

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Summary Audit Report

***For the
International Cyanide Management Code***

Türkiye Supply Chain

18 June 2024

Samsung C&T Corporation



18 June 2024

Name of Supply Chain Operator

Lead Auditor Signature

Date

Transportation Summary Audit Report

Operation General Information

Name Transport Operation : Samsung C & T Corporation Türkiye Supply Chain
Name of Facility Owner : Samsung C & T Corporation
Name of Facility Operator : Samsung C & T Corporation
Name of Responsible Manager : HyoSuk Kang / Head of Mining Materials Group
HyoSub Kim / Mining Materials Group Professional
Address : 67, Sejong-daero, Jung-gu
State / Province : Seoul
Country : Republic of Korea
Telephone : 82-2-2145-2505
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Operation Location Detail and Description

The head office of Samsung C & T Corporation is located in Seoul, Korea. They have four groups named as Trading & Investment Division, Engineering & Construction Division, Fashion Division and Resort Division. Related to supplying the sodium cyanide, the main jobs of Trading & Investment Division are making agreement with mining company, receiving customer order, review of customer order and arrangement of shipping. Those were conducted by Mining Materials Group in Trading & Investment Division of Samsung C & T Corporation.

The Türkiye Supply Chain of Samsung C & T Corporation was ICMC initially certified during January 2018 and last recertification was completed during June 2021. Almost 3 years were elapsed since last recertification, so recertification audit for the Türkiye Supply Chain was conducted during 05~07 June 2024.

Since June 2021 when the Türkiye Supply Chain was recertified, there was some changes in Türkiye Supply Chain as below.

- Izmir Port in Türkiye was included in Türkiye Supply Chain
- Trans-loading and interim storage facility in Mersin Tarsus Organize Sanayi Bolgesi was closed so not included in Türkiye Supply Chain

The detail segments and subcontractors in Türkiye Supply Chain are as below.

1. Sodium cyanide manufacturer : TaeKwang Industrial Co., Ltd., and TongSuh Petrochemical Co., Ltd. Ulsan Plants in Korea.
2. Roadway transportation by truck and trailer from sodium cyanide manufacturers in Ulsan Plants to Pusan New Port in Korea : Hae Dong Logistics and Bukwang Logistics Co., Ltd.
3. Marine transportation from Pusan New Port in Korea to Mersin Port and Izmir Port in Türkiye : MSC
4. Roadway transportation from Mersin Port and Izmir Port to customer mining sites in Türkiye : TO-PET A.S.

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Auditor's Finding

This operation is

- in full compliance
- in substantial compliance
- not in compliance

with the International Cyanide Management Code.

Compliance Statement

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

Auditor Information

Audit Company : QMS Consulting Co., Ltd.
Lead Auditor : Mr. BongWon Kim
Lead Auditor E-mail : kbw1999@naver.com
Dates of Audit : 05~07 June 2024

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.

Samsung C & T Corporation

Name of Operation



Lead Auditor Signature

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Date

Samsung C&T Corporation

Name of Supply Chain Operator



Lead Auditor Signature

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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.

The operation is	X in full compliance with	Standard of Practice 1.1
	<input type="checkbox"/> in substantial compliance	
	<input type="checkbox"/> not in compliance with	

The Samsung C&T Corporation established and have implemented hazardous chemical transportation manual since 2010. They have considered population density, infrastructure, security and cost effectiveness according to the manual when they select the sodium cyanide transportation routes. Since the Türkiye Supply Chain was ICMC recertified during 2021, there was some changes as Izmir Port in Türkiye was included and trans-loading and interim storage facility in Mersin Tarsus Organize Sanayi Bolgesi was closed so not included in Türkiye Supply Chain. The Samsung C&T Corporation considered overall transportation route from sodium cyanide manufactures TaeKwang Industrial Co., Ltd. and TongSuh Petrochemical Co., Ltd. Ulsan Plants in Korea to customer mining sites in Türkiye according to their manual. They identified several possible routes from sodium cyanide manufactures in Korea to customer mining sites in Türkiye. They evaluated the routes for such items as availability, security, transportation quantity and cost and finally decided the transportation routes as below.

