 October 2025.

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 TRANSPORTATION VERIFICATION PROTOCOL

PRINCIPAL 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.

in full compliance with

Orica is: in substantial compliance with

Transport Practice 1.1

not in compliance with

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

Orica has developed guidance for subcontractors to follow with respect to route selection, and it addresses population density, infrastructure, road construction, condition, pitch, grade and the prevalence and proximity of water bodies and fog.

Orica checks Walters Transport against their application of the guide by periodic site visits and drives the route. Walters Transport has a Journey Management Plan (JMP) that reflects the guidance - Orica's JMP development procedure. Completed risk assessments for the routes were available for review.

The route selected are the most direct routes on roads that are deemed acceptable by the regulator for the transport of dangerous goods. The same routes are used for the return of empty containers to the ports.

These documents include information on the hazards along the route and control measures taken. The routes have been assessed as not presenting special security or safety concerns a with a section of winding roads for approx. 20 km along the route noted. Walters have the ability to delay collection of the container at the Port or utilise a nearby licenced dangerous goods facility in the event of additional safety precautions being needed on the route.

Walters are a general transport company and has vehicles driving the routes daily and drivers routinely report on road conditions, incidents or issues along the route. Interviews with drivers confirmed route conditions are discussed and reported back as part of daily operations. In addition, Orica periodically check on Walters' JMP as part of its subcontractor management process.

The measures to address the risks are listed within the JMPs and are focused on driver fitness for work, vehicle condition and pre-start checks, load security and GPS tracking of the vehicles.

Input is sought from government agencies through the permit process for transporting dangerous goods within New Zealand. The community is not directly consulted by Orica or Walters Transport and does not have a designated role in an emergency involving cyanide.

The routes have been evaluated, and the use of convoys, escorts or additional security measures are not warranted at this time. Standard security measures are implemented across all movements including container locks and GPS tracking.

Orica subcontracts the transport of cyanide to Walters Transport. Walter Transport does not subcontract the transport. Walters is not a signatory to the Code and operates under Orica's systems to meet the requirements of the Code.

Orica has a developed procedures for subcontracting transport of cyanide and informs transporters of the Code requirements applicable to them. Orica's *Transport Management Procedure* details the equipment, training and procedural requirements for transporting on Orica's behalf.

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

Orica is: in substantial compliance with

Transport Practice 1.2

not in compliance with

Orica 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.

The transport company does only used trained, qualified and licensed operators to operate its transport vehicles. Walters have a main and back up driver allocated to cyanide transport with three drivers used across the audit period. Licences and training certificates were available for the cyanide transport drivers and suitable for the vehicle class being used to transport cyanide product.

Personnel involved in operating cyanide transportation equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposure. All the drivers have completed the Orica Cyanide Safe Use and Handling Awareness Program, along with Walters' training on standard operating procedures, fatigue management, fitness for work, pre-operational checks and emergency response actions.

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Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

Orica is: in substantial compliance with

Transport Practice 1.3

not in compliance with

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

Orica does not directly operate transport vehicles and subcontracts the road transport of cyanide product to Walters Transport. Walters have a preventative maintenance program for their equipment. Transport vehicles in New Zealand are subject to a permit system managed by New Zealand Transport Agency (NZTA), with permits issued for a 2-year period.

Walters have two vehicles (prime mover and trailer) that have been designated for cyanide transport use. The combination used is a prime mover and single trailer with twist locks capable of transporting either a single 20-foot container with intermediate bulk containers (IBCs) or a single 20-foot isotainer. Equipment inspected had the manufacturers compliance plates attached indicating sufficient capacity for the loads being handled.

There are procedures to verify the adequacy of the equipment for the load it must bear. Cyanide product is loaded into certified containers (IBCs) in shipping containers or solid product within isotainers with set standardised weights. Walters transport process has been designed around the movement of single container or isotainer which is well within the capacity of the prime mover and trailer.

Overloading of the transport vehicle is prevented through the movement of a single container which is well within the operating limits. In addition, vehicles are subject to random roadside inspection and weight checks by regulatory agencies.

