ICMI CYANIDE CODE
SUMMARY AUDIT REPORT
CERTIFICATION AUDIT

CYANIDE TRANSPORTATION

TO-PET A.Ş.

Petrol Ürünleri Dağıtım ve Pazarlama Sanayi Ticaret Anonim Şirketi

Çanakkale Asfalti No: 567/1 Buruncuk
Menemen, İzmir - 35660, Turkey

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CONSULTING o TRAINING o AUDITS o CERTIFICATION o VERIFICATION

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ISO 9001, ISO 14001, ISO 50001, ICMC

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WEITNAU 87480 - GERMANY

(Signature Lead Auditor Dr. Steinweg)

Name of Cyanide Transportation Facility:	TO-PET A.Ş. Petrol Ürünleri Dağıtım ve Pazarlama Sanayi Ticaret Anonim Şirketi
Name of Facility Owner:	TO-PET A.Ş. Petrol Ürünleri Dağıtım ve Pazarlama Sanayi Ticaret Anonim Şirketi
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TO-PET A.Ş., which began operations in 1999 with fuel sales and the transportation of hazardous goods, is today one of the largest hazardous materials transport companies in Turkey with a clearly defined corporate identity. The company supplies fuel to various industries and provides hazardous goods transportation services, primarily involving fuels, sodium cyanide, chemicals, and explosives.

In the fuel sector, two Shell fuel stations—one in Izmir and one in Ankara—continue to provide fuel sales services to commercial customers and vehicles in cooperation with Shell premium dealers.

TO-PET Logistics, a leading company in hazardous goods logistics in Turkey, acts as Shell's preferred contract carrier and handles fuel transportation for Shell and TO-PET A.Ş., as well as the transportation of sodium cyanide, chemicals, and explosives for the mining sector in Turkey.

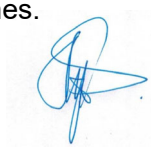
Headquartered in Bayraklı, Izmir, with truck parking facilities in Izmir Pınarbaşı, on the Anatolian side of Istanbul, in Ankara, and in Mersin, the company provides hazardous goods logistics services throughout Turkey with a fleet of 53 company-owned vehicles equipped in accordance with ADR standards and a driver team trained and certified under SRC5 requirements.

Through logistics operations carried out in compliance with ADR standards, TO-PET A.Ş.'s logistics division ensures the transport of sodium cyanide to numerous mines in Turkey in accordance with applicable safety and environmental requirements.

Having provided hazardous goods transport services since 1999, TO-PET A.Ş. began offering sodium cyanide logistics services in 2015 by employing an experienced and trained team together with fully equipped ADR-compliant vehicles from a company that had transported sodium cyanide to gold mines in Turkey for more than ten years before ceasing its logistics activities.

As a preferred carrier for Shell in the field of hazardous goods transport, TO-PET A.Ş. maintains training and certification programs for its drivers and operates a fleet of ADR-compliant vehicles for sodium cyanide transportation.

With a fleet of 53 ADR-compliant vehicles and drivers holding SRC5 licenses, TO-PET A.Ş. operates 30 vehicles and 3 escort vehicles dedicated to sodium cyanide transport. The company provides logistics services to international companies such as Cyplus, Samsung, Beecom, and Hebei, transporting more than 10,000 tons of sodium cyanide annually to several mines in Turkey, including the Tüprag, Anagold, and Koza gold mines.



(Signature Lead Auditor Dr. Steinweg)

Based in part on audit results conducted by ICMC and Shell since 2011, as well as certifications under ISO 9001, ISO 14001, and OHSAS 18001 (now ISO 45001), the company provides logistics services for critical materials in accordance with local and international standards.

TO-PET Logistics continues to provide sodium cyanide transport services for gold mines in Turkey, particularly for the Tüprag Gold Mine (Eşme, Uşak), the Anagold Gold Mine (İliç, Erzincan), and the Koza Gold Mines (Bergama, Eskişehir, Kayseri, Gümüşhane).

Commercial fuel sales and transport services are offered to logistics companies engaged in land and sea transportation. Tax-exempt fuel transport services are provided to companies engaged in maritime freight transport.

TO-PET provides distribution services to companies in the logistics sector, ranging from city centers to remote construction sites.

The company provides logistics services in accordance with European standards (in particular ADR) and specializes in the transportation of hazardous materials and chemicals, as well as in supplying the chemical industry with fuels.

Since November 2019, TO-PET has held its own independent certification as an ICMC-registered cyanide transporter. This certification has been maintained without interruption.

According to company management, TO-PET A.Ş. has not experienced any incident in the past that would have been reportable to ICMI.