- 1) From cyanide manufacturer, TaeKwang Industrial Co., Ltd., and TongSuh Petrochemical Co., Ltd. Ulsan plants to Pusan New Port in Korea : Roadway transportation by truck and trailer
- 2) Pusan New Port in Korea to Mersin Port and Izmir Port in Türkiye : Marine transportation by ship
- 3) Mersin Port and Izmir Port to customer mining sites in Türkiye : Roadway transportation by truck and trailer

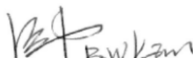
During March 2024, the Samsung C & T Corporation reevaluated and chose sodium cyanide manufacturers, transporters and shipping company according to the sub-contractor evaluation procedure as below.

- 1) Sodium cyanide manufacturer : TaeKwang Industrial Co., Ltd. and TongSuh Petrochemical Co., Ltd. Ulsan Plants in Korea.
- 2) Roadway transportation by truck and trailer from sodium cyanide manufactures in Ulsan Plants to Pusan New Port in Korea : Hae Dong Logistics and Bukwang Logistics Co., Ltd.
- 3) Marine transportation from Pusan New Port in Korea to Mersin Port and Izmir Port in Türkiye : MSC
- 4) Roadway transportation from Mersin Port to customer mining sites in Türkiye : TO-PET A.S.

Considering the situations of cyanide manufacturers, transporters and shipping company, the Samsung C&T Corporation decided the control measures for each segment in Türkiye Supply Chain as below.

- 1) Cyanide manufacture TaeKwang Industrial Co., Ltd. and TongSuh Petrochemical Co., Ltd. Ulsan Plants in Korea
 - (1) Periodic subcontractor evaluation by Samsung C & T Corporation
 - (2) Implementation and certification of ICMC by TaeKwang Industrial Co., Ltd. and TongSuh Petrochemical Co., Ltd. Ulsan Plants
 - TaeKwang Industrial Co., Ltd was ICMC recertified during 21 August 2023
 - TongSuh Petrochemical Co., Ltd. was ICMC recertified during 19 April 2023
- 2) Roadway transportation in Korea by Hae Dong Logistics and Bukwang Logistics Co., Ltd.
 - (1) Periodic supplier evaluation by Samsung C&T Corporation

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- (2) Implementation and certification of ICMC by Hae Dong Logistics
 - Hae Dong Logistics Co., Ltd. was ICMC recertified during 16 March 2023
 - Bukwang Logistics Co., Ltd. was ICMC certified during 01 April 2022
- 3) Pusan New Port in Korea
 - (1) Periodic route evaluation by Samsung C&T Corporation
 - (2) Periodic due diligence investigation by Samsung C&T Corporation
- 4) Marine transportation by shipping company MSC
 - (1) Periodic route evaluation by Samsung C&T Corporation
 - (2) Periodic due diligence investigation by Samsung C&T Corporation
- 5) Mersin Port and Izmir Port in Türkiye
 - (1) Periodic route evaluation by Samsung C&T Corporation
 - (2) Periodic due diligence investigation by Samsung C&T Corporation
- 6) Road transportation in Türkiye by TO-PET A.S.
 - (1) Periodic supplier evaluation by Samsung C&T Corporation
 - (2) Implementation and certification of ICMC by TO-PET A.S.
 - TO-PET was ICMC certified during 06 March 2023

During March 2024, the Samsung C & T Corporation have checked the overall routes of Türkiye Supply Chain and reevaluated the risks again according to their hazardous chemical transportation manual. The following high risks were identified.

- Release of sodium cyanide powder to road, land and surface water during roadway transportation by transporters
- Damage to sodium cyanide container and human contact with sodium cyanide in ports
- Release to sea water during marine transportation by shipping company
- Robbery during roadway transportation, storage in ports and marine transportation

The Samsung C&T Corporation prepared control measures for the high risks identified as below.

