

***Cyanide Transportation
Summary Audit Report
For The
International Cyanide Management Institute and
Olimp LLP (Republic of Kazakhstan).***

***Prepared by : NCABrasil Expert Auditors Ltd.
www.globalsheq.com***

www.cyanidecode.org

June 2021

The International Cyanide Management Code (hereinafter “the 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 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.

This report contains 14 pages.

SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.
3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

International Cyanide Management Institute (ICMI)
1400 I Street, NW, Suite 550.
Washington, DC 20005, USA
Tel: +1-202-495-4020
5. The submittal must be accompanied by 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.
7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.

SUMMARY AUDIT REPORT (draft # 1)

Name of Cyanide Transportation Facility: Olimp LLP.
Name of Facility Owner: Olimp LLP.
Name of Facility Operator: Olimp LLP.
Name of Responsible Manager: Aizhan Samatovna Zhumasheva
Address: Abay avenue 109, office 501.
State/Province: Almaty.
Country: Republic of Kazakhstan.
Telephone: +7 701 759 0136
Fax: n.a
E-Mail: aizhan@cyanide.kz

Location detail and description of operation:

The Olimp operation is focused on the road transportation of solid cyanide for gold mining operations, without interim storage. The operation is located at Almaty town, in Kazakhstan and transports solid cyanide from an approved/ certified solid NaCN producer (Saratovorgsyntez/ Russian Federation), which is responsible to load the cyanide cargo (boxes) into Olimp trailers, to gold mine operations located in Kazakhstan, which are responsible to unload the cyanide cargo at their premises. The NaCN boxes (1.0 ton each/ original package) are transported to gold mines inside tent trailers, specifically designed for this purpose, where twenty cyanide boxes (maximum capacity) are placed. All tent trailers are soft-sided (reinforced plastic outside a steel structure). Cyanide transportation from Saratovorgsyntez production plant to the gold mine operations in Kazakhstan are made in convoys. Olimp's contracted drivers and assistants are not involved in the cyanide cargo loading and unloading activities. The operation contracts third party transporters to perform these activities. All contractors are citizens of the Republic of Kazakhstan, and work under the labor laws of the Republic of Kazakhstan. In some cases, the cyanide producer (Saratovorgsyntez/ Russian Federation), is responsible, by contract, to deliver the solid cyanide at gold mining operations in Kazakhstan.



SUMMARY AUDIT REPORT (draft # 1)

Auditor's Finding

This operation is:

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

with the International Cyanide Management Code.

- * For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Auditing Company: NCABrasil Expert Auditors Ltd.

Audit Team Leader: Celso Sandt Pessoa (ICMI qualified lead auditor and transportation qualified TEA (technical expert auditor)), since 2006.

E-mail: celsopessoa@ncabrasil.com.br and celso@globalsheq.com

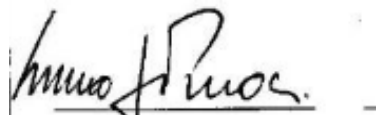
Website: www.globalsheq.com

Names and Signatures of Other Auditors: not applicable

Date(s) of Audit: 27 ~ 29/09/2023 (on-site) and 30~31/January/2024 (off-site).

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

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



Celso Sandt Pessoa

SUMMARY AUDIT REPORT (draft # 1)

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

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

The operation is: in full compliance with
 in substantial compliance with Transport Practice 1.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The operation, designed, documented, implemented and maintains a management procedure for routes identification, evaluation and definition. It was evidenced that the organization performed a risk evaluation for road transportation of solid cyanide, in accordance with this procedure, related to route evaluation system, which includes periodic re-evaluation of the routes, including the driver's feedback.

Reviewed the route definition and risk evaluation for the following routes/ mining operations:

- Aksu (Altynalmas Gold mine/ Stepenogorsky county).
- Pustynoye (Altynalmas Gold mine/ Balkash county).
- RG Gold mine (Nikolaevka county)
- Suzdal Alel Gold mine (Semey county).