For several years, TO-PET A.Ş. has held and continues to maintain internationally recognized certifications that form an essential basis for hazardous goods transport: ISO 9001, ISO 14001, and ISO 45001.

For all cyanide transports, TO-PET A.Ş. cooperates with the nationwide emergency response service provider Hydra/Meke, which is involved in all cyanide transports taking place in Turkey—not only those carried out by TO-PET A.Ş. These transports may be organized by mine operators, other consignors, or competitors of TO-PET A.Ş. Hydra/Meke has relevant experience in this field.

Key subcontractors engaged by TO-PET in the cyanide business and supporting compliance with Code requirements include the company Meke as well as workshops responsible for the maintenance and repair of trucks and trailers. These subcontractors were included on a sample basis in the audit process, in particular and in detail the emergency response service provider Meke.

The material containers (typically 20 wooden boxes in a 20-foot container and, in very rare cases, SLS containers), each containing approximately 20 tons of solid cyanide, arrive at a Turkish port. They are unloaded there by the respective port operator and may be temporarily stored on the operator’s premises if required.

TO-PET A.Ş. assumes responsibility only at the moment the containers are loaded onto its own trailer. The containers are then transported in escorted convoys directly to the respective mine in all cases. The one-way distance from port to mine can be up to 738 km in the maximum case (see SP001 in the following table). In the minimum case (SP008), the distance is approximately 95 km. As a result, overnight stops at selected and qualified parking areas occur on a regular basis.

Empty SLS containers are transported back via the same route and in the same manner (including proper labeling) and are only opened upon arrival at the cyanide manufacturer’s site.

As of the time of the audit (February 2026), the following 17 routes within Turkey are actively served for the transport of sodium cyanide:

SP 001 Anagold Gold Mine at Mersin Port

SP 002 Anagold Gold Mine at Trabzon Port

SP 003 Mersin Port Sivas Demirexport Gold Mine

SP 004 Izmir Port, Sogut, Bilecik, Gubretas Gold Mine

SP 005 Izmir Port, Bergama, Ovacik, Koza Gold Mine

SP 006 Izmir Port, Eskisehir Kaymaz Koza Gold Mine

SP 007 Mersin Port, Kayseri Himmetdede Koza Gold Mine

SP 008 Trabzon Port, Gümüşhane Mastra Koza Gold Mine

SP 009 Mersin Port, Kayseri Develi Öksüt Gold Mine

SP 010 Izmir Port Sindirgi Polymetal Gold Mine

SP 011 Izmir Port Tümad Gold Mine - Balıkesir İvrindi

SP 012 Izmir Port Tümad Gold Mine - Çanakkale Lapseki

SP 013 Pendik Port - Tüprag Gold Mine

SP 014 Izmir Port - Tüprag Gold Mine

SP 015 Izmir Port, Zenit Gold Mine, Balikesir Bigadiç

SP 016 Izmir Port - Zenit Gold Mine, Kütahya

SP 017 Mersin Port - Gümüştaş Gold Mine Ulukışla

Road assessments have already been conducted for each and every of these routes.

(Signature Lead Auditor Dr. Steinweg)

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 production 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.

Audit Company …….	LULU Intelligent Organization
Audit Team Leader ……..	Dr. Benno Steinweg
Email ……..	Benno.Steinweg@hs-kempten.de
Names / Signatures of other auditors …	n/a
Date of audit ……..	February 16 - 17, 2026

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.

(Signature Lead Auditor Dr. Steinweg)

PRINCIPLE 1 – TRANSPORT

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

<u>Transport Practice 1.1:</u> Select cyanide transport routes to minimize the potential for accidents and releases.

This operation is	☒	in full compliance with	Transport Practice 1.1
	☐	in substantial compliance with	
	☐	not in compliance with	

Summarize the basis for this Finding:

The operation TO-PET A.Ş. is in full compliance with Transport Practice 1.1; cyanide transport routes are selected to minimize the potential for accidents and releases.
The transporter implements processes and procedures to select transport routes that minimize both the likelihood of accidents and the potential impacts of accidents and/or releases. To achieve this, the company has worked in the past—and continues to work—with the mines, the cyanide suppliers, and the emergency response provider Meke to determine and establish the most appropriate transport routes.
The objective is that the selected route between the relevant port and the mine site represents the most direct route using main roads in good condition. Hazards associated with the routes are documented within the route risk assessments. TO-PET A.Ş. prepares these route risk assessments, which form the basis for determining the route, using a standard procedure. The following factors, among others, are considered as part of the route selection:

- Road structure and road condition
- Emergency lane / shoulder availability
- Trip planning and trip duration
- Terrain and field structure
- Natural events (e.g., earthquakes)
- Risks associated with reduced visibility
- Climate conditions
- Visibility conditions
- Population density
- Accident likelihood (black spots and hot spots)
- Environment
- Communication
- Security (e.g., potential attacks by criminal groups)
- Traffic density – road risks – speeds, livestock and agriculture
- Availability of immediate support / emergency assistance

