



SOLIDCORE RESOURCES PLC ON-SITE TRANSPORT

CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

Table of Contents

Introduction.....	3
Operation General Information	3
Operation Location Detail and Description.....	4
Auditor’s Finding.....	7
Compliance Statement.....	7
Auditor Information	7
Auditor Attestation.....	8
Principles and Standards of Practice	9
Principle 1 TRANSPORT	9
Standard of Practice 1.1.....	9
Standard of Practice 1.2.....	11
Standard of Practice 1.3.....	11
Standard of Practice 1.4.....	13
Standard of Practice 1.5.....	14
Standard of Practice 1.6.....	14
Principle 2 INTERIM STORAGE	15
Standard of Practice 2.1.....	15
Principle 3 EMERGENCY RESPONSE	17
Standard of Practice 3.1.....	17
Standard of Practice 3.2.....	18
Standard of Practice 3.3.....	19
Standard of Practice 3.4.....	20
Standard of Practice 3.5.....	21

The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.



Introduction

This document represents a Summary Audit Report for the Cyanide Code recertification transportation audit of Varvarinskoye JSC, a company which conducts mining operations located in Kazakhstan.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audit is complete, it posts the Summary Audit Report on the Cyanide Code website.

Current Summary Audit Report has been prepared based on the information available at the time of the audit. Every effort has been made to ensure accuracy of the information presented herein with the supporting evidence available where applicable. Information provided by Varvarinskoye JSC has been taken in good faith and has been verified where possible.

Operation General Information

Name of Production Facility:	Varvarinskoye JSC
Name of Facility Owner:	Solidcore Resources PLC
Name of Facility Operator:	Varvarinskoye JSC
Name of Responsible Manager:	Ryssaldy Komutova, Chief Environmental Engineer
Address:	Varvarinka
State / Province:	Kostanay
Country:	Kazakhstan
Telephone:	+7 (7142) 39 02 25
Email:	KomutovaRT@solidcore-resources.kz

Operation Location Detail and Description

Cyanide Transportation on-site of the Varvarinskoye mine consists of 2 routes: 1) Varvarinkoye Railway Spur – CN Storage Compound and 2) CN Storage Compound – CN Mixing Area at the Processing Plant (Figure A below).

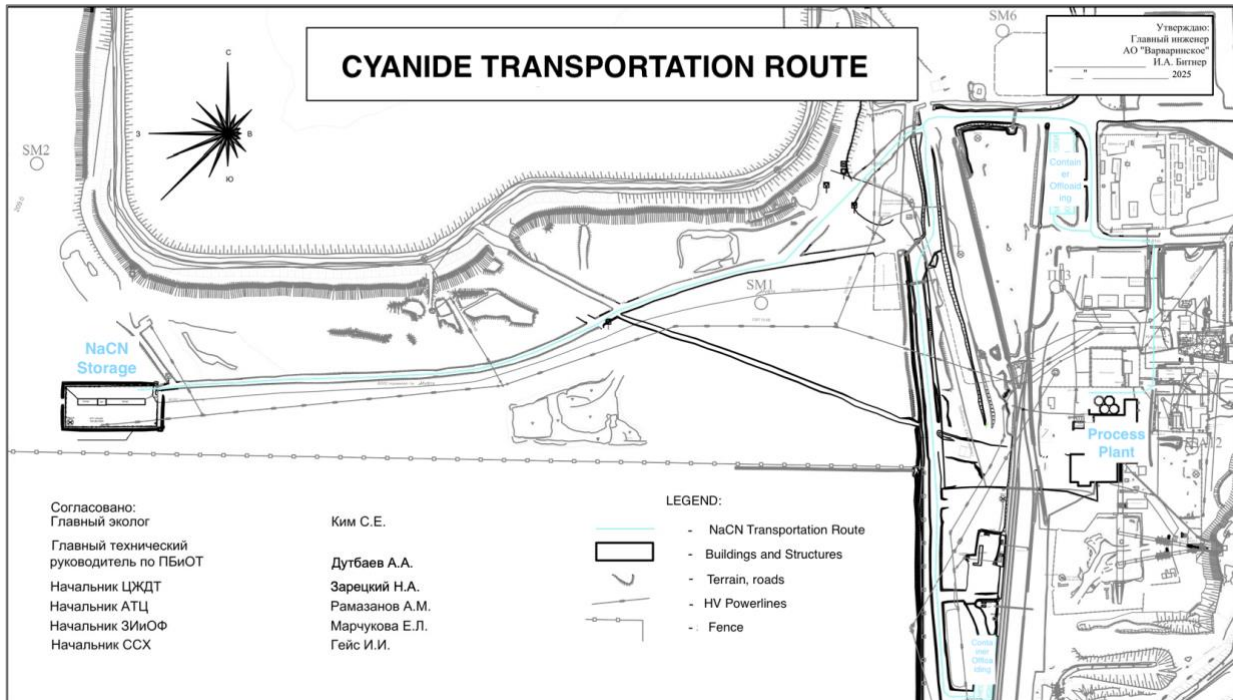


Figure A: Cyanide Transportation Route On-Site of Varvarinskoye Mine

“Varvarinskoye” JSC purchases cyanide from “Korund Zyan” JSC (hereinafter referred to as “Korund”, a cyanide manufacturer located in Russian Federation (hereinafter referred to as “RF” or “Russia”) and has been certified under ICMI since 2012.

Transportation of sodium cyanide from Dzerzhinsk station in Russian Federation to Bataly station in the Republic of Kazakhstan is implemented through joint efforts of JSC Russian Railways (hereinafter referred to as “RZD”), which owns the railway infrastructure in the Russian Federation, and JSC Kazakh Railways (hereinafter referred to as “KTZ”), which has similar rights in the Republic of Kazakhstan. These organizations are state-owned and their actions are governed by the regulations for the transportation of dangerous goods by rail, which in turn are based on UN recommendations. The shipping containers are loaded onto the rolling stock at Korund’s own railway spur and travel to the destination station without being unloaded.

As soon as cyanide cargo arrives at Bataly Station, “Varvarinskoye” JSC becomes duly responsible for the cargo. At Bataly, cyanide containers are inspected by the acceptance operators of both

the “Varvarinskoye” JSC and Kazakhstan Railway, are handed over and forwarded on to the Varvarinskoye platform, where the cyanide is offloaded from the containers (wooden boxes) by Varvara and transported by means of own site vehicles to the designated cyanide storage warehouse. After emptying and decontaminating the cyanide containers they are returned to the manufacturer (Korund).

“Varvarinskoye” JSC is continually informed of the cargo whereabouts and pending arrivals via designated acceptance-delivery agents. Computerized tracking system ETRAN is used to monitor the cargo using the rolling stock numbers. Consignment notes specify this information which will remain unchanged from the start to the end of the cyanide transportation route.

For the cyanide transportation within the mining tenement, Varvarinskoye” JSC deploys Belaz and Kamaz trucks (shown on Figure B and Figure C below) operated by experienced drivers in possession of appropriate licenses.



Figure B: Belaz Truck Used for Cyanide Transportation at Varvarinskoye JSC, 2025

Both Kamaz and Belaz trucks are suitable for the loads they are carrying, undergo appropriate maintenance and have appropriate labeling (UN 1689) when transporting the cyanide. The cyanide is securely fastened to prevent the loads from shifting. Procedures are in place, including the Emergency Reponse Plan which is updated annually.



Figure C: Kamaz Truck Used for Cyanide Transportation at Varvarinskoye JSC, 2025

No problems with the transportation of cyanide have occurred in the Varvarinskoye transportation history. No incidents or emergencies have occurred; the process is strictly monitored by the Health and Safety and the Security departments, as was reported to the auditors during the site visit.

Auditor's Finding

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

Compliance Statement

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

Auditor Information

Audit Company: Greenrock International LLC
Lead Auditor: Julia Kennedy
Lead Auditor Email: juliakennedy@kennedy-global.com

Names and Signatures of Other Auditors:

Auditor 1: Christine Blackmore Lead and Technical
Name (Print/Type)


Signature

Dates of Audit: 23-26 September 2025

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the recertification audit. I further attest that the recertification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Varvarinskoye JSC

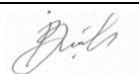


23-26 September 2025

Name of Operation

Signature of Lead Auditor

Date



Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

Varvarinskoye JSC implements a procedure for selecting transport routes that minimizes the potential for accidents and releases or the potential impacts of accidents and releases.

Cyanide Transportation on-site of the Varvarinskoye mine consists of 2 routes: 1) Varvarinkoye Railway Spur – CN Storage Compound and 2) CN Storage Compound – CN Mixing Area at the Processing Plant (Figure A above).

Transportation of cyanide containers from the Railway spur to the Storage Compound takes place every 6 weeks on the average. Transportation of cyanide boxes from the Compound to the Mixing Plant takes place on a daily basis or every other day.

“Varvarinskoye” JSC has advised external responders and also communities of the nearby settlements of their roles in an emergency. In case of a large-scale emergency a National EMERCOM would step in and take over. “Varvarinskoye” JSC has agreements in place with the licensed rescue services such as “Ort Sondirushi” JSC, “Phoenix Security” LLC and others who are based at the site and also ensure emergency preparedness in case of an emergency. “Phoenix Security” LLC is identified in the ERP as one of the main responders, the expected arrival time into an emergency location is within ten minutes.

Cyanide transportation routes within the mine site are selected in such a way as to minimize the potential risks to the people and the environment.

Infrastructure maintenance and construction is implemented in accordance with the local legislation. The roads have been designed and constructed in accordance with the local legislation.

Cyanide transport routes are well-maintained technical roads with appropriate grade and pitch which runs across a flat terrain with a shortest possible distance. No water bodies are present in close proximity. The area is not seismic with predictable climate and fog.

Varvarinskoye JSC implements procedures to evaluate and manage risks pertaining to the transportation of cyanide within the mine site area. Procedures include Emergency Response Plan, Standard Operating Procedures, mock drills and continuous training of personnel.

Varvarinskoye truck and trail drivers evaluate the route condition at the beginning of every shift prior to transportation of cyanide. Such a routine assessment is part of the risk evaluation and management procedures and allows establishing the condition of main roads and access roads, fitness of a truck and absence of people, among other things.

“Varvarinskoye” JSC documents the measures taken to address the risks with the selected route as part of a pre-trip inspection routine. The drivers document the measures in their daily risk assessment cards as well as provide H&S reports to the linear manager. In addition, risk management measures have been documented in the Standard Operating Procedures and the Emergency Response Plan.

Varvarinskoye mine has earned its social licence to operate upon design, governmental approval and successful public consultations. “Varvarinskoye” JSC seeks input from communities prior to commissioning any significant facility, including roads and railway. Following each public consultation, Minutes of Public consultations are signed by the community participants and the mine representatives and submitted to the Governmental authorities for approval. Should any significant changes to the road location or design arise, “Varvarinskoye” JSC would have to go through the process once again until full approval is granted by the state agencies.

Transportation within “Varvarinskoye” JSC territory does not require special convoys. However, designated mine rescue services are on standby 27/7, including the contractors: “Ort Sondirushi” JSC and “Phoenix Security” LLC. Reportedly, no accidents involving cyanide transportation by trucks have occurred.

“Varvarinskoye” JSC does not subcontract transportation or handling of cyanide within the mine site territory to other companies.

Standard of Practice 1.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC uses only trained and qualified drivers to operate its transport vehicles. Drivers deployed for the transportation of cyanide hold special ADR License (DOPOG) which is required by law pertaining to transportation of dangerous goods (State Order No 460 dated 17 April 2015), licenses and training records were evidenced by the auditors during the visit.

Any personnel involved in the handling of cyanide during loading, unloading and transportation receives appropriate training. Drivers, forklift and crane operators have been trained appropriately by “Varvarinskoye” JSC, participate in the planned mock drills and pass routine inductions and refresher training. Necessary training and refresher training is conducted regularly apropos the Training Schedule. Evidence has provided to the auditors during the site visit.

“Varvarinskoye” JSC does not subcontract transportation or handling of cyanide within the mine site territory to other companies.

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC uses only machinery and vehicles designed to operate within the appropriate loads. Figure B and Figure C demonstrate the vehicles which are used for transportation of cyanide from a) the Varvarinskoye railway station to the Storage Compound and b) from the Storage Compound to the Mixing area.

For the transportation of cyanide on site, “Varvarinskoye” JSC uses heavy duty vehicles – KAMAZ and BELAZ trucks - which can carry greater tonnages than the maximum permitted cyanide tonnage.

The BELAZ truck that is used to transport cyanide containers from the railway station to the cyanide warehouse has a load capacity of 40.5 tons while that of the trailer is 65 tons (according to the data sheet). The weight of the cyanide in the container arriving at the railway station is 20 tons (20 x 1 ton boxes) of cyanide plus 2.5 tons the weight of the container itself, thus giving a total of 22.5 tons. Therefore, overloading of the BELAZ is omitted.

The BELAZ truck is used for the transportation of sealed containers from the railway station to the cyanide storage only; individual cyanide boxes are not loaded. Varvara has systems in place to make sure only one container is loaded on the trailer at a time and is securely fastened prior to transportation. The supervisor responsible for the loading-offloading and the transportation of cyanide runs a risk assessment check-list no make sure the system is observed.

Once at Varvarinskoye station, the containers are handled using a crane (GROVE GRT880). The crane is appropriate for the loads and is equipped with the overload safety devices.

KAMAZ truck is used to transport cyanide boxes (12 x 1 ton each) from the Storage Compound to the Mixing Area. Its load capacity is suitable for the load of 12 tons.

Varvara maintains a monthly maintenance schedule for all equipment and machinery used at the Mine, including the aforementioned BELAZ, KAMAZ and the crane used for the handling and transportation of cyanide. Both the maintenance schedule and the maintenance records have been viewed by the auditors and are found appropriate.

At the commencement of every shift all vehicles and trailers are checked prior to use on site, this protocol includes both BELAZ and KAMAZ, records of the checks are logged.

Varvarinskoye drivers implement procedures to prevent overloading of the trucks and trailers used for the transportation of cyanide. Only one 20-foot container is loaded on to a vehicle at a time and is locked securely.

KAMAZ truck has safety drop-sides which cover 70% of the box height, the boxes are securely fastened following the loading. The truck bed can contain no more than 12 boxes which is equal to 12 tonnes. This prevents overloading of the transport vehicle.

Lifting capacity of GROVE GRT880 Crane is 78 tonnes, overload safety devices are in place. The crane is on a rolling maintenance program and is operated by a highly qualified operator, the latter was interviewed during the visit.

“Varvarinskoye” JSC does not subcontract transportation or handling of cyanide within the mine

site territory to other companies.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide is transported in 20ft shipping containers which are compliant with UN design and specification.

Transportation of cyanide in the boxes occurs only at a short route within the mine site. Cardboard boxes carry required signage and warning signs. Cyanide boxes retain manufacturer packaging during storage and transportation within the mine site, as evidenced during the visit.

UN 1689 classification 6 is shown on the placards. The placards are attached to the 4 walls and a door, as required by the International Regulations applicable to the transportation of dangerous goods. The placards are available on the trucks transporting the cyanide.

“Varvarinskoye” JSC implements a safety procedure for its cyanide transport. Vehicles are undergoing regular checks prior to every departure; the log is being signed off by the drivers. Evidence includes inspection checklists, risk assessment forms and reports which have been provided to the auditors.

Preventive maintenance programme for the trucks, trailers, crane and the loader is implemented by “Varvarinskoye” JSC. Kamaz is serviced by a professional servicer located in Kostanay being still on the warrantee. Annual Schedule for the preventive maintenance as well as maintenance records have been produced to the auditors.

Drivers work in accordance with the Labour Code of Kazakhstan Republic and internal procedures of “Varvarinskoye” JSC which stipulate for the limitation on the hours worked.

Appropriate locks are in place and safe driving rules are strictly observed by the drivers.

Likelihood of civil unrest occurring is minimal; the mine site area within which cyanide transportation takes place is fenced off and is also protected by armed security.

In case of severe weather conditions such as rain, hail or snowstorm, trucking of cyanide is not allowed.

“Varvarinskoye” JSC employees involved into cyanide handling, undergo mandatory medical examination at the start of every shift as part of drug and alcohol prevention and control. This includes drivers who are breathalised prior to each shift. In addition, Varvara has implemented breathalizers at each gate entry.

“Varvarinskoye” JSC implements appropriate Health and Safety procedures standard which outline overarching H&S requirements to all employees and are updated regularly. Observation of the requirements contained therein is recorded in special purpose records and journals. The auditors have been provided with records of routine vehicle maintenance, safety checks and medical checks. The auditors have reviewed the above procedures as well as the evidence of compliance and concludes that the procedures are being implemented at a high level.

