



SUMMARY AUDIT REPORT

International Cyanide Management Code

Toll Resources, Australian Supply Chain, Recertification Audit

Submitted to:

International Cyanide Management Institute

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Distribution List

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Toll Resources Australian Supply Chain

Name of Facility



Signature of Lead Auditor

23 February 2022

Date

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1.0 INTRODUCTION

1.1 Operational information

Name of Transportation Facility:	Toll Global Logistics – Australian Supply Chain
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Toll Resources
Name of Responsible Manager:	Holly Davison, Regional HSE Manager
Address:	24 Young Street, Gladstone
State/Province:	Queensland
Country:	Australia
Telephone:	0437 466 776
Email:	Holly.Davison@tollgroup.com

2.0 CYANIDE TRANSPORTATION

2.1 Toll Resources

Toll Resources (TR) provides transportation of cyanide within the Australian Supply Chain through the use of various divisions and subcontractors. All road transporters operate under TR procedures for transport and are required to have maintenance systems in place that meet TR standards.

TR provides road transportation to customers in Queensland and the Northern Territory and to customers in NSW and Western Australia via other Toll divisions. The TR Australian Supply Chain covers:

- The transportation of solid cyanide within containerised intermediate bulk containers (IBCs) and sparge isotainers, and liquid cyanide in isotainers from Orica Australia Limited's (Orica) Yarwun Production Facility, Australia to the customer mine sites throughout Australia by rail and road.

Orica is certified under the Code as transporters and have systems in place that meet Code requirements. TR implements and maintains their client's systems, tools and procedures where required and has interfaces with Orica systems for their respective client supply chains particularly in relation to emergency response.

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2.2 Audit Scope

The scope of this Audit includes road transportation of cyanide from the manufacturing facilities in Yarwun, Queensland (Orica) to customers within Australia.

The scope of the 2021 Australian Supply Chain audit covers:

Road transportation

- Toll Resources
 - Toll Gladstone, Queensland (Qld)
 - Toll Laverton, Victoria (Vic)
 - Toll Adelaide, South Australia (SA)
 - Toll Kalgoorlie, Western Australia (WA)
 - Toll Tasmania, Tasmania (Tas)
- Subcontractors
 - KJP Haulage, Qld

Road transportation – Transit storage

- Kalgoorlie, WA

Rail transportation – Operators

- Aurizon/Linfox / Linfox
- Pacific National

Rail transportation – Rail heads and sidings

- Mount Miller rail head, Qld
- Acacia Ridge freight terminal, Qld
- Chullora freight terminal, New South Wales (NSW)
- Melbourne freight terminal, Vic
- Adelaide freight terminal, SA
- Kalgoorlie freight terminal, WA

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2.3 Auditors Findings and Attestation

in full compliance with

TR is: in substantial compliance with

**The International
Cyanide Management Code**

not in compliance with


No significant cyanide exposures or releases were noted to have occurred during TR's Supply Chain recertification audit.

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Ed Clerk, Exemplar Global (105995)

Email: eclerk@golder.com.au

2.4 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Ed Clerk	Lead Auditor and Technical Specialist		23/02/2022

2.5 Dates of Audit

The ICMC Recertification Audit was conducted during the following dates:

- Gladstone (Qld) – Tuesday 16 March to Thursday 18 March 2021
- Burnie (Tas) – Thursday 29 July 2021
- Kalgoorlie (WA) – Wednesday 7 April 2021.

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

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3.0 CONSIGNOR SUMMARY

3.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

3.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

TGL is in full compliance with **Transport Practice 1.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

TR has implemented a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases.

TR has a procedure for conducting route assessments that does include the assessment of schools, factories, infrastructure, intersections, towns and city, construction activities, sharp turns and steep gradients, bridges, tunnels, area known for instability, rivers, lakes, speed limits, seasonal weather conditions (snow, ice, flooding, fog) and medical facilities.

The route assessment is documented and used to compile a Journey Management Plan (JMP). This is provided to all drivers, including subcontractor drivers, prior to departure.

TR implements a process to periodically re-evaluate routes used for cyanide deliveries.

As per the Cyanide Management Plan, ongoing reviews of approved routes are conducted. The JMP also includes a section for driver feedback.

TR does document the measures taken to address risks identified with the selected routes. TR has implemented a JMP process that summarises and documents the control measure for the individual route including preparation, unscheduled stoppages and alternative routes.

TR, through collaboration with the supplier and customer, seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. The community is indirectly consulted.

TR has assessed its routes and it considers that no routes require routine additional control measures for security concerns. TR did advise that where winding roads and visibility are a concern it has used a pilot vehicle to caution traffic.

TR does subcontract the transport and handling of cyanide to KJP Haulage in Queensland.

TR does implement a procedure to ensure its subcontractors meet elements 1 through 7. Subcontracted transporters operate under TR procedures and processes and are required to complete TR designated training for cyanide transport. TR audits its subcontractors for compliance against the Code.

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KJP Haulage

KJP Haulage does not Select cyanide transport routes to minimise the potential for accidents and releases. It is the responsibility of KJP to provide drivers and trucks to transport cyanide in accordance with TR's requirements.

Due Diligences – Rail Operators

Aurizon/Linfox

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 23 February 2021. The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

Pacific National

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 3rd March 2021. The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

Due Diligences – Rail Terminals and Sidings

Acacia Ridge Freight Terminal

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 23 February 2021 (Aurizon/Linfox) and 3rd March 2021 (Pacific National). The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

Chullora Freight Terminal

TR conducted compiled a due diligence of the Chullora Freight Terminal on 21 January 2021. The assessment found that the Chullora Freight Terminal meets TR's operational requirements.

