

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

Address: Jl. Tebet Raya No. 22A, Tebet Barat

State/Province: South Jakarta 12810

Country: Indonesia

Telephone: +62 21 8378 7104

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Operation Location Detail and Description

PT Bumi Suksesindo (BSI) Copper and Gold Mines

PTTC imports cyanide in the form of intermediate bulk containers (IBCs) stored inside GP containers from Australian Gold Reagents (AGR) in Australia port of Fremantle; CIF terms shipped via commercial vessel to PT Terminal Petikemas Surabaya (TPS). Thereafter these containers are being transported by PTTC own drivers and vehicles via road transportation estimated 350km East Jaya; Banyuwangi mine site which is owned by BSI. PTTC transportation supply chain starting from PT Terminal Petikemas Surabaya (TPS) dangerous goods yard and after customs clearance, these containers are being transported by PTTC own transportation and drivers to PTTC own interim storage (25km from TPS) before land transportation to estimated 350km East Jaya; Banyuwangi mine site estimated 350km. Usually convoy of 5 Vehicles for each land transportation to BSI.

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Signature of Lead Auditor
& Technical Expert

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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.

Compliance Statement

The Summary Audit Report for a recertification audit must include one additional statement that is not required in the Summary Audit Report for an initial certification audit. For a transportation operation found in full compliance with the Code, the report must indicate whether the operation had any compliance issues or significant cyanide incidents since its previous certification and identify where in the report such information can be found.

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

Auditor Information

Audit Company: Danny Tan

Lead Auditor: Danny Tan

Lead Auditor Email: dannytan163@yahoo.com.sg

Dates of Audit: 7 and 8 Nov 2022

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Danny Tan

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& Technical Expert

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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	<i>Danny Jan</i>	6 Jan 2023
Name of Operation	Signature of Lead Auditor	Date

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Danny Jan

Date: 6 Jan 2023

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& Technical Expert

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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 of 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 Standard of Practice 1.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Land transport from PT Terminal Petikemas Surabaya (TPS) to PTTC interim storage at Gresik and from Gresik to PT Bumi Suksesindo (BSI), East Jaya, Banyuwangi

PTTC conducted a comprehensive route assessment for BSI cyanide transportation in accordance with P233 (Route Assessment Procedure dated 3 May 2017). Based on documented information (Road assessment conducted on 4 Oct 2022) 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

Based on review of P210 (Risk assessment process and procedures dated 1 Feb 2017), PTTC address the evaluation of risks in the selection of the cyanide transportation routes with appropriate risk management controls and the process on collecting feedback on route condition from the PTTC drivers.

Records of meeting dated 3 Oct 2022 of community consultation from local police was

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conducted as part of the route assessment.

PTTC provided records as reflected in F248 (Emergency Contact List) that local police escorts and own transporters played the critical roles as both external and internal responders in notifying respective medical facilities and communities' communications during an emergency or in the event of safety and security incidents. PTTC do not subcontracts cyanide handling and transportation.

Standard of 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 Standard of Practice 1.2

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

[Land transport from PT Terminal Petikemas Surabaya \(TPS\) to PTTC interim storage at Gresik and from Gresik to PT Bumi Suksesindo \(BSI\), East Jaya, Banyuwangi](#)

PTTC based on F102 (Health Safety Matrix) outlines the qualifications and internal training that is required for each employee and the documented copies of current licences, such as driving and forklift, are to be kept on file and records of internal training are reviewed.

Records of refresher training (2018) are being reviewed and noted that in person training is being implemented to ensure personnel are familiar with work requirements and emergency situations.

PTTC do not subcontracts cyanide handling and transportation.

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Standard of Practice 1.3:

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.3

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

[Land transport from PT Terminal Petikemas Surabaya \(TPS\) to PTTC interim storage at Gresik and from Gresik to PT Bumi Suksesindo \(BSI\), East Java; Banyuwangi](#)

Records of shipment between Apr to Oct 2022 were verified that PTTC only deploys appropriate equipment, which is designed and maintained to operate within the permitted loads of cyanide shipments in accordance with established procedures (P294 – Pre-start SOP and P209 Road Transport Procedure)

It is reflected in P224 (Securing a load SOP) to prevent overloading of the transport vehicle used for transportation of cyanide.

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Standard of Practice 1.4:

Develop and implement a safety program for transport of cyanide.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.4

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Land transport from PT Terminal Petikemas Surabaya (TPS) to PTTC interim storage at Gresik and from Gresik to PT Bumi Suksesindo (BSI), East Java; Banyuwangi

Based on F209 Road Transport dated 20 Mar 2017, PTTC ensure integrity of product within sealed containers from origin. The product is not unloaded while in transport until destination BSI Mine and related Cyanide shipments are identifiable by Dangerous Goods (DG) placards required for Cyanide transportation including Marine Pollutant placards.

Based on representative records (21 Sep 22 and 21 Dec 22) that PTTC has implemented a vehicle inspection prior to each departure and also the following:

- 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 test are being conducted on a random check basis

Based on maintenance records (Jan to Dec 2022), trailers are being maintained in accordance with preventive program in place.