“Varvarinskoye” JSC does not subcontract transportation or handling of cyanide within the mine site territory to other companies.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

Summarize the basis for this Finding/Deficiencies Identified:

Varvarinskoye JSC do not use maritime transportation. For the purpose of the current report “Varvarinskoye” JSC only uses vehicles to transport cyanide within the mine site territory.

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Summarize the basis for this Finding/Deficiencies Identified:

The drivers have necessary means of communications such as mobile phones and a radio. Also,

there is a stationary landline at the Cyanide Storage Compound.

1. Is the communication equipment (e.g. GPS, mobile phones, radios, pagers.) periodically tested to ensure it functions properly?

The communication equipment is tested on a daily basis at the beginning of each shift and prior to each shipment.

There are no black out areas along the transport routes on the territory of “Varvarinskoye” JSC. However, radio is used by the drivers with specific frequencies assigned for specific purposes. For example, radio wave “Safety” shall be used in case of an emergency or incidents.

Cyanide shipments are tracked using the electronic system and the consignment notes as well as internal waybills. In addition, inventory records are kept by the storehouse manager.

“Varvarinskoye” JSC implements inventory controls and appropriate chain of custody documentation to track cyanide during transportation. Both the Cyanide Storage and the Mixing Plant are observed by the security manager using CCTV. Cyanide quantities transported within the site are managed in such a way as to keep lean production and overloading of the Mixing Plant area.

During transport of cyanide, Material Safety Data Sheets (MSDS) are available in English and Russian languages. MSDS are also used when “Varvarinskoye” JSC applies for the Import License to make shipments of cyanide possible.

Shipping records indicating the amount of cyanide include the Consignment Note which accompanies cyanide until it reaches the Storehouse Compound as well as the Waybill which is used for internal records are available; other documents are also available in Russian and Kazakh languages.

“Varvarinskoye” JSC does not use subcontractors for the cyanide handling or transport within the territory of its mining tenement.

Principle 2 | INTERIM STORAGE

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

Standard of Practice 2.1

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

in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

For purposes of the audit, “interim storage sites” and “trans-shipping depots” refer to facilities where cyanide is held temporarily when changing carriers or transport modes. Truck and rail terminals and port facilities are examples of interim storage sites and trans-shipping depots.

Activities such as parking a cyanide transport vehicle for the night while en route do not involve interim storage. However, parking a truck carrying a cyanide load at a truck or rail terminal or a port for transfer to another truck, train or ship would constitute interim storage unless such a transfer took place within a short period of time (hours as opposed to a day or more). Storage in a warehouse, as defined in the Code’s *Definitions and Acronyms* document, is a production activity and must be evaluated for compliance using the Cyanide Production Verification Protocol.

There is no interim storage involved during the cyanide transportation within the Varvarinskoye tenement. Only permanent Storage Compound is available at the Varvarinskoye mine site.

Appropriate warning signs are posted across the facilities alerting workers that cyanide is present, that smoking, open flames, eating and drinking are not allowed and what personal protective equipment must be worn.

The Cyanide Storage Compound area is fenced off to prevent unauthorised access, as is the entire mine site area. The Compound is equipped with CCTV surveillance, movement sensors and a 24/7-armed security; the gates are sealed, as witnessed by the auditors this during the site visit.

Permanent Storage Compound is operated at Varvara mine site. Cyanide is stored separately from other chemicals.

Cyanide is stored at the warehouse with concrete floor which minimises the potential for contact of solid cyanide with water. Every cell at the Storage Compound is equipped with the cyanide detectors, working ventilation, leakage sumps, iron sulphate solution, fire-fighting equipment and Emergency Cabinets with necessary PPE.

Cyanide is stored in a permanent compound with adequate ventilation (1 operating and 1 back-up), to prevent build-up of cyanide gas. Back-up ventilation would switch on should the main ventilation malfunction. Ventilation maintenance checks take place on a monthly basis.

To prevent release of any spilled cyanide into the environment, each storage cell in the warehouse is equipped with drainage trenches and sumps, all of which are built of impermeable concrete as the Kazakhstan legislation dictates.

Ongoing expansion of the permanent Cyanide Storage (Stage 2 construction) is fully licensed by the state and is built in such a way as to observe the construction protocol and best practice

Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC has the Emergency Response Plan (“ERP”) that has been developed for its operations. The Emergency Response Plan for the Toxic Substances Warehouse contains emergency response information pertaining to the transportation of cyanide within the mine site and includes, among other thing, the following:

- emergency response scenarios and guidelines;
- instructions on the use of personal protective equipment;
- procedures for implementation of mandatory general measures in case of accidents;
- emergency response actions;
- first aid instructions;
- stakeholder notification;
- contact information;
- need for monitoring, and
- instructions for medical care.

The Emergency Response Plan is comprehensive, stipulates for the possible emergency scenarios involving cyanide and outlines necessary actions, requirements and roles.

The Emergency Response Plan is appropriate for the selected transportation routes on the territory of the mines site; those are short-distance designated routes with special-purpose vehicles assigned.

The Emergency Response Plan considers the physical and chemical form of the cyanide. The physical and chemical form of cyanide is also available in the Standard Operating Procedures.

The plan is specific to the method of vehicular transport and considers emergency response actions associated with that.

The Plan considers all aspects of the transport infrastructure through the procedures and instructions specifically linked to it.

The ERP considers the design of transport vehicles through standalone procedures and instructions linked to it. No interim storage is involved.

The Plan includes descriptions of response actions, as appropriate for the anticipated emergency situations during the railway operations. Staff responsibilities are described in detail and include measures pertaining to the safe evacuation of people, stakeholder notification protocols, incident investigation procedures and other responsibilities.

The Plan considers detailed description of response actions for all parties involved, as appropriate for the potential emergency situation scenarios.

The Plan clearly identifies the roles of both internal and external responders; these include Varvarinskoye personnel, mine rescue services such as “Phoenix Security” LLC and “Ort Sondyrushi” SC, on-site paramedics (MC “Abil Faiz”), fire brigade, hospitals, police and relevant governmental agencies.

Standard of Practice 3.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC provides regular emergency response training which involves inductions,

refresher training and drills in line with the existing Training Program and schedule. All vehicle operators receive initial induction and subsequent repeat inductions every six months. They also receive ADR training and emergency response training involving different emergency scenarios. Off-schedule briefing is also implemented for personnel involved with handling and transportation of dangerous substances such as cyanide. The auditors have reviewed the training program and training records and find these fit for purpose and appropriate.

Emergency response duties and responsibilities of personnel are described in the Emergency Response Plan in sufficient detail. There are clear descriptions of specific emergency response roles and responsibilities for all responders; these include Varvarinskoye personnel, mine rescue services such as "Ort Sondyrushi" SC and "Phoenix Security" LLC, on-site paramedics (MC "Abil Faiz"), fire brigade and others. Job Descriptions and Emergency Response Plans containing this information have been reviewed by the auditors.

Each vehicle has emergency response equipment on board. Safety Cabinet at the Cyanide Storage also contains a list of appropriate responder equipment which would be available during an emergency.

Varvara Mine Paramedic Service is adequately staffed and prepared to provide first aid treatment to its workers in cases of cyanide poisoning, should any cyanide exposure occur during the transportation of cyanide.

All necessary emergency response equipment is available at each truck during cyanide transportation. This includes a shovel, "Dragger" facemask, gloves, L1 protective suit, and necessary emergency response tools. The list of equipment is provided in the ERP and is reviewed annually.

The Paramedic Service is equipped with the necessary medical supplies, such as antidotes and oxygen as well as other supplies that would be available to the workers should the need arise.

"Varvarinskoye" JSC implements Health and Safety procedures which outline the requirements for the emergency response equipment. Emergency Response equipment is inspected apropos the set procedures and is available during transport.

"Varvarinskoye" JSC does not use subcontractors for the cyanide handling or transport within the territory of its mining tenement.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC implements procedures and keeps current the contact information for notifying affected parties of an emergency. These are outlined in internal procedures, including the Emergency Response Plan.

“Varvarinskoye” JSC implements necessary procedures to ensure that the emergency response procedures are updated. Annual review of the procedures is implemented to achieve this aim. Procedures can also be modified and updated as needed.

“Varvarinskoye” JSC has procedures in place for notifying ICMI on any significant cyanide accidents that would occur during cyanide transport. This information is included in the Emergency Response Plan, as evidenced by the auditors. To date, there have been no cyanide incidents that have occurred during the port operations.

Standard of Practice 3.4

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

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC has developed procedures for remediation and neutralization of decontaminated soils as well as management of spill clean-up debris. These have been reviewed by the auditors and are found appropriate.

In an emergency, all response measures should be carried out taking into account the properties of sodium cyanide and the relevant precautions as specified in the emergency card. The emergency card (619) does not allow release of substance into water bodies, basements or sewers.

Varvarinskoye” JSC has developed procedures for remediation and neutralization of decontaminated soils. The Emergency Response Plan contains procedures for remediation and

neutralization of decontaminated soils, which allow the use of ferrous sulphate and calcium hydroxide. The use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide released into surface water is not a possible scenario due to the absence of surface waterbodies within the immediate proximity to the cyanide transport route at the mine site. The ERP strictly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

Standard of Practice 3.5

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

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC undertakes revisions of the Plan on an annual basis unless off-schedule reviews and evaluations are required.

“Varvarinskoye” JSC periodically conducts emergency response drills involving different scenarios, as has been evidenced by the auditors during the site visit. Latest mock drill has been conducted using a scenario of a cyanide spill during transportation with the reports available for review.

Emergency response drills and exercises are conducted on a schedule in accordance with the Emergency Response Plan — each scenario at least annually, including scenarios of cyanide releases (positions 4, 5, 7, 8 of the updated ERP).

To date, the mock drills have been conducted successfully involving relevant parties with clearly assigned responsibilities, clear communication lines and timings recorded. Mock drill reports have been reviewed by the auditors and are fit for purpose.

“Varvarinskoye” JSC implements Health and Safety standards and the relevant procedures such as "Preparedness for emergency situations and elimination of accidents at hazardous production facilities" which require evaluation of the Plan’s performance.

“Varvarinskoye” JSC evaluates the Plan’s performance on an annual basis unless off-schedule reviews and evaluations are required.



SOLIDCORE RESOURCES PLC

KAZAKH RAILWAYS

CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

Table of Contents

Introduction	3
Operation General Information	3
Operation Location Detail and Description	4
Auditor’s Finding	7
Compliance Statement	7
Auditor Information	7
Auditor Attestation	8
Principles and Standards of Practice	9
Principle 1 TRANSPORT	9
Standard of Practice 1.1	9
Standard of Practice 1.2	11
Standard of Practice 1.3	11
Standard of Practice 1.4	12
Standard of Practice 1.5	16
Standard of Practice 1.6	16
Principle 2 INTERIM STORAGE	17
Standard of Practice 2.1	17
Principle 3 EMERGENCY RESPONSE	18
Standard of Practice 3.1	18
Standard of Practice 3.2	20
Standard of Practice 3.3	21
Standard of Practice 3.4	21
Standard of Practice 3.5	22

The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.



Introduction

This document represents a Summary Audit Report for the Cyanide Code recertification transportation audit of Varvarinskoye JSC, a company which conducts mining operations located in Kazakhstan.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Auditis complete, it posts the Summary Audit Report on the Cyanide Code website.

Current Summary Audit Report has been prepared based on the information available at the time of the audit. Every effort has been made to ensure accuracy of the information presented herein with the supporting evidence available where applicable. Information provided by Varvarinskoye JSC has been taken in good faith and has been verified where possible.

Operation General Information

Name of Production Facility:	Varvarinskoye JSC
Name of Facility Owner:	Solidcore Resources PLC
Name of Facility Operator:	Varvarinskoye JSC
Name of Responsible Manager:	Ryssaldy Komutova, Chief Environmental Engineer
Address:	Varvarinka
State / Province:	Kostanay
Country:	Kazakhstan
Telephone:	+7 (7142) 39 02 25
Email:	KomutovaRT@solidcore-resources.kz

Operation Location Detail and Description

Kazakhstan Temir Zholy (hereinafter – “Kazakhstan Railways” or “KTZ”) is used to transport cyanide on the territory of the republic of Kazakhstan. This organization is state-owned and its activities are governed by the regulations for the transportation of dangerous goods by rail, which in turn are based on UN recommendations.

“Varvarinskoye” JSC is purchasing cyanide from Korund Zyan JSC, a cyanide manufacturer located in Russian Federation (hereinafter referred to as “RF” or “Russia”) and certified under ICMI since 2012.

Transportation of sodium cyanide from Dzerzhinsk station in Russian Federation to Bataly station in the Republic of Kazakhstan is implemented through joint efforts of JSC Russian Railways (hereinafter referred to as “RZD”), which owns the railway infrastructure in the Russian Federation, and JSC Kazakh Railways, which has similar rights in the Republic of Kazakhstan.

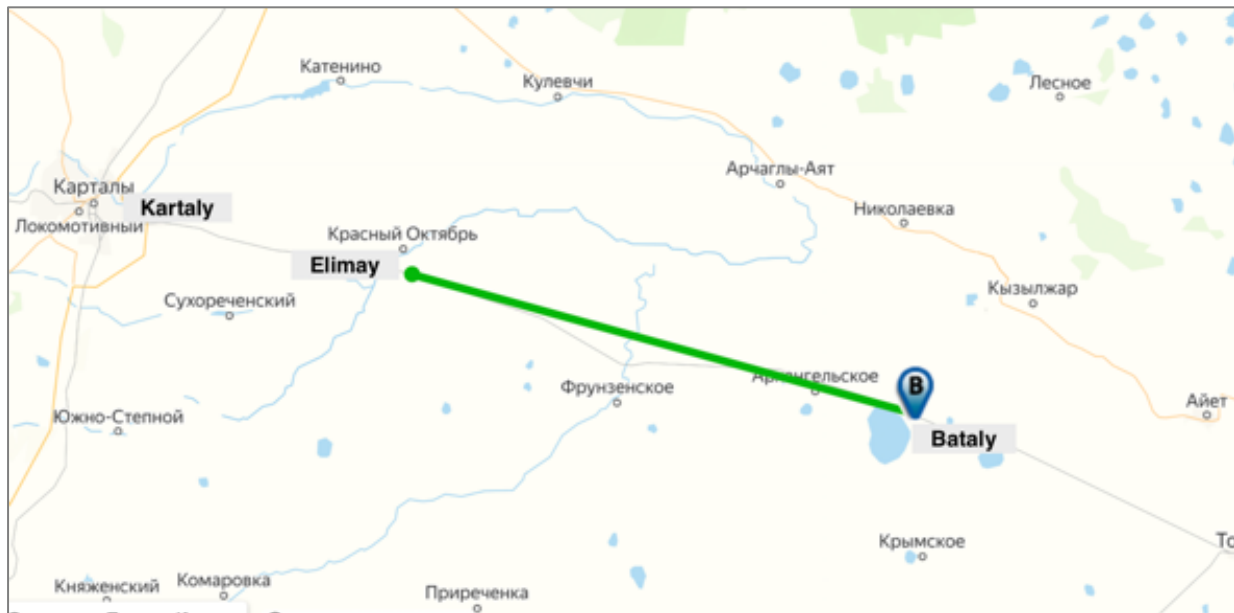


Figure A: Cyanide Transport Route from Kartaly Station to Bataly Station

JSC RZD and JSC KTZ are licensed to transport all types of cargo, including sodium cyanide (UN code 1689). Their activities are insured in accordance with the current legislation of the Russian Federation and the Republic of Kazakhstan. Both are monopolies and select appropriate routes for the transport of dangerous goods with a likely border crossing for such international freight shipments between Russia and Kazakhstan being the Kartaly station border crossing. There is only

one rail line from Kartaly Station in Russia to Bataly Station in Kazakhstan; there are no stations in between. Route from Kartaly to Bataly is less than 100km long and is shown on Figure A above.

All responsibility for the safety and transportation of cargo rests with the carriers JSC Russian Railways within the territory of the Russian Federation and JSC KTZ within the territory of the Republic of Kazakhstan.

In the process of transportation, the Russian locomotive is uncoupled at Kartaly and the rolling stock coupled to Kazakhstan Railway locomotive and then proceeds to Bataly station where the Kazakhstan locomotive is uncoupled from the rolling stock and then coupled to Varvarinskoye JSC locomotive. Thus, the containers loaded onto the railway platform travel to the destination station without being unloaded. The carriers - JSC Russian Railways and JSC KTZ - are responsible for the cargo safety.

