

TRANSPORTATION SUMMARY AUDIT REPORT

Operation General Information

Name of Transportation Operation: PT Trans Continent (PTTC)

Name of Facility Owner: Mr Ismail Rasyid

Name of Facility Operator: Mr Ismail Rasyid

Name of Responsible Manager: Mr Ismail Rasyid

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Operation Location Detail and Description

Overview

Land transportation from Belawan Port (Medan) to Martabe Gold Mine.

Land transportation of solid sodium cyanide (ISO containers) from Belawan Port (Medan) to Martabe Mine located at Batang Toru (North Sumatra) – 550km. PTTC deployed own drivers and transportation. PTTC commenced transportation of cyanide through Belawan Port from Mar 2021 and the cyanide management activities are only restricted to interim storage. As such due diligence is being conducted to meet compliance with Transport Protocols from 2.1 to 2.1.6.



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Auditor's Finding

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

At the point of this recertification based on records reviewed, this operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

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

Audit Company: Danny Tan

Auditor Information

Lead Auditor: Danny Tan

Lead Auditor Email: dannytan163@yahoo.com.sg

Dates of Audit: 23 to 26 May 2022

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

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

PTTC



Jul 18th 2022

Name of Operation

Signature of Lead Auditor

Date

Name of Operation: PTTC

Signature of Lead Auditor
& Technical Expert



Date: Jul 18th 2022

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Principles and Standards of Practice

Principle 1 | TRANSPORT

Transport cyanide in a manner that minimizes the potential for accidents and releases.

Standard Practice 1.1: *Select cyanide transport routes to minimize the potential for accidents and releases.*

in full compliance with

The operation is in substantial compliance with Transport Practice 1.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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PTTC conducted a comprehensive route assessment for this cyanide transportation route. Based on documented information and on-site verification, selection of route was based on the minimizing the potential accidents and releases or the potential impacts of accidents with due consideration given for the following:

- a) traffic conditions,
- a) road conditions,
- b) environmental impacts
- c) community relations and reactions
- d) daily commuting habits

Based on the route selected, PTTC conducted a Route Risk Assessment covering

- a) Population Density
- b) Infrastructure construction and condition
- c) Pitch and grading
- d) Prevalence and proximity of water bodies and fog

PTTC implemented route risk assessment process and documented as follows:

P210 - Cyanide Route Risk Assessment from Port of Belawan at Martabe Mine), address the evaluation of risks in the selection of the cyanide transportation routes with appropriate risk management controls.

PTTC implemented as process or procedure to periodically reevaluate routes used for cyanide deliveries or does the transporter have a process for getting feedback on route condition from the transporter's operators as follows:

- a process for reevaluation as reflected in F220 whereby driver feedback after completion of shipment on route conditions (pot holes but not significant) along the route to Martabe Mine; sighted in 18 May 2022 records of feedback.

Based on the route assessment register, review existing Job Risk Assessment dated 31 Mar 2022 covering resting stops and driver fatigue.

Documentation reviewed reflected the input from communities, other stakeholders and applicable governmental agencies in the selection of routes and development of risk management measures (As reflected with a prior request for police escort before shipment dated 11 Feb 2022 and 17 May 2022)

Verified documentation the of use convoys, escorts or other additional safety or security measures to address the special safety and security concerns based on G153 – Convoy Formation 6 trucks (max) with police escort and rescue vehicle - ERT (standby driver)

PTTC do not contract other entities.

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Standard 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

The operation is in substantial compliance with Transport Practice 1.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

PTTC F102 HSEC Matrix (Training) outlines the required qualifications and internal training that for each employee. Documented copies of current licences, such as driving and forklift, are to be kept on file and records of internal training are reviewed. Refresher training is being implemented to ensure personnel are familiar with work requirements and emergency situations. Training records and appropriate materials were reviewed to ascertain the relevancy and applications. Interviews held with trainer and designated drivers are evident that drivers are trained in this aspect.

Review training records HSE annual training covering MSDS, cyanide awareness and ERP drills along with verifications as follows:

- 3 Jan 2022 – transportation – Herman (verified with training records) (B9710 SHE) and PM17
- 18 May 2022 – transportation – Yamis (verified with training records)

Conducted onsite interview with 3 Drivers on 25 May 2022 with expiry of 5 years. Verified their understanding and purpose of re-delivery checklist and knowledge of MSD including responsibilities during emergency responses such as accidental spillage.

PTTC do not contract other entities.

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

in full compliance with

The operation is in substantial compliance with Transport Practice 1.3

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

PTTC deploys appropriate equipment, which is designed and maintained to operate within the permitted loads of cyanide shipments.