Ongoing monitoring of the routes is carried out through logs prepared for each container transfer, and these are incorporated into the TO-PET A.Ş. route risk assessments. In addition, TO-PET A.Ş. conducts an annual trip along the route to review current conditions. Drivers, convoy supervisors, and the Emergency Response Team (ERT) are trained, regularly briefed, and informed about any changes in route conditions.
TO-PET A.Ş. has documented the measures taken to address the risks identified for the selected route within the route risk assessments. These include, among other things, information on distances, speeds, and hazards along the route, reduced speeds at certain crossings, no overtaking on bends, and the maintenance of safe driving practices, which are now also supported by technical measures (driver monitoring systems).

(Signature Lead Auditor Dr. Steinweg)

Where necessary, the transporter seeks input from stakeholders in developing risk management measures. It is noted that the selected routes are the main transport routes with well-developed roads between the relevant port and the mine site. TO-PET A.Ş. maintains contact with the port and the mine site along the route, and relevant information is used to inform the route selection process. According to TO-PET A.Ş. , there are currently no particular or unusual safety or security concerns; however, should such issues arise, the plans would be reviewed and modified accordingly.
For each trip, cyanide is normally transported by a minimum of five trucks and two escort vehicles. Drivers receive appropriate training (ADR, chemicals—including cyanide—and emergency response). Additional security measures for the material include the use of locked and sealed containers, locking plates, convoy monitoring by escort vehicles at the front and rear, and informing the mine sites of the expected arrival times.
The mines and/or the cyanide suppliers have contracted Meke as a subcontractor for emergency response planning; this company has provided corresponding support and training during the current re-certification period and continues to do so. In addition, TO-PET A.Ş. has established its own Emergency Response Team, which performs comparable functions for other types of transport as Meke does for cyanide transport.

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.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 1.2

Summarize the basis for this Finding:

The operation TO-PET A.Ş. is in full compliance with Transport Practice 1.2; it is ensured that personnel operating equipment for the handling and transport of cyanide can perform their duties with minimal risk to communities and the environment.

TO-PET A.Ş. only employs trained and qualified drivers to operate its vehicles. In Turkey, there is a legal requirement for drivers to hold both a heavy goods vehicle driving license and an ADR certification for the transport of dangerous goods. TO-PET A.Ş. maintains records of all drivers employed, including the following documentation:

- Confirmation about personal integrity from a government authority
- Contract with TO-PET A.Ş.
- Driver identification
- Driving license
- ADR training certificate
- Residency information
- Medical report
- Training records, including evidence that the driver has understood the training content

A range of training courses, for which TO-PET A.Ş. also maintains records, are provided to drivers, including:

- HSE induction
- Emergency response
- Defensive driving
- ADR training (transport of dangerous goods)
- Cyanide hazard awareness

All personnel operating cyanide handling and transport equipment have been trained to perform their duties in a manner that minimizes the potential for cyanide releases and exposures. A sample of drivers and members of the Emergency Response (ER) Team were interviewed regarding their knowledge of procedures and practices related to cyanide. Their responses demonstrated a good level of understanding and relevant experience.

The transport company implements procedures to ensure that contractors are aware of the applicable Code requirements and comply with those requirements. During the current recertification period, a contractor (Meke) has supported the Emergency Response Team and provided corresponding support and training.

Transport Practice 1.3: Ensure that transport equipment is suitable for cyanide shipment

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 1.3
- ☐ not in compliance with

Summarize the basis for this Finding:

The operation TO-PET A.Ş. is in full compliance with Transport Practice 1.3; it is ensured that the transport equipment is suitable for cyanide shipments.

TO-PET A.Ş. uses only equipment that is designed and maintained to operate within the parameters of the cyanide loads it handles. Cyanide manufacturers and suppliers limit the amount of cyanide shipped to the mine to 20 tonnes per container. This also applies in particular to the SLS container shipping method. This is clearly indicated in the chain-of-custody documentation provided with each shipment.

The weight of the packaging (approximately 1.1 tonnes), the container (approximately 3 tonnes), and the trailer (approximately 3 tonnes) together with the 20 tonnes of cyanide results in a total weight of approximately 27.1 tonnes.

The equipment used to transport cyanide consists of road vehicles (tractor units and trailers) that were purchased according to specifications suitable for the cyanide transport task. These include tractor units and trailers designed to carry one container per trailer.

The capacity of the trailer is 33.5 tonnes, which is significantly higher than the combined weight of the cyanide, packaging, and container (27.1 tonnes). The tractor units have a maximum permissible capacity of 44 tonnes.