Freight forwarder "Grant Express" LLC is a forwarding agent on the territory of Kazakhstan. Freight forwarders act as intermediaries to ensure timely receipt of funds by the carriers. Diagram of delivery of sodium cyanide from Korund Zyan in Russia to Varvarinskoye JSC in Kazakhstan in 2025 is shown on Figure B below and outlines all parties involved in the supply chain.

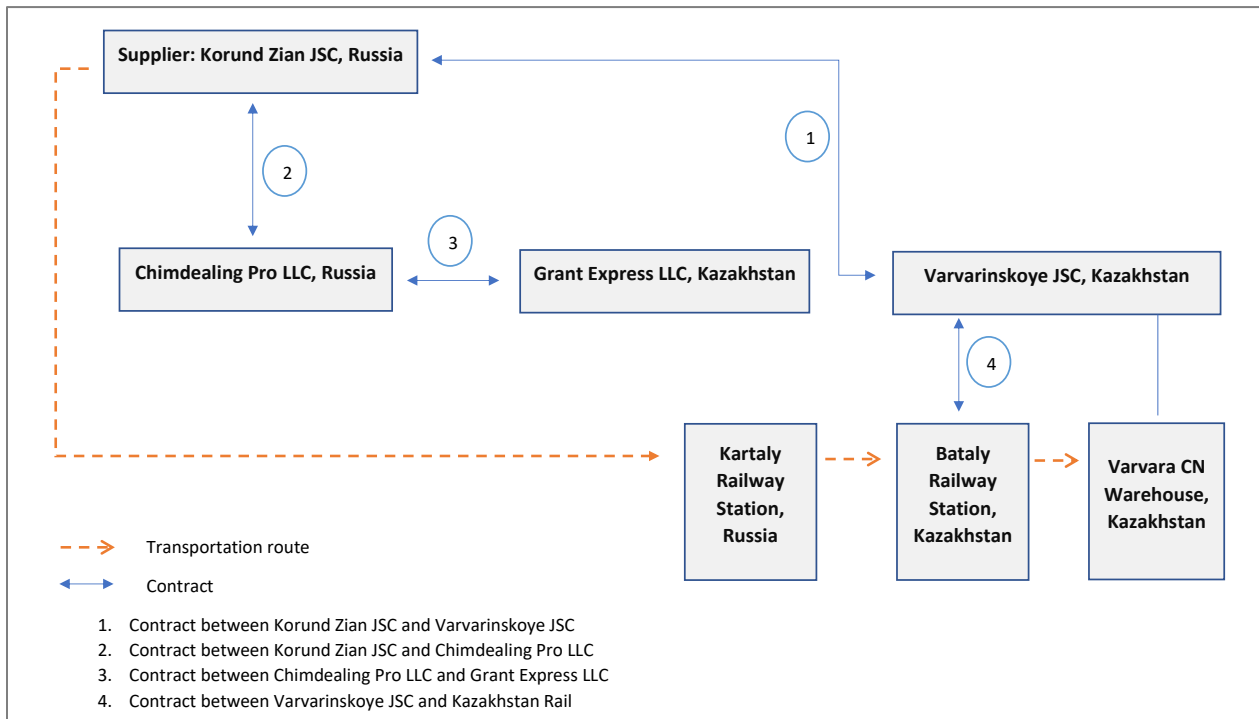


Figure B: Diagram of Cyanide Delivery from Korund Zyan JSC to Varvarinskoye JSC

KAZAKHSTAN RAILWAY CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

In Dzerzhinsk, Russia, RZD accepts the cyanide cargo from Korund Zyan upon checking the container integrity, total number and weight of the containers, integrity and impression of seals. Consignment notes specify this information which will remain unchanged from the start to the end of the cyanide transportation route.

RZD continually informs KTZ and “Varvarinskoye” LLC of the cargo whereabouts and pending arrivals via designated acceptance-delivery agents. Computerized tracking system ETRAN is used to monitor the cargo using the rolling stock numbers. Documentation with regard to the supply of dangerous goods by rail is in accordance with RID (international carriage of Dangerous Goods by Rail).

As soon as the cyanide cargo arrives at Bataly Station, the destination station apropos the Agreement with KTZ, KTZ’s liability ends and “Varvarinskoye” JSC becomes duly responsible for the cargo. At Bataly, cyanide containers are inspected by the acceptance operators of both the “Varvarinskoye” JSC and Kazakhstan Railway, are handed over and forwarded on to the Varvarinskoye storage compound.

On arrival of the cyanide at Varvara platform, the shipping containers are unloaded from the rolling stock and taken to the cyanide storage compound. At no time during the journey from Korund to Varvara platform are the shipping containers (containing the cyanide boxes) opened or leave the rail rolling stock. Security is provided throughout the journey.

Shipping containers are emptied, decontaminated and returned to the manufacturer apropos the implemented procedure. Each container is subjected to cyanide testing before being returned and all placards displaying UN1689 are removed. Containers are placed back onto the rolling stock matching the original numbers assigned when shipped to the mine, as the procedure dictates. This constitutes the significant change in the cyanide transportation operations since the previous audit.

Varvarinskoye JSC is in possession of Specific Goods Import License No KZ57LBG00002423 issued by the Ministry of Industry and Construction of Kazakhstan Republic (valid till 30.12.2025). Basis for the issuing of the Import License is Contract No KҚ.671.24 / No AOB 2(03-1-4552) dated 20.12.2024. In addition, MSDS for Cyanide, Environmental Insurance agreement (SK “Eurasia”) and hazardous waste management Agreement (“Sharua” LLC) are submitted to the Ministry as part of the licensing requirements. These agreements are in place to guarantee safe transportation and environmental insurance of the dangerous goods.

Preliminary customs declaration would have been submitted to the Customs before every shipment thereby speeding up the transit and customs clearance process of the cyanide containers, a process made possible by the Customs Union treaties.

Auditor's Finding

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

Compliance Statement

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

Auditor Information

Audit Company: Greenrock International LLC
Lead Auditor: Julia Kennedy
Lead Auditor Email: juliakennedy@kennedy-global.com

Names and Signatures of Other Auditors:

Auditor 1: Christine Blackmore Lead and Technical
Name (Print/Type)


Signature

Dates of Audit: 23-26 September 2025

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the recertification audit. I further attest that the recertification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Varvarinskoye JSC



23-26 September 2025

Name of Operation

Signature of Lead Auditor

Date



Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

During transportation of dangerous goods, such as cyanide, across the countries of the Commonwealth of Independent States (CIS), of which Kazakhstan and Russia are members, the transport companies involved into such transportation are to abide by the applicable national legislation as well as international rules, such as UN Standard Rules.

Kazakhstan and Russia are members of the Customs Union which allows smooth and speedy transit of cargo. When cyanide is dispatched from Korund, a set of documents is issued that travel with the cargo till it reaches Varvara, such as the Consignment note, MSDS, Emergency Response Card and Transit Permit. While Russian Railways is the monopoly rail in the Russian Federation, Kazakhstan Temir Zholy is the monopoly rail in Kazakhstan Republic and therefore both implement country wide safety procedures to ensure secure transportation.

In both countries, international transportation of dangerous goods by rail, including transit, is carried out in accordance with the international legislation and ratified international treaties. Where national law pertaining to transport, labeling, fixing, loading and offloading of dangerous goods would not suffice, international treaties apply.

In Kazakhstan, the process of transportation of goods by rail is regulated by the Rules for the Transportation of Goods by rail, approved by the Order of the Minister of Industry and Infrastructure Development of the Republic of Kazakhstan on August 2, 2019, No. 612.

Kostanay region in Kazakhstan has population density of 4,45 people/km² (total Kostanay region population is 865000 people); population alongside the CN transportation route is scarce. Therefore, associated risks are considered low albeit managed accordingly.

Infrastructure maintenance and construction is implemented in accordance with the local legislation. The main railroad had been constructed back in the Soviet era under the strict rules and impeccable standards and is being effectively used and maintained in the current days. Cyanide transportation route runs across a flat terrain on a straight line. Therefore, associated risks are considered low albeit managed accordingly.

Sharply continental climate inherent to the Kostanay region does not yield much fog while snowstorms pose certain risk to an uninterrupted transportation of cargo across the area through to the final destination. Water bodies alongside the CN transportation route are small in size and scarce.

KTZ operates procedures to evaluate the risks prior to each cyanide delivery. The procedures are reviewed periodically. KTZ implements procedures to re-evaluate the route, as required by the company's Safety Standards and the national legislation. Train crew reports back after each shift on the railroad condition and circumstances.

The transporter documents measures in specially designated templates. Thus, station attendants make an entry about any risks or malfunctions identified in DU-46 template and notify the relevant parties (including a duty engineer/dispatcher) about the risks and malfunctions that may pose a threat to the safety of train traffic. Appropriate measures are taken accordingly to manage these risks.

The transporter is to ensure the involvement of the communities, governmental agencies and public associations in its work on ensuring traffic safety, informing the general public about the progress and results of work on the prevention of safety breaches using mass media, as stipulated in the company procedure "Order of KTZ President on the control system and measures to organize traffic safety" dated January 4, 2012.

Dangerous goods which are subject to being escorted by specially trained conductors of the consignor (consignee) and are transported in compliance with the requirements of the Rules for the Transportation of dangerous goods by rail, as approved at the fifteenth meeting of the Council for Rail Transport of the Commonwealth of Member States on April 5, 1996.

RZD is responsible for the provision of security convoy, namely the 2 armed security guards, who remain onboard the "teplushka" designated carriage throughout the entire route. These are provided with the necessary PPE, a first-aid kit, a set of emergency tools and primary fire extinguishing equipment.

The security convoy (2 guards) accompanying dangerous cargo and guarding it at the interim

Ensure that transport equipment is suitable for the cyanide shipment.

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

Summarize the basis for this Finding/Deficiencies Identified:

KTZ uses only the equipment with the appropriate load capacity. KTZ receives the cyanide cargo from RZD upon checking the container integrity, total number and weight of the containers, integrity and impression of seals. Consignment notes specify this information which remains unchanged from the start to the end of the cyanide transportation route. The rolling stock with containers remain intact when the trains stop at the interim stations on their journey from Russia. The flatbeds' technical characteristics are suitable for the 20ft containers. If necessary, the weight of the dangerous goods is verified at the point of destination using scales of similar type which would have been used for the goods to be weighed at the point of departure.

Loading and unloading of dangerous cargo in the covered wagons and standard containers, as well as containers with dangerous goods on open-type flatbeds is carried out in accordance with the "Rules for the transport of dangerous goods by railways", "Safety rules for the transport of dangerous goods by rail RD 15-73-94" and other applicable rules and technical operating procedures. These are translated into internal procedures according to which adequacy of the rolling stock is verified.

During shunting operations of the rolling stock with dangerous goods marked as "Do not hump" and "Hump with care", station duty officer or a shunting dispatcher informs the driver of the shunting locomotive of necessary actions to be performed.

Technical standards for loading and securing of the cargo, the procedure and conditions for the carriage of dangerous goods, are established in the international agreements (treaties) adopted within the framework of the Organization for Cooperation between Railways and the Council on Railway Transport of the member states of the Commonwealth of Independent States (CIS) and the Republic of Latvia, the Republic of Lithuania, the Republic of Estonia and other international agreements (treaties) to which the Republic of Kazakhstan is a party. These procedures are followed strictly by the national railways such as KTZ in Kazakhstan (and RZD in Russia).

KTZ does not use subcontractors.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarize the basis for this Finding/Deficiencies Identified:

Procedures are in place and ensure compliance with the national international treaties and national law.

Transportation of dangerous goods by railways of the member states of the Commonwealth are carried out in accordance with the requirements of the Rules for the carriage of dangerous goods by rail (RID) and the Rules for the carriage of liquid cargo in bulk in bunker-type tank cars for the transportation of oil bitumen, in the international traffic - in accordance with Appendix 2 of the Rules for the Carriage of Dangerous Goods to the Agreement on International Rail Freight Traffic, which are mandatory for consignors and consignees of dangerous goods, ports and marinas, as well as for the forwarding companies carrying out service for consignors and consignees.

The emergency card 619 is included to provide for the UN number in accordance with the UN Recommendations on the Transport of Dangerous Goods, the names of dangerous goods, which are covered by the applicable emergency card, main properties and types of danger, instructions for the use of personal protective equipment, instructions on neutralization and first aid measures.

Signage used to identify the shipment as cyanide includes the UN 1689 sign. In addition, local rules require that the consignor provides additional signs. The rolling stock entering the main railway network, regardless of belonging and form of ownership, must comply with the requirements of these Rules. Thus, each unit of railway rolling has the following distinctive clear signs and inscriptions:

- 1) the name of the owner of the railway rolling stock;
- 2) number, manufacturer's plate with the data;
- 3) identification numbers and acceptance marks, and
- 4) tare weight (except for locomotives)

In addition, the following inscriptions are applied:

- on locomotives, motor-carriage railway rolling stock - design speed, series and side number, name of the place of registration, etc., and
- on freight, postal, baggage wagons - carrying capacity.

Prior to each shipment, station attendant checks the rolling stock, tracks, turnouts, signaling system and devices, centralization and blocking, communication and contact network and makes an entry in the DU-46 log (the inspection log of the established DU-46 format). In case of malfunctions identified, a duty engineer (dispatcher) is notified about such malfunctions of the technical devices that pose a threat to the safety of traffic. Ultimately, a relevant employee makes a note about the elimination of malfunctions in the DU-46, which is certified by his/her signature and the signature of the station attendant. It is not allowed to operate rolling stock which has malfunctions that threaten traffic safety.

Preventive maintenance program is implemented at KTZ to ensure compliance with the national "Rules for the technical operation of railway transport" No87, dated 05 Feb 2013.

Rolling stock must undergo scheduled preventive repairs and maintenance in a timely manner. The types and terms of maintenance and repairs are established by the authorized body. During the period of operation of the rolling stock in accordance with the scheduled preventive maintenance program, repair organizations carry out depot repairs, overhaul repairs and overhauls with the extension of the service life. The procedure for extending the service life of freight and passenger cars and rolling stock is established by the authorized body.

Rolling stock and traction rolling stock are inspected by a commission twice a year (in spring and autumn). Changes to the design of the railway rolling stock that may affect its operational characteristics are allowed, provided that the requirements of the operational documentation are met. The procedure for the maintenance and repair of the main railway network is approved by the authorized body.

Limitation on operator's hours is set out in KTZ internal labour procedures and the Labour Code of the Republic of Kazakhstan and is strictly observed.

Technical standards for loading and securing cargo, the procedure and conditions for the transportation of dangerous goods are governed by international agreements between the CIS member states and other international agreements (treaties) to which the Republic of Kazakhstan is a party. Stowage and fastening of goods in wagons and containers with a gauge of 1520 mm is carried out in accordance with Appendix 3 to the RID "Technical Conditions for Stowage and Fastening of Cargo" and Technical Conditions For Accommodation and Securing of Loads in Cars and Containers N TsM-943 approved by the Ministry of Railways of Russia in May 27, 2003.

In order to check the correct placement of dangerous goods within the specified dimensions, clearance gates are available at the loading points.

To prevent spontaneous departure of railway cars at stations, during uncoupling and shunting operations, longitudinal profiles with counter-slopes towards the limiting arrows are available with the suitable design. To prevent spontaneous exit of cars to other tracks, there are safety dead ends, guard switches, drop shoes, drop wits, drop switches, as well as the use of stationary devices for securing railway cars.

Rolling stock and railway cars are equipped with coupling devices that exclude spontaneous disconnection of railway rolling stock units.

The consignor's inventory of fasteners is indicated in column 4 of the consignment note "Special statements and marks of the consignor".

Procedures are in place and are strictly observed. While no civil unrests have occurred en route, severe weather conditions occur with the heavy snowy winters in the Kostanay region. Snow removal machinery and equipment (snow trains, snow plows, rotary snow blowers) are being prepared for the winter work within the timeframes set by the National Infrastructure Operator. All snow removal equipment has assigned supervisors, machinists and their assistants in order to ensure round-the-clock work.

Trains with snow removal equipment are equipped with radio communication between the work manager and the locomotive driver, train dispatcher, station duty officer and operator of the shunting zone. Shoulder of service for a snowplow on heavily snowed areas is at least 100-150 km per one snowplow, for medium and lighter condition areas at least 200-300 km. During difficult meteorological conditions with a shortage of snow removal equipment, in order to avoid transport disruptions, back-up snow removal equipment is deployed.

KTZ employees, including locomotive shunter operators and other relevant employees involved into cyanide cargo handling, undergo medical examination (including blood pressure, breathalyser, drug test) every shift.