P209 Road Transport Procedure addresses the following:

- Keep records of new and existing vehicles, such as maintenance schedule, log books, pre-start checklists, drivers' handbook, update training programs as required;
- Ensure vehicle maintenance is kept up to date; and ensure vehicles are used to their rated capacity

Preventive maintenance schedule and scope of works in place and verified as part of operation's routine and preventive maintenance regime.

Pre-approved vehicle list (F819) was verified and dated 18 May 2022 and confirmed with 3 Jan 2022 – transportation – vehicle number PM17.

Procedures on the type of vehicle used for cyanide transportation as reflected in P216 Pre-delivery checklist – container sign of overloading.

PTTC do not contract other entities.

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

in full compliance with

The operation is in substantial compliance with Transport Practice 1.4

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

PTTC had developed and implemented the following overarching procedures to facilitate implementation of a safety program for transport of cyanide:

- P294 – Pre-start SOP
- F216 Pre-Delivery Checklist completed (PH 17) – ORA Trailer B9710 SHE dated 18 May 2022.
- P209 – Road Transport Procedure

These procedures were implemented to ensure integrity of product within sealed containers from origin. The product is not unloaded while in transport until final destination Martabe Mine. Cyanide shipments are identifiable by Dangerous Goods (DG) placards required for cyanide transportation including Marine Pollutant placards.

Prior to cyanide transports, PTTC has implemented a vehicle inspection prior to each departure. The preventive maintenance program was checked for trucks and chassis.

Maintenance schedule for this equipment is verified with documented records including vehicles change due to fair wear and tear.

The following are verified with established Road Transport Procedure:

- Rotating shifts for drivers
- Transportation can be modified depending on external conditions such as weather or community unrest
- Prevention of loads from shifting during transportation
- Alcohol tests are being conducted on a random check basis

Implemented safety programs were established for the safe transportation commensurate with local operating conditions. Overall, verified documented records and onsite assessment demonstrated respective compliance.

F216 Pre-Delivery Checklist and was sampled with shipment dated 18 May 2022 for ORA (ISO Tank) ORA 4715. Shipment records 3 Jan 2022 and 18 May 2022 sampled for implementation of the safety program covering the following:

- Vehicle inspection
- Preventive maintenance programme
- Limitations on operations of drivers' hours
- Prevention of loads of shifting
- Modifications or suspensions during severe weather
- Drug abuse program

PTTC do not contract other entities.

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

in full compliance with

The operation is in substantial compliance with Standard Practice 1.5

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

This provision does not apply to transport of cyanide by truck.

PTTC in this context of operations do not transport cyanide by sea transportation.

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Standard Practice 1.6: Track cyanide shipments to prevent losses during transport.

in full compliance with

The operation is in substantial compliance with Standard Practice 1.6

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

PTTC had implemented the overarching procedures to facilitate tracking of cyanide shipments to prevent losses during transportation:

- P112 – Standard Transportation – escort communicate with mobile and radio along with GPS control as reflected in F216 for communication checks prior to transportation.

- P209 – Road Transport Procedure

These implemented procedures mandated transport vehicles (convoy and escort vehicle) to have in place mobile phones to enable two-way communications with operations room. This integrated system helps to mitigate the risk of communication blackouts and feedback system to review the chain of custody of cyanide shipments and ongoing risk assessment. Shipments inventory controls are in place to prevent loss of cyanide shipments during land transportation as verified with cargo management records. There are no transfers of shipments during the entire of land transportation.

On site route assessment and interviews with branch manager, yard manager, transport manager and escort leader were held. Along with respective delivery orders and accompanying MSDS verified with shipments records; are indicative that system is in place to ensure tracking of cyanide shipments and loss prevention.

P112 – Standard Transportation – escort communicate with mobile and radio along with GPS control as reflected in F216 for communication checks prior to transportation along with sampled records.

Blackout areas along transport routes has been identified as depicted in Route Assessment conducted from 31st Mar to 3 Apr 2022 and noted that there is no blackout area. However, in the event mobile phone out of range; radio serve as an alternate means of communications.

Tracking system (Maxx Fleet Pro managed by Lavinta Telematics Fleet Monitoring) in place to track the progress of cyanide shipments as sampled and evaluated with activity report dated 18 May 2022 (B9710 and SEH PM17)

Sampled with bill of lading dated 7 Feb 2022, Pre-Alert Truck dated 19 May 2022 and Delivery note dated 20 May 2022 (ORA, 4675, 4701, 4741, 4573, 4715 and 4735) for inventory controls and indication of the amount of cyanide in transit using ISO containers. Material Safety Data Sheets also made available during transportation issued date : 2/12/2014; Version: 1

PTTC do not contract other entities.