TO-PET A.Ş. holds registration certificates for all tractor units and trailers and maintains records of

vehicle specifications. The maintenance history is documented in vehicle logbooks kept with each vehicle. The vehicles are maintained by four workshops certified by the OEM suppliers of the equipment (Daimler Truck, MAN, Tirsan, and Krone). During the audit, a spot inspection of one workshop confirmed the professional execution of a maintenance task on a truck.

Before the start of each convoy (and also at certain points during the trip), vehicles, trailers, and loads are inspected to ensure they are safe for operation. In addition, vehicles are required to complete an annual TÜV inspection. Procedures are in place to verify the adequacy of the equipment for the loads to be carried.

TO-PET A.Ş. requires the use of equipment designed and maintained to operate within the parameters of the cyanide loads being transported. The relevant procedures ensure that vehicles are checked both before and during cyanide transport. Furthermore, the specifications of the tractor units and trailers are compatible with the loads being carried.

TO-PET A.Ş.'s maintenance procedure ensures that potential technical issues are identified at an early stage. The responsible manager reviews the relevant maintenance records on a regular basis. The four OEM-certified workshops also operate their own scheduling systems and notify TO-PET A.Ş. of upcoming maintenance appointments well in advance, which also serves their own operational interests.

The Emergency Response Plan also describes the checks that must be performed on emergency response vehicles before and during a convoy. Procedures are in place to prevent overloading of transport vehicles used for cyanide transport. The Driver's Manual includes a specific requirement to prevent overloading. The load carried by each vehicle is always the same and is verified by TO-PET A.Ş. at the start of the convoy, during the ordering process, during convoy planning, and when collecting the cyanide at the port. Daily inspections are conducted during the convoy, and examples from actual convoys were reviewed during the audit. The transport company also has a procedure in place to ensure that subcontractors comply with the requirements of Transport Practice 1.3.

ADR regulations (European regulations for the transport of dangerous goods) require that equipment authorized for transporting hazardous materials be fit for duty and properly maintained and inspected. Authorities regularly conduct roadside inspections throughout all regions of Turkey, verifying valid equipment certifications and proper loading practices.

During the audit, a random check of shipping documentation was conducted. The review of shipping weights and the number of loads or containers confirmed that shipments consistently adhere to the standard weights specified in advance by the shipper and remain well below the capacity limits of the trucks and trailers used.

<u>Transport Practice 1.4:</u> Develop and implement a safety program for transport of cyanide.

This operation is	☒	in full compliance with	Transport Practice 1.4
	☐	in substantial compliance with	
	☐	not in compliance with	

Summarize the basis for this Finding:

The operation is in full compliance with Transport Practice 1.4; a safety program for the transport of cyanide has been developed and implemented.

TO-PET A.Ş. has developed its own procedures and follows these documented procedures to

ensure that cyanide is transported in a manner that maintains the integrity of the manufacturer's packaging. Route risk assessments ensure that transport routes are selected to minimize potential damage to vehicles and the transported cyanide. The routes follow roads of good quality. The vehicles and trailers used by TO-PET A.Ş. are designed to carry the loads safely. Inspections conducted by TO-PET A.Ş. at the start of a convoy and during the convoy also help ensure that the integrity of the manufacturer's packaging is maintained.

Vehicles transporting cyanide are also tracked by TO-PET A.Ş. using a GPS system (LojiSoft). Continuous monitoring of both the convoy and the driver is maintained during transportation, and in the event of any issue, TO-PET A.Ş. management is informed.

Vehicles and their loads are regularly inspected during the convoy. Waybills and container checklist forms are also provided to the mine site (where they are signed upon receipt) and retained by TO-PET A.Ş. These confirm that the material has been received in proper condition. Hazard labels and signage are used to identify the shipment as cyanide in accordance with local regulations.

All cyanide is delivered by sea to the relevant port in Turkey. Containers arrive with the appropriate dangerous goods placards already attached by the supplier in accordance with the International Maritime Dangerous Goods (IMDG) Code. These placards remain on all sides of the containers until they are unpacked at the mine sites. These provisions, together with the attachment of the IMO marine pollutant label, ensure that all consignments comply with international standards.

The placards used on containers include, among other things, the relevant UN numbers and the Hazchem classification. The presence of each placard is checked at the port and during the journey. Placards (which are normally covered when not in use) are also present on the trucks and trailers and are uncovered or made visible when cyanide loads are transported.