All records generated during each shift are retained by the KTZ personnel and are rolled over to the next shift. Before entering duty, the station attendant gets acquainted with the entries in the DU-58 dispatching order log, DU-2 & 3 train and locomotive movement log, DU-60 warning book, DU-46 inspection log, DU-47 log for the train telegrams and others.

Any instructions made to the locomotive operator are also recorded with the operator's surname and the time of transmission of the instruction are noted in the journal of the train dispatcher or station.

KTZ does not use subcontractors.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

Summarize the basis for this Finding/Deficiencies Identified:

Varvarinskoye JSC/KTZ do not use maritime transportation. Shipments of cyanide are by railway only and are in compliance with Regulation concerning the International Carriage of Dangerous Goods by Rail (RID).

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Summarize the basis for this Finding/Deficiencies Identified:

Necessary radio communication equipment is in place and is maintained in good condition at all times. Mobile telephones are used as well stationary landline phones. Where appropriate, telephonograms are exchanged between neighbouring stations personally by the operators on duty. Exchange of train telegrams on train movements is carried out by telephones of train inter-station communication or by train dispatching communication. All communication equipment is tested periodically to ensure it functions properly and complies with the operating procedures of KTZ as well as national requirements.

In exceptional cases, in the event of a malfunction of the train inter-station communication and train dispatcher communication, dialogues on the movement of trains can be carried out using other types of communication available to the duty officer at the station directly with the duty officer at the neighbouring station.

Possible blackout areas along the cyanide transportation route have been identified. On sections equipped with centralized dispatching, the main means of signaling and communication during the movement of trains is automatic blocking. All station traffic lights and switches on the sections are controlled directly by the train dispatcher. The position of switches, traffic lights,

station tracks equipped with electrical insulation, turnout sections and spans is controlled by the train dispatcher using the control apparatus instruments.

All orders concerning the movement of trains and shunting are sent by the train dispatcher by telephone or radio communication directly to the operator or an employee responsible for the execution of operations for the reception and departure of trains or shunting.

If necessary, provided for by this Instruction, the train dispatcher transfers the stations to standby control, after which the reception and departure of trains, shunting operations, as well as the opening and closing of signals are carried out by the station manager. Before transferring the station to standby mode, the train dispatcher will inform a designated employee about the trains on the adjacent tracks.

Cyanide shipments are tracked using the electronic system such as ETRAN. In addition, KTZ staff communicate with Varvarinskoye JSC directly to inform on the date and hour of the planned cyanide cargo arrival. Quantity of cyanide is specified in the accompanying documentation such as Consignment Note.

Existing inventory control system and the chain of custody documentation are used to monitor the amount of cyanide during transport. The list of documents includes: Consignment note, Transit Declaration, Cyanide Import License, Certificate of Origin, Certificate for the packaging and for the containers. Cyanide quantity and shipping requirements are contained therein and are checked at the interim stations.

Shipping records indicating the amount of cyanide are available and were shown to the auditors. Material Safety Data Sheets are available in English and Russian.

KTZ does not use subcontractors.

Principle 2 | INTERIM STORAGE

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

Standard of Practice 2.1

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

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

For purposes of the audit, “interim storage sites” and “trans-shipping depots” refer to facilities where cyanide is held temporarily when changing carriers or transport modes. Truck and rail terminals and port facilities are examples of interim storage sites and trans-shipping depots.

Activities such as parking a cyanide transport vehicle for the night while en route do not involve interim storage. However, parking a truck carrying a cyanide load at a truck or rail terminal or a port for transfer to another truck, train or ship would constitute interim storage unless such a transfer took place within a short period of time (hours as opposed to a day or more). Storage in a warehouse, as defined in the Code’s *Definitions and Acronyms* document, is a production activity and must be evaluated for compliance using the Cyanide Production Verification Protocol.

There is no interim storage involved en route to Varvarinskoye.

Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

When transporting dangerous goods, namely cyanide by rail in international traffic, the consignor is obliged to comply with all safety requirements applicable to transportation by national and international regulations. KTZ has an Emergency Response Plan and Dangerous Goods Emergency Card 619 to ensure compliance.

In accordance with RID, cyanide belongs to 6.1 hazard class "Poisonous (toxic substances), cyanides with UN numbers specified in paragraph 2.2.45 of ADR are allowed for transportation only under convoy of consignors (consignees), and is regulated by special conditions of the Alphabetical Index of Dangerous Goods approved for rail transport. The convoy is in possession of both the Emergency Response Plan and the Emergency Card 619.

The emergency card contains:

- UN number in accordance with the UN Recommendations on the Transport of Dangerous Goods (Model Regulations);
- the names of dangerous goods, (the name of the dangerous goods and its spelling in the emergency card corresponds to the entry in the Alphabetical Index of Dangerous Goods Permitted for Carriage by Railways;
- main properties and types of danger;
- instructions for the use of personal protective equipment; along with the listed personal protective equipment, means of neutralization and first aid measures, those means can also be used that are recognized by the competent authorities on the territory of each state and provide the same safety and assistance in an emergency situation as those listed in the emergency card;
- necessary instructions for actions in case of an emergency (general, leakage, spill, fire);
- instructions for neutralization;
- instructions for first aid measures.

The Emergency Response Plan is appropriate for the transportation route and satisfies the requirements of national and international rules applicable to the dangerous goods transportation.

The emergency card is appropriate for the chemical and physical form of cyanide and includes all synonymous variants of the name of the dangerous cargo, under which it is named in the current regulatory and technical documentation.

The Plan is appropriate for the transportation as assigned by the national and international rules. The Plan considers necessary aspects of the transport infrastructure and its safety condition. Technical requirements to the design of the train/flatbed used for the cyanide transport are strictly observed by KTZ. No interim storage is involved in Kazakhstan en route to the destination station.

Roles of KTZ personnel and the outside responders are identified in the internal emergency response procedures and Emergency Response Framework (Appendix 3.2.1.). All emergency response measures (fire, leakage, spillage of a hazardous substance, damage to containers or railway cars) with dangerous cargo are coordinated by a responsible supervisor in accordance with the Emergency Response Plan. Owing to the well established response infrastructure, rapid response by trained personnel of internal and external responders is guaranteed.

In the event of an emergency, railway transport workers and Civil Defense act as quickly as

possible, in accordance with the nature and scale of the emergency and taking into account the properties of the dangerous goods (fire hazard, toxicity, corrosiveness, oxidizing effect, etc.), in compliance with the safety and preventive measures provided for by the RID and Emergency cards for relative dangerous goods.

According to paragraph 5 of Article 30 of the Law of the Republic of Kazakhstan dated December 8, 2001 No. 266-II "On Railway Transport", the sender (consignor), the recipient (consignee) receiving dangerous goods as well as the carrier performing the transportation of dangerous goods, are obliged to ensure transport safety, have the means and mobile units (crews) necessary the emergency response.

Standard of Practice 3.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

KTZ provides inductions and appropriate safety training to all staff. Safety Day is implemented company-wide with the purpose of raising awareness of employees, conducting emergency response training as well as auditing the level of internal procedures, for managers of the regional divisions – once a month, for senior managers – quarterly.

In the event of an emergency during the cyanide transport, participants in the transportation process are obliged to ensure the immediate emergency response at the emergency area. Emergency response duties and responsibilities of appropriate personnel are available at KTZ.

The list of emergency response equipment at KTZ is similar to one at Russian Rail. PPE includes first-aid kit and a set of portable radio stations, masks, gloves, coverall and is provided to relevant workers. Emergency Card 619 contains instructions on the use of personal protective equipment.

KTZ has necessary emergency response equipment as ascribed by law and the KTZ Safety Standard. Emergency response equipment is available at all times to the locomotive operators, station workers and the convoy. It is checked apropos KTZ Safety Standard with relevant logs kept.

KTZ does not use subcontractors.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Summarize the basis for this Finding/Deficiencies Identified:

KTZ maintains procedures and current contact information for notifying relevant parties of any emergency. The procedures include the notification framework approved by the Chief State Doctor of the “Kostanay Agency for the Protection of Public Health During Transport”.

Systems and procedures are updated in accordance with the ISO requirements as well as national and international legislative requirements and rules.

To date, there have been no cyanide incidents that have occurred during the railway operations.

It is not the responsibility of KTZ to notify ICMI on any cyanide accidents that would have occurred on the territory of the Republic of Kazakhstan. No such accidents have occurred; however, it will be the responsibility of Varvarinskoye JSC to notify ICMI should any occur.

Standard of Practice 3.4

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Neutralization measures are to be carried out in accordance with the Emergency Procedures and with the use of personal protective equipment and in a cordoned off area.

Any restoration work is possible only after the threat to life and health of people in the emergency zone has been eliminated. Guidance to ensure compliance with the safety requirements rests with the emergency response manager.

In an emergency, all response measures would be carried out taking into account the properties of sodium cyanide and the relevant precautions as specified in the emergency card. The emergency card (619) does not allow release of substance into water bodies, basements or sewers.

Standard of Practice 3.5

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Provisions for periodically reviewing and evaluating Emergency Plan’s adequacy are in place and are being implemented by KTZ during the Safety Day.

Mock emergency drills are conducted by KTZ periodically in accordance with the “Safety Training Program” which provides for emergency training of different scale and nature. Civil Defense training is also part of the Program.

The Emergency Response Plan’s performance is revised by KTZ periodically in accordance with the procedures and ISO requirements.



SOLIDCORE RESOURCES PLC RUSSIAN RAILWAYS

CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

Table of Contents

Introduction	3
Operation General Information	3
Operation Location Detail and Description	4
Auditor’s Finding	7
Compliance Statement	7
Auditor Information	7
Auditor Attestation	8
Principles and Standards of Practice	9
Principle 1 TRANSPORT	9
Standard of Practice 1.1	9
Standard of Practice 1.2	11
Standard of Practice 1.3	12
Standard of Practice 1.4	14
Standard of Practice 1.5	19
Standard of Practice 1.6	20
Principle 2 INTERIM STORAGE	22
Standard of Practice 2.1	22
Principle 3 EMERGENCY RESPONSE	22
Standard of Practice 3.1	22
Standard of Practice 3.2	25
Standard of Practice 3.3	27
Standard of Practice 3.4	29
Standard of Practice 3.5	31

The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.



Introduction

This document represents a Summary Audit Report for the Cyanide Code recertification transportation audit of Varvarinskoye JSC, a company which conducts mining operations located in Kazakhstan.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Auditis complete, it posts the Summary Audit Report on the Cyanide Code website.

Current Summary Audit Report has been prepared based on the information available at the time of the audit. Every effort has been made to ensure accuracy of the information presented herein with the supporting evidence available where applicable. Information provided by Varvarinskoye JSC has been taken in good faith and has been verified where possible.

Operation General Information

Name of Production Facility:	Varvarinskoye JSC
Name of Facility Owner:	Solidcore Resources PLC
Name of Facility Operator:	Varvarinskoye JSC
Name of Responsible Manager:	Ryssaldy Komutova, Chief Environmental Engineer
Address:	Varvarinka
State / Province:	Kostanay
Country:	Kazakhstan
Telephone:	+7 (7142) 39 02 25
Email:	KomutovaRT@solidcore-resources.kz

Operation Location Detail and Description

“Varvarinskoye” JSC is purchasing cyanide from Korund Zyan JSC, a cyanide manufacturer located in Russian Federation (hereinafter referred to as “RF” or “Russia”) and certified under ICMI since 2012.

Transportation of sodium cyanide from Dzerzhinsk station in Russian Federation to Bataly station in the Republic of Kazakhstan is implemented through joint efforts of JSC Russian Railways (hereinafter referred to as “RZD”), which owns the railway infrastructure in the Russian Federation, and JSC Kazakh Railways (hereinafter referred to as “KTZ”), which has similar rights in the Republic of Kazakhstan. These organizations are state-owned and their actions are governed by the regulations for the transportation of dangerous goods by rail, which in turn are based on UN recommendations.

JSC RZD and JSC KTZ are licensed to transport all types of cargo, including sodium cyanide (UN code 1689). Their activities are insured in accordance with the current legislation of the Russian Federation and the Republic of Kazakhstan. Both are monopolies and select appropriate routes for the transport of dangerous goods with a likely border crossing for such international freight shipments between Russia and Kazakhstan being the Kartaly station border crossing. While exact transportation route is only known prior to each shipment, guidance is given on Figure A below.

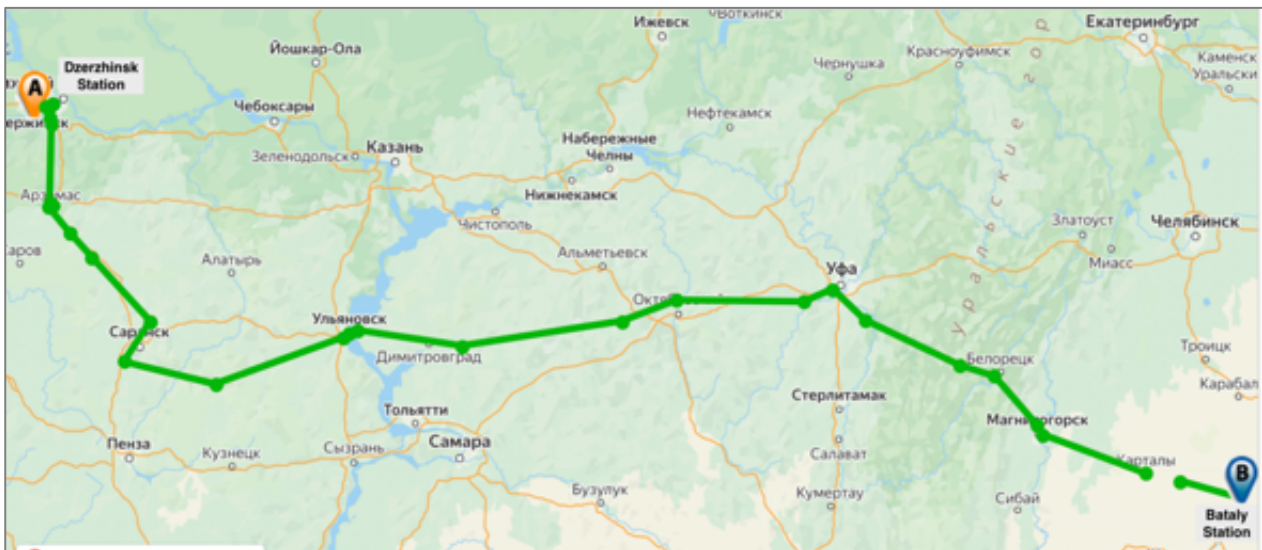


Figure A: Cyanide Transportation Route from Dzerzhinsk Station to Bataly Station

All responsibility for the safety and transportation of cargo rests with the carriers JSC Russian Railways within the territory of the Russian Federation and JSC KTZ within the territory of the Republic of Kazakhstan.

Korund Zyan JSC has a rail spur at the site and loads cyanide containers directly on to RZD. Korund Zyan JSC holds a loading and unloading license issued by Russian Railways JSC, which is confirmed by the presence of a shipper code. In the process of transportation, Russian locomotive is uncoupled and the rolling stock coupled to Kazakhstan rail proceeds to Bataly station where the Kazakhstan locomotive is uncoupled and the rolling stock is then coupled to Varvarinskoye JSC locomotive. Thus, the containers loaded onto the railway platform travel to the destination station without reloading. The carriers - JSC Russian Railways and JSC KTZ - are responsible for the cargo safety.