- 1) Release of sodium cyanide powder to road, land and surface water during roadway transportation by transporters
 - Complete the supplier evaluation for roadway transporters by Samsung C&T Corporation
 - Roadway transporters Hae Dong Logistics, Bukwang Logistics Co., Ltd. and TO-PET A.S. have maintained ICMC certification
 - Prepare and apply emergency response plan for the accident of sodium cyanide spillage
- 2) Damage to sodium cyanide container and human contact in ports
 - Due diligence investigation for ports by Samsung C&T Corporation
 - Prepare and apply emergency response plan for the accident of human contact with sodium cyanide
- 3) Release to sea water during marine transportation by shipping company
 - Complete the supplier evaluation for shipping company by Samsung C&T Corporation
 - Due diligence investigation for shipping company by Samsung C&T Corporation
 - Prepare and apply emergency response plan for the accident of sodium cyanide spillage
- 4) Robbery during road transportation, storage in ports and marine transportation.
 - Complete the supplier evaluation for roadway transporters by Samsung C&T Corporation
 - Roadway transporters as Hae Dong Logistics, Bukwang Logistics Co., Ltd. and TO-PET A.S. have maintain ICMC certification
 - Complete the supplier evaluation for shipping company by Samsung C&T Corporation
 - Due diligence investigation for ports and shipping company by Samsung C&T Corporation
 - Use of escort and convoy for roadway transportation in Türkiye

According to hazardous chemical transportation manual, the Samsung C&T Corporation should reevaluate the overall routes of Türkiye Supply Chain every three year periodically. In case that there is any change related to routes, transporters, facilities and relevant legal requirements, they will

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reevaluate the routes non-periodically. Almost three year were elapsed since last route evaluation for Türkiye Supply Chain, the Samsung C&T Corporation have reevaluated the routes of Türkiye Supply Chain during March 2024.

The Samsung C&T Corporation have received information related to cyanide transportation routes from sodium cyanide manufacturers, roadway transporters, ports, shipping company and other sub-contractors. The review of information to identify any other safety issues was conducted according to their manual. Since June 2021 when the Türkiye Supply Chain was ICMC recertified, there is no special issue from received information related to Türkiye Supply Chain.

The Samsung C & T Corporation documented the measures to address risks in Türkiye Supply Chain. They have completed the control measures such as supplier evaluation, check the certification of ICMC by applicable subcontractors and due diligence investigation for ports and shipping company. They also established emergency response plan for sodium cyanide release, human contact and robbery. The communication channel with government body, safety agency, police, manufactures and transporters was defined in emergency response plan.

When the Samsung C&T Corporation selected the transportation route of Türkiye Supply Chain and developed the control measures for high risks, they considered and reflected the comments from applicable governmental agencies, communities and stakeholders such as Ulsan government office, Pusan government office, hospitals in Ulsan and Pusan, sodium cyanide manufactures, roadway transporters, shipping company, Korea Occupational Health and Safety Agency and local fire fighting agency. The Samsung C&T Corporation informed the sodium cyanide transportation and received some general comments.

The Samsung C&T Corporation reviewed overall route for Türkiye Supply Chain from cyanide manufactures to customer mining sites in Türkiye. According to the review results and mining customer requests, they have used convoys and escorts for roadway transportation from Mersin Port, and Izmir Port to customer mining sites in Türkiye. They finally decided that convoys, escorts or additional measures are unnecessary for other segments with their reasonable justification. For roadway transportation from Mersin Port and Izmir Port to customer mining sites in Türkiye, the roadway transporter TO-PET A.S. have used escort and convoy for their transportation by trucks.

The Samsung C&T Corporation informed their sodium cyanide handling manual as pocket book, emergency response plan and material safety data sheet to manufacturers, roadway transporters, ports and shipping company and requested awareness and implementation.

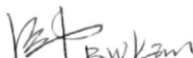
Transport Practice 1.2

Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The operation is **X in full compliance with** **Standard of Practice 1.2**
 in substantial compliance
 not in compliance with

During the subcontractor evaluation and due diligence investigation, the Samsung C&T Corporation checked and evaluated sodium cyanide transporters whether the operators were trained, qualified and licensed. They confirmed that the transporters have used operators and drivers trained, qualified and licensed according to national legal requirements. The Samsung C & T Corporation have prepared and informed sodium cyanide handling manual as pocket book to transporters, ports and shipping company to use during training, daily operation and emergency situation.

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Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 1.3**
 not in compliance with

According to hazardous chemical transportation manual, the Samsung C&T Corporation reevaluated subcontractors during March 2024. During the subcontractor evaluation, they checked and evaluated sodium cyanide transporters whether the transport equipment is suitable for sodium cyanide transportation. They confirmed that roadway transporters have used only equipment designed and maintained to operate within the designed capacity.

During the due diligence investigation, they checked that ports and shipping company whether the transport equipment are suitable or not. According to the due diligence investigation results, the ports and shipping company used suitable equipment.