The safety program implemented by the transport company includes, among other elements:

- Vehicle inspections prior to every departure or shipment
- A preventive maintenance program
- Limitations on drivers' operating and working hours
- Procedures to prevent loads from shifting
- Procedures to modify or suspend transportation if conditions require it
- A drug and alcohol abuse prevention program
- Retention of records documenting that the above activities have been conducted

TO-PET A.Ş., together with Meke, implements a safety program for cyanide transport that includes, where applicable, the following aspects.

Vehicle inspections are conducted before each departure. Vehicle inspection forms are completed for each individual transport during the convoy. These were reviewed during the audit and are archived for all cyanide transports. This includes pre-departure inspections of emergency response vehicles and equipment, as well as checklists completed by Meke and TO-PET A.Ş.. The inspection of the sea containers containing the cyanide is also included.

TO-PET A.Ş. has implemented a preventive maintenance program and uses an electronic system that flags maintenance requirements in advance.

Driver working hours are monitored by TO-PET A.Ş.. The relevant requirements are communicated during training, at the start of the convoy, and within the driver information packs. Vehicles are also equipped with a GPS system that monitors operating hours.

Solid cyanide is loaded into the sea containers by the supplier. Vehicles and trailers are designed so that these containers can be securely fixed. At the relevant Turkish port, containers are secured to the vehicles using twist locks designed and constructed in accordance with international transport standards. These are checked at the start of the convoy and daily during the convoy.

The TO-PET A.Ş. Manager, the Emergency Response Coordinator, and the Convoy Leader are authorized to modify transport operations and consult with drivers and management during a convoy if necessary. Discussions with TO-PET A.Ş. confirmed that such communication takes place. However, changes to the route are very rare and would normally only occur due to road or weather conditions. Any such events would be properly documented.

TO-PET A.Ş. also has a drug and alcohol abuse prevention program in place. The policy applies to all drivers and is addressed during cyanide-related training. In addition, alcohol testing is carried out at the start of each trip.

Records are maintained and reviewed for all relevant elements as described in the findings above. The corresponding documentation is retained by TO-PET A.Ş.

The transport company also has procedures in place to ensure that subcontractors are informed of the Code requirements related to Transport Practice 1.4 and comply with them..

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

This operation is	☒	in full compliance with	Transport Practice 1.5
	☐	in substantial compliance with	
	☐	not in compliance with	

Summarize the basis for this Finding:

TO-PET A.Ş. does not ship cyanide by sea or by air.

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

This operation is	☒	in full compliance with	Transport Practice 1.6
	☐	in substantial compliance with	
	☐	not in compliance with	

Summarize the basis for this Finding:

The operation is in full compliance with Transport Practice 1.6; track cyanide shipments to prevent losses during transport.

Vehicles transporting for TO-PET A.Ş. have several means to communicate with TO-PET A.Ş., with emergency responders and with the relevant mining operation. Vehicles have the means to communicate with the transport company, the mining operation, the cyanide producer/distributor and emergency responders. Each convoy has a lead and end vehicle which keep the convoy in view during the entire route. In the event of an issue one of the convoy team would initially follow the Emergency Response calling procedure and alert the relevant parties (depending on the incident).

In addition, each driver within the convoy has a mobile phone. Telephone numbers are provided at the start of the convoy so drivers can get in touch with relevant persons in the event of an issue although drivers are not allowed to use mobile phones whist driving. All vehicles transporting cyanide are also fitted with GPS and are tracked live (including with cameras on the road and inside the cab). Each vehicle is fitted with cameras and there is an emergency button in the vehicle that can be pressed to send a warning signal to TO-PET A.Ş. emergency communication lines.

There are no black spots for the GPS or mobile phone system for the routes that TO-PET A.Ş. is currently involved with. The communication equipment is regularly tested to ensure that it functions correctly and is checked prior to the start of each convoy. Mobile phone and GPS connection is also tested during the annual check of each route and any changes result in an update to the route risk assessment.

TO-PET A.Ş. have developed procedures to track the progress of cyanide shipments including the use of LojiSoft tracking software, completion of Journey Management plans used to track actual timing of starts and stops. These requirements are also noted in Driver's Manual, Drivers Instructions and Job Profiles. Procedures also include:

- Advising the mine when shipments leave the departure point and estimated time and date of arrival of the consignment
- Logging of convoy movements using telephone calls from the mobile phones at convenient stop points
- GPS (which is actively monitored) is also used to track progress along the routes

For each convoy, there is a designated departure time and arrival time (including for breaks and overnight stays) and every journey is logged to monitor progress (departure, interim stops, overnight stops etc). All logs are documented (Journey Management Plans) and records maintained.

The transporter uses inventory controls and chain of custody documentation to prevent the loss of cyanide during shipment. Shipments are inspected at the start of the convoy and at periods during the convoy. These include visual integrity checks.