Melbourne Freight Terminal

TR conducted compiled a due diligence of the Melbourne Freight Terminal on 25th February 2021. The assessment found that the Melbourne Freight Terminal meets TR's operational requirements.

Mt Miller Rail Head

TR conducted compiled a due diligence of the Mt Miller Freight Terminal on 15th January 2021. The assessment found that the Mt. Miller Freight Terminal meets TR's operational requirements.

Adelaide Rail Terminal

TR conducted compiled a due diligence of the Adelaide Freight Terminal on 13th October 2021. The assessment found that the Adelaide Freight Terminal meets TR's overall operational requirements.

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3.1.2 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.

TGL is in full compliance with **Transport Practice 1.2**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

TR only uses trained, qualified and licensed operators for its transport vehicles. All drivers undertaking cyanide transport must have a government issued current driver's license with relevant category along with mandatory internal training.

All personnel operating cyanide transport equipment are trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

All drivers complete an extensive onboarding training program that covers TR standards and procedures with the following content specific to cyanide transport:

- Cyanide Awareness
- Unloading
- Transport Emergency Response Plan (TERP)

In addition, TR operates a buddy system to familiarise new drivers with the route and check that driving skill and behaviour aligns with TR standards.

TR does implement a procedure to ensure its subcontractors meet elements 1 through 2. Subcontracted transporters operate under TR procedures and processes and are required to complete TR designated training for cyanide transport. TR audits its subcontractors for compliance against the Code.

KJP Haulage

KJP Haulage drivers must meet TR training, qualification and licensing requirements prior to transporting cyanide. Licence details for KJP Haulage's drivers are recorded and tracked in TR's systems. The training of KJP Haulage's drivers is also recorded and tracked in TR's systems.

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3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

TGL is in full compliance with **Transport Practice 1.3**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

The operation only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide.

The operation maintains a fleet of prime movers and trailers to transport cyanide freight containers, liquid isotainers and sparge isotainers. Equipment specifications are recorded by TR and the equipment is allocated by TR based on the design specifications of the equipment and its ability to carry the specified load.

TR vehicles are subject to a preventative maintenance program. All maintenance must be completed by competent persons and supported by documented records. All maintenance files are recorded in the Toll UNIBIS database system. TR also utilise documented pre-departure checks that require drivers to comment on the condition of the vehicle.

There are procedures to verify the adequacy of the equipment for the load it must bear.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide.

TR is accredited under both the National Heavy Vehicle Accreditation Scheme (NHVAS), and the Western Australia Heavy Vehicle Accreditation (WAHVA), for Maintenance and Mass Management.

TR does implement a procedure to ensure its subcontractor meets elements 1 through 3. Subcontracted transporters operate under TR procedures and processes and are required to complete TR designated training for cyanide transport. TR audits its subcontractors for compliance against the Code.

KJP Haulage

All KJP Haulage vehicles used to transport cyanide for TR are subject to KJPs systems and procedures to ensure that transport equipment is suitable for the cyanide shipment. KJP Haulage is NHVAS Accredited.

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3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

TGL is in full compliance with **Transport Practice 1.4**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

TR has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. TR's involvement in maintaining the integrity of packaging is limited. Cyanide product is loaded and sealed by the producer and TR has written procedures to check seals on all vessels and containers. Seals and locks are checked at key points along the journey. Sparge tanks are sealed with a unique numbered lock and liquid iso tanks are sealed with locks and the keys are stored only at applicable delivery locations. Seal numbers are recorded and cross checked at each point of the delivery chain through the delivery dockets.

TR uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards. The placards include a UN number, Dangerous goods class, product name, Hazchem code and contact details for emergency specialist advice. TR ensure the placards are attached to each container before travelling.

The TR pre-departure checks include checks on placarding for the presence of dangerous goods diamonds, EIPs and dangerous goods labels.

TGL implements a safety programme for cyanide transport that includes:

- Vehicle inspections prior to each departure that covers both the prime mover and trailer and includes vehicle roadworthiness, dangerous goods requirements, PPE, communication equipment, etc.
- A preventative maintenance program which meets each manufacturer's recommended maintenance schedule and is compliant with NHVAS/ WAHVA requirements. TR conducts annual audits of its subcontractors which includes a check on maintenance compliance.
- A Driver Fatigue Management Standard that aligns with the NVHAS Basic Fatigue Management (BFM) and WAHVA Fatigue Module requirements. There are group, divisional, and mining level procedures for fatigue management within Toll.
- Cyanide is stowed into the freight containers by the producer. Isotainers and freight containers are the only containment methods used during transport and these are secured using twist locks, which are designed and constructed to international transport standards. Twist locks are inspected prior to each departure and periodically during the journey.
- Procedures by which transportation can be modified or suspended
- A Drugs and Alcohol Policy, and a drug abuse prevention programme.

Records are maintained that the above activities have been conducted.

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KJP Haulage

KJP Haulage conform with TR's systems and procedures requiring the development and implementation of a safety programme for transport of cyanide including procedures to maintain the integrity of the cyanide producer's packaging and placarding of cyanide shipments.

KJP Haulage are required to abide by the following TR safety programs:

- Vehicle inspections
- Preventative maintenance
- Limitations on driver hours
- Load shifting prevention
- Procedures for the suspension or modification of routes
- Drug abuse prevention.

3.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

TGL is in full compliance with **Transport Practice 1.5**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to TR.

TR does not transport consignments of cyanide by sea within the scope of this audit.

TR Transport does not transport consignments of cyanide by air within the scope of this audit.

KJP Haulage

KJP Haulage does not transport consignments of cyanide by sea or by air within the scope of this audit.

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3.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

TGL is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

TR transport vehicles have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

All vehicles have communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Trucks are fitted with duress buttons.

Consignees are advised of dispatch time, estimated arrival time and information on the container that was dispatched.