The approved route considers population density, road infrastructure, fauna and flora, surface waters, pitch and grade and weather conditions, among other aspects. All transportation routes were reviewed and approved by the Kazakhstan Authority for Road Transportation of Dangerous Goods and by the Russian Federation road transit authority. It was evidenced that the operation identified and evaluated all the risks related to the selected routes above mentioned. Examples are: population density along the route, the infrastructure (asphalt, double or single speedway, gas stations, police stations, emergency stations, communication infrastructure, shadow areas for communication, fauna and flora), the condition of the route (under maintenance, holes, without asphalt), weather conditions (such as snow, ice, fog, fire, rain) and surface waters (rivers, creeks, lakes), fog formation trend, type of bridges, dangerous curves, environmental aspects (desert, mountain, forest) and security related places. Several controls such as speed limit, driver qualification and mandatory training (DAPOC/ EU agreement on International Transportation of Dangerous Goods), truck maintenance, pre-traveling brief with the driver, planned transport observations, full time monitoring of the truck from a remote station, limited traveling time, were implemented by the organization in order to mitigate the risks related to the selected routes. The selected route includes the transport using national and state roads.



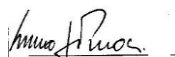
SUMMARY AUDIT REPORT (draft # 1)

It was evidenced that the operation, at least annually, re-evaluates the condition of the selected routes. In the end of each travel, the driver records on the traveling plan his perceptions about the route condition. This travel report is reviewed by the operations coordinator and, when necessary, the route plan is updated, and the risks re-evaluated. Track traffic conditions, points allowed to stop and overnight, authorized supply points, places with sharp curves, places with winding and slippery and snow conditions, uphill and steep slopes, bridges and rivers, risk of accidents, police checkpoints, locations requiring special permits for transit, allowed speed for trucks, pedestrian crossing sites, kettle and fauna related risks on track, emergency telephones of the places, population data, weather conditions, communication shadows are considered to select pertinent routes. All comments are reported at travel operation reports). Reviewed travel reports issued be 2023. As previously mentioned, it was evidenced that the organization performed a risk evaluation for road transportation of solid cyanide (Olimp Risk register), in accordance with documented procedures. All transportation documentation addresses the hazards and related risks and defines the operational control measures to be taken by the qualified drivers. All permits related to transportation route are kept updated. Olimp, as a mandatory requirement defined by the Kazakhstan and Russian Federation laws, contacts public authorities responsible for the road transportation of dangerous goods, the environmental protection agencies, road police and security agencies (e.g: Department of Emergency Situations), in other to obtain official permits to transport solid cyanide in the proposed routes. The operation will use security escorts when the risk analysis indicates that this should be an operational control during the transport (safety and security). In the selected routes, it was identified that a security escort is not necessary. Related to the use of convoys, all cyanide transportation uses this transport model. In the reviewed cyanide transportation cases (operational transportation reports), convoys were used. All cyanide transportation is performed by third party transporters, legally qualified by Russian Federation and Kazakhstan authorities, and Olimp adequately manages all ICMI requirements to be followed by these qualified third-party contractors., as above mentioned.

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

The operation is:

- in full compliance with
- in substantial compliance with Transport Practice 1.2
- not in compliance with



SUMMARY AUDIT REPORT (draft # 1)

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation's contractors are trained and licensed drivers as required by the applicable legislation for the transport of dangerous products, including solid sodium cyanide. The drivers must have a specific driving license, type "CE" and ADR/DAPOC license (International Rules for Delivering Dangerous Goods by Road), both in accordance with the Kazakhstan and Russian Federation legislation. Reviewed the driver license for: Mirat Agissov, Issatayev Mazafar, Tulepbergenov Nurbolat, Yerlev Boranbayev, Serik Kenebayev, Askar Kineyev and Utarov Zhenisbek. All reviewed permits and DAPOC certificates are valid and within the expiration date. It was evidenced that the operation defined, documented, implemented and maintains an annual training program for the operational team (truck drivers and operational personnel). The operation provided for its operational team drivers, initial and refresh trainings such as use of personal protective equipment, defensive driving (refresh), emergency response plan and solid NaCN properties and management (Material Safety Data Sheet). Records of such initial and refresh trainings are retained by the operation and were reviewed during this opportunity. All cyanide transportation is performed by third party transporters, legally qualified by Russian Federation and Kazakhstan authorities, and Olimp adequately manages all ICMI requirements to be followed by these qualified third-party contractors., as above mentioned.