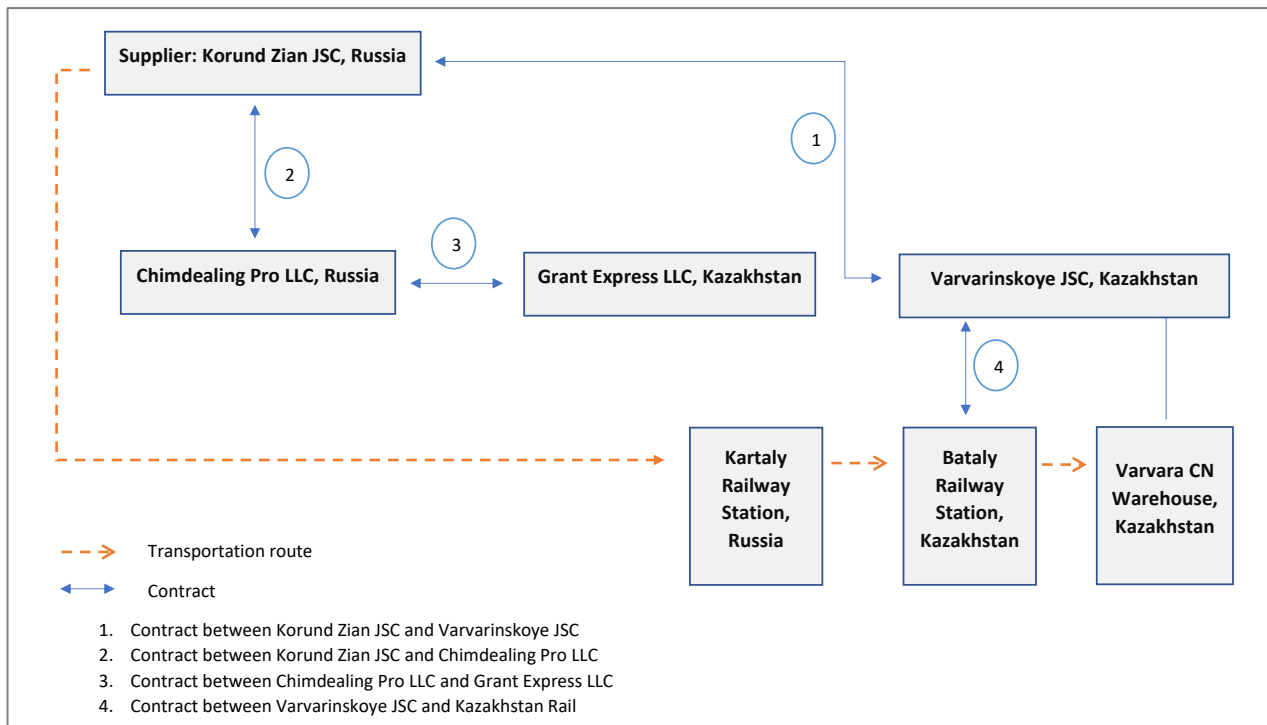


Figure B: Diagram of Cyanide Delivery from Korund Zyan to Varvarinskoye JSC

Freight forwarder “Chimdealing Pro” LLC is a forwarding agent on the territory of Russian Federation while “Grant Express” LLC is a forwarding agent in Kazakhstan. Freight forwarders act as intermediaries to ensure timely receipt of funds by the carriers. Diagram of delivery of sodium cyanide from Korund Zyan in Russia to Varvarinskoye JSC in Kazakhstan in 2025 is shown on Figure B above and outlines all parties involved in the supply chain.

RZD accepts the cyanide cargo from Korund Zyan upon checking the container integrity, total number and weight of the containers, integrity and impression of seals. Consignment notes specify this information which will remain unchanged from the start to the end of the cyanide

transportation route.

Varvarinskoye JSC is in possession of Specific Goods Import License No KZ57LBG00002423 issued by the Ministry of Industry and Construction of Kazakhstan Republic (valid till 30.12.2025). Basis for the issuing of the Import License is Contract No KЦ.671.24 / No AOB 2(03-1-4552) dated 20.12.2024. In addition, MSDS for Cyanide, Environmental Insurance agreement (SK "Eurasia") and hazardous waste management Agreement ("Sharua" LLC) are submitted to the Ministry as part of the licensing requirements.

On average, it takes less than a week for the cyanide containers to arrive from Dzerzhinsk to Bataly station in Kazakhstan. Standard delivery times for freight by JSC Russian Railways and JSC KTZ are determined by their internal regulations on the formation of the route plan. RZD continually informs "Varvarinskoye" LLC of the cargo whereabouts and pending arrivals via designated acceptance-delivery agents. Computerized tracking system ETRAN is used to monitor the cargo using the rolling stock numbers.

"Varvarinskoye" JSC becomes duly responsible for the cargo when it reaches Bataly station. At Bataly, cyanide containers are inspected by the acceptance operators of both the "Varvarinskoye" JSC and Kazakhstan Railways, are handed over and forwarded on to the Varvarinskoye storage compound.

Preliminary customs declaration would have been submitted to the Customs before every shipment thereby speeding up the transit and customs clearance process of the cyanide containers, a process made possible by the Customs Union treaties.

Auditor's Finding

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

Compliance Statement

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

Auditor Information

Audit Company: Greenrock International LLC
Lead Auditor: Julia Kennedy
Lead Auditor Email: juliakennedy@kennedy-global.com

Names and Signatures of Other Auditors:

Auditor 1: Christine Blackmore Lead and Technical
Name (Print/Type)


Signature

Dates of Audit: 23-26 September 2025

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the recertification audit. I further attest that the recertification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Varvarinskoye JSC



23-26 September 2025

Name of Operation

Signature of Lead Auditor

Date



Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

Russian Railways (RZD) implements a process and procedures for selecting the most appropriate route for the transportation of cyanide. The following is a summary of precautions considered by RZD:

In accordance with the Rules of Dangerous Goods transportation practiced in CIS, cyanide cargo must be a part of a Safety Coverup Scheme. This Coverup Scheme entails a pusher locomotive or empty locomotives, which cover up the dangerous railcar on both sides as follows:

1 – distance not less than one car from the locomotive that is leading the train (to prevent fire risks); 1 – one train away from steamer trains (shunters); 1 – cover up from the pusher locomotive; 1 – 1 car (either empty one or one containing non- inflammable goods) must be between people and dangerous cargo.

As a Safety Cover-up for railcars with dangerous goods, railcars with non-hazardous goods or empty ones (except empty specialized tank wagons) should be placed in the trains. It is forbidden to use as a cover (the first from a car with a dangerous load) open rolling stock (flatbeds) loaded with lengthy loads that extend beyond the limits of the front beam or to use empty flatbeds as a cover first from railcars loaded with dangerous goods of class 1.

Requirements are such that cyanide in the containers has to be transported “on the straight line” which means that upon arrival a container must be handed over to the receiving agent without touching the ground at a station.

The route is approved by the Russian Federation Authorities (“RFA”) and it takes into account population density. Russian Federation is a vast country and the route largely runs through the scarcely populated areas.

Handling of dangerous goods is carried out in accordance with the Russian Governmental

Standard GOST 22235-10 and applicable technical rules. RZD does not admit defective cargo on to its infrastructure or in absence of required paperwork. RZD has a well-maintained infrastructure, as much of the goods including dangerous goods are distributed via the rail network.

The route is approved by the Russian Federation Authorities and it takes into account terrain conditions such as pitch and grade. Appropriate marks with regard to allowable grade are made on the Consignment notes as per the standard requirements and are observed during cyanide transport.

RZD designates the rail route for the transportation of cyanide. Transport of dangerous goods is allowed in weather condition with low risks. The risks are acute in winter due to heavy snowfall and these are managed in accordance with internal procedures.

RZD is responsible for timely clean-up of the switchpoints, intertracks and adjacent infrastructure from snow as well as maintenance of the cleaning and emergency equipment. Similar rules apply for the rest of the transport route.

RZD has procedures in place for the carriage of dangerous goods, the procedures include the evaluation of the route and the risks involved. Globally, RZD implements procedures to re-evaluate the route if required by the national legislation. Locomotive operators report on the railway condition after each shift.

Feedback data are recoded in the black-box and are thoroughly analysed. Data stick (black-box data) with the data recorded during the shift (speed limits, operator behavior, etc.) is handed to the shift manager for analysis.

RZD documents the measures taken to address risks identified with the designated cyanide transportation routes where necessary in accordance with the set procedures. Specially designated templates are used for this purpose such as DU-46 and others. Appropriate measures are taken accordingly to manage these risks.

RZD holds the implementation of risk management measures in strict observation. Cyanide transportation route approved by the Russian State Authorities does not present security concerns. Dangerous cargo, like standard cargo, is inspected at every interim station by RZD personnel during transit, to ensure integrity and safety of the cargo.

Dangerous goods such as cyanide are transported with the specialised convoy as required by the Rules for the Transportation of Dangerous Goods by Rail approved at the fifteenth meeting of the Council for Rail Transport of the Commonwealth of Member States on April 5, 1996. RZD is responsible for the cargo security with 2 armed security guards accompanying the cyanide container from Dzerzhinsk to the Varvarinskoye station inside the “teplushka” designated heated carriage. Therefore, the armed convoy accompanies the cyanide cargo all the way through to the mine site.

The convoy are provided with the necessary PPE, a first-aid kit, a set of emergency tools and primary fire extinguishing equipment. The guards are trained to perform the maintenance of the cargo, developed and approved by the shipper, as well as MSDS describing the dangerous properties of the cargo, first aid measures and safety measures in emergency situations.

RZD does not use subcontractors.

Standard of Practice 1.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

RZD uses only trained and qualified personnel to operate its locomotives, stations and the tracks. Training and certification of personnel handling special purpose rolling stock and containers designed for transportation of dangerous goods is conducted at special organizations with training courses specifically created by those organizations based on the programs agreed with the regional inspectorate responsible for the supervision of railway transport of Gosgortekhnadzor of Russia and the management of the railway.

In accordance with RZD’s standards, acceptance/delivery agents receive special-purpose inductions (pre-shift briefing) daily and once every 7 days. Refresher training covers aspects pertaining to handling of general dangerous cargo.

Emergency cards for each profession are contained in the Emergency Response Reference Book. These cards are to international standards. Sodium cyanide related card is number 619. Special-purpose H&S training is conducted in accordance with such cards and apropos RZD's Standards.

Longitudinal profiles of sorting slides, half-slides, shunting hoods, pidding tracks, railway stations are checked in accordance with the Rules for the Technical Operation of Russian Railways.

Where loading may involve a gantry crane, such work would be carried out in accordance with “H&S instructions for crane operators on the safe operation of bridge and gantry cranes (RD 10-103-95)” as well Technological Safety Card No5 “Safe work: loading-unloading operations using gantry crane KK-41K on the heavy-duty MCH-5 loading area.

Instrumentation and equipment are subject to periodic inspection and certification in accordance with current regulatory and technical documentation.

Loading and unloading of dangerous cargo in the covered wagons and standard containers, as well as containers with dangerous goods on open-type flatbeds is carried out in accordance with the “Rules for the transport of dangerous goods by railways”, “Safety rules for the transport of dangerous goods by rail RD 15-73-94” and “Sanitary Rules for the Organization of Cargo Transportation by Railway Transport” which specify the allowable loads. Placement and fastening of dangerous cargo in wagons, flatbed railcars and containers is carried out in accordance with the “Technical conditions for the placement and securing of goods in wagons and containers”, approved by the Ministry of Railways of Russia.

Cars and containers purchased abroad for the transport of dangerous cargo must comply with the requirements of the Rules, the relevant regulatory and technical documentation established by the Ministry of Railways of Russia or approved by the Ministry of Railways of Russia on the basis of a technical examination report compiled in accordance with Annex 4 of the Rules

Technical standards for loading and securing of the cargo, the procedure and conditions for the carriage of dangerous goods, are established in the international agreements (treaties) adopted within the framework of the Organization for Cooperation between Railways and the Council on Railway Transport of the member states of the Commonwealth of Independent States (CIS) and the Republic of Latvia, the Republic of Lithuania, the Republic of Estonia and other international agreements (treaties). These procedures are followed strictly by the national railways such as RZD in Russia.

To prevent overloading of the railway cars, handling operations at RZD are carried out in accordance with the procedures compliant with the State Order “Methodology on the Development of Technological Norms for the Loading and Unloading of Cargo” №70 dated 10.11.2003 by the Ministry of Railways of Russia. Departmental control is carried out by the auditing office of the Ministry, railways, railway sections, as well as sectorial departments and services.

When loading the cyanide container, signalling device rests with the operators who operates the fitting knuckles and the crane. Once a green light is on, an operator lifts the container, places it onto a truck to be fastened by the driver, after which red light is turned on signalling that the container is uncoupled and the driver may begin transportation.

RZD does not use subcontractors.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide is transported in 20ft sealed containers. At dispatch, the number of a railway car, container, cargo type, UN classification, Emergency card number 619 is affixed. Procedures are in place and ensure compliance with the national international treaties and national law. Instructions of the Station (TRA) are used where all actions for handling dangerous cargo listing main procedures, infrastructure and alike, are specified.

Should a container be found to have been damaged before the dispatch it will not be dispatched. The design parameters for specialized containers intended for transportation of dangerous cargo comply with the requirements of the standards or technical specifications and ensure safety of transportation.

The emergency card 619 is included to provide for the UN number in accordance with the UN Recommendations on the Transport of Dangerous Goods, the names of dangerous goods, which are covered by the applicable emergency card, main properties and types of danger, instructions for the use of personal protective equipment, instructions on neutralization and first aid measures.

Signage used to identify the shipment as cyanide includes the UN 1689 sign. Placards are placed on the 4 walls of the container and the rooftop is labelled with relevant signage.

Carriages and containers used for transportation of dangerous goods are labeled specifically to characterize the transport hazard of the cargo in accordance with the Rules for the Carriage of Goods and have distinctive coloring according to regulatory and technical documentation. The procedure for applying danger placards on cars and containers is established by the Ministry of Railways of Russia.

In addition, local rules require that the consignor provides additional signs. Danger signage and labels on containers and packaging is also compliant with Russian GOST 14192-96 "Marking of cargo" and GOST 19433-88 "Dangerous goods. Classification and labelling". The rolling stock entering the main railway network, regardless of belonging and form of ownership, must comply with the requirements of these Rules. Thus, each unit of railway rolling has the following distinctive clear signs and inscriptions:

- 1) the name of the owner of the railway rolling stock;
- 2) number, manufacturer's plate with the data;
- 3) identification numbers and acceptance marks, and
- 5) tare weight (except for locomotives).

In addition, the following inscriptions are applied:

- on locomotives, motor-carriage railway rolling stock - design speed, series and side number, name of the place of registration, etc., and
- on freight, postal, baggage wagons - carrying capacity.

Multilevel inspection control is maintained at RZD with designated departments responsible for different sections. Thus, before cyanide is dispatched the flatbed car is inspected as well as related infrastructure and documented appropriately.

Railway tracks are inspected and serviced by the railway department (PCH), wagons are serviced by the maintenance department (VCHDE) prior to each shipment. Railcar inspectors sign off on the car readiness and usability, including the mounted wheels, main coupler units, fittings and other equipment. Dangerous goods transport equipment is of particular attention.

According to RZD's Procedures, there is an established acting Committee headed by the station manager who is an operational commander of all departments. Responsibilities for undertaking interim inspections as well as relevant procedures are reflected in a Job Description of an inspector. All main stations in Russia belong to RZD and therefore adhere to the main regulations, including a set of "Regulations for the Transportation of Dangerous Goods", which is approved by the Ministry of Transport and lists all main rules. In addition, Technological Instructions of the Station are implemented and electronically document actions pertaining to the handling of dangerous cargo.

Thus, the flatbed railcars are inspected before the cyanide is loaded onto them, during the transport route and upon arrival at the destination station. Seals and technical condition of a car is inspected in a manner of priority. The result of an inspection of each container will be the cargo receiving agent printing out the acceptance certificate in two copies. The receiver of the cargo

puts a stamp “the container is suitable for loading” on a suitable container or “container is not suitable for loading” on a faulty container. The receiver of the cargo hands over the acceptance certificate (in 2 copies) together with the shipping documents, to the cashier against signature in the book GU-48k.

Requirements are such that cyanide in the containers has to be transported “on the straight line” which means that upon arrival a container must be handed over to the receiving agent without touching the ground at a station. The suitability of a container in commercial terms for the transport of cargo is determined by the consignor in accordance with Article 27 of the Transport Regulations of the railways.

Transport, loading and unloading of dangerous cargo in covered wagons and universal containers, as well as containers with dangerous cargo on flatbeds is carried out in accordance with the “Rules for the transport of dangerous goods by railways”, “Safety rules for the transport of dangerous goods by rail” and the Sanitary Rules for the Organization of Freight Carriage by Railway Transport”, approved by the Russian State.

Placement and fastening of dangerous goods in wagons and containers is carried out in accordance with the “Technical conditions for placement and securing of goods in wagons and containers”, approved by the Ministry of Railways of Russia.

Monthly inspections are carried out on both public and private railways following which a railway witnessed certificate is raised electronically. Evidence of any following maintenance is in the Manifest and a Certificate signed by the receiving agents (railway witnessed certificates).