TR periodically tests the communication equipment including prior to each delivery as part of the pre-departure checks and through the continuous operation of the systems.

TR ensures communication blackout areas along transport routes are identified and special procedures are implemented for within these blackout areas. This process is undertaken during the route assessment process.

TR has identified communication blackout areas for phone coverage along transport routes. The occurrence of blackout areas is offset by the presence of satellite tracking and satellite phone systems installed within the trucks. In the event that a driver is unable to use the UHF radio or mobile phone to communicate with TR, the satellite phone is used.

TR has extensive procedures to track the progress of cyanide shipments including advising consignees estimated consignment departure/arrival, and the use of satellite tracking, phone and UHF systems to monitor progress along transport routes.

- TR has appropriate inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. Inventory controls are the primary method of preventing product loss during shipment. These controls include the following:
- Consignments are identified and documented (individual IBCs are identified by number, and each freight container and each isotainer number is recorded).
- All containers are locked with seals and the seal numbers are recorded and checked by the consignee. Seals are also checked at transfer locations and on route.
- The shipments are weighed when leaving the production facility and again when arriving at some mine sites.

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- The identifying container numbers are transmitted to the consignee and are checked off by the representative (driver) and consignee at the point of delivery.

The controls placed on empty containers on the return journey are the same as full ones.

Shipping records indicating the amount of cyanide in transit and Safety Data Sheets are available during transport. A copy of the emergency response plan with the SDS booklet held within the cabin of each vehicle.

TR does subcontract the transport and handling of cyanide. TR implements a procedure to ensure its subcontractors meets the requirements of the Code. Subcontract transporters operate under TR procedures following TR rule and completing TR designated training for cyanide transport. TR audits its subcontractors to ensure compliance with their procedures.

KJP Haulage

KJP Haulage abides by TR's systems and procedures for the tracking of cyanide to prevent losses during transport.

KJP Haulage vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Communication with consignees is by telephone and email and coordinated by through TR.

KJP Haulage's communication equipment, communication blackout areas and cyanide tracking are managed through processes established by TR. KJP Haulage has adopted TR's inventory controls and shipping records, as described for TR, are available during the transport of cyanide by KJP Haulage.

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3.2 Principle 2 – Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

3.2.1 Transport Practice 2.1

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

in full compliance with

TGL is

in substantial compliance with

Transport Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 2.1 that requires transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Within the scope of this audit, there are several trans-shipping depots or interim storage site, as defined in the audit protocol:

- Kalgoorlie, Western Australia
- Gracemere (Rockhampton), Queensland
- Gladstone, Queensland
- Burnie, Tasmania

Toll's Kalgoorlie Depot has a dedicated hardstand where cyanide can be stored within shipping containers and sparge isocontainers. There are warning signs that alert works to the hazard and that smoking, open flames, eating and drinking are not allowed.

The depot facility has a full perimeter fence and access control system to prevent unauthorised access to the depot. The cyanide is stored within the sealed and locked isocontainers that prevent access.

At Burnie, Gracemere and Gladstone, the storage facilities are not routinely used unless there are events that result in the need to park loaded trucks overnight prior to delivery the following day where possible. The cyanide is stored on trucks and not on the ground.

Due Diligences – Rail Operators

Aurizon/Linfox

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 23 February 2021. The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

Pacific National

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 3rd March 2021. The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

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Due Diligences – Rail Terminals and Sidings

Acacia Ridge Freight Terminal

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 23 February 2021 (Aurizon/Linfox) and 3rd March 2021 (Pacific National). The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

Chullora Freight Terminal

TR conducted compiled a due diligence of the Chullora Freight Terminal on 21 January 2021. The assessment found that the Chullora Freight Terminal meets TR's operational requirements.

Melbourne Freight Terminal

TR conducted compiled a due diligence of the Melbourne Freight Terminal on 25th February 2021. The assessment found that the Melbourne Freight Terminal meets TR's operational requirements.

Mt Miller Rail Head

TR conducted compiled a due diligence of the Mt Miller Rail Head on 15th January 2021. The assessment found that the Mt. Miller Rail Head meets TR's operational requirements.

Adelaide Freight Terminal

TR conducted compiled a due diligence of the Adelaide Freight Terminal 13th October 2021. The assessment found that the Adelaide Freight Terminal meets TR's operational requirements.

Kalgoorlie Freight Terminal

TR conducted compiled a due diligence of the Kalgoorlie Freight Terminal on 22nd April 2021. The assessment found that the Kalgoorlie Freight Terminal meets TR's operational requirements.

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3.3 Principle 3 – Emergency Response

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

3.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

TGL is in full compliance with **Transport Practice 3.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

The management of cyanide related emergencies is an integrated approach with the assistance of the cyanide producer and consignor (Orica). The TERP details the interface and responsibilities of the transporter (TR) and Orica.

TR's TERP is the emergency response document that will be used in the case of a cyanide related incident. The TERP covers transport emergencies, with Appendix 1 providing further detail on cyanide emergency response.

General evacuation procedures have been developed for individual depots such as Burnie, Gladstone, Gracemere and Kalgoorlie.

Road transport subcontractors operate under TR's emergency response plan and procedures.

The TERP is appropriate for the selected transportation route and interim storage facility. The TERP covers all transport movements controlled by TR. The TERP requires notification of Emergency Services, TR Operations Manager and the cyanide producer's emergency response service (ERS) in the event of a cyanide emergency during transport.

The drivers have a copy of the TERP and the ISS First Response number, which is a 24-hour emergency contact centre that relays information to TR's Management, the cyanide producer's ERS and Emergency Services as needed.

