

SUMMARY AUDIT REPORT

for the July 2025
International Cyanide Management Code Certification Audit



Prepared for:

RSB Logistic Inc, Canada

Submitted to:

International Cyanide Management Institute
1400 "I" Street NW, Suite 550
Washington, D.C. 20005

FINAL REPORT

24 November 2025



3615A, rue Isabelle
Brossard (Québec) J4Y 2R2, Canada

SUMMARY AUDIT REPORT

Name of Transporter: RSB Logistic Inc.

Name of Owner: RSB Logistic Inc.

Name of Responsible Mr. George Eckel, President

Address: 219 Cardinal Crescent
Saskatoon, SK
S7L 7K8 Canada

Telephone: +1 306-242-8300

Fax: +1 306-242-2311

E-mail: George.Eckel@rsblogistic.com

Location detail and description of operation:

RSB LOGISTIC INC. (RSB) is the North American subsidiary of CLI.AG, located in Hamburg, Germany. In 2013 the Kieserling Group merged with Compass Ocean Logistics to form Compass Logistics International AG, with offices located in North America, Western Europe, the Middle East and India. In 2020 CLI.AG was formed and took over the independent operation of all RSB entities in Europe and North America. RSB is now integrated in a division of CLI.AG, which specializes in the worldwide transportation of sensitive substances including radioactive goods through a network of strategic partners and agents. The division is known as CLI Seven.

RSB is headquartered in Saskatoon, Saskatchewan, Canada, and has been in operation since 1978. RSB's primary hazardous goods transport business is the shipment of radioactive materials from mines in northern Saskatchewan. Transport of sodium cyanide makes up only a small percentage of RSB's business (2024:43; 2025:58 loads).

RSB uses only dry-van trailers to transport cyanide in solid briquettes form packed in 1-metric ton Eco-Pak containers. The shipments originate either from in Memphis, Tennessee or from Alvin, Texas in the United States and are bound for Canadian customers. RSB is only contracted to transport cyanide containers and is not responsible for loading, unloading or temporarily warehousing the product.

RSB currently transports dyed sodium cyanide for Covoro Mining Solutions LLC (Covoro) between the Memphis, Tennessee plant and Brenntag Canada Inc. facility in Winnipeg, Manitoba. Covoro Mining Solutions LLC (for USA) and Covoro Mining Solutions Canada are subsidiaries of Draslovka Holdings. RSB also transports the reagent for Univar Solutions Canada (Univar) between the Cyanco International LLC production plant in Alvin, Texas and the SSR Mining's Seabee Gold Operation (SGO) in Northern Saskatchewan.

Univar shipments only occur during the winter months as it involves use of a winter ice-road for the final segment of the transportation route.

RSB maintains an International Organization for Standardization (ISO) 9001:2015 certified Quality Management System (QMS), that provides an organizational structure, defines responsibilities, and establishes controls for implementing and managing procedures, processes, documentation, and resources. The current certification granted by Intertek Testing Services is valid until 12 May 2026. RSB is also a Customs-Trade Partnership Against Terrorism / Partners in Protection (CTPAT/PIP) approved carrier, which places added security requirements on all components of cross-border transportation.

RSB has a fenced yard equipped with security cameras and infrared detection at its Saskatoon address where, on occasion but not a regular practice, in transit cyanide loaded dry-van trailers are occasionally parked for short periods while awaiting the opening of the winter ice-road to SGO mine. The occasional interim storage at the Saskatoon RSB location lasts between 2 to 10 days maximum. No interim storage of cyanide occurred during the site audit in July 2025.

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Auditors' Finding

The operation is:

- ☒ **in full compliance**
☐ in substantial compliance
☐ not in compliance

Audit Company:

Terrapex

3615A Isabelle Street
Brossard, QC J4Y 2R2, Canada


Lead & Technical Auditor:

Jean-Marc Léger, CEA®
ICMC Lead, Mine and Transport Auditor
e-mail: jean-marc.leger@terrapex.ca

Date(s) of Audit: 2nd and 3rd July 2025

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader and Transport, 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 International Cyanide Management Code Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

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1. *TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.*

Transport Practice 1.1: *Select cyanide transport routes to minimize the potential for accidents and releases.*

The operation is in:

☒ **in full compliance with Transport Practice 1.1**

☐ in substantial compliance

☐ not in compliance


Summarize the basis for this Findings/Deficiencies Identified:

RSB has implemented a process for selecting transport routes to minimize accidents and releases. The RSB *Guidelines for Dangerous Goods Route Selection Policy* document confirms that routing is completed by using the most current version of PC Miler Hazmat software. The software optimizes route selection through several parameters including population density, highway type, sensitive areas such as schools, hospitals, water sources, grade of terrain, weather conditions, traffic congestion and accident history, as well as emergency response capabilities by state or provincial authorities. The use of these defined Hazmat routes ensures adherence to local requirements regarding safe transport of hazardous materials as PC Miler Hazmat generated results are based on various government agencies' updated databases. The route selection also complies with consignor and consignee procedures when travelling off highway to SGO mine site.

To manage route-related risks, RSB requires drivers to hold a valid Class 1A commercial driver license and a minimum 2-years' experience as well as a valid transport of dangerous training (TDG). In addition, RSB ensures drivers receive training and refresher training on a variety of topics including but not limited to Dupont's sodium cyanide transport safety, professional driver improvement course, truck driver & cargo security and hazard perception. Cyanide transport routes are reevaluated through the systematic preparation of Routing Package for drivers prior to dispatch. The Routing Package involves the consultation of PC Miler Hazmat software, latest information from consignor and consignee as well as feedback from drivers during daily communications.

The Routing Package documents the mitigation measures to be taken specifically when driving on and off main highways. On main highways, risk mitigation measures comprise obeying speed limits and signs and using defensive driving. RSB procedures also require drivers to exercise caution and shut down and notify dispatch in adverse conditions such as low visibility, poor weather, poor road conditions, night driving, or congested traffic. The Routing Package for transporting cyanide to SGO mine includes specific safety instructions when driving north of the town of La Ronge, Saskatchewan, where the route is gravel highway and then winter ice-road.

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These instructions include no passing on gravel roads, speed limits, and radio dispatch call requirements. Another measure to address route-related risk is the mandatory use of Omnitrac/Solera Fleet Solutions AMG-C systems for electronic logging in each vehicle of the fleet. The system telematics records driving violations or deviations including speeding, harsh braking, acceleration, and un-signalled lane changes. Significant deviations trigger alert messages to RSB dispatch and management.

The SGO mine dispatch is responsible for contacting RSB driver and provide an ice marshal to escort driver for the last segment of the route between Brabant Lake and SGO mine. This road segment is 3 to 4 hours long depending on winter road condition and weather. Otherwise, RSB maintained its CTPAT/PIP status throughout the recertification period.

Transport Practice 1.2: *Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.*

The operation is in:

☒ **in full compliance with Transport Practice 1.2**

☐ in substantial compliance

☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

RSB requires that all cyanide truck drivers have a valid Class 1A commercial driver license and a minimum 2-years' experience as well as a valid TDG training. Once hired, drivers go through RSB training curriculum. RSB also ensures drivers receive training and refresher training on additional topics like vehicle backing; pre-trip equipment inspection; coupling & un-coupling; hazmat placarding; transport accident and incident; dry cargo securement; CTPAT-PIP (Customs-Trade Partnership Against Terrorism & Partner in Protection); and fire extinguisher use. These courses are either video or computer-based training packages with tests requiring an 80% pass mark. As part of its Quality Management System, RSB keeps an Annual Driver File Checklist to ensure licensing, training and other required documents (e.g. passport) are kept current. Training records retention and management is supported by TMW software.

RSB is only contracted to transport cyanide containers and is not responsible for loading, unloading or temporarily warehousing the product. Hence, cyanide Eco-Pak containers in trailers are not handled by RSB personnel through forklift or other lifting equipment.

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

The operation is in:

☒ **in full compliance with Transport Practice 1.3**

☐ in substantial compliance

☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

RSB averages 50 cyanide shipments annually. The transport company owns or leases 52 tractors and 130 trailers. Approximately 85% of the tractors and 35% of trailers are 2 years old or less. The document reviewed show that trailers are rated to carry a payload of 55,000 lbs (25 tons). Review of bills of lading for cyanide shipments indicate that the maximum loads transported are approximately 44,000 lbs. (20 metric tons).

RSB implemented procedures and checklist to ensure that tractors and trailers are inspected and maintained to safely transport the specified loads. Drivers are responsible to ensure that inspection, repair, and maintenance of all equipment under their control is carried out. Drivers are required to undertake pre-departure, and enroute vehicle inspections and report any issues to dispatch.