Procedures for the organization and implementation of control and technical supervision to ensure safe and emergency-free operations, maintenance of technical equipment in good condition at hazardous industrial facilities is carried out according to the norms and rules in industrial safety "Safety rules of hazardous production facilities that use lifting equipment" and “Industrial Safety Management System at Russian Railways” which include:

- targeted inspections of railways according to the schedule of targeted inspections, at least once a quarter with the subsequent drawing up of the certificate;
- examination of the results of comprehensive and targeted audits with the drafting of the Protocol;
- implementation of control and supervision of lifting equipment during operation based on annual work plans;
- maintenance of the lifting facilities in working condition and preserving the seals on the relay blocks of load limiters and protective panels and an inspection of the lifting machines and crane tracks once every 15 days, with the recording of the results of the

inspection in the inspections log;

- monitor the records of crane drivers in logbooks and take measures to eliminate the identified deficiencies every 15 days;
- organization of maintenance and repair of substations, as well as repair and alignment of rail tracks (for lifting equipment moving along rails), removable load-handling devices and containers;
- instrumental check of crane tracks carried out twice a year in spring and autumn, as well as after especially unfavorable metrological conditions (flooding, heavy rains, snowfall, etc.), taking into account the acting requirements;
- maintenance in good condition of removable lifting devices, interchangeable load gripping organs (auto-lines, spreaders, vibration-unloading devices, overhead vibrators hung on a crane hook) and crane platforms.

The responsible persons periodically inspect removable lifting devices and containers within the terms established by the Rules and with recording of the results of every inspection in the logbook.

Preventive maintenance program is implemented at RZD to ensure compliance with the national legislation and internal program. Workers of the railway transport carry out timely preventive maintenance and repair of railcars and containers intended for the transportation of dangerous goods, including:

- maintenance of cars that are in formed trains or in transit trains as well as empty wagons (own, rented, MPS fleet) in preparation for transportation before loading without uncoupling them;
- routine repair of empty cars during planned preparation for transport with uncoupling the cars from the train or a group of cars and parking on a specialized track (TR-1);
- routine repair of cars with uncoupling from transit and arriving trains or from formed trains (TR-2), and
- depot repair (DR), capital repair (KR).

Containers issued to shippers for loading are presented by the receiver for the maintenance service with an entry in the logbook. At the end of technical maintenance, suitability of each inspected container is indicated against its ID number. Logbooks VU-14 are kept separately and record the containers presented for maintenance and loading of dangerous cargo and other cargo.

In cases when the loaded containers need to be repaired post unloading, a mark "Container is not valid" is placed on the copy of the acceptance certificate (KEU-16VTS form). If the loaded container is suitable for loading post external examinations, a note "Container is suitable for loading post external examination" is made in a copy of the acceptance certificate (KEU-16VTS).

Locomotives engaged in the transport of dangerous goods meet the requirements of RZD (PTE) and Governmental Standards and have serviceable automatic locomotive signaling, auto-stop, speed- gauge, additional safety devices that prevent the locomotive from going back, train or shunter radio communication, serviceable sparking and (or) spark-extinguishing devices and fire-fighting devices, and other traffic safety systems. Locomotives not equipped with the above are not admitted to trains with dangerous cargo loaded railcars.

Each train operator has a set limit in their shift hours, continually works on a specific section (150km or so) and has an in-depth knowledge of the section, including gradient, weather, etc. RZD monitors operator's behavior using an electronic bracelet and GPS each shift.

Since all RZD trains are automated, a role of a loco driver is mainly to monitor the process. GPS system to track the location of a train operator to constantly remain at workplace is in place.

Placement of containers on the flatbeds is carried out in accordance with Chapter 9 "Technical conditions for the placement and securing of cargo in wagons and containers" approved by the Russian State Authorities, local technical conditions for the placement and securing of cargo and Appendix No. 3 to the Agreement on International Carriage by Rail (RID) of 01.07.2015. Container fixing procedures are provided in the Technological Instructions as well as local instructions and procedures for maintenance and marching order on the connecting spurs.

Containers are installed on the platforms in such a way that the stop heads located on the flatbeds are brought into the working (vertical) position and enter the opening of the fittings located beneath the containers. Upon the loading of the containers, a worker responsible for loading checks the correct positioning of the stop heads in the working position through the side openings in the fittings. A gap of no more than 30 mm is allowed only between one of the fittings and the flatbed floor.

Once the containers are fixed on the flatbed, the receiver checks the correct position of its stop heads through the side openings of the fittings. Foreman or site manager performs an additional inspection of the cars to check the correctness of the loading and compliance with the technical specifications or the technical manual, and makes a record as follows: "the fitting stops are in working position and correctly installed", which is certified by its signature. Loading is photographed. Control of compliance with the layout schemes to prevent loads from shifting is also performed using internal electronic system.

Slings of a container is done using all four anchor rings. The driver raises a container by 0.2 - 0.3m ensuring safety of the sling, moves the container to the loading site at a height of at least 0.5m above the protruding objects.

According to the technical specifications, when loading containers onto flatbeds, the following conditions must be met:

- for large-capacity containers - compliance with the number of containers of standard sizes 1AA, 1A, 1CC, 1C with one of the permitted schemes for this type of cars;
- correspondence of the quantity and location inside the cars of loaded and empty containers to figures 11-15 of chapter 9 of TU;
- not exceeding the gross mass difference of the permissible value of the extreme containers as specified in Chapter 9 of RZD Specification.

Procedures are in place at RZD and are strictly observed. With regard to weather condition, should a Force Majeure arise where an extremely heavy snowfall occurs, the flatbed cars with containers would be parked temporarily in a designated area apropos the Safety Rules (TRA).

Snow removal equipment is available at RZD. During difficult meteorological conditions with a shortage of snow removal equipment, in order to avoid transport disruptions, back-up snow removal equipment is deployed.

RZD employees, including cane operators, locomotive shunter operators and other relevant employees involved into cyanide cargo handling, undergo medical examination (including blood pressure, breathalyser, drug test) every shift. A bracelet on a train operator's arm is placed and is designed to send a signal should an operator's blood pressure drop or pulse lowered or an operator falling asleep, in which case a train would stop. Should an operator speed up or attempt to cross on red lights, a train would stop automatically.

All records generated during each shift are retained by RZD staff. In their daily work, the persons responsible for documenting the above activities are guided by the Rules, Instructions, inductions and orders of Russian Railways of the Russian Federation, as approved by the Russian State Authority Rostekhnadzor.

RZD does not use subcontractors.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 1.5

Summarize the basis for this Finding/Deficiencies Identified:

RZD do not use maritime transportation. Shipments of cyanide are by railway only and are in compliance with Regulation concerning the International Carriage of Dangerous Goods by Rail (RID).

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Summarize the basis for this Finding/Deficiencies Identified:

The conductors accompanying dangerous goods and special wagons have means of communication with JSC Korund Zyan. Necessary radio communication equipment is available and is maintained in good condition at all times. Shunter locomotives carrying out shunting operations with cars containing dangerous cargo is equipped with radio communication. Should radio communication fail, shunting operations should be carried out in compliance with additional security measures (a limited number of cars, presence of a crew consisting of at least two people, etc.) in a manner prescribed by the station’s technical and administrative procedures and protocols.

All communication equipment is tested periodically to ensure it functions properly and complies with the operating procedures of RZD. All equipment is tested and calibrated periodically. In case of emergency situations on the stretch, the locomotive driver immediately informs on the situation the train dispatcher and the duty personnel at the nearest stations as per the established procedure.

Possible blackout areas along the cyanide transportation route have been identified by RZD. Radio communication is used to ensure continuous communication.

ETRAN system is used to monitor the status of the cyanide shipments. In addition, RZD personnel communicate with Varvarinskoye JSC to inform on the upcoming arrivals. Upon receipt of shipping documents for the unloaded containers into the commodity office, the Travel Service agent generates an entry in the GU-42VTS arrival book of the ETRAN system. An agent of the Federal Service for Military Transport notifies the consignees (forwarders) about the arrival at their address of container shipments with the registration of the notice in the ETRAN system in the established order.

Upon arrival of the consignee (freight forwarder), Transport Service agent processes the issuance of waybill through ETRAN. In the original consignment note and waybill, the Travel Service agent puts a calendar stamp "Issuance of the original consignment to the consignee", signs it, and hands the consignee the original consignment note against signature in the waybill.

At the end of issuance of the waybill, the Travel Service agent, through ETRAN, generates and transmits message 402 to Automated Traffic Control System (ASOUP). ETRAN system transmits information on issuance of documents for the arrived containers to the Automated Traffic Control System on Containers. The information fed by the Automated Control System is used to plan and arrange the unloading of containers

Quantity of cyanide is specified in the accompanying documentation such as Consignment Notes, Transit Declaration, Cyanide Import License, Certificate of Origin, Certificate for the packaging and for the containers. Existing inventory control system and the chain of custody documentation are used to monitor the amount of cyanide during transport. Upon arrival of the consignee at the station for the issuance of consignment notes, in the case of non-receipt of those, the agent processes those in ETRAN based on electronic records and prints copies of the issued notes with machine-printed stamps "Arrival at the destination station" and "Notice to the consignee on the arrival of cargo." In machine-printed copies of invoices, the agent puts a calendar stamp "Issuance of the original consignment note to the consignee", signs it, and issues to the consignee a machine-printed copy of the original note against a signature in the machine-printed copy of the waybill. At the end of the issuance process, the agent generates and transmits completion message 402 in ETRAN.

All documentation for the dispatch of cargo is completed at the departure station with the appropriate designations for this cargo, which is displayed in the electronic system of JSC Russian Railways and JSC KTZ. Safety Data Sheets are available in English and Russian. Upon inspection of a container and verification of the composition of the arrived cargo to the relevant documents, including Material Safety Data Sheets, the receiver of cargo prints a fragment of a book in the set form (GU-48VTs/E) enabling the transfer of the bill of lading to the container platform, which is signed by the station's receiver.

When documents are handed to the receiver, they are reconciled with the Manifest data and the bills of lading attached to them.

Should empty or loaded containers be found technically faulty as a result of a visual inspection, further delivery of goods in which is deemed impossible, the receiver prepares a certificate (form GU- 23VTS) and a report addressed to the manager. Additional statement on the technical condition of a container (of the form GU-106) is drawn up specifying the malfunction of a container and a notice is issued for the repair of the container (form VU-23k). The notice form VU-

23k, issued on a loaded container, is the basis for the release of the faulty container and use of an empty non- defective container.

RZD does not subcontract any handling or transport of cyanide.

Principle 2 | INTERIM STORAGE

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

Standard of Practice 2.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

For purposes of the audit, “interim storage sites” and “trans-shipping depots” refer to facilities where cyanide is held temporarily when changing carriers or transport modes. Truck and rail terminals and port facilities are examples of interim storage sites and trans-shipping depots.

Activities such as parking a cyanide transport vehicle for the night while en route do not involve interim storage. However, parking a truck carrying a cyanide load at a truck or rail terminal or a port for transfer to another truck, train or ship would constitute interim storage unless such a transfer took place within a short period of time (hours as opposed to a day or more). Storage in a warehouse, as defined in the Code’s *Definitions and Acronyms* document, is a production activity and must be evaluated for compliance using the Cyanide Production Verification Protocol.

There is no interim storage involved en route to Varvarinskoye.

Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

In accordance with RID, cyanide belongs to 6.1 hazard class Poisonous (toxic substances), cyanides with UN numbers specified in paragraph 2.2.45 of ADR are allowed for transportation only under convoy of consignors (consignees), and is regulated by special conditions of the Alphabetical Index of Dangerous Goods approved for rail transport. The convoy is in possession of both the Emergency Response Plan and the Emergency Card 619. RZD has an Emergency Response Plan and Dangerous Goods Emergency Card 619 to ensure compliance.

The emergency card is a paramount tool in responding to any emergencies during cyanide transport and contains:

- UN number in accordance with the UN Recommendations on the Transport of Dangerous Goods (Model Regulations);
- the names of dangerous goods, (the name of the dangerous goods and its spelling in the emergency card corresponds to the entry in the Alphabetical Index of Dangerous Goods Permitted for Carriage by Railways;
- main properties and types of danger;
- instructions for the use of personal protective equipment; along with the listed personal protective equipment, means of neutralization and first aid measures, those means can also be used that are recognized by the competent authorities on the territory of each state and provide the same safety and assistance in an emergency situation as those listed in the emergency card;
- necessary instructions for actions in case of an emergency (general, leakage, spill, fire);
- instructions for neutralization, and
- instructions for first aid measures.

Emergency response actions are also described in MSDS.

The Emergency Response Plan is appropriate for the selected transportation route. Emergency Card for Cyanide No 619 is used to ensure compliance.

In accordance with the emergency card for sodium cyanide (619), cyanide becomes dangerous when it comes into contact with water. If a container’s integrity is undisturbed, risk of danger related to cyanide spillage is minimum.

The Plan is appropriate for the transportation route and satisfies the requirements of national and international rules applicable to the dangerous goods transportation.

The emergency card is appropriate for the chemical and physical form of cyanide and provide response actions respectively.

The Plan is appropriate for the transportation as assigned by the national and international rules. H&S procedures at Russian Railways are uniform and are applied company wide with similar PPE equipment and procedures implemented at each division.

The Plan considers necessary aspects of the transport infrastructure and its safety condition. The Plan considers the design of the railcars and the containers and also the limiting equipment. RZD's function is to assess the integrity of a container during transport and upon arrival and then pass it over along the custody chain to the consignee.

No interim storage is involved in Russia en route to the destination station.

Emergency Response Plan and Emergency Card contain a set of response actions to respond to different scenarios. Emergency cards for each profession are contained in the Emergency Response Reference Book of RZD. These cards adhere to international standards (cyanide card number 619).

In the event of an emergency involving dangerous cargo, conductors or personnel of the shipper (consignee) are to:

a) take all necessary measures to prevent threat to people, damage to the rolling stock, facilities, cargo, and other consequences; b) assess possibility and conditions for further movement of cargo and, if necessary, together with the locomotive crew, take measures to stop movement of trains, shunting works and prevent unauthorized persons from entering the danger zone; c) after inspecting the scene of the incident, report on the situation safety measures taken to designated people both on the train and at the station; d) upon arrival at the emergency site, emergency and fire fighting departments should inform their managers of the condition of the cargo, rolling stock and safety measures when conducting emergency and rescue operations.

Emergency Response Plan contains a set of response actions with roles and responsibilities clearly assigned to each party involved. In the event of an emergency involving cyanide, RZD personnel are to communicate with the assigned parties, stop shunting operations or transport, take necessary measures to prevent threat to people and the equipment, prevent access from unauthorized persons and conduct rescue operations.

Roles of outside responders are identified in the emergency response procedures. All emergency response measures (fire, leakage, spillage of a hazardous substance, damage to containers or railway cars) with dangerous cargo must be carried out in accordance with the instructions of the work supervisor, taking into account the properties and toxicity of the cargo and compliance with the safety requirements specified in the emergency card for a relevant dangerous cargo and in accordance with the requirements of the "Safety Rules and Procedures for Emergency Situations with Dangerous Goods during Transportation by Rail CM-407", Company's Standards and "Rules for the Transport of Dangerous Cargo by Rail".

In the event of an emergency, railway transport workers and Civil Defense act as quickly as possible, in accordance with the nature and scale of the emergency and taking into account the properties of the dangerous goods (fire hazard, toxicity, corrosiveness, oxidizing effect, etc.), in compliance with the safety and preventive measures provided for by the RID and Emergency cards for relative dangerous goods.

According to paragraph 5 of Article 30 of the Law of the Republic of Kazakhstan dated December 8, 2001 No. 266-II "On Railway Transport", the sender (consignor), the recipient (consignee) receiving dangerous goods as well as the carrier performing the transportation of dangerous goods, are obliged to ensure transport safety, have the means and mobile units (crews) necessary the emergency response.

Standard of Practice 3.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

RZD provides inductions and appropriate emergency response training to all personnel. All sorting and precinct stations (freight yards), stations for reloading, shunting, as well as at other stations where operations with cars loaded with dangerous cargo are performed, conduct personnel training and produce instructions which are appended to the technical distribution certificates, named "the procedure of working with cars loaded with dangerous cargo" and approved by the head of the section of the road.

Inspection and determination of the suitability of containers in technical terms can be carried

out by the receivers of cargo certified and trained in accordance with the general requirements for the technical condition and maintenance of containers as per the Rules for technical inspection and production of current repair of containers. Attestation of the receivers is carried out by the commission which includes a senior commercial auditor and the division head during their appointment to the post and with the subsequent frequency once every two years.

In addition, instructions are developed on how to deal with emergency situations with dangerous cargo, with response measures indicated in the emergency cards. The instructions and training include:

- procedures for emergency situations;
- procedure for interaction with rescue units on safety measures under extreme weather conditions and work complications (fog, blizzard, heavy rain, hurricane wind, snow drifts, failure of technical equipment, etc.);
- procedures for taking into account the location at the station of cars with the goods and their identification, if necessary, with emergency cards;
- procedures for notifying employees of stations, points of maintenance and commercial inspection of cars, locomotive depots, units of the militarized security of the Ministry of Railways of the forthcoming reception and departure of trains, shunting operations and other operations with railcars;
- procedures for admission and passing, preparation for the departure of trains, as well as carrying out of shunting operations with cars;
- procedures for the use of automatic brakes during shunting operations;
- order of maintenance and commercial inspection of trains and cars;
- the procedure for fulfilling verbal orders in the production of shunting work;
- procedure for documenting the issuance of diesel locomotives and shunter locomotives with serviceable spark arresters and spark detection devices, and
- maintenance of tracks for temporary cargo.