TR has access to Orica's emergency response capabilities in the event of incidents. Orica has approached transport incidents as a shared responsibility and transporters have access to Orica's 24-hour emergency call centres. In the event of an incident, TR has the responsibility for notification and initial isolation of the scene. Support and technical expertise are provided by the producer

The same support services operate for interim storage facilities. In addition to this, general evacuation procedures have been developed for individual depots such as Burnie, Gladstone, Gracemere and Kalgoorlie.

The TERP does consider both the physical and chemical form of cyanide. The TERP prompts activation of the producer's emergency response service and thus addresses both the chemical and physical forms of cyanide. Access to the SDS is available which provides information on the physical and chemical form of cyanide and the associate hazards and response actions.

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TR operates the road component of the supply chain, with other modes of transport being covered by due diligences. The TERP has been developed specifically for road transportation.

The consideration of transport infrastructure has been undertaken by TR through route assessments. JMPs detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route.

The plan does consider the design of the transport vehicle. The plans are based around the road transportation of isocontainers and freight containers.

The plans do include descriptions of response actions, as appropriate for the anticipated emergency situation. There are procedures for response to break down, product recovery, threats and motor vehicle incidents.

The plan does identify the role of emergency responders through the use of the national 000 emergency number and through contacting the producer. Specific responder actions are not detailed in the plan as government emergency response agencies assume control of an incident initially until satisfied that public safety is no longer a concern.

Due Diligence Rail Operators

Aurizon/Linfox

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 23 February 2021. The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

Pacific National

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 3rd March 2021. The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

Due Diligence Rail Terminals

Acacia Ridge Freight Terminal

TR conducted compiled a due diligence of the Acacia Ridge Freight Terminal on 23 February 2021 (Aurizon/Linfox) and 3rd March 2021 (Pacific National). The assessment found that the Acacia Ridge Freight Terminal meets TR's operational requirements.

Chullora Freight Terminal

TR conducted compiled a due diligence of the Chullora Freight Terminal on 21 January 2021. The assessment found that the Chullora Freight Terminal meets TR's operational requirements.

Melbourne Freight Terminal

TR conducted compiled a due diligence of the Melbourne Freight Terminal on 25th February 2021. The assessment found that the Melbourne Freight Terminal meets TR's operational requirements.

Mt Miller Rail Head

TR conducted compiled a due diligence of the Mt Miller Rail Head on 15th January 2021. The assessment found that the Mt. Miller Rail Head meets TR's operational requirements.

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Adelaide Freight Terminal

TR conducted compiled a due diligence of the Adelaide Freight Terminal on 13th October 2021. The assessment found that the Adelaide Freight Terminal meets TR's operational requirements.

3.3.2 Transport Practice 3.2

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

in full compliance with

TGL is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

TR provides emergency response training of personnel to fulfil the duties outlined in the TERP. Drivers are trained in the response actions to take in the event of an incident and a review of training records for drivers involved in cyanide transport confirmed that training had been provided.

Annual TERP refresher training is provided for all drivers. In addition to training on the TERP, mock emergency drills with debriefs are held periodically as part of TR's training and evaluation process.

KJP Haulage must meet TR training, qualification and licensing requirements prior to transporting cyanide, which includes training in emergency response procedures and participation in drills

The TERP does identify the specific emergency response duties and responsibilities of personnel for response in the event of an incident. The response duties are outlined in the scenarios contained within the TERP.

The TERP lists the equipment items for incident responders in a major incident. In addition to the equipment in the TERP, all drivers are required to carry PPE (long clothing, broad brim hat, sunscreen, respirators, safety glasses, boots, gloves, etc.). This is also documented in pre-departure documentation.

TR does have the necessary emergency response and health and safety equipment, including personal protective equipment available during transport. Inspection, testing and maintenance activities are conducted on equipment.

TR does provide initial induction training on cyanide awareness and emergency response procedures for drivers and subcontractor drivers and records are maintained in TRs online system.

The TERP requires regular exercises to be carried out with the National HSE Manager having responsibility for ensuring emergency exercises are carried out and involve all personnel and Emergency Services, where appropriate.

TR does have procedures to check emergency response equipment.

TR implements an Operator Daily Pre-Start check and Vehicle Inspection & Audit Checklist. This checklist includes a check on emergency response equipment and its condition.

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TR also undertakes vehicle audits that checks the driver has the correct PPE, its condition and understands that hazards of cross contamination of different dangerous goods.

TR does implement a procedure to ensure its subcontractors meet the elements of this Transport Practice. Subcontracted transporters operate under TR procedures and processes and are required to complete TR designated training for cyanide transport. TR audits its subcontractors for compliance against the Code.

3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

TGL is in full compliance with **Transport Practice 3.3**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

TR has procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

The TERP requires notification of Emergency Response Services (ERS). The drivers have a copy of the TERP. In addition, the drivers have the number for ISS First Response, which is a 24-hour emergency contact, cyanide manufacture's ERS services and Emergency Services as needed.

The TR fleet allocators have the numbers of cyanide specialists preloaded in their phones. These numbers are also detailed in the JMPs.

KJP Haulage follows the TERP. External communication with stakeholders is coordinated through TR. In a major incident, a representative of TR must attend the scene.

TR has provisions to ensure that internal and external emergency notification and reporting procedures are kept current.

TR has a document distribution system to ensure drivers and subcontractor receive and verify they have received information and updates including emergency contact details for management personnel for use in the event of an emergency. TR has set up designated numbers to allow for consistency in the notification of emergencies and the JMPs cover page has key contact information for supervisors, delivery site and emergency contacts. The JMPs are updated regularly.

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3.3.4 Transport Practice 3.4

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

in full compliance with

TGL is in substantial compliance with **Transport Practice 3.4**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

TR does not undertake the remediation or recovery of cyanide as this is managed through their relationship with the cyanide manufacture. In the event of a cyanide emergency TR will contact cyanide manufacture and their product specialists will assist emergency services as needed.

