

***Cyanide Transportation  
Summary Audit Report  
For The  
International Cyanide Management Institute and  
ProMS LLC (transporter).***

***Prepared by : NCABrasil Expert Auditors Ltd.  
www.globalsheq.com***

**[www.cyanidecode.org](http://www.cyanidecode.org)**

**June 2021**

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**This report contains 13 pages.**



# SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

## *Instructions*

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.
3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

**International Cyanide Management Institute (ICMI)**  
**1400 I Street, NW, Suite 550.**  
**Washington, DC 20005, USA**  
**Tel: +1-202-495-4020**
5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.
7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.



## SUMMARY AUDIT REPORT

Name of Cyanide Transportation Facility: ProMS LLC.  
Name of Facility Owner: ProMS LLC.  
Name of Facility Operator: ProMS LLC.  
Name of Responsible Manager: Olga Sher  
Address: Zavodskoy village, Industrial zone No. 6, building 235.  
State/Province: Stepnogorsky.  
Country: Republic of Kazakhstan.  
Telephone: +7-777-710-00-06  
Fax: n.a  
E-Mail: olga.sher@proms.kz

### Location detail and description of operation:

The ProMS operation is focused on the road transportation of solid cyanide for gold mining operations, without interim storage. The operation is located at Stepnogorsky town, in Kazakhstan and transports solid cyanide from approved/ certified solid NaCN producers to gold mine operations located in Kazakhstan. ProMS imports solid NaCN from Korund-Tsian JSC, a Russian NaCN producer that is certified by the International Cyanide Management Institute since December 2014. Korund-Tsian JSC is responsible to transport (by rail) the solid cyanide and deliver it at a remote terminal at the Stenogorsky Railway station. The carriage of sodium cyanide (UN No. 1689) by rail in the Russian Federation (RF) and in the Republic of Kazakhstan (RK) is carried out according to the internal rules for the transport of dangerous goods by rail, which, in turn, are based on the recommendations of the rules for the transport of dangerous goods by rail developed by the UN (United Nations). The Russian Federation and the Republic of Kazakhstan are parties to the Agreement on International Freight Transport by Rail (SMGS), effective from 01.11.1951. Railways are owned by the signatories of the SMGS, which ensure compliance with the rules for the transport of dangerous goods by rail. Packaging and labeling requirements are in line with the UN Recommendation on the Transport of Dangerous Goods and the Agreement on International Carriage of Goods by Rail and International Road Transport Regulations. Packages and containers are certified according to the Standards of the UN Recommendations on the Transport of Dangerous Goods, the International Maritime Dangerous Goods Code (IMDG), the European Agreement on the International Carriage of Dangerous Goods by Road (ADR) and the Regulations concerning the International Carriage of Dangerous Goods by Rail (RID). The resulting cyanide is packaged in packages that fully comply with international regulations for the transport of dangerous goods. The NaCN boxes (1.0 ton each/ original package) are transported inside hermetic 20´ railway containers (from railway station to ProMS warehouses (please refer to ProMS cyanide producer/ distributor reference) and from the ProMS warehouses to gold mines inside tent trailers or flatbed trailers, specifically designed for this purpose, where twenty cyanide boxes (maximum capacity) are placed or one 20´ container is placed, respectively. The operation does not contract third party transporters to perform these activities. All cranes, trucks and trailers belong to the operation, as well as all the drivers are ProMS employees.



## 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.

- \* For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Auditing Company: NCABrasil Expert Auditors Ltd.

Audit Team Leader: Celso Sandt Pessoa (ICMI qualified lead auditor and transportation qualified TEA (technical expert auditor)), since 2006.

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Website: [www.globalsheq.com](http://www.globalsheq.com)

Names and Signatures of Other Auditors: not applicable

Date(s) of Audit: 10~12/04/2023 (on-site) and 17~18/December/2023 (off-site).

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 certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.



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Celso Sandt Pessoa

## SUMMARY AUDIT REPORT

### **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.**

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 1.1  
 not in compliance with

#### *Summarize the basis for this Finding/Deficiencies Identified:*

The operation, designed, documented, implemented and maintains a management procedure for routes identification, evaluation and definition. It was evidenced that the organization performed a risk evaluation for road transportation of solid cyanide, in accordance with this procedure, related to route evaluation system, which includes periodic re-evaluation of the routes, including the driver's feedback.