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Principle 2 | INTERIM STORAGE

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

Standard Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

in full compliance with

The operation is in substantial compliance with Standard Practice 2.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Due diligence investigations for Port of Belawan was conducted on 20 May 2022 and reviewed as follows:

- Interim/trans-shipment storage is situated within Port of Belawan that serves as depot for laden inbound shipments prior to land transportation of cyanide.
- Security is being ensured with security post managed by port security services as observed during on site visit.
- Visitors' access control is in place and monitored for entrance to Port of Belawan including areas designated for cyanide storage.

Conducted onsite review on 25th May 2022 of interim/trans-shipment storage conducted with the following observations:

- warning signs are visible around the yard indicative of the presence of toxic material such as dangerous goods and cyanide.
- within the interim storage, indicative segregation and separation of the dangerous goods and dedicated cyanide storage.
- at the actual designated area there are placards indicating the exact area in which the cyanide is stored with the following signs were clearly displayed; No Smoking. Stringent Personal Protection Equipment (PPE) requirements are enforced in the yard indicated by signs at the entrance:

- Helmet
- Safety Shoes
- Chemical Glasses
- Overall/PPE clothing

Dedicated security officers are stationed at the yard for access controls and movement of containers which ensure that no planned and accidental access by general public.

Security is being ensured with security post managed by outsourced security services as observed during on site visit. Visitors' access control is in place and monitored for entrance to Port of Belawan yard including areas designated for cyanide storage.

Site review of interim/trans-shipment storage conducted with the following observations:

- warning signs are visible around the yard indicative of the presence of toxic material and cyanide.
- within the interim storage, indicative segregation and separation of the dangerous goods and dedicated cyanide storage.
- at the actual storage area there are placards indicating the exact area in which the cyanide is stored. In addition to the placard there is also the SDS reflected in both English and Bahasa Indonesia.

At the entrance gates into the yard the following signs were clearly displayed; No Smoking and Eating

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Stringent Personal Protection Equipment (PPE) requirements are enforced in the yard indicated by signs at the entrance:

- Helmet
- Safety Shoes
- Chemical Glasses
- Overall/PPE clothing

Dedicated in house security officers are stationed at the yard for access controls and movement of containers. This augments well for the prevention of planned and accidental access by general public.

Site review of interim/trans-shipment storage conducted with the following observations:

- warning signs are visible around the yard indicative of the presence of toxic material and cyanide.
- within the interim storage, indicative segregation and separation of the dangerous goods and dedicated cyanide storage.
- at the actual storage area there are placards indicating the exact area in which the cyanide is stored. In addition to the placard there is also the SDS reflected in both English and Bahasa Indonesia.

At the entrance gates into the yard the following signs were clearly displayed; No Smoking and Eating

Stringent Personal Protection Equipment (PPE) requirements are enforced in the yard indicated by signs at the entrance:

- Helmet
- Safety Shoes
- Chemical Glasses
- Overall/PPE clothing

Dedicated in house security officers are stationed at the yard for access controls and movement of containers. This augments well for the prevention of planned and accidental access by general public.

Cyanide ISO Containers are stored in open spaces.

Belawan Dangerous Goods Yard has the required systems in place with the capacity to contain any spilled cyanide materials and minimize the extent of a release along with the support of PTTC specialized equipment to contain the spillage and this was validated during the joint drill between Port of Belawan and PTTC conducted on 23 Jun 2022.



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Principle 3 | EMERGENCY RESPONSE

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

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

in full compliance with

The operation is in substantial compliance with Standard Practice 3.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

P319 provides the details of the Cyanide Emergency Response Plan and updated as Version 2 dated 25 May 2022.

PTTC had implemented procedure (P319 – Cyanide Emergency Response Plan) in place for emergency response plans (ERP) for potential cyanide releases to address both ERP for interim storage and land transportation.

Management of the following identified incidents leading to potential cyanide release derived were from risk assessment:

- Chemical Spillage at Interim Storage
- Chemical Spillage during land transportation
- Vehicle accidents
- Loading and unloading accidents
- Fire at interim storage

Respective classifications of incidents correspond with incident response structure taking into account the physical and chemical form of cyanide during accidental release.

Requirements of transport infrastructure are considered as part of the overall ERP:

- Recovery vehicle
- Evacuation zones
- Communications with external responders
- Respective roles and integrated response with local communities, medical facilities, local authorities, fire departments and Port authorities
- Design of trailers and interim storage areas to minimize the risks

Requirements of transport infrastructure are considered as part of the overall ERP:

- Recovery vehicle
- Evacuation zones
- Communications with external responders
- Respective roles and integrated response with local communities, medical facilities, local authorities, fire departments and Port authorities

PTTC had implemented procedure (P319 – Cyanide Emergency Response Plan) in place for emergency response plans (ERP) for potential cyanide releases to address both ERP for interim storage and land transportation.