All vehicle maintenance work and mandatory government inspections are subcontracted to suppliers registered by a recognized authority or approved by RSB. Leased equipment is maintained by the leasing companies as part of the full-service contracts. RSB is also inspected by the Canadian Nuclear Safety Commission (CNSC) for transportation compliance as it provides transport services for this industry. The driver is required to weigh the load at a certified scale prior to commencing transport to ensure the load is correctly distributed across axles as per regulation. RSB only uses its own transport equipment or in the case of leased equipment, the trailers meet the company' load capacity criteria of 55 000 lbs. RSB only uses drivers that are full time employees for transport of hazardous goods, including cyanide.

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

The operation is in:

☒ **in full compliance with Transport Practice 1.4**

☐ in substantial compliance

☐ not in compliance

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Summarize the basis for this Findings/Deficiencies Identified:

RSB does not load or unload shipments. Cyanide is loaded into the trailer by the shipper. RSB driver is to inspect the trailer to ensure it is clean and free of repairs and available for immediate use. The Routing Package provides instructions for the driver at the shipper, enroute as well as lock and security procedures. The driver is also responsible for strapping the load as required by regulation prior to the doors being closed and sealed with a seal provided by the shipper and/or a RSB bolt seal.

Placards (UN 1689 and Marine Pollutant) are placed by drivers on all four sides of the trailer when loaded with cyanide as required by regulation. Placards are checked every 2- hours while enroute. The removal of placards by the driver occurs when shipment has been delivered and the trailer unloaded.


Drivers are required to undertake pre-trip vehicle inspections (The Circle Check) prior to each trip. The Vehicle Inspection Form is on the tablet under the ADHOC tab on the Omnitrac/Solera Fleet Solutions AMG-C. The inspection must also follow the "17 Point CTPAT Inspection" and "Spotted Lanternfly Inspection" (a known insect pest) processes.

Tractors and trailers undergo preventative maintenance service inspections every six months. Regulatory safety inspections are undertaken every six months on tractors and annually on trailers. These inspections include checks of the brake systems, suspension, electrical components, wheel seals and bearings, tire tread, and integrity of the frame and cross members. RSB is now using Solera integrated platform (with e-log system) to record driver hours to comply with regulatory requirements in the US and Canada. Drivers are required to blocked and braced loads prior to departing from consignor to ensure safe transport of the goods. The driver is also responsible for strapping the load as required by regulation prior to the doors being closed and sealed. Procedures are in place to instruct drivers to get off the road and not proceed when road conditions deteriorate. RSB established a drug and alcohol policy and provides training on substance abuse upon initial training. The use of illegal or non-prescribed drugs by employees or owner-operators is strictly prohibited and the consumption of alcohol within 24 hours of operating a vehicle is prohibited. New hires are required to undertake a pre- employment drug test. As set out in the quality management system, records documenting conduct of each of the above safety procedures are retained in the e-log for a minimum period of 6 months.

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

The operation is not involved in transportation by sea

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

The operation is in:

☒ **in full compliance with Transport Practice 1.6**

☐ in substantial compliance

☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

The fleet of RSB trucks are equipped with communication software and hardware providing GPS, email, e-log, and voice communication capabilities. The integrated platform is known as Solera, formerly Omnitracs. The communication between drivers and RSB dispatch is supported by satellite and cellular networks. Prairie Mobile provides two-way radio VHS system where the cellular network coverage is inexistant in Northern Saskatchewan. The software features include self-diagnosis for troubleshooting, regular software upgrades and maintenance.

Interview with the Safety/Maintenance Manager indicated that northern Ontario's Nipigon and Sault-Sainte-Marie region presents intermittent blackout areas, mostly associated with hills. The Operations Supervisor confirmed that these communication blackouts do not impact cyanide transport routes.

Drivers are required to contact dispatch before 10AM each day and regularly afterwards. The arrival, departure and load completed notifications to RSB dispatch provides additional information regarding progress tracking of cyanide shipment. Additional progress tracking of cyanide shipment occurs during scheduled truck tire inspections or stop notifications.

Chain-of-Custody procedures are used to track and prevent loss of cyanide during shipment. The driver is responsible for checking that the product being shipped matches the description on the consignor's bill of lading and the information is complete and in compliance. A consignor seal is applied to the trailer door and the seal number is recorded on the bill of lading. On acceptance of the load, the bill-of lading is signed by the driver and consignor. The driver also applies a RSB bolt seal to the trailer door and completes a separate RSB bill of lading.