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Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

Orica is: in substantial compliance with

Transport Practice 1.4

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 1.4 requiring the development and implementation a safety program for transport of cyanide.

Orica has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. Orica's cyanide is packaged at its ICMC certified production facility in Yarwun, Queensland, Australia, in accordance with the packaging and labelling requirements required by the political jurisdictions through which the load will pass. Individual IBCs are loaded into sea containers which are sealed prior to departure from the facility. The containers are not opened until they reach their destination at the mine.

Solid product is placed into isotainers that are sealed at the Yarwun production facility with seals attached. The seals are not removed until the isotainer is connected for discharge at the customer site. The Orica production facility was last fully recertified against the Code on 31 October 2023.

Walters check the seals as part of chain of custody checks upon receipt of the product for transport and then checked again with the customer at the completion of the delivery. The container number and seals are recorded on delivery documentation and retained by Walters. Samples of delivery documentation were reviewed to confirm these detailed are recorded.

Vehicle placarding requirements for transporting cyanide are prescribed in the New Zealand Land Transport Rule: Dangerous Goods 2005 and New Zealand Standard 5433 Transport of Dangerous Goods on Land. Walters Transport drivers must complete a review of the consignment before departure and check placards, securement of load, seal numbers and integrity

Walters' drivers complete pre-departure checks on vehicles to confirm fuel, oil and coolant levels are acceptable, tyres are in suitable condition and lights and indicators on the trucks and trailer are operational. Twist locks are checked. If defects are identified the vehicle is sent to the work or workshop personnel attend site. If necessary, the vehicle would be replaced with the contingency vehicle or unit.

As part of the container collection drivers complete a visual inspection of the container looking for damage, confirm container number is correct and seals are intact. If damage is observed this is reported to the office and report is completed. Placarding on the front and rear of the truck is set up for the cargo being carried and is checked prior to departure with the product.

Walters have a preventative maintenance program for their vehicles managed through mTrax software system with an inhouse maintenance team supported by dealer support. A tiered servicing schedule has been implemented depending on distance travelled. Bridgestone is contracted to complete tyre checks and optimise tyre life. Each vehicle used for cyanide transport is subject to certificate of fitness (CoF) which is a regular check by regulatory agencies that the vehicle meets safety standards with a label displayed on the vehicle. It is illegal to drive a vehicle that doesn't meet CoF standards or doesn't display a current CoF label.

Walters' drivers have a limit of 13 on duty hours in day with a minimum 10-hour break between operations and 70 hours per calendar week. Typically, the drivers work from 4.30 am to 2.30 pm to complete a cyanide delivery and would drive to and from the customer location in the same day due to the relatively short distance (approx. 288 km return). Driver hours are regulated through NZTA and logbooks are kept.

Cyanide is transported in isotainers or standard shipping containers secured to the trailer with twist locks.

There are procedures in place to modify or suspend transport should conditions warrant. As a general transport carrier Walters' have other trucks operating on the same network of roads that cyanide is transported and receive regular updates on road conditions and traffic. There is the ability to delay collection at the port or at Orica's direction transport product from the port to a licenced dangerous goods storage facility.

Walters have a drug and alcohol program which includes information on the management of drugs and alcohol in the workplace during the driver's induction process, pre-employment testing, for cause testing and post incident testing. Periodic educational/awareness programs are also provided.

Records are maintained and were available for review. Walters' are also subject to periodic audits from NZTA where these records are also evaluated for compliance.

Orica subcontracts the transport of cyanide to Walters Transport. Walter Transport does not subcontract the transport. Walters is not a signatory to the Code and operates under Orica's systems to meet the requirements of the Code.

Orica has a developed procedures for subcontracting transport of cyanide and informs transporters of the Code requirements applicable to them. Orica's *Transport Management Procedure* details the equipment, training and procedural requirements for transporting on Orica's behalf.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

in full compliance with

Orica is: in substantial compliance with

Transport Practice 1.5

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 1.5 requiring international standards for transportation of cyanide by sea.

Orica does not transport cyanide by sea within the scope of this supply chain.