The producer's emergency procedure includes procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management of spill clean-up debris. Remediation would be conducted by the product supplier.

The producer using TR to transport its product is an ICMC certified producer and is aware of the prohibitions around sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

KJP Haulage follows TR's TERP, which provides drivers with a notification role and a scene isolation and control role as far as circumstances allow. Remediation would be conducted by the product supplier.

3.3.5 Transport Practice 3.5

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

in full compliance with

TGL is in substantial compliance with **Transport Practice 3.5**

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TR is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

The TERP contains provisions for periodically reviewing and evaluating the plan's adequacy and they are being implemented. The BU HSE Manager must undertake a review of the TERP:

- At least annually (12 months from the date of last review); or
- Upon being notified of significant deficiencies identified during emergency exercises or incidents; or
- Upon being notified of significant business or legislative changes that could impact the effectiveness of this plan.

The TERP has been revised three times since 2019.

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KJP Haulage follows TR's TERP, which is developed and maintained by TR. As such, the evaluation and revision of such procedures is controlled by TR.

The TERP contains provisions for periodically conducting mock emergency drills and they are being implemented in part. TR advised Covid restrictions prevented a full suite of mock emergency drills being conducted during the audit period, however mock exercises were conducted at least annually.

There is a procedure to evaluate the TERPs performance after its implementation and revise it as needed. The operation has conducted several drills with documented debriefs. The 2019 review of the TERP incorporated learnings from an emergency evaluation.

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4.0 DUE DILIGENCE

TR's due diligence process and findings for rail operators and rail terminals and sidings used as part of the Toll Mining Services Australian Supply Chain are summarised in the following sections. These have been reviewed by Ed Clerk of Golder. Ed is pre-certified by the ICMI as a Transport Technical Specialist.

4.1 Rail Operators

4.1.1 Aurizon/Linfox

TR conducted a due diligence of Aurizon/Linfox on 23rd February 2021. The due diligence was based on a site visits to the Acacia Ridge Rail Terminal. The due diligence was conducted by Olivia Cuthbertson, Regional HSE Manager, Toll Resources. TR has template due diligence assessment format and the following items were addressed within the due diligence:

- Facility Description
- Cyanide Handling
- Storage of Cyanide
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through visual inspections and interviews of Acacia Ridge Aurizon/Linfox representatives.

Facility Description

Acacia Ridge Freight Terminal is a transition point in the overall supply chain for Sodium Cyanide. Units arrive at Acacia Ridge from Yarwun and are transitionally stored and transferred to the relevant connections, by Aurizon/Linfox and Pacific National.

Cyanide Handling

Sodium Cyanide Solid sparges and containers travel from Yarwun and are transitionally held and transferred to the relevant connections by Aurizon/Linfox.

No lifting equipment is owned by Aurizon/Linfox.

Rail wagons are maintained and serviced by Aurizon/Linfox – the computer system will not allow a wagon to be reloaded if it is due for maintenance (can only travel empty to Townsville to be serviced). There are three levels of maintenance – level 1 can be done at Acacia Ridge, Levels 2 and 3 must be completed in Townsville.

Aurizon/Linfox provides Aurizon/Linfox Dangerous Goods (internal) training and Linfox Rail Dangerous Goods Awareness (internal) training.

Aurizon/Linfox conducts pre-departure inspections and also secure the pins. They have to sign that the train is safe, this is then submitted to QR.

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Aurizon have a current Emergency Response Plan. Linfox also have an Emergency Response Plan that is based off the Aurizon/Linfox ERP. The last emergency response exercise covering the whole terminal was conducted in November 2020. The ERPs cover DG are not cyanide specific.

Storage of Cyanide

Cyanide is stored in purpose-built tanks utilised by Orica and separated from other DGs, which are designed to minimise the potential for contact with water.

The area is open so ventilation is not an issue. A windsock was observed during the audit.

The area has a bunded zone with spill kits available in the case of any emergency. There are no sensitive receptors in the vicinity of the area. The site is adequately signed and details surrounding these requirements are discussed in the induction process.

Aurizon/Linfox DG/Emergency Response training is conducted annually.

Aurizon/Linfox has an online portal through which training records are maintained for all personnel.

Additional Information including ICMC Transport Practice 2.1

The entire site is securely fenced and monitored by guards 24/7.

In the event of a Cyanide spill Aurizon/Linfox would contact Toll and the Transport Emergency Response Plan would be initiated – this includes establishing contact with the Orica Emergency Response number (as displayed on the tank EIP) for technical support.

Report Completion and Summary

After inspection of the Acacia Ridge Freight Terminal, it was determined that both the site and Aurizon/Linfox has sufficiently met Toll's requirements.

4.1.2 Pacific National

TR conducted a due diligence of Pacific National on 23rd February 2021. The due diligence was based on a site visit to the Acacia Ridge Rail Terminal. The due diligence was conducted by Olivia Cuthbertson, Regional HSE Manager, Toll Resources. TR has template due diligence assessment format and the following items were addressed within the due diligence:

- Facility Description
- Cyanide Handling
- Storage of Cyanide
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through visual inspections and interviews of Acacia Ridge Pacific National representatives.

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Facility Description

Acacia Ridge Freight Terminal is a transition point in the overall supply chain for Sodium Cyanide. Units arrive at Acacia Ridge from Yarwun and are transitionally stored and transferred to the relevant connections, whether it is with Aurizon/Linfox or Pacific National.

Cyanide Handling

Sodium Cyanide Solid sparges and containers travel from Yarwun and are transitionally held and transferred to the relevant connections by Pacific National.