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- Chemical Spillage at Interim Storage
- Chemical Spillage during land transportation
- Vehicle accidents

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- Loading and unloading accidents
- Fire at interim storage
- Design of trailers and interim storage areas to minimize the risks

PTTC had implemented procedure (P319 – Cyanide Emergency Response Plan) in place for emergency response plans (ERP) for potential cyanide releases to address both ERP for interim storage and land transportation.

Management of the following identified incidents leading to potential cyanide release derived were from risk assessment:

- Chemical Spillage at Interim Storage
- Chemical Spillage during land transportation
- Vehicle accidents
- Loading and unloading accidents
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Respective classifications of incidents correspond with incident response structure taking into account the physical and chemical form of cyanide during accidental release.

Requirements of transport infrastructure are considered as part of the overall ERP:

- Recovery vehicle
 - Evacuation zones
 - Communications with external responders
 - Respective roles and integrated response with local communities, medical facilities, local authorities, fire departments and Port authorities
 - Design of trailers and interim storage areas to minimize the risks
-



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

in full compliance with

The operation is in substantial compliance with Standard Practice 3.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

PTTC implemented procedure (P319 – Cyanide Emergency Response Plan) was reviewed to examine the ERP training as part of the DG Awareness Training conducted for personnel involved in port, yard and transportation operations covering the following:

- Specific roles and responsibilities during activation of ERP
- Media liaisons
- Loading/unloading, yard and transportation designated emergency response equipment
- Personal Protective Equipment (PPE)

This includes specific cyanide emergency response duties and responsibilities assigns to its personnel and outside responders during response to emergency incidents such as leakage

- To carry out initial action to contain the leakage
- To alert branch manager
- To minimize the risk to people and environment

PTTC keeps emergency response equipment during transportation in Emergency Response Vehicle along with accompanied list of equipment such as full-face respirator, gas detector and spill kits. Maintenance regime was established to ensure the assurance on the functionality of the emergency response equipment. Records are maintained for this regime along with the list emergency response required for ERP for transportation operations.

PTTC F102 HSEC Matrix (Training) spelt out the qualifications and internal training that is required for each employee. Refresher training is being implemented to ensure personnel are familiar with work requirements and emergency situations. PTTC provides refresher training in emergency response procedures for cyanide handling personnel on a six monthly schedule.

Training records (Emergency and Critical Response Training for Cyanide and Other Hazards) and appropriate materials were reviewed to ascertain the relevancy and applications.

Descriptions of the specific emergency response duties and responsibilities of personnel are depicted in P319.

List of all emergency response equipment are made available as observed during onsite verification during transport or along the transportation and inspection are carried out prior to commencement of transportation.

PTTC do not contract other entities.

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

in full compliance with

The operation is in substantial compliance with Standard Practice 3.3

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

PTTC had in place procedures (P319) and contact information for respective notification of emergencies in the event of emergencies that occur during transportation. Implemented ERP procedure covers both internal and external emergency notification and reporting as part of the incident response structure. This is being reviewed during tool-box meeting prior to land transportation. Contact lists are currently updated during these meetings.

Records are maintained with the list emergency response contacts required for ERP for yard and transportation operations. On site interviews held with respective personnel verified that the implemented ERP and associated contact lists.

On site interviews held with respective personnel verified that the implemented ERP and associated contact lists.

Systems in place are being validated during joint drill exercise between PTTC and Port of Belawan to ensure that internal and external emergency notification and reporting procedures are kept current. Procedure in place to notify ICMI for significant cyanide incidents as reflected in Emergency Structure in Procedure 006, appendix D flow chart with appropriate contract. Till date no significant cyanide incident that required to notify ICMI.

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

in full compliance with

The operation is in substantial compliance with Standard Practice 3.4

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

PTTC ERP procedures (P319) outline the spill contingency plan in the event of accidental spillage; dictates the agreement with mine site to respond. P235 also outline procedures for remediation, such as recovery or neutralization of solutions or solids and decontamination of soils or other contaminated media.

P319 addresses the prohibition on the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface waters.

Interviews held with incident response team members on the implementation and understanding of Emergency Response Plan for transport of hazardous chemicals.

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

in full compliance with

The operation is in substantial compliance with Standard Practice 3.5

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

PTTC implemented ERP procedure covers periodic review for the suitability, adequacy and effectiveness of the ERPs. This is being also being reviewed during pre-loading meeting with port operator and tool-box meeting prior to land transportation. Contact lists are currently updated during these meetings.

Mock drill with integrated response between PTTC, Port of Belawan and PTAR on 23 Jun 2022. Key lessons learnt were captured and reflected in post exercise report. Mock drills schedule is being drawn up for year to include the scenarios of land transportation with respective external responders.

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