

SUMMARY AUDIT REPORT

Operation General Information

Name of Transportation Operation: **PT Trans Continent**

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**

E-Mail: **ismail@tcontinent.com**

Operation Location Detail and Description

PT J Resources Bolaang Mongondow Bakan (JRBM)

PTTC transportation supply chain starting from PT Terminal Petikemas Surabaya (TPS), thereafter these containers are being transported by PTTC own transportation and drivers to Surabaya Tanjung Perak Domestic seaport; followed by loading onboard TANTO commercial vessel for sea transportation to Port of BITUNG. Upon arrival at Bitung; these containers will be stored at Dangerous Goods yard located within Port of Bitung, land transportation for delivery to JRBM in Bakan North Sulawesi by PTTC own transportation and drivers.

PTTC

Danny Tan

12 Mar 2023

Name of Operation:

Signature of Lead Auditor
& Technical Expert

Date:

SUMMARY AUDIT REPORT

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.

Auditor Information

Audit Company: Danny Tan
Lead Auditor: Danny Tan
Lead Auditor Email: dannytan163@yahoo.com.sg
Dates of Audit: 27 to 30 Jan 2023

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 Tan</i>	12 Mar 2023
Name of Operation	Signature of Lead Auditor	Date

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Name of Operation:	Signature of Lead Auditor & Technical Expert	Date:

SUMMARY AUDIT REPORT

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 Bitung to JRBM in Bakan North Sulawesi

PTTC conducted a comprehensive route assessment (revised road assessment dated 30 Jan 23) for Bitung. 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, b) road conditions, c) environmental impacts, d) community relations and reactions, e) 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) Prevalance and proximity of water bodies and fog

PTTC implemented a process and written document (P233 – Cyanide Route Risk Assessment Bitung Port to JRBM). These procedures address the evaluation of risks in the selection of the cyanide transportation routes with appropriate risk management controls. A process on collecting feedback on route condition from the PTTC drivers were verified in accordance with implemented road transport procedure (P209). Community consultation from local police, port authorities and village chiefs for Bitung route to JRBM was conducted as part of the route assessment.

Land Transportation from TPS to Surabaya Tanjung Perak Domestic seaport

Documented information on cyanide transportation by PTTC vehicles were reviewed with supporting information on delivery notes dated 9, 14 and 19 May 2022, bill of lading and commercial invoices. Route risk assessment was conducted in accordance with P234 – Cyanide Route Risk Assessment – Surabaya International to Domestic Port for land transportation between TPS to Surabaya Tanjung Perak Domestic seaport within the port limits to ascertain the required control measures.

Sea Transportation (TPS to Bitung domestic seaport) PTTC subcontracts TANTO commercial vessel for sea transportation from TPS to Port of Bitung. PTTC do not contract nities to conduct land transportation.

PTTC

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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 Bitung to JRBM in Bakan North Sulawesi

Training records dated 29 Jan 23 for drivers that are assigned for transportation on 9, 14, 18 May 2022 based on the following:

- PTTC F102 HSEC Matrix (Training) spelt out the qualifications and internal training that is required for each employee.
- 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.

PTTC do not contract entities to conduct land transportation.

PTTC

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SUMMARY AUDIT REPORT

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 Bitung to JRBM in Bakan North Sulawesi

Updated records of transportation equipment that are assigned for 9, 14 and 18 May 2022 were reviewed for transportation based on updated P212 Vehicle Management Procedure:

- Appropriate equipment, which is designed and maintained to operate within the permitted loads of cyanide shipments.
- Records of new and existing vehicles, such as maintenance schedule, logbooks, 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.
- maintenance schedule and scope of works in place for verification of vehicle that is safe and suitable for transportation.

PTTC do not contract entities to conduct land transportation.

PTTC

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SUMMARY AUDIT REPORT

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 Bitung to JRBM in Bakan North Sulawesi

Updated procedures as follows:

- P201 – HSEC Management System
- P203 – Cyanide Management Procedure
- P209 – Road Transport Procedure

The above are continually implemented along with onsite interview with cyanide transportation supervisor coupled with provided records based on 9, 14 and 18 May 2022 transportation that addressed the following key requirements :

- 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

PTTC do not contract entities to conduct land transportation.