Chain of custody forms and Container Inspection Forms are signed by the mine and also confirm that the material has been received in an effective state. Examples of this documentation was observed during the audit. Shipping records indicate the amount of cyanide in transit and Materials Safety Data Sheets are available during transport.

All vehicles carry a driver's record which includes a copy of the Material Safety Data Sheet. Examples were observed during the site visit both within the Delivery records and within vehicles.

TO-PET A.Ş. provided a number of documents indicating the amount of cyanide involved in shipments during the last three years. The transport company has a implemented a procedure to ensure that its sub contractors are aware of the applicable Code requirements of Transport Practice.

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.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 2.1
- ☐ not in compliance with

Summarize the basis for this Finding:

Transport Practice 2.1 is not applicable as TO-PET A.Ş. does not undertake any interim storage of cyanide.

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.

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 3.1
- ☐ not in compliance with

Summarize the basis for this Finding:

The operation is in full compliance with Transport Practice 3.1; detailed Emergency Response Plans (ERPs) have been prepared for potential cyanide releases.

The transporter has an Emergency Response Plan. However, in practice the cyanide suppliers and/or the mines engage the emergency response provider Meke to accompany and support each individual cyanide transport. The Emergency Response Plan of TO-PET A.Ş. applies both to the activities of Meke as the emergency response contractor for TO-PET A.Ş. and to the activities of TO-PET A.Ş. itself as the transporter. In addition to cyanide transport, the transporter is also involved in the transport of other hazardous materials. Therefore, the company has a strong operational interest in maintaining its own emergency response teams and equipment to support non-cyanide hazardous materials transport. However, for cyanide transport operations Meke continues to be engaged as the sole and responsible emergency response provider. The internal Emergency Response Plan of TO-PET A.Ş. reflects this arrangement and addresses its role in non-cyanide hazardous materials transport.

Both ERP documents include, among other things, the following sections:

- Purpose and scope
- Roles and responsibilities
- Types of actions
- Classification of emergencies
- Training
- Equipment and maintenance
- Communication
- Emergency response operations and services
- Attachments – including route risk assessments, contact details, Safety Data Sheets (SDS), etc.

a) Both emergency response plans (Meke and TO-PET A.Ş.) are appropriate for the selected transportation route. Both documents contain sections specifically aligned with the selected transport route, including route risk assessments, contact details, and Safety Data Sheets. The plans include communication procedures for the specific route and consider possible release scenarios and their management.

b) The plans consider the physical and chemical form of cyanide. The emergency response plans describe sodium cyanide in briquette form and include the corresponding Safety Data Sheet (SDS) for sodium cyanide briquettes.

c) The plans consider the method of transport. Transport from the port to the mine is carried out exclusively by road. The plans include requirements for both the vehicle and the driver, as well as requirements for vehicle inspections and safety checks. The descriptions of key roles in the event of an accident also include the duties and responsibilities of the drivers. The plans consider both “wooden boxes with liners in containers” and “SLS containers” as transport configurations.

d) The plans consider all aspects of the transport infrastructure relevant to the activities of TO-PET A.Ş. All transport activities are conducted by road. The route risk assessments provide information on road conditions (e.g., surface type, number of lanes, and gradients), specific hazards at various points along the route, and precautionary measures such as applicable speed limits.

Emergency contact numbers are included in the emergency contact list within the plans. Drivers are also provided with training regarding the hazards associated with the transported materials and related risks.

e) The plans consider the design of the vehicles being used. The emergency response plans state that the vehicles used are trucks with 20-foot trailers. The plans also describe that solid cyanide is packaged by the manufacturer in heavy-duty plastic bags inside nylon bulk bags, which are placed in UN-approved wooden IBCs or drums. These are then placed in metal shipping containers for transport. The transport method using SLS containers is also considered.

The plans further describe that the containers are loaded through the rear door and subsequently placed onto the vehicle. In the event of an accident or incident, drivers are instructed to inspect the cargo for signs of damage or leakage and communicate this information to emergency responders. The containers are secured on the trailer using twist locks to prevent movement during transport.

The plans also include descriptions of appropriate response actions for anticipated emergency situations. The emergency response plans consider a range of emergency scenarios and classify them into three response levels (Level 1 to Level 3), with Level 3 representing the most severe incidents. The documents include sections describing specific response actions and general procedures to be considered during an incident, including:

- Securing the incident area
- Establishing the incident zone
- Containing or isolating spills
- Use of covers
- Chemical treatment
- Evaluation of release scenarios
- Consideration of weather conditions
- Measures in the event of potential contamination of waterways

The plans also include various release scenarios and corresponding response recommendations.