Reviewed the route definition and risk evaluation for the following routes/ mining operations:

- Altyntau Railway station/ Aksu base (ProMS producer/ distributor warehouses)
- Aksu/ Akbakay (Altynalmas Gold mine).
- Aksu/ Pustynoye (Altynalmas Gold mine).
- Aksu/ Kemp Vostok (gold mine)
- Aksu/ Fik-Alel (Suzdal gold mine)
- Aksu/ Brendt 1 and 2 gold mines (Zhitikara county)
- Aksu/ RG Gold mine (Nikolaevka county)
- Aksu/ Altyn MM gold mine (Sekisovka county).

The approved route considers population density, road infrastructure, fauna and flora, surface waters, pitch and grade and weather conditions, among other aspects. All transportation routes were reviewed and approved by the Kazakhstan Authority for Road Transportation of Dangerous Goods. It was evidenced that the operation identified and evaluated all the risks related to the selected routes above mentioned. Examples are: population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, police stations, emergency stations, communication infrastructure, shadow areas for communication, fauna and flora), the condition of the route (under maintenance, holes, without asphalt), weather conditions (such as snow, ice, fog, fire, rain) and surface waters (rivers, creeks, lakes), fog formation trend, type of bridges, dangerous curves, environmental aspects (desert, mountain, forest) and security related places. Several controls such as speed limit, driver qualification and training, truck maintenance, pre-traveling brief with the driver, planned transport observations, full time monitoring of the truck from a remote station, limited traveling time, were implemented by the organization in order to mitigate the risks related to the selected routes.



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The selected route includes the transport using national and state roads. It was evidenced that the operation, at least annually, re-evaluates the condition of the selected routes. In the end of each travel, the driver records on the traveling plan his perceptions about the route condition. This travel report is reviewed by the operations coordinator and, when necessary, the route plan is updated, and the risks re-evaluated. Track traffic conditions, points allowed to stop and overnight, authorized supply points, places with sharp curves, places with winding and slippery and snow conditions, uphill and steep slopes, bridges and rivers, risk of accidents, police checkpoints, locations requiring special permits for transit, allowed speed for trucks, pedestrian crossing sites, kettle and fauna related risks on track, emergency telephones of the places, population data, weather conditions, communication shadows are considered to select pertinent routes. All comments are reported at travel operation reports). Reviewed travel reports issued between 2022 and 2023. As previously mentioned, it was evidenced that the organization performed a risk evaluation for road transportation of solid cyanide, in accordance with document procedures. All transportation documentation addresses the hazards and related risks and defines the operational control measures to be taken by the qualified drivers. All permits related to transportation route are kept updated. ProMS, as a mandatory requirement defined by the Kazakhstan law, contacts public authorities responsible for the road transportation of dangerous goods, the environmental protection agencies, road police and security agencies (e.g: Department of Emergency Situations), in other to obtain official permits to transport solid cyanide in the proposed routes. The operation will use security escorts when the risk analysis indicates that this should be an operational control during the transport (safety and security). In the selected routes, it was identified that a security escort is not necessary. Related to the use of convoys, this will be dependent of the amount of solid NaCN to be transported. In the reviewed cyanide transportation cases, convoys (at least two trucks) were used. ProMS does not contract any other entity to transport cyanide, as previously mentioned.

***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.***

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 1.2  
 not in compliance with

***Summarize the basis for this Finding/Deficiencies Identified:***

It was evidenced that the operation employees trained, and licensed drivers as required by the applicable legislation for the transport of dangerous products, including solid sodium cyanide. The drivers must have a specific driving license, type "CE" and ADR/DOPOC license (International Rules for Delivering Dangerous Goods by Road), both in accordance with the Kazakhstan legislation.



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Reviewed the driver license for: Viktor Shrenef, Kostantin Novossyolov, Segey Sayenko, Vladimir Abaikin, Viktor Drizner and Vladimir Sukharev. Also reviewed the operation license for crane and forklift operators Sergey Blank, Alexandr Shadrin, Sergey Kabalin and Yevgeny Raizer. All reviewed permits are valid and within the expiration date. It was evidenced that the operation defined, documented, implemented and maintains an annual training program for the operational team (truck drivers and operational personnel). The operation provided for its operational team drivers, initial and refresh trainings such as use of personal protective equipment, defensive driving (refresh), emergency response plan and solid NaCN properties and management (Material Safety Data Sheet). Records of such initial and refresh trainings are retained by the operation and were reviewed during this opportunity. The operation does not contract other entities to transport cyanide, as previously mentioned.