Transport Practice 1.6

Track cyanide shipments to prevent loss during transport.

in full compliance with

Orica is: in substantial compliance with

Transport Practice 1.6

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 1.6 requiring tracking of cyanide shipments to prevent loss during transport.

Transport vehicles have means of communicating with the office and mining operation throughout the transport route. There is mobile phone coverage for the extent of the route and there are radios fitted as standard in the cabins of the trucks. Communication between Walters and Orica is undertaken by the operations manager.

Walters' transport vehicles are fitted with GPS and these are continually monitored by the office dispatch team via Teletrac Navman software platform. Drivers cannot leave the base if the GPS system is not working. This system is used to track deliveries and position of vehicles along the various routes. The GPS system fitted to the trucks also provide messaging capability.

There are no identified communication black out areas along the transport route.

There are systems to track progress of cyanide shipments via the GPS tracking and via drivers reporting in.

Walters' does use chain of custody documentation to track cyanide deliveries. Each consignment has shipping documentation that identifies the shipping container or isotainer collected for delivery. These are checked and recorded on the delivery documentation along with the unique seal numbers.

Walters' personnel do not open any of the containers and these are checked by the mine and signed for at delivery.

The shipping records detail the amount of cyanide and safety data sheets are available during transport.

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Orica has a developed procedures for subcontracting transport of cyanide and informs transporters of the Code requirements applicable to them. Orica's *Transport Management Procedure* details the equipment, training and procedural requirements for transporting on Orica's behalf.

PRINCIPAL 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 minimises the potential for accidental releases.

in full compliance with

Orica is: in substantial compliance with

Transport Practice 2.1

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 2.1 requiring the design, construction and operate cyanide interim storage sites to prevent releases and exposures.

Walters Transport does not provide interim storage of cyanide.

Ad-hoc storage of cyanide may occur at ChemCare, a Licenced Dangerous Goods facility in Auckland. Orica has not included this facility within the scope of this supply chain.

PRINCIPAL 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.

in full compliance with

Orica is: in substantial compliance with

Transport Practice 3.1

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 3.1 requiring preparation of detailed emergency response plans for potential cyanide releases.

Orica has developed an Emergency Response Guide for sodium cyanide that provides guidance to the development of specific transport route emergency plans for the management of incidents involving Orica product. Orica New Zealand have developed a local response guide tailored to New Zealand operations.

Walters have developed a Truck Driver Emergency Response Guide outlining the actions of their drivers in the event of an emergency situation.

The tier of Emergency Response Plans are appropriate for the transportation route, method of transport, transport vehicle and products being transported. Walters' transports solid sodium cyanide in IBCs within shipping containers or within isotainers, with a single container per prime mover and trailer. Their guide outlines the actions for the driver to take for a range of scenarios including breakdown, vehicle incident, fire, loss of product.

The Walters Emergency Plan has been developed based on the Orica New Zealand Emergency Response Guide and includes response actions for the driver. The response protocols involve contacting emergency services via the public emergency number and contacting the Orica Emergency Response Service. The Orica Emergency Response Guide includes descriptions of response actions for the anticipated emergency situations.

The plans recognise the statutory role of external responders (Police, Fire and Ambulance) in responding to and controlling incidents on New Zealand road network. There are no specific actions identified for the community in the plan other than following directions of authorities at the scene of the incident.

Transport Practice 3.2

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

in full compliance with

Orica is: in substantial compliance with

Transport Practice 3.2

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 3.2 requiring the designation of appropriate response personnel and commit necessary resources for emergency response.

Orica through its check point audit process confirms that its transporters have provided initial and refresher training on emergency response to personnel involved in transporting their product. This is supplemented by their *Cyanide Safe Use and Handling Awareness Program* which provides instruction on the hazards and general actions to take in an emergency.

There are descriptions of emergency response duties and responsibilities within Orica's Emergency Response Guide and within Walters Emergency Response Guide. Orica's includes responsibilities for cyanide specific support functions applicable to the transport contractor, Orica management and technical personnel and emergency response equipment.

Walters are responsible for notification of the incident and making the securing the scene to the extent practical in the circumstances until emergency services arrive. Orica and Walters would liaise with the New Zealand fire and emergency response authorities, in accordance with New Zealand's national emergency response procedures.