According to the results of subcontractor evaluation and due diligence investigation, the Samsung C&T Corporation confirmed that transporters, ports and shipping company have maintained and implemented procedure to verify the adequacy of transport equipment. And they confirmed that the transporters have procedure to prevent overloading and container itself designated to prevent overloading.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 1.4**
 not in compliance with

The Samsung C&T Corporation reevaluated subcontractors during March 2024. According to the subcontractor evaluation results, they confirmed that transporters have maintained procedure and work instruction to maintain the integrity of manufacture's packaging. And the Samsung C&T Corporation confirmed that transporters used placard and signage to identify the shipment of sodium cyanide. According to the subcontractor evaluation results, the Samsung C&T Corporation confirmed that transporters established and implemented safety program related to transportation equipment, driver, suspension of transportation as severe condition, drug abuse prevention and retention of records documenting the safety program implementation.

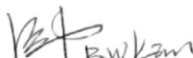
Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 1.5**
 not in compliance with

The Samsung C&T Corporation evaluated shipping company according to hazardous chemical transportation manual. They evaluated such items as compliance of target delivery, compliance with International Maritime Dangerous Goods (hereinafter IMDG) code, legal requirements and international standards and accident cases during marine transportation. Considering the evaluation

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results, they selected MSC as shipping company for sodium cyanide transportation from Pusan New Port in Korea to Mersin Port and Izmir Port in Türkiye.

The Samsung C&T Corporation completed the due diligence investigation for the shipping company MSC during May 2024. According to the due diligence investigation results, the Samsung C&T Corporation confirmed that shipping company MSC was comply with IMDG Code.

Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is **X in full compliance with** **Standard of Practice 1.6**
 in substantial compliance
 not in compliance with

The Samsung C&T Corporation conducted the subcontractor evaluation for transporters in Türkiye Supply Chain. According to the evaluation results, the transportation vehicles have means to communication with relevant bodies. They also confirmed that transporters periodically tested their communication equipment according to their work instruction.

The Samsung C&T Corporation checked the overall routes of Türkiye Supply Chain and found no blackout area. The Samsung C&T Corporation requested to transporters to identify blackout area and alternative process to control the blackout area. Until now, they have not received any identified blackout area from transporters.

The Samsung C&T Corporation has the process to track the progress of cyanide shipments, inventory control and custody documentation for the export of sodium cyanide products.

The process was also applied to Türkiye Supply Chain. As necessary, they tracked the progress of cyanide shipments by contact with sodium cyanide manufactures, transporters and website check of shipping company.

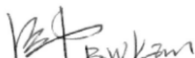
According to annual sales plan, the Samsung C&T Corporation requested sodium cyanide manufacturers to dispatch the sodium cyanide and nominate the shipping company. The individual dispatch order (order number, target delivery and amount), dispatched date and quantity of sodium cyanide from manufactures to shipping company were registered in computer network system of Samsung C&T Corporation. The progress of marine transportation by shipping company can be checked for individual dispatch order in web-site of shipping company.

According to the subcontractor evaluation results, the Samsung C&T Corporation confirmed that the manufacturers controlled the dispatch amount and date for individual order in their computer network system. They recorded the same items in dispatch sheet and issued to roadway transporters. As the roadway transporters transport the sodium cyanide to Pusan New Port, the dispatch sheet and sodium cyanide delivered to shipping company. The shipping company checked the dispatch sheet and sodium cyanide containers and input the shipping results in their computer network system. The inventory control and custody documentation were properly implemented to prevent the loss of sodium cyanide during transportation.

The Türkiye agent of Samsung C&T Corporation conducted the customs clearance in Mersin Port and Izmir Port and requested transportation to transporter from Mersin Port and Izmir Port to customer mining sites in Türkiye. The progress of roadway transportation from Mersin Port and Izmir Port to gold mining sites in Türkiye can be tracked by contact with transporter.

The dispatch orders (order number, target delivery and amount), dispatched date and quantity of sodium cyanide from manufactures to shipping company were registered in computer network system

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of Samsung C&T Corporation. The progress of marine transportation by shipping company can be checked for each dispatch orders in web-site of MSC. So the amount of cyanide in transit can be checked in computer network system of Samsung C&T Corporation and web-site of shipping company. According to the subcontractor evaluation result, the manufactures input the dispatch amount and date for individual order in their computer network system. They record the same items in dispatch sheet and issued to roadway transporters. So the amount of cyanide in transit also can be checked in computer network system of manufactures and dispatch sheet maintained by transporters. According to the subcontractor evaluation results, the sodium cyanide manufactures, roadway transporters and shipping company controlled the Material Safety Data Sheet properly.