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

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 1.3  
 not in compliance with

#### *Summarize the basis for this Finding/Deficiencies Identified:*

It was evidenced that ProMS uses trucks, such as Volvo FH 13 (4x2) and Volvo FH 64T (6x4), both supporting loads up to 42 ton and 61 ton, respectively. In the same way, the related trailers are made by Fliegl Germany, Schmitz Germany and Krone Germany, all adequate to transport 20 (twenty cyanide boxes/ tent trailer) and 20' railway containers, with load capacity above 35 ton. The operation does not transport loads above 20 ton. According to the Kazakhstan laws, trucks and platforms must go through an annual technical inspection, which frequencies depends on the age of the truck and platforms. In this case, the technical inspection must be carried out annually or every six months. Reviewed the following technical inspection reports for the following trucks and trailers (pair/ couple): 079-DL-02+72-FMA-02, 596-YC-02+07-CFZ-02, 597-YC-02+08-AAB-02 and 967-HB-02+41-FVA-02. The operation only transports 20' railway containers containing 20 NaCN boxes/ 1 ton each or 20 (twenty) NaCN boxes inside a tent trailer. The cargo weight to be transported is also recorded in the transportation documentation, as demanded by the Kazakhstan law. The cargo weight is verified in the departure of the cyanide producer/ distributor, along the routes (weight control stations and road police stations) and, in some cases, during the reception of the cargo at the mining operations. Reviewed transportation documentation (ProMS LLC bill of lading/BoL) # 9 for Fik Alel mining and # 90 (for Altyn MM mining), among others. The operation does not contract other entities to transport cyanide, as previously mentioned.




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### **Transport Practice 1.4: Develop and implement a safety program for transport of cyanide.**

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 1.4  
 not in compliance with

#### *Summarize the basis for this Finding/Deficiencies Identified:*

All solid cyanide boxes are transported inside a 20'-railway container, that is sealed before departing from the cyanide seller premises (Korund Tsyau). The operation also transports 20 NaCN boxes inside a tent trailer, specifically designed for this purpose. According to the Russian and Kazakhstan laws, safety placards (UNO # 1689 and toxic (6.1) pictogram)) must be placed in the front of the truck and in the three sides of the railway container and in the three sides of the tent trailer. Evidenced full compliance during the field audit. Before each departure the operation performs a general inspection, which includes the documentation inspection, cargo weight, emergency response resources, protective personal equipment, railway container, truck and tent trailer, anti-shifting locks, communication resources, traceability system, safety signage, among other aspects. The pre-departure inspection is based on an inspection checklist. This inspection is performed every day during the cyanide transportation. Reviewed pre-departure and daily inspection records for transportations performed between 2022 and 2023. Trucks, tent trailers, flat bed platforms, cranes and forklifters are maintained in accordance with a planned preventive maintenance program and performed internally or at approved maintenance shops. Preventive maintenance program, for trucks and trailers, is based on the kilometers (km) used by the truck + trailer. Preventive maintenance activities are performed every 15000 km. For cranes and forklifters, the maintenance frequency is every six months. Reviewed preventive maintenance records for 079-DL-02+72-FMA-02, 596-YC-02+07-CFZ-02, 597-YC-02+08-AAB-02 and 967-HB-02+41-FVA-02 (truck and trailer, respectively), all performed between 2022 and 2023. Also reviewed maintenance records for three cranes (40 ton, 50 ton and 70 ton) and two forklifters (1,5 ton and 3,0 ton). All trucks, trailers, cranes and forklifters must pass through an independent (third party) technical inspection in order to receive a permit to be used in road transportation of solid cyanide. Reviewed technical inspection reports issued between 2022 and 2023. Railway containers (20') are maintained by the cyanide producer. A preventive maintenance and inspection plan were implemented, and records of such activities were reviewed during this opportunity. According to the Kazakhstan law and the operation policy, the daily work hours is from 6AM up to 6PM, where 8,0 hours is the maximum work shift within the mentioned range, with a 45' minutes rest every 4,0 hours driving. The drivers must have a 1.0 hour for lunch. Night travels are not allowed. Minimum rest time, between journeys, is 11 hours. Twist lockers are installed in flatbed trailers. Tent trailers are provided with wood locks (for the pallets), straps (fixed in the tent wall), a steel plate in the front of the trailer and a wood structure in the rear of the trailer. Cyanide boxes are not stacked in tent trailers.