Pacific National engages an external contractor for its lifting equipment. The maintenance of this equipment is managed by the external contractor who provides a weekly forecast of the required works. Pacific National maintains procedures and systems, including a VOC program and online learning system for lifting equipment and relevant operating licences.

Pacific National's handling equipment is again maintained by an external contractor who provides a weekly forecast of all required works.

Pacific National implement accredited in house training for drivers and managers/planners, TA's, VOC tested every 2 years.

Pacific National pre-departure checks and inspections are conducted throughout the day and a final inspection done before departure. Train inspectors conduct all inspections.

Pacific National have adopted the Aurizon/Linfox Emergency Response Plan. The last emergency response exercise covering the whole terminal was conducted in November 2020. The ERPs cover DG are not cyanide specific.

Storage of Cyanide

Cyanide is stored in purpose-built tanks utilised by Orica and separated from other DGs, which are designed to minimise the potential for contact with water.

The area is open so ventilation is not an issue. A windsock was observed during the audit.

The area has a bunded zone with spill kits available in the case of any emergency. There are no sensitive receptors in the vicinity of the area. The site is adequately signed and details surrounding these requirements are discussed in the induction process.

Pacific National DG/Emergency response training is provided every 2 years. All parties partake in the emergency exercises conducted by Aurizon/Linfox.

Pacific National have an online portal through which training records are maintained for all personnel.

Additional Information including ICMC Transport Practice 2.1

The entire site is securely fenced and monitored by guards 24/7.

In the event of a Cyanide spill PN would contact Toll and the Transport Emergency Response Plan would be initiated – this includes establishing contact with the Orica Emergency Response number (as displayed on the tank EIP) for technical support.

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Report Completion and Summary

After inspection of the Acacia Ridge Freight Terminal, it was determined that both the site and Pacific National has sufficiently met Toll's requirements.

4.2 Rail Terminals

4.2.1 Kalgoorlie Freight Terminal

TR conducted a due diligence of Kalgoorlie Freight Terminal on 22nd April 2021. The due diligence was conducted by Jason Harwood, Operations Manager (Gladstone), Toll Resources. TR has template due diligence assessment format and the following items were addressed within the due diligence:

- Facility Description
- Cyanide Handling
- Storage of Cyanide
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Facility Description

The Kalgoorlie Freight Terminal facility is a transitory facility for inbound and outbound goods to and from Kalgoorlie from all parts of Australia. The terminal facility is also the arrival point for Pacific National cargo into the Kalgoorlie area.

Cyanide Handling

Cyanide is moved by crane for loading/unloading. The cranes are maintained as per the internal management system (HOWED), which covers inspection, certification and maintenance. Maintenance of the equipment is conducted by United Cranes in Perth.

Personnel are involved in general DG and cyanide specific training. Training records are maintained within the Internal Manage System.

Storage of Cyanide

Cyanide is stored in a manner that it is separated from incompatible materials and water. It is stored in the open and therefore no ventilation concerns apply.

In case of an emergency there is a windsock in the open yard where cyanide is stored. The area is adequately bunded and located away from sensitive receptors.

Additional Information including ICMC Transport Practice 2.1

The storage yard area is adequately sign posted and has two fences which are locked overnight. Staff monitor the area throughout the afternoon.

Report Completion and Summary

The due diligence concluded that the facility met Toll's requirements.

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4.2.2 Mount Miller Rail Head

TR conducted a due diligence of the Mount Miller Rail Head on 15th January 2021. The due diligence was conducted by Holly Davison, HSE Manager, Toll Resources. TR has template due diligence assessment format and the following items were addressed within the due diligence:

- Facility Description
- Cyanide Handling
- Storage of Cyanide
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through visual inspections, document reviews and interviews of Mount Miller representatives.

Facility Description

Mt Miller is a small freight terminal, that assists Toll in the transport of Cyanide to meet the demands of Orica, Yarwun. Activities onsite consist of unloading and loading containers via top lifting forklift or overhead gantry crane from truck to rail wagon, vice versa. Cargo consists of shipping containers or Isotainer sparges that can be full of cyanide for delivery to customers or empty, returning to Orica for refilling.

Cyanide Handling

Cyanide is moved between rail and truck via overhead gantry and top lifting forklift. No maintenance program for the equipment was sighted. Site staff stated maintenance is conducted by an external group, Clarke Equipment.

There is a training/licence register for staff involved with cyanide works. Online DG training and annual DG training is provided but is not specific to cyanide.

A pre-start is in place to be completed prior to operating any equipment. The pre-starts are completed on paper and scanned in into their internal management system. Pre-starts were sighted as evidence.

A Loading Advice Form was sighted during the audit, sign-off of which confirms the complete train has undergone a visual inspection. All containers are checked before and prior entry/exiting site by Toll personnel.

A Site Emergency Response Plan (SERP) (created 25 May 2020, review due 25 May 2021) was sighted. The last emergency exercise was conducted in November 2020. The SERP is however generic in nature and does not specifically address cyanide.

Storage of Cyanide

Cyanide comes onto site by truck and is transferred immediately to the rail wagon. On the off occasion it is stored on the ground in the DG area. There is a reliance on employee's knowledge to separate DG. The auditor observed segregation chart in main office.

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If stored, the containers come sealed and weatherproof from Orica. There is a 4-inch gap between the floor and the base of the cyanide container. These are kept outside so ventilation is not an issue.

There are two windssocks located on the site (one south, one north). The area is not bunded but there are spill kits available on site. Any cyanide spill response is to be conducted Orica.

The site is within a rural commercial area and is not close to any sensitive receptors. There is adequate signage on entry to the site, but the DG area is not specifically sign posted.

Additional Information including ICMC Transport Practice 2.1

The site does not have indications, visual or physical to separate Cyanide from incompatible goods.