Emergency response duties and responsibilities of appropriate personnel are available at RZD for all relevant personnel. Actions and duties of the railway workers in the event of an emergency are set out in RZD's Emergency Response Plan and international rules for the transport of dangerous cargo, are rapid, correspond to the nature and scale of the emergency and carried out taking into account the properties of the cargo (fire and explosion, toxicity, corrosiveness, oxidizing effect, etc.)

The main features of potential transportation hazard of cargo as well as specific safety measures and precautions that must be observed when dealing with emergencies with dangerous goods are

provided in the emergency cards.

The list of emergency response equipment that must be available during transportation is available at RZD. Emergency Card 619 contains instructions on the use of personal protective equipment. PPE includes first-aid kit and a set of portable radio stations, masks, gloves, coverall and is provided to relevant workers. At the stations, PPE includes SPI-20 which is provided to all workers, it has the capacity to safeguard an employee from a surrounding ambient environment for 20 minutes, a first-aid kit and a set of portable radio stations.

The security convoy accompanying the cyanide cargo are provided with necessary personal protective equipment, a set of tools, necessary spare materials, plugs, Instructions for the conductor, approved by the chief engineer of the Manufacturer.

RZD has necessary emergency response equipment for all personnel including a set of tools, necessary spare materials, plugs, Instructions for the conductor, approved by the chief engineer of the Manufacturer. Standard PPE such as SPI-20 is given to all workers at the stations. Spillage would be collected apropos the instructions in the Emergency Card.

In the event of an emergency, the management (departmental) of the railways informs, in accordance with the legislation of the Russian Federation, specialists of gas rescue, mountain-rescue and other emergency services of the region, nearby enterprises, fire departments of settlements. These services and designated specialists travel to the emergency site with necessary means and equipment for the emergency response. Organizations involved have the right to use not only emergency card recommendations, but also specific neutralizers and methods for emergency response, personal protective equipment, and are required to provide personal protective equipment for all personnel of an organization involved in the emergency response.

Emergency response equipment is available at all times and is inspected apropos the schedule. In an emergency, chemical investigators and work supervisors use PDU-3 (within 20 minutes), emergency brigades - an insulating protective suit KIH-5 complete with an insulating gas mask IP-4M.

RZD does not use subcontractors.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is in full compliance with
 in substantial compliance with
 not in compliance with

Standard of Practice 3.3

Summarize the basis for this Finding/Deficiencies Identified:

RZD maintains procedures and current contact information for notifying relevant parties of any emergency.

Safety Rules for The Transport of Dangerous Cargo by Rail RD 15- 73-94 (approved by the Decision of Gosgortekhnadzor of the Russian Federation) with Amendment, approved by the Decree of Gosgortekhnadzor of Russia contains the main set of H&S procedures at RZD is a guiding set of emergency response procedures.

Railways management within each region determine in advance with the regional bodies of Russian Civil Defence (MCHS) a list of organisations which have emergency services or relevant specialists that can take part in the emergency response. The list of such organisations is approved by the local administration at the suggestion of the Railway.

RZD contracts specialised organisations which are in possession of necessary licences and certificates to provide emergency response and rescue services.

Depending on the severity of consequences, the on-duty personnel of the branches and departments of the railways should inform the shipper, consignee or the nearest enterprise located near the emergency site and a rescue service to eliminate the consequences of an emergency, and the brigade ambulance if harm is caused to people's lives and health, If in the emergency zone there is a threat to the population or contamination of the area, the duty officer is obliged to inform the emergency commission and other relevant organizations about such emergency.

Shift personnel or the locomotive crew inform the duty officer of the railway department about an emergency during the transportation of dangerous cargo. The operative-administrative department of the transportation service should immediately inform the regional bodies of Gosgortekhnadzor of Russia about an accident. Regional bodies of Gosgortekhnadzor are obliged to transmit information about the accident to the central office of the Gosgortekhnadzor of Russia apropos a set format.

The message should contain information about the circumstances of an emergency, the name of the cargo and the number of the emergency card, the quantity of dangerous goods, its location in the composition, and on electrified sections - information about the need for stress relief.

Emergency response plans for railway sections and railway departments provide for emergency response measures, and stations are planned where, if necessary, railcars with dangerous goods can be reloaded.

Systems and procedures are updated in accordance with the mandatory requirements of national and international legislation. H&S statistics are collected and analysed by a designated department – Transport Service Center - in an electronic format.

Emergencies and incidents are recorded at each branch of the railway, transport management and the Ministry of Railways of Russia and industrial railway transport in a special journal in a set form "Instructions for technical investigation and recording of emergencies that did not result in accidents on the enterprises and facilities which fall under control of Gosgortekhnadzor of Russia." The railway management submits monthly information on the state of safety, emergencies and incidents pertaining to dangerous cargo to the local authorities of Gosgortekhnadzor of Russia (railway transport inspection authorities).

To date, there have been no cyanide incidents that have occurred during the operations.

It is not the responsibility of RZD to notify ICMI on any cyanide accidents that would have occurred on the territory of the Russian Federation. No such accidents have occurred; however, it will be the responsibility of Varvarinskoye (Solidcore) to notify ICMI should any occur.

Standard of Practice 3.4

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Neutralization measures are to be carried out in accordance with the Emergency Procedures and with the use of personal protective equipment for no longer than 40 minutes, with total shift duration of no more than 4 hours.

The restoration work by the Ministry of Railways of Russia (recovery trains, etc.) can begin after the special forces have eliminated the threat to life and health of people in the emergency zone. Spills are collected taking precautions into a metal container without using any moisture and are sealed tightly. Sand is used thereafter. Surface layer of soil with contaminants is cut off, collected and removed for disposal and replaced with fresh layer of soil. Surface of the emergency area is then treated with a mixture of two volumes of 10% ferrous sulphate solution and one volume of 10% hydrated lime solution (20% sodium hydroxide solution). Surfaces of the flatbeds are rinsed

with water and detergent compositions.

Drainage and unloading of dangerous cargo from damaged wagons or containers onto the ground is prohibited. These operations are allowed only in exceptional cases with the permission of local executive authorities and territorial bodies of the Ministry of Natural Resources of Russia with subsequent disposal of dumping sites for dangerous goods.

In case of detection of leakage (spill) of dangerous goods along the transportation route, the emergency car shall be uncoupled and set aside on a special track on which the measures specified in the emergency card are performed, the station manager notifies the consignor of such.

Head of the restoration work together with the specialists of the relevant and interested organizations should:

- determine the nature of the lesion;
- assess the situation, determine the boundaries of the danger zone, take measures to protect and cordon it;
- identify the number of people exposed to hazardous substances, and organize the provision of medical care to them;
- develop a plan to eliminate the infection that has occurred;
- calculate the number of forces and means necessary to eliminate the consequences of accidents, and the procedure for their use;
- assign tasks to individual special forces and set the order of work; identify ways to neutralize lost dangerous goods;
- to organize control over the complete neutralization of the terrain, objects of the external environment, equipment and transport, and
- arrange medical care and take other security measures for those involved in the elimination of consequences and living near the population. General guidance to ensure compliance with the safety requirements is done by the emergency response manager.

In an emergency, all response measures shall be carried out taking into account the properties of sodium cyanide and the relevant precautions as specified in the emergency card. The emergency card (619) does not allow release of substance into water bodies, basements or sewers. All first aid measures should be carried out taking into account the properties of sodium cyanide and the relevant precautions.

The possibility of resuming the movement of trains through the zone in which the accident may have occurred, is determined by employees of the emergency response organizations that

in a special journal in a set form according to "Instructions for technical investigation and recording of accidents that did not result in accidents under the control of the Gosgortekhnadzor of Russia enterprises and facilities."

The railway authorities submit monthly information on the state of safety, accidents and incidents with dangerous goods to local authorities of the Gosgortekhnadzor of Russia (railway transport inspection authorities).





SOLIDCORE RESOURCES PLC

VARVARA RAIL

CYANIDE TRANSPORTATION SUMMARY AUDIT REPORT

Table of Contents

Introduction	3
Operation General Information	3
Operation Location Detail and Description	4
Auditor’s Finding	8
Compliance Statement	8
Auditor Information	8
Auditor Attestation	9
Principles and Standards of Practice	10
Principle 1 TRANSPORT	10
Standard of Practice 1.1	10
Standard of Practice 1.2	11
Standard of Practice 1.3	12
Standard of Practice 1.4	13
Standard of Practice 1.5	15
Standard of Practice 1.6	15
Principle 2 INTERIM STORAGE	16
Standard of Practice 2.1	16
Principle 3 EMERGENCY RESPONSE	17
Standard of Practice 3.1	17
Standard of Practice 3.2	18
Standard of Practice 3.3	19
Standard of Practice 3.4	20
Standard of Practice 3.5	20

The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.



Introduction

This document represents a Summary Audit Report for the Cyanide Code recertification transportation audit of Varvarinskoye JSC, a company which conducts mining operations located in Kazakhstan.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audits is complete, it posts the Summary Audit Report on the Cyanide Code website.

Current Summary Audit Report has been prepared based on the information available at the time of the audit. Every effort has been made to ensure accuracy of the information presented herein with the supporting evidence available where applicable. Information provided by Varvarinskoye JSC has been taken in good faith and has been verified where possible.

Operation General Information

Name of Production Facility:	Varvarinskoye JSC
Name of Facility Owner:	Solidcore Resources PLC
Name of Facility Operator:	Varvarinskoye JSC
Name of Responsible Manager:	Ryssaldy Komutova, Chief Environmental Engineer
Address:	Varvarinka
State / Province:	Kostanay
Country:	Kazakhstan
Telephone:	+7 (7142) 39 02 25
Email:	KomutovaRT@solidcore-resources.kz

Operation Location Detail and Description

“Varvarinskoye” JSC operates its own Railway Spur which is less than 15km long and reaches the mine site on the straight line from Bataly station which belongs to Kazakhstan Temir Zholy (hereinafter “Kazakh Railways” or “KTZ”). It takes for the cyanide containers approximately 50 minutes to reach Varvarinskoye Railway Station from Bataly Railway Station. Cyanide Transportation Route from Bataly Station to Varvarinskoye platform is shown on Figure A below.



Figure A: Cyanide Transportation Route from Bataly Station to Varvarinskoye Station

“Varvarinskoye” JSC purchases cyanide from Korund Zyan JSC (hereinafter – “Korund”), a cyanide manufacturer located in Russian Federation (hereinafter referred to as “RF” or “Russia”) and has been certified by ICMI since 2012. The cyanide is loaded directly on to the rolling stock within the boundaries of Korund which operates its own railway spur and is in possession of license for the loading and unloading operations issued by Russian Railways (hereinafter – “RZD”).

Transportation of sodium cyanide from Dzerzhinsk station in Russian Federation to Bataly station in the Republic of Kazakhstan is implemented through joint efforts of JSC Russian Railways, which owns the railway infrastructure in the Russian Federation, and JSC Kazakh Railways, which has similar rights in the Republic of Kazakhstan. These organizations are state-owned and their

actions are governed by the regulations for the transportation of dangerous goods by rail, which in turn are based on UN recommendations.

JSC RZD and JSC KTZ are licensed to transport all types of cargo, including sodium cyanide (UN code 1689). Their activities are insured in accordance with the current legislation of the Russian Federation and the Republic of Kazakhstan. Both are monopolies and select appropriate routes for the transport of dangerous goods with a likely border crossing for such international freight shipments between Russia and Kazakhstan being the Kartaly station border crossing.

Diagram of delivery of sodium cyanide from Korund Zyan in Russia to Varvarinskoye JSC in Kazakhstan in 2025 is shown on Figure B below and outlines parties involved in the supply chain.

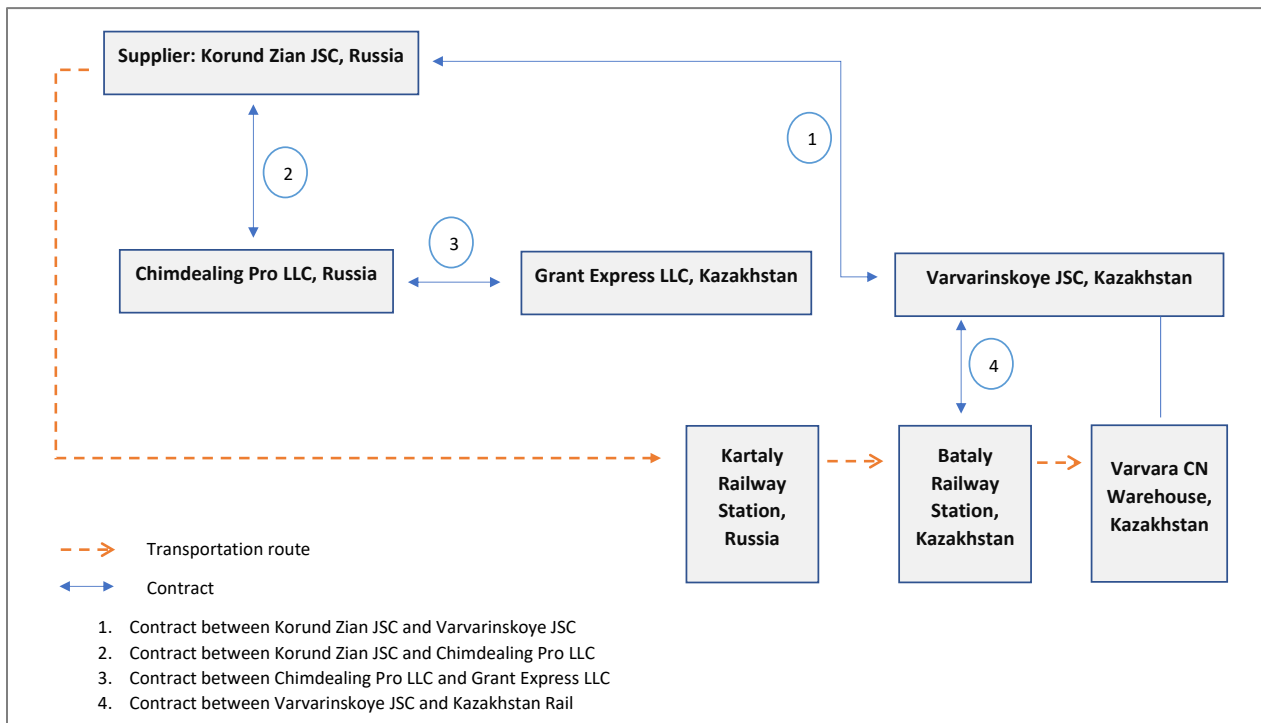


Figure B: Diagram of Cyanide Delivery From Korund Zyan to Varvarinskoye JSC

In the process of transportation, Russian locomotive is uncoupled and the rolling stock coupled to Kazakhstan rail proceeds to Bataly station where the Kazakhstan locomotive is uncoupled and the rolling stock is then coupled to Varvarinskoye JSC locomotive. Thus, the containers loaded onto the railway platform travel to the destination station without reloading.

“Varvarinskoye” JSC is continually informed of the cargo whereabouts and pending arrivals via designated acceptance-delivery agents. Computerized tracking system ETRAN is used to monitor

the cargo using the rolling stock numbers. Consignment notes specify this information which will remain unchanged from the start to the end of the cyanide transportation route.

As soon as cyanide cargo arrives at Bataly Station, “Varvarinskoye” JSC becomes duly responsible for the cargo. At Bataly, cyanide containers are inspected by the acceptance operators of both the “Varvarinskoye” JSC and Kazakhstan Railway, are handed over and forwarded on to the Varvarinskoye platform, where the cyanide is offloaded from the containers (wooden boxes) by Varvara and transported by on site vehicles to the designated cyanide storage warehouses. Varvarinskoye” JSC operates its own (Figure C) that is used for the final section of cyanide delivery.



Figure C: Varvara Locomotive, 2025

After emptying and decontaminating the cyanide containers they are returned to the manufacturer (Korund Zyan).

Preliminary customs declaration would have been submitted to the Customs before every shipment thereby speeding up the transit and customs clearance process of the cyanide containers, a process made possible by the Customs Union treaties.