Furthermore, the plans define the roles of external responders, medical facilities, and affected communities within the emergency response procedures. The emergency response plans also include a communication plan in the event of an incident, including telephone numbers for emergency services and local hospitals. The role of medical providers is also described. For major incidents, the plans also consider the possibility of calling upon national and international experts and response teams, with the relevant contact details included. The plans also clearly identify the roles of government authorities (including police, fire services, and ambulance services) as well as the responsibilities of the TO-PET A.Ş. and Meke emergency response teams.

<u>Transport Practice 3.2:</u> Designate appropriate response personnel and commit necessary resources for emergency response

This operation is	☒	in full compliance with	Transport Practice 3.2
	☐	in substantial compliance with	
	☐	not in compliance with	

Summarize the basis for this Finding:

The operation is in full compliance with Transport Practice 3.2; appropriate response personnel have been designated and the necessary resources for emergency response have been committed.

The transporter provides initial and refresher emergency response training for relevant personnel. Meke provides cyanide awareness training for TO-PET A.Ş. drivers and the supervisor, as well as for the emergency response teams of Meke and TO-PET A.Ş. Training records were reviewed to confirm this. In addition, HSE training is provided to all involved personnel, including basic job training, use of personal protective equipment (PPE), working with chemicals, field training, use of equipment, technical safety, hazardous materials, and environmental protection. Refresher training is conducted annually for all relevant staff. Training calendars are developed by Meke and TO-PET A.Ş. for their respective personnel.

Interviews were conducted with staff from Meke and TO-PET A.Ş. These confirmed that personnel operating cyanide transport equipment or involved in the convoys are appropriately trained and have a good understanding of what actions to take in the event of an emergency. In addition, TO-PET A.Ş. evaluates the effectiveness of the training in a structured and traceable manner (i.e., whether the employee has understood the training and is capable of applying it in practice). Where necessary, additional training sessions are scheduled.

The Emergency Response Plans include descriptions of the specific duties and responsibilities of personnel during an emergency. The plans identify the key roles and responsibilities for the following positions:

- Drivers
- External responders (police, firefighters, ambulance services)
- Emergency response teams of TO-PET A.Ş. and Meke

Specific duties are also described within the procedures for the various emergency scenarios. These requirements are included in the training programs. During interviews with staff from TO-PET A.Ş. and Meke, personnel were asked about their roles, and their responses were consistent with the documented procedures.

A list of all emergency response equipment required during transport and along the transportation route is available. Both the Meke and TO-PET A.Ş. Emergency Response Plans include a list of equipment that must be available in the emergency response vehicles that may accompany the convoy. The listed emergency response equipment includes, among other items:

- HCN detectors
- First aid kit
- Stretcher
- Alcohol testing kit
- Lighting equipment
- Fire extinguishers
- Sample bottles
- Generator
- Ladder
- Plastic drums
- Tools
- Respirators with ABEK filters and full-face masks
- Self-contained breathing apparatus (SCBA) and O_2 cylinders
- Decontamination equipment
- Chemical-resistant gloves and protective suits
- Polyethylene covers of various sizes
- Chemical absorbents (pads and booms)
- Chemical-resistant boots
- Traffic control equipment
- Information material on the cyanide antidote (for the acetone cyanohydrin antidote)

This equipment is regularly inspected, including before and after each cyanide transport convoy. Inspections also include checking the oxygen pressure in the cylinders. It should be noted that neither the transport company nor the emergency response team carries a cyanide antidote, as in Turkey such treatment may only be administered by medical professionals.

During the audit, an emergency response vehicle and its equipment were inspected and were found to contain all items listed on the checklist. The respirator cartridges were within their validity period, the HCN monitors were properly calibrated, and the oxygen cylinders were fully charged.

In accordance with the emergency response plan, the equipment is checked monthly using a checklist. The same checklist is also used to verify the equipment prior to the start of each convoy. The transporter has the necessary emergency response and occupational health and safety equipment, including personal protective equipment, available during transport. Checklists are used to confirm that the required equipment is present in the convoy vehicle before the convoy begins. Transport personnel receive initial training as well as periodic refresher training in emergency response procedures, including the implementation of cyanide procedures.

Interviews with truck and convoy vehicle drivers confirmed that they understand the requirements set out in the plans. Procedures have been implemented to inspect emergency response equipment and ensure its availability, as required under Criterion 3.2.3. The transport company has also clearly defined the roles and responsibilities of its subcontractor during an emergency response situation.

The findings demonstrate that the TO-PET A.Ş. subcontractor (Meke) fully performs the required emergency response duties.

<u>Transport Practice 3.3:</u> Develop procedures for internal and external emergency notification and reporting

This operation is	☒	in full compliance with	Transport Practice 3.3
	☐	in substantial compliance with	
	☐	not in compliance with	

Summarize the basis for this Finding:

The operation is in full compliance with Transport Practice 3.3; procedures for internal and external emergency notification and reporting have been developed.