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Evidenced such configurations during the field audit. Also evidenced that such anti-shifting systems are included in the preventive maintenance plan. Social turbulences, storm wind, snow, ice, mud and storm rain, are aspects that could impact the transportation plan, that could be modified or suspended. The operation policy related to drug and alcohol use/abuse is clear and accepted by all internal stakeholders. Monitoring is performed when the trucks are leaving the operation premises and along the route at defined checkpoints (for alcohol) and annually performed during the occupational health control (for other types of drugs). Reviewed records of monitoring performed between 2022 and 2023. All results were negative. The operation retains records of all above mentioned activities. The operation does not contract other entities to transport cyanide.

### **Transport Practice 1.5: Follow international standards for transportation of cyanide by sea.**

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 1.5  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

**This transport practice is not applicable to the operation's scope. The operation scope is road transportation of solid cyanide.**

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

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 1.6  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified: (Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided).*

The trucks are provided with tracking systems (on board computer, text messages), using online GPS signal (supplied and managed by Wialon Ltd.). The driver is also equipped with a mobile phone. Verified the monitoring system during the field audit. All communication resources are tested before departure from the operation base, time to time with the operation headquarter, with tracker system supplier. Evidenced and tested communication resources during the field audit. Blackout areas are not present in the selected routes. As previously mentioned, all trucks are provided with online GPS trackers, which was tested during the audit.



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The cyanide cargo documentation (bill of lading/ BoL) addresses the amount of solid cyanide being transported. The amount of solid cyanide being transported is controlled at the seller premise, during transportation (at weight control stations and police control stations) and, in some cases, in the reception at the mining operation. The cargo documentation (retained by the transporter) includes the following documents: bill of lading (producer and transporter), weight control records, police control records and cyanide buyer reception control records. The MSDS (Material Safety Data Sheet) is part of the transportation documentation, but it is left at the mining operation. All reviewed transportation documentation clearly indicates the amount of cyanide being transported. The operation does not contract other entities to transport cyanide.

### **2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.**

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

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 2.1  
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:\**

**This principle is not applicable to the operation scope because the cyanide cargo is transported straight from suppliers/ distributors (ProMS LLC Distributor) to its final destination, the mining operation. During the transport, the truck is monitored 100% of the time (online GPS) and stops, at night, only at pre-evaluated and approved stations along the route. The tracking system also blocks (remote turn-off) the truck engine if something different from the planned script (travel plan) occurs. It is possible to send/ receive text messages from the truck. Evidenced/ tested during the audit at operation headquarter.**

### **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.**

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 3.1  
 not in compliance with



## SUMMARY AUDIT REPORT

### *Summarize the basis for this Finding/Deficiencies Identified:*

It was evidenced that the operation developed and documented (dated 04/01/2023) an emergency response plan. The operation also has a contract with Ecopromothod AS LLC (environmental emergencies services provider). It was evidenced that the operation emergency response plan was developed for the specific circumstances and was verified that the emergency plans are appropriate to the specific cyanide transportation routes, and transport practices. The risks associated to the selected routes were identified and evaluated and the emergency response plans are focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes. The operation emergency response plan is specific for solid NaCN transportation by road. The emergency response plan is specific for solid cyanide transportation by road (truck + platform+ railway container + tent trailer). The emergency response plan is specific to the routes (roads) defined to be used from the seller (ProMS LLC Distributor) to the buyer (the mining operation). The emergency response plan is specific for the transportation resources (truck+ platform+ railway container + tent trailer) used to transport solid cyanide from the seller to the buyer. It was evidenced that the emergency response plan describe the specific response actions that shall be applied to each emergency situation/ scenario, such as accident with fire, fall into a river, cyanide leakage on a rainy day, cyanide intoxication, among other specific emergency scenarios. It was evidenced that the emergency response plan describes the roles of several external stakeholders that should be involved in the emergency response, such as road police, emergency responders (Ecopromothod AS LLC) and firefighters, reference hospitals along the routes, and environmental and security authorities.

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

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 3.2  
 not in compliance with

### *Summarize the basis for this Finding/Deficiencies Identified:*

It was evidenced that the operation provided initial and refresh emergency training for drivers, emergency coordinators, emergency response members, in accordance with the Kazakhstan laws, as previously mentioned. The operational team receives theoretical training related to emergencies and practical ones during planned emergency drills. All duties and responsibilities, for each identified scenario, are addressed in the operational & emergency management procedures, that are part of the approved emergency plan. The required emergency response resources master list is part of the traveling documentation and checked before each travel.