Report Completion and Summary

The site was found to meet Tolls operational requirements with the following exceptions:

- No dangerous goods signs are displayed on the fence or in segregation area.
- TR have committed to request relevant DG signs on entry fence and in segregation area, i.e., toxic, class 6. In the meantime appropriate placards are placed on the containers and containers are delivered to the facility on an as needed basis and not stored for extended periods.
- No documented emergency response plan specific to Cyanide was evident.
- TR have committed to provide a one-page immediate emergency response specific to Cyanide. SDS are also present on site and containers are delivered to the facility on an as needed basis and not stored for extended periods.

4.2.3 Acacia Ridge Freight Terminal

TR conducted a due diligence of the Acacia Ridge Freight Terminal on 23rd February 2021 (Aurizon/Linfox) and 3rd March 2021 (Pacific National). The due diligence was conducted by Olivia Cuthbertson, Regional HSE Manager, Toll Resources. TR has template due diligence assessment format and the following items were addressed within the due diligence:

- Facility Description
- Cyanide Handling
- Storage of Cyanide
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through visual inspections and interviews of Acacia Ridge Aurizon/Linfox and Pacific National representatives.

Facility Description

Acacia Ridge Freight Terminal is a transition point in the overall supply chain for Sodium Cyanide. Units arrive at Acacia Ridge from Yarwun and are transitionally stored and transferred to the relevant connections, whether it is with Aurizon/Linfox or Pacific National.

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Cyanide Handling

Sodium Cyanide Solid sparges and containers travel from Yarwun and are transitionally held and transferred to the relevant connections, whether it is with Aurizon/Linfox or Pacific National.

No lifting equipment is owned by Aurizon/Linfox, while Pacific National engages an external contractor for its lifting equipment. The maintenance of this equipment is managed by the external contractor who provides a weekly forecast of the required works. Pacific National maintains procedures and systems, including a VOC program and online learning system for lifting equipment and relevant operating licences.

Rail wagons are maintained and serviced by Aurizon/Linfox – the computer system will not allow a wagon to be reloaded if it is due for maintenance (can only travel empty to Townsville to be serviced). There are three levels of maintenance – level 1 can be done at Acacia Ridge, Levels 2 and 3 must be completed in Townsville. Pacific National's handling equipment is again maintained by an external contractor who provides a weekly forecast of all required works.

Aurizon/Linfox provides Aurizon/Linfox Dangerous Goods (internal) training and Linfox Rail Dangerous Goods Awareness (internal) training.

Pacific National implement accredited in house training for drivers and managers/planners, TA's, VOC tested every 2 years.

Aurizon/Linfox conducts pre-departure inspections and also secure the pins. They have to sign that the train is safe, this is then submitted to QR. Pacific National checks are conducted throughout the day and a final inspection done before departure. Train inspectors conduct all inspections.

Aurizon have a current Emergency Response Plan that has been adopted by Pacific National. Linfox also have an Emergency Response Plan that is based off the Aurizon/Linfox ERP. The last emergency response exercise covering the whole terminal was conducted in November 2020. The ERPs cover DG are not cyanide specific.

Storage of Cyanide

Cyanide is stored in purpose-built tanks utilised by Orica and separated from other DGs, which are designed to minimise the potential for contact with water.

The area is open so ventilation is not an issue. A windsock was observed during the audit.

The area has a bunded zone with spill kits available in the case of any emergency. There are no sensitive receptors in the vicinity of the area. The site is adequately signed and details surrounding these requirements are discussed in the induction process.

Aurizon/Linfox DG/Emergency Response training is conducted annually. Pacific National DG/Emergency response training is provided every 2 years. All parties partake in the emergency exercises conducted by Aurizon.

Both Aurizon/Linfox and Pacific National have online portals through which training records are maintained for all personnel.

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Additional Information including ICMC Transport Practice 2.1

The entire site is securely fenced and monitored by guards 24/7.

In the event of a Cyanide spill Pacific National or Aurizon/Linfox would contact Toll and the Transport Emergency Response Plan would be initiated – this includes establishing contact with the Orica Emergency Response number (as displayed on the tank EIP) for technical support.

Report Completion and Summary

After inspection of the Acacia Ridge Freight Terminal, it was determined that the site has sufficiently met Toll's requirements.

4.2.4 Chullora Freight Terminal

TR conducted a due diligence of the Pacific National Chullora Freight Terminal on 21st January 2021. The due diligence was conducted by Trevor Anderson, Regional HSE Manager, Toll Resources. TR has a template due diligence assessment format and the following items were addressed within the due diligence:

- Facility Description
- Cyanide Handling
- Storage of Cyanide
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through visual inspections and interviews of Chullora representatives.

Facility Description

The Chullora Freight Terminal facility is a transitory facility for inbound and outbound goods to and is cyanide units pass through on the journey to Pacific National rail terminal in Kalgoorlie and previously Dubbo.

All products are in transit only.

Cyanide Handling

The terminal facility is fully fenced with security personnel on site.

An emergency response plan exists for the facility. The last emergency response exercise was conducted in December 2020.

Digital prestart inspections of equipment are completed daily, which require a swipe card to operate.

All lifting equipment is detailed under an equipment register with the current inspection and certification records. A maintenance program is conducted for all equipment and procedures for standard lifting operations are in place.

Personnel are involved in general DG training.

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Storage of Cyanide

Cyanide product is stored in an appropriate manner, in sealed containers separated from incompatible materials. The containers are kept outside so there is minimal risk of hydrogen cyanide gas build up.

An emergency response container is available should there be any cyanide spill.

The facility has three windsocks to indicate wind direction in the event of an emergency.

Additional Information including ICMC Transport Practice 2.1

Cyanide is not stored on site.

Report Completion and Summary

The due diligence concluded that based upon the information obtained in this due diligence assessment, this facility does meet Toll Resources requirements.