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Principle 2 | INTERIM STORAGE

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

Transport Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental releases.

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 2.1**
 not in compliance with

The Samsung C & T Corporation identified interim storage areas in Türkiye Supply Chain as below.

- Pusan New Port in Korea, Mersin Port and Izmir Port in Türkiye

The Samsung C & T Corporation completed the due diligence investigation for Pusan New Port in Korea, Mersin Port and Izmir Port in Türkiye during May 2024. The due diligence investigation was conducted on site visit, change review and web-site check for those ports, national port agency and shipping company. They confirmed the interim storage areas in ports were controlled properly in compliance with legal requirements and ICMC code requirements. They informed the sodium cyanide handling manual as pocket book to ports and shipping company.

During the due diligence investigation for ports, the Samsung C & T Corporation confirmed the interim storage areas were controlled properly as security measures in place, the sodium cyanide storage areas were fenced and locked to prevent unauthorized access, the interim storage areas were separated from materials as acids, oxidizers and explosives with burns and fence to prevent mixing, the sodium cyanide maintained in container itself in ports as dispatched from manufactures and the sodium cyanide was stored to prevent the contact with water. The Samsung C & T Corporation confirmed in the interim storage areas that the sodium cyanide containers were stored in open port yards as no need the ventilation for hydrogen cyanide gas from solid sodium cyanide in ports, the interim storage areas in ports were controlled properly by national port agency and shipping company to contain the spilled sodium cyanide in storage areas, bunds were installed around interim storage areas in ports and the sodium cyanide maintained in containers in ports so the spilled sodium cyanide can't release out of the containers.

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Principle 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 **X in full compliance with** **Standard of Practice 3.1**
 in substantial compliance
 not in compliance with

The Samsung C&T Corporation established emergency response plan considering the possible emergency cases as sodium cyanide release to road, land, surface water and sea water, robbery during transportation and interim storage areas.

The emergency response plan considered the transportation route and interim storage area, transportation of solid sodium cyanide packaged in polyethylene inner film and polypropylene woven bag or box and transported in container, transportation method, interim storage areas, infrastructure as road condition, ports and marine transportation. In the emergency response plan, they defined what they should do, communication channel and relevant external responders such as sodium cyanide manufactures, transporters, shipping company, mining customers, safety agencies, fire-fighting agencies and hospitals. Detail emergency response plans considering roadway transportation were already prepared by transporters and checked by Samsung C&T Corporation. The Samsung C&T Corporation checked that shipping company issued commitment to comply with IMDG Code in which the emergency response plan required. For interim storage areas such as ports they informed the emergency response plan and MSDS of sodium cyanide in which handling and treatment for released sodium cyanide defined.

Transport Practice 3.2

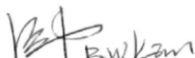
Designate appropriate response personnel and commit necessary resources for emergency response.

The operation is **X in full compliance with** **Standard of Practice 3.2**
 in substantial compliance
 not in compliance with

The Samsung C&T Corporation have implemented the initial training for new employee of Mining Materials Group and refresher training for their team members for the emergency response plan and cyanide handling manual during March and September every year. They also have training plan in which the emergency trainings are scheduled. The communication channel, duties of relevant external agency and main activities of Mining Materials Group were trained and records were maintained. In the emergency response plan prepared by Mining Materials Group, the roles and responsibilities of team leader, team member, other relevant team and external agency were defined.

As the Samsung C & T Corporation is trading company, they do not actually implement the transportation works. So they do not need the list, availability and inspection of emergency response equipment. However in the sodium cyanide handling manual of Samsung C&T Corporation, the emergency response equipment was defined. The roadway transporters in Türkiye Supply Chain have the lists of emergency response equipment. And also shipping company MSC have the lists to comply with IMDG Code. During the subcontractor evaluation and due diligence investigation, the Samsung C&T Corporation confirmed that roadway transporters and shipping company maintained the emergency response equipment according to their lists. And they confirmed that roadway transporters

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and shipping company implemented the procedure to inspect emergency response equipment. For interim storage ports areas, they informed the sodium cyanide handling manual as pocket book in which the emergency response equipment introduced.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is **X in full compliance with** **Standard of Practice 3.3**
 in substantial compliance
 not in compliance with

The Samsung C & T Corporation prepared the emergency response plan appropriate to the overall emergency cases possibly expected in Türkiye Supply Chain. In the emergency response plan, contact information as telephone number, relevant personnels and address of sodium cyanide manufactures, roadway transporters, shipping company, ports, safety agencies, fire fighting agencies and hospitals were defined.