The description of the load (product name, number of boxes) and weight cyanide in transit is recorded on the bill of lading. The RSB Routing Package instruction document specifies that the shipper is responsible for providing a Safety Data Sheet with each load and that the driver is responsible for obtaining the SDS. The SDS is added to the Routing Package along with the ERAP emergency response guidance.

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2. *INTERIM STORAGE: Design, construct and operate cyanide interim storage sites to prevent releases and exposures.*

The operation is in:

☒ **in full compliance with Transport Practice 2.1**

☐ in substantial compliance

☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

On rare occasions when the Northern Saskatchewan winter road conditions are not considered safe, RSB may stage cyanide, usually in early March, at its Saskatoon yard for a short period of time not extending 10 days. No handling of cyanide Eco-Pak occurs while staging at RSB. "No smoking" and "No eating and drinking" signs are posted on the entrance gate to the RSB yard when cyanide is present. Because cyanide is not handled in the RSB yard and locked within the dry-van trailer no specific personal protective equipment is needed and therefore PPE signage is not warranted.

The yard is characterized by a gravel surface and the perimeter is fenced with a 6-feet high perimeter chain-link fence topped with barbed wire. Infrared detection and security cameras are installed on the administrative building overlooking the staging area. Key RSB employees receive alarms notification 24/7. A guard is stationed on site during out of office hours when cyanide trailers are parked in the yard. The RSB yard is primarily used for parking empty trailers and the occasional vehicle. No hazardous materials are stored in the RSB yard during the time cyanide trailers are present.

The dry-van trailers are designed to be watertight. The trailers undergo pre-trip inspections that include checking the integrity of the trailer for any leaks or potential holes. The cyanide remains locked in the dry-van trailers while being temporarily parked in the RSB yard.

Because the solid cyanide is transported in bag-in-box delivery form in watertight trailers and that trailers are sealed during staging at RSB yard, the cyanide is protected from potential contact with water or spillage. No build up of hydrogen cyanide or cyanide dust release is expected from watertight trailers containing 18 bags-in-box.

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3. EMERGENCY RESPONSE: *Protect communities and the environment through the development of emergency response strategies and capabilities*

Transport Practice 3.1: *Prepare detailed emergency response plans for potential cyanide releases.*

The operation is in:

☒ **in full compliance with Transport Practice 3.1**

☐ in substantial compliance

☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

RSB developed a Transportation Emergency Response Plan (TERP). The TERP document provides guidance to drivers in case of accident with or without spillage of dangerous materials.


In addition, RSB developed an Emergency Preparedness Package (EPP) that is maintained as an internal manual of the company's procedures for emergency response.

The EPP implemented by RSB is considered appropriate for the transportation route, form of cyanide, type of vehicle, method of transport, and conditions of the roads travelled. RSB transports cyanide only in solid briquette form in tractor-trailers, and except for an approximately 120 km of unpaved gravel road and winter ice road in northern Saskatchewan all transportation is on U.S. State and Canadian Provincial hazmat defined highways.

The ERAP and CHEMTREC emergency contact numbers are included on the Bill-of-Lading and in the event of a cyanide transport emergency drivers are required to contact the applicable emergency response number. CHEMTREC and ERAP will call the product owner's emergency contact to implement the product owner's emergency response plan.

Both EPP and TERP documents provides specific response actions to drivers and RSB Safety Manager in the event of a cyanide transport accident. The EPP's customers section refers to specific guidance for cyanide. The TERP document specifies the driver's obligation to notify local authorities of an accident with or spill of hazardous materials. As indicated in the TERP document, drivers by law must notify the local authorities in the event of an accident involving a hazardous material. In the USA this entails notifying the Fire Department (911), and in Canada the police (911) to initiate local response. RSB must also notify CHEMTREC in the USA or ERAP number in Canada, to implement the product owner's emergency response plan if there is a spill or potential of a spill of hazardous material. The Federal Motor Carrier Safety Administration (FMCSA) in the US is also to be notified if the spill is reportable. In summary, in the event of a spill, external contractors will carry out any clean-up activities. The arrangements for hiring external contractors will be managed by the cyanide supplier who will be contacted by either CHEMTREC or ERAP agencies, themselves contacted by local authorities in the US or Canada.