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SUMMARY AUDIT REPORT

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:

Sea Transportation (TPS to Bitung domestic seaport (TANTO))

Based on review of due diligence investigation records (7 Feb 2023) and Dangerous Goods Declaration records dated 6 Jan 2023, TANTO are in compliance with the prevailing IMDG code.

- TANTO has the applicable IMDG Code requirements available, and staff interviewed on site was able to verify compliance of DG shipments with the applicable IMDG Code requirements.
- Packing list - Packaged as required by Part 4 of the IMDG Code and according to the packaging instructions and packaging provisions indicated on the DG List.
- Cyanide shipments were sampled with documents and appropriate records to verify that shipments are identified with required placard and marked as required by Chapter 5.3 of the IMDG Code
- Sampled dangerous goods transport document verified with records demonstrated compliance with requirements under Chapter 5.4 of the IM DG Code.
- Vessel carrying the cyanide containers had a manifest identifying the presence of the cyanide.
- Vessel carrying the cyanide containers was found to have an Emergency Response Plan in place with appropriate response structure in place.

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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 Bitung to JRBM in Bakan North Sulawesi

Updated records that PTTC on the following were verified for continual implementation:

- P201 – HSEC Management System
- P202 – Cargo Tracking Procedure
- P203 – Cyanide Management Procedure
- P209 – Road Transport Procedure

Based on onsite interview conducted and records dated 7 Mar 2022, the above procedures are implemented as follows:

- transport vehicles (convoy and escort vehicle) to have in place mobile phones to enable two-way communications with operations room.
- 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.
- Communication equipment are tested to ensure proper functioning.

Reviewed PTTC Command Centre that monitor the movement of vehicles 24/7 and their positions based on the transportation conducted on 9, 14 and 18 May 2022.

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.

PTTC do not contract entities to conduct land transportation.

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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:

The interim storage is situated within the Port of Surabaya (TPS) and Port of Bitung Interim/trans-shipment storage is situated within TPS and Port of Bitung (TPB) which serves as depot for laden inbound shipments prior to land transportation of cyanide.

Records of due diligence for both TPS (23 Nov 2022) and verification of onsite of TPB.

Warning signs are visible in both Indonesian and English language at the entrance of the DG yard as reviewed during the onsite visit to Surabaya and Bitung designated Dangerous Goods (DG) yard.

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 DG yard including areas designated for cyanide storage.

Segregation of cyanide storage in DG yard managed by port authorities as observed during on site visit to DG yard in accordance with DG location plan as part of safety management plan for DG storage.

Cyanide is being stored outdoor which is designed for DG storage managed by both Surabaya and Bitung port authorities.

Process and systems are in place to contain the volume of largest single drum of cyanide in the vent of spillage occur within DG yard. Reviewed procedure for emergency for Port Bitung.

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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 Bitung to JRBM in Bakan North Sulawesi

PTTC had implemented procedure (P235 – 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

Sea Transportation (TPS to Bitung domestic seaport)

Records of Due diligence reviewed, and interview held with operations staff highlighted the contents of the ERP as follows:

- Emergency Committee - Operation of Emergency Committee
- Drill to encounter an Emergency Hazard - Emergency Committee Contact List
- Escalation processes

The ERP as part of shipboard management plan covers the voyage route under TANTO responsibility.

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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

Summarize the basis for this Finding/Deficiencies Identified:

PTTC implemented procedure (P235 – 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 assigned to its personnel and outside responders during response to emergency incidents such as leakage or spillage.

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

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 of 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.

Training records (Emergency and Critical Response Training for Cyanide and Other Hazards) and appropriate materials were reviewed to ascertain the relevancy and applications. Interviews during on-site impromptu ERP exercise held with trainer and designated emergency responders demonstrated required competencies.

PTTC do not contract entities to conduct land transportation.

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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

Summarize the basis for this Finding/Deficiencies Identified:

Land transport from Bitung to JRBM in

Bakan North Sulawesi

PTTC had in place procedures (P235) 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 toolbox 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.

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 Bitung to JRBM in Bakan North Sulawesi

PTTC ERP procedures (P235) 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. 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. the cyanide handling or transport.

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

Summarize the basis for this Finding/Deficiencies Identified:

Land transport from Bitung to JRBM in Bakan North Sulawesi

Mock drills are conducted on 29 Jan 2023 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.

PTTC

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