During March 2024, the communication channel and external responders were revised to reflect current information and relevant personnel in Türkiye Supply Chain.

According to Samsung C & T Corporation's hazardous chemical transportation manual, they should check the emergency response plan twice per year and revise the contact information and detail process as needed. Current internal and external notification is revised during March 2024. The communication channel and external responders were revised to reflect current information and relevant personnels in Türkiye Supply Chain. should check the emergency response plan twice per year and update the contact information and detail process as needed. Current internal and external notification was updated during April 2019 year to include the changes as one road transporter in Korea and operator of trans-loading and storage facility in Mexico.

The should check the emergency response plan twice per year and update the contact information and detail process as needed. Current internal and external notification was updated during April 2019 year to include the changes as one road transporter in Korea and operator of trans-loading and storage facility in Mexico.

Finding: Is the operation in full compliance, substantial compliance, or non-compliance with Production Practice 3.3? Explain the basis for the finding.

- The operation is in full compliance.

ICMC Türkiye anuary8

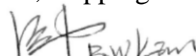
Transport Practice 3.4

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

The operation is **X in full compliance with** **Standard of Practice 3.4**
 in substantial compliance
 not in compliance with

The Samsung C & T Corporation prepared the emergency response plan appropriate to the overall emergency cases possibly expected in Türkiye Supply Chain. And in the sodium cyanide handling manual, the remediation as recovery and protect for released sodium cyanide, decontamination of soil and water, control and disposal of wastes etc. were defined. The sodium cyanide handling manual as pocket book was informed to roadway transporters, shipping company and ports.

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According to sodium cyanide handling manual, the prohibit of the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat sodium cyanide that has been released into surface water was defined.

Transport Practice 3.5

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

The operation is **X in full compliance with**
 in substantial compliance **Standard of Practice 3.5**
 not in compliance with

According to the Samsung C & T Corporation's hazardous chemical transportation manual, they should review the adequacy of emergency response plan twice per year and revise the contact information and detail process with the reflection of changes in Türkiye Supply Chain. And after the check, actual incident and mock emergency drill, they should evaluate and revise the plan as needed. The emergency response plan was reviewed and revised during March 2024. The communication channel and external responders were revised to reflect current information and relevant personnels in Türkiye Supply Chain.

According to the Samsung C & T Corporation's hazardous chemical transportation manual, they should do the mock emergency drill once per year. The mock emergency drill was implemented in their office during March 2024. The mock emergency drill simulated cyanide exposure of employee and release to land and surface water. They checked the overall process and adequacy of emergency response plan and recorded the results. And also the Samsung C & T Corporation Mining Materials Group member have participated the emergency mock drill and training conducted every year by sodium cyanide manufacture's Ulsan Plants.

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Summary of Due Diligence Investigations

1. Background of due diligence investigation

1) Inability as consigner for ports and shipping company lead to ICMC implementation and certification

The Türkiye Supply Chain includes sodium cyanide roadway transporters, ports and shipping company as below.

- (1) Sodium cyanide manufacture : TaeKwang Industrial Co., Ltd. and TongSuh Petrochemical Co., Ltd. Ulsan Plants in Korea.
- (2) Roadway transportation by truck and trailer from sodium cyanide manufactures in Ulsan Plants to Pusan New Port in Korea : Hae Dong Logistics and Bukwang Logistics Co., Ltd.
- (3) Marine transportation from Pusan New Port in Korea to Mersin Port and Izmir Port in Türkiye : MSC
- (4) Roadway transportation from Mersin Port and Izmir Port to customer mining sites in Türkiye : TO-PET A.S.