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Transport Practice 3.2: *Designate appropriate response personnel and commit necessary resource, for emergency response.*

The operation is in:

☒ **in full compliance with Transport Practice 3.2**

☐ in substantial compliance

☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

RSB drivers follow company defined training curriculum prior to being dispatched. The curriculum emphasizes transportation safety, hazardous materials transport and emergency response. This is represented by the following courses: Dupont Sodium and Potassium Cyanide transport safety (video – DVD media); transport of dangerous goods, professional driver improvement course (PDIC); and fire extinguisher use. The RSB Employee Handbook mentions refresher training is conducted every two years for Dangerous Goods and Sodium and Potassium Cyanide e-Learning Suite. Driver TDG re-certification occurs every two years.

The Emergency Preparedness Plan, the Transport Emergency Response Plan as well as the Employee Handbook provides descriptions of the specific emergency response duties and responsibilities of drivers and office personnel in the event of a cyanide-related emergency.

The Employee Handbook document specifies the content of a spill kit when transporting hazardous or radioactive materials. RSB provides each truck driver with a first aid and spill kits. The Routing Package checklist reminds the driver to confirm that a spill kit is available. The RSB Employee Handbook procedures establishes the responsibility of the driver to ensure the availability of a first aid and spill kits when transporting hazardous materials. The kits only comprise supplies appropriate for the driver's response activities called for in the TERP and do not include any remediation material or equipment that needs regular service or maintenance.

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

The operation is in:

☒ **in full compliance with Transport Practice 3.3**


☐ in substantial compliance

☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

The critical information for emergency response is included in the bill of lading. This involves CHEMTREC and ERAP phone numbers. Upon notification by local emergency response team, both CHEMTREC (US) or ERAP (Canada), as applicable, will call the product owner's emergency contacts to implement the product owner's emergency response plan.

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TERP document includes contact information for the RSB 24/7 emergency office, local authorities (police (Canada) or fire department (USA)), CHEMTREC, ERAP, and the Federal Highway Motor Carrier Administration (FHMC). The EPP includes a checklist for gathering and recording incident information via telephone. The checklist includes the following contacts: RSB Drivers, Police Department, Emergency Response Site Coordinator, Dispatch, Safety Department, Insurance Company Contact, Customer, Shipper and Consignee.

As set out in the roles and responsibilities in the Quality Manager System Manual, the Safety & Maintenance Manager is responsible for ensuring the review and maintenance of the EPP and TERP documents. Finally, a reference for notifying ICMI in the event of a significant cyanide incident is also observed in the TERP document.

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

The operation is in:

- ☒ **in full compliance with Transport Practice 3.4**
- ☐ in substantial compliance
- ☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

RSB truck drivers are not expected to participate in remediation efforts following a cyanide-related incident. Instead, hazardous waste professionals contacted by local emergency authorities will mobilize to the accident scene and follow CHEMTREC, ERAP guidance or consignor's emergency response plan as necessary. Nonetheless, RSB has developed a Sodium Cyanide Instruction Sheet included in Routing Packages that provides general information to drivers on response and disposal measures for contaminated solids including contaminated dirt and/or spill clean-up debris.

The EPP contains instructions to drivers transporting cyanide including the prohibition to use chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide if cyanide spills occur on surface water. However, it should be noted that drivers do not transport the above-mentioned chemicals and do not have a role in any remediation activities involving a cyanide release.

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

The operation is in:

☒ **in full compliance with Transport Practice 3.5**

☐ in substantial compliance

☐ not in compliance

Summarize the basis for this Findings/Deficiencies Identified:

EPP and TERP review of adequacy is conducted regularly as part of a task required by the Quality Management System (ISO 9001:2015). In practice the emergency procedures are reviewed more frequently as clientele changes, and contact information is reviewed at least annually prior to the start of each cyanide shipment consignment.

The Safety/Maintenance Manager is responsible for ensuring that mock drills (either live or table-top) are conducted annually. Interview with RSB president and previous ICMC audit report indicate mock drills, either table-top or field-based, were conducted between 2018 and 2021, except for 2020. In September 2025, an emergency response field-based training and mock drill was provided by Cameco to RSB office personnel and limited number of drivers. The lessons from the September 2025 mock drill were shared with the rest of RSB drivers not able to attend the field-based training.

In the event of an accident, an Incident Report is prepared by RSB that includes specific details of the incident, evaluates the effectiveness of the company's response and, as appropriate, makes recommendations for improvement. RSB has not had a transport incident involving cyanide during the recertification period.

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