Procedures are in place (Emergency Response Plan) together with current contact information (Emergency Communication Chart) for notifying ICMI, the shipper, the receiver/consignee, regulatory authorities, external emergency responders, medical facilities, and potentially affected communities in the event of an emergency. The specific notifications made depend, among other factors, on the severity of the incident.

The Emergency Response Plans (Meke and TO-PET A.Ş.) describe in detail the notification and communication procedures in the event of an incident. The plans include the relevant contact information, including the contact details for ICMI. A list of all internal and external contacts is provided and includes the relevant mine site.

TO-PET A.Ş. (and Meke through TO-PET A.Ş.) maintains contact with the relevant port, the mine site, and hospitals along the transportation route. Meke has a written emergency response plan that clearly defines the roles and responsibilities of external parties. In addition, periodic calls are made to emergency responders to verify that the contact information remains current.

National and local government emergency responders (e.g., Governor's Office, Environmental Authority, Health Department, Police, Fire Department, Ambulance Services, Highways Authority, Coast Guard) use standardized emergency numbers, which remain unchanged and are also included in the contact list (e.g., the nationally standardized number for chemical accidents: 444 5312). Systems and procedures are in place to ensure that internal and external emergency contact information and reporting procedures are regularly updated.

Since the operation's initial ICMC certification on November 13, 2019, no cyanide-related emergencies have occurred.

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

This operation is
- ☒ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Transport Practice 3.4

Summarize the basis for this Finding:

The operation is in full compliance with Transport Practice 3.4; develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

There are procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. Both Meke and TO-PET A.Ş. Emergency Response Plans identify actions to be considered depending on the incident, location and weather conditions. Key actions identified include containment of any spill and clean-up of solid spills. No chemical treatment is recommended in the plans.

The procedures include details to follow in the event of a spill including:

- Protect Yourself
- Alerting
- Secure Area
- Define Hot Zone
- Cover / Contain spilled material
- Use suitable salvage packaging
- No Chemical treatment on spillage site
- Chemical analysis

The ER Plans provide details which guide the clean-up spills process. It is noted that in the case of significant spill events the regulatory authorities will likely take over such activities. The ER Team would arrange for the disposal of cyanide contaminated wastes. In Turkey waste disposal is well structured. There are (Ministry approved) disposal facilities. Documentation and authorizations are strict and would be managed by the ER Team. Temporary waste storage is also possible at the mines also.

The procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. Both plans state that no chemical treatment is allowed on the spillage site. Chemicals are also not to be used to destroy the remaining cyanide instead requiring the use of adsorbing material like sand to clean up the remaining cyanide. In addition, it was confirmed in interviews that training reinforces the idea that such chemicals cannot be used to treat the cyanide.

The plan also identifies external responders who would provide support in the event of an incident.

<u>Transport Practice 3.5:</u> Periodically evaluate response procedures and capabilities and revise them as needed

This operation is	☒	in full compliance with	Transport Practice 3.5
	☐	in substantial compliance with	
	☐	not in compliance with	

Summarize the basis for this Finding:

The operation is in full compliance with Transport Practice 3.5; emergency response procedures and capabilities are periodically evaluated and revised as necessary.

Provisions are in place for the regular review and evaluation of the adequacy of the emergency response plans, and these provisions are implemented. Representatives of Meke and TO-PET A.Ş. confirmed that their emergency response plans are reviewed annually, as explicitly required in the document control procedures. Software applications are used to ensure that these review deadlines are not overlooked. In addition, revisions are made whenever changes occur in the system or operational conditions.

Provisions are also in place for the periodic conduct of mock emergency drills, and these have been implemented and will continue to be carried out. It should be noted that the organization of such drills also depends on the cooperation of the cyanide suppliers and, in particular, the mine sites. In addition, it is often not possible for all drivers to participate in a drill, even when a mine offers the opportunity to conduct one. Mock drills are also included in the training plans.

During the audit, records of emergency drills were reviewed that had been conducted by the teams of Meke and TO-PET A.Ş., as well as by the mine sites. These records included photographic and video documentation of the exercises. The drills covered both cyanide release scenarios and exposure scenarios.

A procedure is in place to evaluate the effectiveness of the emergency response plan following its implementation, and this procedure is applied. The revision records of the emergency response plans of both companies include the publication date, revision number, and a description of the respective changes. The document history shows that several revisions have been implemented over the past three years. The emergency response plan is also reviewed after each mock drill to determine whether any revisions are required based on the results of the exercise.

Since the operation’s certification on November 13, 2019, no cyanide-related emergencies have occurred.