As consigner the Samsung C&T Corporation controls overall Türkiye Supply Chain and will choose ICMC certified subcontractors or lead the ICMC implementation and certification to sodium cyanide manufactures, roadway transporters, ports and shipping company. So they successfully have chosen ICMC certified subcontractors as TaeKwang Industrial Co., Ltd., TongSuh Petrochemical Co., Ltd., Hae Dong Logistics, Bukwang Logistics Co., Ltd. and TO-PET A.S. However they can't choose the ICMC certified ports and shipping company. They can't lead the ports and shipping company ICMC implementation and certification due to their inability to affect the operating practices. So the Samsung C&T Corporation planned and implemented the due diligence investigation for ports and shipping company as required by ICMC.

2) Scope of due diligence investigation

The due diligence investigation was implemented for Pusan New Port in Korea, shipping company MSC, Mersin Port and Izmir Port in Türkiye.

2. Progress of due diligence investigation

1) Development of checklist

The Samsung C&T Corporation reviewed the ICMC requirements, IMDG Code, Türkiye Supply Chain, property of sodium cyanide and information from TaeKwang Industrial Co., Ltd. and TongSuh Petrochemical Co., Ltd. They have developed checklist for due diligence investigation applicable to the control of sodium cyanide in interim storage areas of ports and marine transportation.

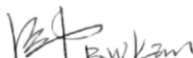
2) Nomination of investigation team leader and member

Considering the work experience and knowledge of ICMC, General Manager of Mining Materials Group nominated team leaders and members for due diligence investigation.

3) Scheduling of due diligence investigation

They planned the due diligence investigation for Pusan New Port in Korea, shipping company MSC, Mersin Port and Izmir Port in Türkiye during May 2024.

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Name of Supply Chain Operator

Lead Auditor Signature

Date

4) Implementation of due diligence investigation

The Samsung C&T Corporation implemented due diligence investigation as planned during May 2024. They used the checklist and recorded the investigation results in checklist. After the investigation, they issued the completed checklist to ports and shipping company and requested corrective actions for nonconformity and opportunity for improvement. The Samsung C&T Corporation checked the action results and confirmed that corrective actions for the nonconformity and opportunity for improvement were completed.

3. Results of due diligence investigation

The Samsung C&T Corporation have developed and used the checklist for due diligence investigation. And record the investigation results in checklist.

1) Pusan New Port in Korea including shipping company MSC

(1) Due diligence investigation results

Investigation Area : Storage, loading, unloading and marine transportation activities
Investigation Item : Storage area control, responsible personnel, emergency plan, mock drill, equipment control and training
Investigation Date : 13 May 2024

(2) Conclusion

According to the due diligence investigation results, the Samsung C&T Corporation concluded that the Pusan New Port and shipping company MSC comply with ICMC, IMDG and national legal requirements.

2) Mersin Port in Türkiye

(1) Due diligence investigation results

Investigation Area : Storage, loading and unloading activities
Investigation Item: Storage area control, responsible personnel, emergency plan, mock drill, equipment control and training
Investigation Date : 22 May 2024

(2) Conclusion

According to the due diligence investigation results, the Samsung C&T Corporation concluded that the Mersin Port comply with ICMC and national legal requirements.

3) Izmir Port in Türkiye

(1) Due diligence investigation results

Investigation Area : Storage, loading and unloading activities
Investigation Item: Storage area control, responsible personnel, emergency plan, mock drill, equipment control and training
Investigation Date : 23 May 2024

(2) Conclusion

According to the due diligence investigation results, the Samsung C&T Corporation concluded that the Izmir Port comply with ICMC and national legal requirements.

4. Review of the due diligence investigation results by ICMC audit team

During the ICMC certification audit during June 2024 for Türkiye Supply Chain, the auditor Mr. BongWon Kim reviewed the due diligence investigation process and the results implemented by Samsung C&T Corporation.

The due diligence investigations included the storage yard in ports and marine transportation. The Samsung C&T Corporation comprehensively implemented the due diligence investigations for the ports and marine transportation as below;

- Study and develop checklist applicable to sodium cyanide storage and transportation.
- Nominated competent personnel as due diligence investigation team leaders and members.
- Implement due diligence investigation with checklists and record the results.

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- Issue corrective actions for a few nonconformity and opportunity for improvement identified during the due diligence investigation.
- Checked corrective action results

The due diligence investigations concluded that the ports and shipping companies in Türkiye Supply Chain have appropriate measures in place for safe management and transport of cyanide. The audit team finally concluded that the due diligence investigations for Türkiye Supply Chain implemented by Samsung C&T Corporation were comply with ICMC requirements.

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