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

The operation is: in full compliance with
 in substantial compliance with Transport Practice 1.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that Olimp uses trucks, such as DAF XF105 (6x2) and Volvo FH 460 (6x2), both supporting loads up to 60 ton. In the same way, the related trailers are made by Schmitz Germany and Krone Germany, all adequate to transport 20 (twenty cyanide boxes/ tent trailer), with load capacity up to 35 ton. The operation does not transport loads above 20 ton. According to the Kazakhstan and Russian Federation laws, trucks and platforms must go through an annual technical inspection, which frequencies depends on the age of the truck and platforms. In this case, the technical inspection must be carried out annually or every six months. Reviewed the following technical inspection reports for the following trucks and trailers (pair/ couple): 038-PEA-04+69-KZA-04, 04-AAN-04+171-AAK-04, 595-SCA-04+93-LAA-04, 202-SCA-04+25-KAA-04 and 514-NVA-04+86-ACG-04. The operation only transports 20 (twenty) NaCN boxes inside a tent trailer.



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The cargo weight to be transported is also recorded in the transportation documentation, as demanded by the Kazakhstan and Russian Federation laws. The cargo weight is verified in the departure of the cyanide producer/ distributor, at the border control, along the routes (weight control stations and road police stations) and, in some cases, during the reception of the cargo at the mining operations. Reviewed transportation documentation (Olimp LLP waybill and CMR (export record issued by Saratovorgsyntez)), 2136180, 2136183, 2136205, 213206, 2136170 and 2136171, among others. All cyanide transportation is performed by third party transporters, legally qualified by Russian Federation and Kazakhstan authorities, and Olimp adequately manages all ICMI requirements to be followed by these qualified third-party contractors., as above mentioned.

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

The operation is: X in full compliance with
 in substantial compliance with Transport Practice 1.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All solid cyanide boxes are transported inside a tent trailer, specifically designed for this purpose. The tent trailer backdoor is sealed by the cyanide producer (Satavorgsyntez) before departure from its premises. According to the Russian and Kazakhstan laws, safety placards (UNO # 66/1689 and toxic (6.1) pictogram)) must be placed in the front of the truck and in the three sides of the tent trailer. Evidenced full compliance during the field audit. Before each departure the operation performs a general inspection, which includes the documentation inspection, cargo weight, emergency response resources, protective personal equipment, truck and tent trailer, anti-shifting locks, leaches, steel bars (to be used in the trailer rear) communication resources, traceability system, cell phones, safety signage, among other aspects. The pre-departure inspection is based on an inspection checklist. This inspection is performed every day during the cyanide transportation. Reviewed pre-departure and daily inspection records for transportations performed during 2023. Trucks and tent trailers are maintained in accordance with a planned preventive maintenance program and performed internally or at approved maintenance shops. Preventive maintenance program, for trucks and trailers, is based on the kilometers (km) used by the truck + trailer. Preventive maintenance activities are performed every 15000 km. Reviewed preventive maintenance records for 038-PEA-04+69-KZA-04, 04-AAN-04+171-AAK-04, 595-SCA-04+93-LAA-04, 202-SCA-04+25-KAA-04 and 514-NVA-04+86-ACG-04 (truck and trailer, respectively), all performed between 2022 and 2023. All trucks and trailers must pass through an independent (third party) technical inspection in order to receive a permit to be used in road transportation of solid cyanide. Reviewed technical inspection reports issued between 2022 and 2023 for the above mentioned trucks and trailers.