No problems with the shipping containers have occurred in the Varvarinskoye shipping history. No incidents or emergencies have occurred; the containers and seals have always arrived intact, as was reported to the auditors during the site visit.



Auditor's Finding

This operation is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

Compliance Statement

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

Auditor Information

Audit Company: Greenrock International LLC
Lead Auditor: Julia Kennedy
Lead Auditor Email: juliakennedy@kennedy-global.com

Names and Signatures of Other Auditors:

Auditor 1: Christine Blackmore Lead and Technical
Name (Print/Type)


Signature

Dates of Audit: 23-26 September 2025

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the recertification audit. I further attest that the recertification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Varvarinskoye JSC



23-26 September 2025

Name of Operation

Signature of Lead Auditor

Date



Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

Varvarinskoye JSC implements a procedure for selecting transport routes that minimizes the potential for accidents and releases or the potential impacts of accidents and releases. No problems with the shipping containers have occurred in the Varvarinskoye shipping history. No incidents or emergencies have occurred; the containers and seals have always arrived intact, as was reported to the auditors during the site visit.

Kostanay region in Kazakhstan has population density of 4,45 people/km² (total Kostanay region population is 865000 people); population alongside the CN transportation route is scarce. Therefore, associated risks are considered low albeit managed accordingly.

Infrastructure maintenance and construction is implemented in accordance with the local legislation. Maintenance records have been presented to the auditors and are appropriate. In addition, Varvarinskoye JSC has invested into upgrading its Varvara Railway Station which now boasts a new office building equipped to modern standards, the platform area has also been refurbished, as observed by the auditors during the visit.

Cyanide transportation route runs across a flat terrain on a straight line. Therefore, associated risks are considered low albeit managed accordingly. No water bodies alongside this section of the CN transportation are present.

“Varvarinskoye” JSC operates procedures to evaluate the risks prior to each cyanide delivery. The procedures are reviewed periodically.

“Varvarinskoye” JSC operates a grievance/feedback mechanism whereby community members are welcome to provide feedback via the company website form, verbally or by letter and

includes the transportation of cyanide. The route is a relatively short railroad appended to the national Bataly station and was designed and commissioned in accordance with the national regulations.

“Varvarinskoye” JSC documents the measures taken to address the risks with the selected route as part of a daily inspection routine at the beginning and at the end of every shift. In addition, risk management measures have been documented in the Standard Operating Procedures and the Emergency Response Plan.

“Varvarinskoye” JSC has obtained a governmental approval for the construction and operation of its railway spur. Preceding this approval, public consultations have been held to enable subsequent implementation and construction. Thus, the route has been designed in the shortest possible distance from the Varvarinskoye mine site and avoids watercourses and villages.

“Varvarinskoye” JSC holds a state approval listing the types of cargo endorsed for transportation using this route; cyanide is on the list and therefore is transported legitimately.

RZD is responsible for the cargo security with 2 armed security guards accompanying the cyanide container from Dzerzhinsk to the Varvarinskoye station inside the “teplushka” designated heated carriage. Therefore, the armed convoy accompanies the cyanide cargo all the way through to the mine site.

The convoy are provided with the necessary PPE, a first-aid kit, a set of emergency tools and primary fire extinguishing equipment. The guards are trained to perform the maintenance of the cargo apropos the procedures developed and approved by the shipper, as well as MSDS describing the dangerous properties of the cargo, first aid measures and safety measures in emergency situations.

A security convoy (guards) accompany any dangerous cargo during transit and at interim stations are to comply with the "Regulations and procedures for the protection of goods and objects in railway transport" in which they are fully trained. They understand the dangerous properties of the cargo, first aid measures, safety measures in emergency situations and ensure that the safety measures established for this cargo are observed both in transit and during the stops. The convoy are to observe Korund’s emergency response procedures.

“Varvarinskoye” JSC does not use subcontractors for the transportation of cyanide from Bataly to Varvarinskoye.

Standard of Practice 1.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC uses only trained and qualified operators to operate its locomotives, as evidenced by the auditors during the visit via training records, professional certificates and work licenses.

“Varvarinskoye” JSC employs only trained personnel to operate its locomotives. Locomotive operators and other railway personnel receive necessary regular inductions and training; refresher-training takes place biannually. Training records have been evidenced by the auditors during the visit.

In addition, emergency response drills involving various scenarios are conducted and documented. Training records and drill reports were presented to the auditors and were found appropriate.

“Varvarinskoye” JSC does not use subcontractors for the handling or transport of cyanide from Bataly to the mine site. In addition, the locomotive operators are payroll employees of the company.

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC uses locomotive TEM2 which is designed and maintained to operate within the established loads. The locomotive technical properties include:

Diesel power - 1200 hp

Design speed - 100 km/h

Figure C above provides a photo of the locomotive used.

“Varvarinskoye” JSC implements “Standard Operating Procedures on Management and Maintenance of Traffic at the Varvarinskoye access tracks” which are updated every three years or as needed. The procedures provide for the adequacy verification of both the locomotive and the railway tracks.

Once at Varvarinskoye station, the containers are handled using a crane GROVE GRT880. The crane is equipped with the overload safety devices.

“Varvarinskoye” JSC implements procedures to prevent overloading of the flatbeds or the locomotive at the Bataly station and for the crane handling the cyanide containers at Varvarinskoye station. Also, national law requires that cyanide containers are transported “on the straight line” which means that upon arrival at Bataly station the containers are handed over to “Varvarinskoye” JSC without touching the ground. No changes are made to the container load en-route. Chance of overloading of the railway flatbeds is therefore excluded.

No more than 25 railcars, weight not exceeding 2300 tonnes at a time are allowed while shunting from Bataly station to the Varvarinskoye access tracks. The cyanide cargo transit weight (1512t) is therefore within the allowable limit.

Lifting capacity of GROVE GRT880 Crane is 78 tonnes, overload safety devices are in place. The crane is on a rolling maintenance program and is operated by a highly qualified operator, the latter was interviewed during the visit.

Varvarinskoye” JSC does not subcontract any handling or transport of cyanide from Bataly to the mine site.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide reaches Bataly station in 20ft sealed containers. The integrity of the containers is maintained by RZD (and KTZ) from Dzerzhinsk to Bataly station. Acceptance agents inspect the containers at Bataly, sign off and hand these over to “Varvarinskoye” JSC. Integrity is further

maintained by “Varvarinskoye” JSC until cyanide reaches the Storage Compound at the mine site.

Should empty or loaded containers be found technically faulty as a result of a visual inspection at Bataly, the receiving agents shall return the faulty containers upon raising appropriate paperwork. To date, such circumstance has not occurred, reportedly.

Appropriate signage used to identify the shipment as cyanide includes the UN 1689 sign. Placards are placed on the 4 walls and the rooftop of the containers in line with UN classification.

“Varvarinskoye” JSC implements a safety procedure for its cyanide transport. Procedures includes inspecting the locomotive prior to each departure. Railway tracks are also inspected in accordance with the existing procedures. Evidence includes inspection checklists and reports which have been reviewed by the auditors.

“Varvarinskoye” JSC implements a maintenance program for its locomotive, including monthly inspections and quarterly maintenance. Annual Schedule for the locomotive preventive maintenance as well as maintenance records have been produced to the auditors.

Limitation on the locomotive operator hours is stipulated in the Job Description and is regulated under the Labour Code of Kazakhstan.

In Russia, where railway shipment of cyanide begins, placement and securing of the containers on the flatbeds is carried out in accordance with Chapter 9 "Technical conditions for the placement and securing of cargo in wagons and containers" approved by the Russian State Authorities, and Appendix No. 3 to the Agreement on International Carriage by Rail (RID) of 01.07.2015. In Kazakhstan, when cyanide reaches Bataly Station, the containers remain on the flatbeds which are switched to the Varvarinskoye locomotive.

To prevent the loads from shifting and flatbeds being side-tracked, appropriate safety devices (such as dropping wit (No23CO) are in place at the access tracks.

The auditors have reviewed the “Standard Operating Procedures for the Varvarinskoye access tracks” and find it comprehensive and fir for purpose.

“Varvarinskoye JSC Standard Operating Procedures” stipulate for appropriate transportation modifications such as weather conditions, heavy wind (>15m/s) or force majeure circumstance. If required, additional break-shoes are used at the Bataly station as an extra flatbed stability measure. Railway tracks cannot be used in case of heavy snow or a thick snow cover, fallen trees, garbage or other obstacles. In case of heavy winter precipitation (snowstorm, blizzard, etc.), snow removal machinery (snowplow, bulldozer, grader, etc.) is mobilized at the request of the locomotive crew.

“Varvarinskoye” JSC employees, including locomotive operators, crane operators and others involved into cyanide handling, undergo mandatory medical examination at the start of every shift as part of drug and alcohol prevention and control. In addition, Varvara has implemented breathalizers at each gate entry.

“Varvarinskoye” JSC implements appropriate Health and Safety procedures standard which outline overarching H&S requirements to all employees and are updated regularly. Observation of the requirements contained therein is recorded in special purpose records and journals. The auditors have reviewed the above procedures as well as the evidence of compliance and concludes that the procedures are being implemented at a high level.

“Varvarinskoye” JSC does not subcontract any handling or transport of cyanide from Bataly station to Varvarinskoye. In addition, the locomotive operator is a payroll employee of the company and not a subcontractor either.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

Summarize the basis for this Finding/Deficiencies Identified:

Varvarinskoye JSC do not use maritime transportation. Shipments of cyanide are by railway only and are in compliance with Regulation concerning the International Carriage of Dangerous Goods by Rail (RID).

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Summarize the basis for this Finding/Deficiencies Identified:

Locomotive operator is equipped with a portable radio station, in addition to the mobile phone, personal protective equipment and a first-aid kit. Necessary radio and mobile communication equipment is maintained in good condition at all times.

All communication equipment is tested and calibrated periodically to ensure it functions properly.

Reportedly, there are no blackout areas along the Bataly – Varvarinskoye route due the short distance and adequate mobile coverage. Radio communication is available for the operators to use should the need arise.

Cyanide shipments are tracked using the electronic system. In addition, Kazakhstan Railway notifies Varvarinskoye prior to arrival of the cargo to Bataly station.

“Varvarinskoye” JSC uses the existing inventory control and the chain of custody documentation to monitor the amount of cyanide during transport. The list of documents includes: Consignment note, Transit Declaration, Cyanide Import License, Certificate of Origin, Certificate for the packaging and the number of the containers. Cyanide quantity and shipping requirements are contained therein.

Shipping records indicating the amount of cyanide are available. Material Safety Data Sheets are available in English, Russian, other documents are also available in Kazakh language.

“Varvarinskoye” JSC does not subcontract any handling or transport of cyanide from Bataly station to Varvarinskoye.

Principle 2 | INTERIM STORAGE

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

Standard of Practice 2.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

For purposes of the audit, “interim storage sites” and “trans-shipping depots” refer to facilities where cyanide is held temporarily when changing carriers or transport modes. Truck and rail terminals and port facilities are examples of interim storage sites and trans-shipping depots.

Activities such as parking a cyanide transport vehicle for the night while en route do not involve interim storage. However, parking a truck carrying a cyanide load at a truck or rail terminal or a

port for transfer to another truck, train or ship would constitute interim storage unless such a transfer took place within a short period of time (hours as opposed to a day or more). Storage in a warehouse, as defined in the Code's *Definitions and Acronyms* document, is a production activity and must be evaluated for compliance using the Cyanide Production Verification Protocol.

There is no interim storage involved en route from Bataly station to Varvarinskoye Railway Spur. Only permanent Toxic Storage Compound is available at the Varvarinskoye mine site.

Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC has the Emergency Response Plan that has been developed for its operations. “Varvarinskoye” JSC Emergency Response Plan is available and outlines necessary actions, requirements and roles, as does the relevant Emergency Card. Emergency Card 619 is a universal requirement for the cyanide shipment and contains the following:

- instructions on the use of personal protective equipment;
- emergency response guidelines;
- procedures for implementation of mandatory general measures in case of accidents;
- emergency response actions;
- first aid instructions;
- instructions for medical care.

The Emergency Response Plan is appropriate for the selected transportation route. Emergency Card for Cyanide No 619 is used additionally.

In accordance with the emergency card for sodium cyanide (619), cyanide becomes dangerous when it comes into contact with water. If a container's integrity is undisturbed, risk of danger related to cyanide spillage is minimum.

Emergency Response Plan and Emergency Card consider the physical and chemical form of the cyanide and provide for the response actions respectively.

The plan is specific to the method of railway transport and considers emergency response scenarios and actions associated with that. The Plan considers all aspects of the transport infrastructure, among other aspects. The Plan considers the design of the railway station and the locomotive. No interim storage is involved in Kazakhstan en route to the destination point.

The Plan includes descriptions of response actions, as appropriate for the anticipated emergency situations during the railway operations. Staff responsibilities are described in detail and include measures pertaining to the safe evacuation of people, stakeholder notification protocols, incident investigation procedures and other responsibilities.

Emergency Response Plan contains a set of response actions with roles and responsibilities clearly assigned to each party involved. In the event of an emergency involving cyanide, Varvarinskoye personnel are to communicate with the assigned parties, stop shunting operations or transport, take necessary measures to prevent threat to people and the equipment, prevent access from unauthorized persons and conduct rescue operations.

In the event of an emergency, railway transport workers and Civil Defense act as quickly as possible, in accordance with the nature and scale of the emergency and taking into account the properties of the dangerous goods (fire hazard, toxicity, corrosiveness, oxidizing effect, etc.), in compliance with the safety and preventive measures provided for by the RID and Emergency cards for relative dangerous goods.

According to paragraph 5 of Article 30 of the Law of the Republic of Kazakhstan dated December 8, 2001 No. 266-II "On Railway Transport", the sender (consignor), the recipient (consignee) receiving dangerous goods as well as the carrier performing the transportation of dangerous goods, are obliged to ensure transport safety, have the means and mobile units (crews) necessary the emergency response.

Standard of Practice 3.2

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

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC provides emergency response training which involves inductions, refresher training and emergency drills in line with the existing Training Program. The auditors have reviewed the training program and training records and finds these fit for purpose and to high standards.

Emergency response duties and responsibilities of personnel are described in the Emergency Response Plan and the Standard Operating Procedures in sufficient detail.

Emergency Response Plan specifies which emergency response equipment should be available in case of emergency. The locomotive operator is in possession of personal protective equipment (Dragger face mask, L-1 suit, etc.), a first-aid kit and a set of portable radio stations. Emergency Response tools and Health & Safety equipment, including appropriate PPE is available for the locomotive crew during transport. The list of equipment is provided in the ERP.

“Varvarinskoye” JSC implements Health and Safety procedures which outline the requirements for the emergency response equipment. Emergency Response equipment is inspected apropos the set procedures and is available during transport.

“Varvarinskoye” JSC does not subcontract any handling or transport of cyanide from Bataly station to Varvarinskoye. In addition, the locomotive operator is a payroll employee of the company.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC implements procedures and keeps current the contact information for notifying affected parties of an emergency. These are outlined in internal procedures, including the Emergency Response Plan.

“Varvarinskoye” JSC implements necessary procedures to ensure that the emergency response procedures are updated. Annual review of the procedures is implemented to achieve this aim. Procedures can also be modified and updated as needed.

To date, there have been no cyanide incidents that have occurred during the port operations.

Varvarinskoye JSC ERP has procedures in place for notifying ICMI on any significant cyanide accidents that would occur during cyanide transport.

Standard of Practice 3.4

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

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC has developed procedures for remediation and neutralisation of decontaminated soils as well as management of spill clean-up debris. These have been reviewed by the auditors and are found appropriate.

In an emergency, all response measures should be carried out taking into account the properties of sodium cyanide and the relevant precautions as specified in the emergency card. The emergency card (619) does not allow release of substance into water bodies, basements or sewers.

Varvarinskoye” JSC has developed procedures for remediation and neutralisation of decontaminated soils, where ferrous sulphate is allowed, but the ERP strictly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

Standard of Practice 3.5

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

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

Summarize the basis for this Finding/Deficiencies Identified:

“Varvarinskoye” JSC undertakes revisions of the Plan on an annual basis unless off-schedule reviews and evaluations are required.

“Varvarinskoye” JSC periodically conducts emergency response drills involving different scenarios, as has been evidenced by the auditors during the site visit. The latest mock drill was successfully conducted and the reports made available for review.

“Varvarinskoye” JSC implements Health and Safety standards and the relevant procedures such as "Preparedness for emergency situations and elimination of accidents at hazardous production facilities" which require evaluation of the Plan’s performance.

“Varvarinskoye” JSC evaluates the Plan’s performance on an annual basis unless off-schedule reviews and evaluations are required.