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Usual emergency hardware to be available at the truck is: safety glasses, helmets, leather gloves, ear protectors, masks for powder (P3 type) and HCN (ABEK1 type), Tychem type overall, fire extinguishers (dry chemical powder/ 9 kg), plastic bags, plastic shovel and brush, and antidotes kit (sodium thiosulphate and sodium nitrite, both stored inside a foam box delivered by the antidotes producer. This kit is kept inside a plastic box identified as “first aid kit”, which includes needles and syringes and auxiliary material (e.g: adrenalin). First aid instructions are inside this plastic box. The antidotes shall be applied by medical professionals only. The expire dates of the antidotes are controlled by the occupational safety technician of the operation). As previously mentioned, there is an emergency kit for the truck driver (which includes the PPEs) and the emergency response resources, transported in the truck. All emergency response resources are inspected before each departure, as well as the driver’s emergency kit. Records of such pre-departure inspections are retained by the operation and were reviewed during this opportunity. The operation contracted Ecopromothod to respond to emergency situations involving solid NaCN transportation. Ecopromothod will play the main role in any emergency related to cyanide, mainly related to the mitigation of all the impacts caused by cyanide. As previously mentioned, the operation’s drivers’ documentation also addresses directions to other stakeholders, such as public entities (road administrator, road police, medical resources, firefighters, mining operation) that could attend the emergency local. All these requirements are addressed in the contract between the operation and Ecopromothod.

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

The operation is:  in full compliance with  
 in substantial compliance with Transport Practice 3.3  
 not in compliance with

#### *Summarize the basis for this Finding/Deficiencies Identified:*

All the necessary contact information with stakeholders (e.g: the NaCN seller, the operation headquarters, the mining operation, road police, environmental and security department)) is addressed at the Emergency Plan. All protocols related to emergency notification and reporting are kept updated and the critical stakeholders to be notified are clearly identified. There were no emergencies related to cyanide transportation between 2022 and 2023. ICM1 is one external stakeholder addressed at the contact master list that will be promptly communicated in the event of a cyanide related emergency.



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

The operation is:             in full compliance with  
                                       in substantial compliance with Transport Practice 3.4  
                                       not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

Two of emergency scenarios are the impact of solid NaCN on soil (dry and wet) and on the surface waters. Emergency protocols for these situations clearly defines the neutralization process to be used in the event of NaCN impact on the soil, using CaO powder, removal of neutralized soil (into plastic bags) and final disposition at the mining operation. Monitoring soil samples will be taken to confirm the neutralization process effectiveness. For surface water, in the event of any impact caused by solid NaCN briquettes, these shall be removed (if possible), neutralized with CaO powder, collected in plastic bags and disposed at the mining operation. Oxidation through bubbles will be tried. An emergency environmental monitoring plan will be implemented to collect and analyze the extent of the contamination plume. No chemical products are allowed to be used to neutralize cyanide in surface water. Suck kinds of products are not included in the truck emergency resources. The prohibition to use such chemicals is also addressed in the existing contract between the operation and at the Ecopromethod one.

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

The operation is:             in full compliance with  
                                       in substantial compliance with Transport Practice 3.5  
                                       not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

The Emergency Response Plan is kept updated by the operation through the feedback of real emergencies (did not occur in the last certification cycle), emergencies occurred with other transporters in Kazakhstan or Russia, after the realization of mock emergency drills. Last updated was performed in January 2023. The operation plans and performs mock drills annually. Two mock drills were performed in between 2022 and 2023. The scope of the mentioned performed drills included the release of solid NaCN briquettes in wet soil and the intoxication of one person. The reports related to the above-mentioned mock drills were reviewed in this opportunity. Every mock drill has defined planned objectives to be achieved. After the drill, it is reviewed, and conclusions are defined in order to confirm (or not) if the planned objectives were reached or not. Improvement actions plans are defined and implemented, resulting in the update of the Emergency Response Plan. The Emergency Response Plan was found updated at revision dated 04/01/2023.



## SUMMARY AUDIT REPORT

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### **Audit team conclusions:**

Based on the sampled evidences, the physical conditions of the site (installations) and the trucks/ trailers/ containers/ cranes and forklifters, in the interviewed personnel and in the reviewed documentation, the audit team concludes that the SHEQ management system is FULLY implemented and maintained in accordance with the International Cyanide Management Protocol for Transporters (June 2021) for cyanide transport operations (principles 1.5 and 2.1 are not applicable to the operation transport scope). The operation does not subcontract transporters to transport the cyanide.



18/02/2024