The drivers have minimal duties or responsibilities in emergency response. Walters provides drivers with a basic emergency response safety bag containing PPE such as masks, filters, overalls. Walters Transport have contracts with Ace Transport and Southern towing for vehicle recovery. Walters Transport keeps a list of the items and Orica periodically checks the contents when reviewing vehicles prior to a shipment.

An inspection of the driver's safety bag found the equipment to be present and in serviceable condition including a calibrated HCN monitor.

The transport does have emergency response equipment available during transport. The driver safety bag is collected for each dangerous goods transport and kept with the driver in the cab.

The driver safety bags are stocked by the office and Orica completes periodic checks on the equipment as part of their check point audit process

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Orica has a developed procedures for subcontracting transport of cyanide and informs transporters of the Code requirements applicable to them. Orica's *Transport Management Procedure* details the equipment, training and procedural requirements for transporting on Orica's behalf.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

Orica is: in substantial compliance with

Transport Practice 3.3

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 3.3 requiring development of procedures for internal and external emergency notification and reporting.

There are procedures and current contact information for notifying the cyanide producer, customer, regulators and external responders. Walters have a simple escalation procedure for notifying Orica in an emergency. Emergency contact information for key contacts is included at the front the Emergency Response Guide.

The Orica Emergency Response Guide provide internal escalation process and contact information once the transporter has contacted the Emergency Response Service.

There are systems in place to kept internal and external notification and reporting procedures current. Orica has implemented an emergency response call centre with a single number that transporters and the public can call in the event of an incident and that call centre will manage the internal emergency notification process.

Walters Truck Driver Emergency Plan was updated in December 2024 for a change in personnel which is reflected in the document review register. This plan has contact details for nominated Walters representative and Orica representatives together with regulatory agency contact numbers.

There are procedures for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. Walters notify Orica of incidents involving their product and Orica in turn are responsible for notifying the ICMI.

Orica has a written procedure for notifying the ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. This is detailed in Orica's procedure for notifying the ICMI which includes a notification template to be completed and contact details.

There have been no significant cyanide incidents at the facility during the audit period.

Transport Practice 3.4

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

in full compliance with

Orica is: in substantial compliance with

Transport Practice 3.4

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 3.4 requiring the development of procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

Orica has developed an emergency response guide that provides procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. Orica would provide technical guidance and assistance to New Zealand regulatory authorities in the event of an incident.

Walters Transport would not be involved in remediation or recovery activities outside of vehicle recovery and removal from the incident scene. Orica would coordinate the making safe of the cyanide containers or isotainers for transport of the product back to the production facility or mining customer to manage the remaining product.

Orica's emergency response guide specifically prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

Transport Practice 3.5

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

in full compliance with

Orica is: in substantial compliance with

Transport Practice 3.5

not in compliance with

Orica is in FULL COMPLIANCE with Transport Practice 3.5 requiring the periodic evaluation of response procedures and capabilities and revise them as needed.

There are provisions for periodically reviewing and evaluating the adequacy of emergency response planning and they are being implemented. Walters Truck Driver Emergency Response Guide was updated twice during the audit period with the first update relating to changes in personnel and the second relating to increased evacuation distances for non-cyanide dangerous goods incidents.

Orica's check point audit process includes evaluation of transporters emergency response planning and equipment. In addition, the Orica Emergency Response Guide was reviewed twice during the audit period with minor updates in 2025.

Walters and Orica undertake combined emergency exercises related to the transport route and potential incident scenarios. Several incident scenario drills were completed during the audit period relating to response to vehicle fire, vehicle incident on route and vehicle roll over.

Written debrief reports are retained that outline the scenario, the actions taken and opportunities for improvement identified.

There are procedures the Plan's performance after its implementation and revise it as needed. The Orica Emergency Response Guide provides for 2 yearly review and following incidents where the guide is utilised. The document review history register indicates that the guide has been reviewed on this frequency.

There have been no incidents during the audit period and accordingly reviewing response procedures post incident have not been triggered.