4.2.5 Adelaide Freight Terminal

TR conducted a due diligence of the Adelaide Freight Terminal on 13th October 2021. The due diligence was conducted by Jake Rosbergen, Regional HSE Manager, Toll Resources. TR has template due diligence assessment format and the following items were addressed within the due diligence:

- Facility Description
- Cyanide Handling
- Storage of Cyanide
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through visual inspections and interviews of Adelaide Freight representatives.

Facility Description

The Adelaide Freight Terminal main purpose involves the movement of containerized freight to and from inter-state rail services using specialised lifting equipment.

Cyanide Handling

Products are transported through the facility on rail wagon in transit to the intended destination.

The facility has perimeter fencing, a CCTV network and a security company intermittently patrols the area.

The facility is a licenced Major Hazard Facility and Dangerous Goods are separated on site. Cyanide is not stored on premises. Cyanide tanks remain loaded on a rail wagon and before departing to their intended destination. Rail wagons are checked for damage, leaks while in the facility.

The facility has a lifting equipment register detailing current inspections and certifications. There is a maintenance program for the equipment managed by a service provider. Records for both the equipment register and maintenance program are held on site.

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Each machine requires an electronic prestart and operator PIN number to operate.

The facility has a procedure for lifting equipment operations. All operators must be appropriately licenced and a Verification of Competency is undertaken biannually. Dangerous Goods training is completed by the relevant personnel.

The facility has an Emergency Response Plan. The last emergency response exercise was undertaken in May 2020.

Storage of Cyanide

Cyanide tank containers remain on the rail wagon and are not stored on site.

Warning signs are present at the terminal entrance specifying presence of dangerous goods and PPE requirements. There are three windsocks at intermediate locations in the terminal.

In case of an emergency, the facility will follow its Emergency Response Plan.

Additional Information including ICMC Transport Practice 2.1

Cyanide is not stored on site.

Report Completion and Summary

The due diligence concluded that based upon the information obtained in this due diligence assessment, this facility does meet Toll Resources requirements.

4.2.6 Melbourne Freight Terminal

TR conducted a due diligence of the Melbourne Freight Terminal on 25th February 2021. The due diligence was conducted by Rob Dimitrioski, HSE Advisor, Toll Resources. TR has template due diligence assessment format and the following items were addressed within the due diligence:

- Facility Description
- Cyanide Handling
- Storage of Cyanide
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through visual inspections and interviews of Melbourne Freight representatives.

Facility Description

The Melbourne Freight Terminal receives cyanide product in containers primarily loaded on to connecting trains for delivery to interstate and occasionally loaded on to trucks for road transport.

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Cyanide Handling

The site maintains a lifting equipment register. All inspections and certifications are maintained in their asset management program, Maximo. The site also has a set of SOPs for all lifting operations.

Training records for lifting equipment includes high risk license requirements, assessed via VOC which is completed every 2 years. An online learning database is maintained for all training. Training records were observed as evidence.

The facility does have a procedure or system for managing and scheduling maintenance on the equipment used for handling. There is also an online pre-start system for all handling equipment.

There is a Freight Loading Manual FLM03.05 Procedure for rejecting containers, which addresses leak and spill concerns prior to handling works.

There is an up-to-date Emergency Response Plan for the site. The last emergency response exercise was conducted in August 2019 (no activities in 2020 noted as a result of COVID). Cyanide is not addressed specifically in this Plan.

Storage of Cyanide

All DG's are stored in line with Australian Dangerous Goods National Code for Transport. ADG 7.7 and are segregated. The trains management system has rules built into its program, which allocates positions of the containers in the yard based on DG classification. Containers are sealed by the provider and remain closed while on site.

The freight terminal is an open space with adequate ventilation. There are three windsocks observed on site.

The area has a purpose-built sump and spill response equipment in case of an emergency. The site is adequately signed.

Training in cyanide spill response was noted as not applicable at the site.

Additional Information including ICMC Transport Practice 2.1

The due diligence assessed the site against the requirements of Transport practice 2.1 including security, signage, incompatibility of stored materials, ventilation, containment systems and procedure to prevent releases.

Report Completion and Summary

After inspection of the Melbourne Freight Terminal, it was determined that the site has sufficiently met Toll's requirements for the purpose of being a transitional storage point in the cyanide supply chain and is in full compliance with the requirements.

4.3 Auditor Review of Due Diligences

The due diligences presented were found by the Golder ICMC Technical Specialist to sufficiently evaluate the rail operations and additional management measures by the consigner were not considered necessary.

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5.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder has under the contract between it and its client.

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Date

Signature Page

GOLDER ASSOCIATES PTY LTD



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APPENDIX A

Important Information

The document ("Report") to which this page is attached and which this page forms a part of, has been issued by Golder Associates Pty Ltd ("Golder") subject to the important limitations and other qualifications set out below.

This Report constitutes or is part of services ("Services") provided by Golder to its client ("Client") under and subject to a contract between Golder and its Client ("Contract"). The contents of this page are not intended to and do not alter Golder's obligations (including any limits on those obligations) to its Client under the Contract.

This Report is provided for use solely by Golder's Client and persons acting on the Client's behalf, such as its professional advisers. Golder is responsible only to its Client for this Report. Golder has no responsibility to any other person who relies or makes decisions based upon this Report or who makes any other use of this Report. Golder accepts no responsibility for any loss or damage suffered by any person other than its Client as a result of any reliance upon any part of this Report, decisions made based upon this Report or any other use of it.

This Report has been prepared in the context of the circumstances and purposes referred to in, or derived from, the Contract and Golder accepts no responsibility for use of the Report, in whole or in part, in any other context or circumstance or for any other purpose.

The scope of Golder's Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder's affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification



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