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Standard of Practice 1.5:

Follow international standards for transportation of cyanide by sea.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.5

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

There is no sea transportation involved with PTTC ICMI cyanide transportation from TPS to BSI.

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Standard of Practice 1.6:

Track cyanide shipments to prevent losses during transport.

in full compliance with

The operation is in substantial compliance with Standard of Practice 1.6

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Land transport from PT Terminal Petikemas Surabaya (TPS) to PTTC interim storage at Gresik and from Gresik to PT Bumi Suksesindo (BSI), East Java; Banyuwangi

PTTC based on P202 Cargo tracking procedures dated 16 Mar 2017 and had implemented procedures to facilitate tracking of cyanide shipments to prevent losses during transportation, procedures mandated transport vehicles (convoy and escort vehicle) to have in place mobile phones to enable two-way communications with operations room and blackout area are being identified.

Based on pre-start checklist (prior to cyanide transportation toolbox meeting), two-way communications radio is being for checked for functionality.

Shipping records such as tracking records and Material Safety Data Sheets along the route to BSI from Apr to Oct 2022 were verified.

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Principle 2 | INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Standard of 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 of Practice 2.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Interim/transshipment storage is situated within both TPS and PTTC interim storage at Gresik around 25 km via highway from TPS which serves as depot for laden inbound shipments prior to land transportation of cyanide.

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 both TPS and Gresik yard including areas designated for cyanide storage.

Site review of interim/transshipment 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 public. Control tower also has a clear view of the DG storage area.

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There is no possible build-up of hydrogen cyanide as the storage is in the open air and thus well ventilated. This outdoor storage is built on a concrete ground provides the assurance that cyanide containers will not come in contact with water and soil.

Overall, interviews with TPS personnel together with safety and environmental management systems in place demonstrate compliances and alertness to the presence of cyanide and its related risks.

Reviewed P205 due diligence procedure dated 1 Feb 2017 verified that PTTC periodically audit TPS as transshipment/interim (for transshipment prior to shipment to mine) that they comply with the ICMI and contractual requirements for interim storage. Due diligence for TPS was conducted on 23 Nov 2022 and verified with P205.

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Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice3.1:

Prepare detailed emergency response plans for potential cyanide releases.

in full compliance with

The operation is in substantial compliance with Standard of Practice3.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Land transport from PT Terminal Petikemas Surabaya (TPS) to PTTC interim storage at Gresik and from Gresik to PT Bumi Suksesindo (BSI), East Jaya; Banyuwangi

PTTC established ERP procedure as reflected in P236 (Emergency Response Plan dated 1 Jun 2017), P203 (Cyanide Management Procedure dated 17 Mar 2017) and P222 (incident Management SOP dated 22 Mar 2017) for potential cyanide releases to address both ERP for interim storages (TPS and Gresik) and land transportation, including 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

PTTC established ERP procedure as reflected in P236 (emergency Response Plan dated 1 Jun 2017), for respective classifications of incidents correspond with incident response structure covering the roles of emergency responders including 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 of 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 of Practice 3.2
- not in compliance with

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PTTC implemented P207 (Training procedure) for ERP training as part of the DG Awareness. Training records dated 12 Dec 2022 were verified 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 assigned 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

Records dated Oct to Sep 2022 and including onsite inspection were verified that maintenance regime is 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.

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Standard of 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 of Practice 3.3

not in compliance with

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PTTC established P222 Incident Management Procedure dated 22 Mar 2017 and related emergency contact list (F248) as respective procedures and contact information for notification of emergencies in the event of emergencies that occur during transportation that covers both internal and external emergency notification and reporting as part of the incident response structure.

Procedure F248 are reviewed and noted for maintenance with the list emergency response contacts required for ERP for yard and transportation operations.

Procedure (P222 Incident Management/Flowchart) is in place to notify ICMI for significant cyanide incidents. Based on interview and PTTC email confirmation, it is verified that till date no significant cyanide incident has happened that required to notify ICMI.

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Standard of 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 of Practice 3.4

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

[Land transport from PT Terminal Petikemas Surabaya \(TPS\) to PTTC interim storage at Gresik and from Gresik to PT Bumi Suksesindo \(BSI\), East Java; Banyuwangi](#)

PTTC Joint procedure with BSI (dated 18 Nov 2022) ERP that outline the spill contingency plan in the event of accidental spillage; dictates the agreement with mine site to respond including outline procedures for remediation, such as recovery or neutralization of solutions or solids and decontamination of soils or other contaminated media.

Based on interview with PTTC Safety Manager it is noted that ultimate clean-up of release occur during operations is being carried out by PTTC. All waste from the ERP will be packed and ship to BSI for their disposal.

P235 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. Interviewed staff is able to describe the responsibilities and appropriate actions required when an emergency occurred during transportation.

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Standard of 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 of Practice 3.5

not in compliance with

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Mock drills are conducted for both HUB Gresik on 10 Dec 2022 and joint drills with TPS on 12 Dec 2022 with records of this mock drill maintained and key observations are subsequently incorporated with the list emergency response contacts required for ERP for yard and transportation operations being updated.

Based on post review and observations conducted after this mock drill and it is indicated that ERP is in place with assigned trained personnel and appropriate equipment.

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