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According to the Kazakhstan law and the operation policy, the daily work hours is from 6AM up to 6PM, where 8,0 hours is the maximum work shift within the mentioned range, with a 45´minutes rest every 4,0 hours driving. The drivers must have a 1.0 hour for lunch. Night travels are not allowed. Minimum rest time, between journeys, is 11 hours. All drivers are citizens of the Republic of Kazakhstan and work under the Kazakhstan labor laws. The Saratov town is located 250 km (kilometer) from the crossing control point at the border between Russia and Kazakhstan. Tent trailers are provided with wood locks (for the pallets), straps (fixed in the tent wall), a steel plate in the front of the trailer and steel bars in the rear of the trailer. Cyanide boxes are not stacked in tent trailers. Evidenced such configurations during the field audit. Also evidenced that such anti-shifting systems are included in the preventive maintenance plan. Social turbulences, storm wind, snow, ice, mud and storm rain, are aspects that could impact the transportation plan, that could be modified or suspended. The operation policy related to drug and alcohol use/ abuse is clear and accepted by all internal stakeholders. Monitoring is performed when the trucks are leaving the operation premises and along the route at defined checkpoints (for alcohol) and annually performed during the occupational health control (for other types of drugs). Reviewed records of monitoring performed between 2022 and 2023. All results were negative. The operation retains records of all above mentioned activities. All cyanide transportation is performed by third party transporters, legally qualified by Russian Federation and Kazakhstan authorities, and Olimp adequately manages all ICMI requirements to be followed by these qualified third-party contractors., as above mentioned.

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

The operation is: in full compliance with
 in substantial compliance with Transport Practice 1.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

This transport practice is not applicable to the operation’s scope. The operation scope is road transportation of solid cyanide.



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

The operation is: in full compliance with
 in substantial compliance with Transport Practice 1.6
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified: (Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided). The trucks are provided with portable radios. The driver is also equipped with a mobile phone. The travel is monitored by Olimp operational coordinator through the cell phone. All communication resources are tested before departure from the operation base, time to time with the operation headquarter. Such tracking system (using cell phone) was tested during the field audit. Blackout areas are not present in the selected routes. As previously mentioned, all trucks are provided with portable radios and cell phones (which was tested during the audit). The cyanide cargo documentation (e.g: bill of lading/ BoL) addresses the amount of solid cyanide being transported. The amount of solid cyanide being transported is controlled at the seller premise, during transportation (at weight control stations, border control station and police control stations) and, in some cases, in the reception at the mining operation. The cargo documentation (retained by the transporter) includes the following documents: bill of lading (producer and transporter), weight control records, police control records and cyanide buyer reception control records. The MSDS (Material Safety Data Sheet) is part of the transportation documentation, but it is left at the mining operation. All reviewed transportation documentation clearly indicates the amount of cyanide being transported. All cyanide transportation is performed by third party transporters, legally qualified by Russian Federation and Kazakhstan authorities, and Olimp adequately manages all ICMI requirements to be followed by these qualified third-party contractors., as above mentioned.



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2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

The operation is: in full compliance with
 in substantial compliance with Transport Practice 2.1
 not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:**

This principle is not applicable to the operation scope because the cyanide cargo is transported straight from the supplier (Saratovorgsyntez) to its final destination, the mining operation. During the transport, the truck is monitored 100% of the time and stops, at night, only at pre-evaluated and approved stations along the route. This tracking/ communication system was tested during the audit at the operation headquarter.

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

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

The operation is: in full compliance with
 in substantial compliance with Transport Practice 3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was evidenced that the operation developed and documented (updated on dated 31/12/2023) an emergency response plan. The operation also has an “emergency card” and the Material Safety Data Sheet (MSDS), both provided by the cyanide producer (Saratovorgsyntez), containing instructions to be followed in the event of an emergency during the road transportation of cyanide. It is important to note that the cyanide producer (Saratovorgsyntez) is responsible, by contract, to deliver the cyanide cargo at a gold mining operation in Kazakhstan (e.g: Pustynoye gold mine) and has responsibilities on the management of emergency situations during the road cyanide transportation, inside Russia and Kazakhstan. It was evidenced that the operation emergency response plan was developed for the specific circumstances and was verified that the emergency plans are appropriate to the specific cyanide transportation routes, and transport practices.



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The risks associated to the selected routes were identified and evaluated and the emergency response plans are focused on the identified and evaluated risks, also considering the available infrastructure and resources available in the selected routes. The operation emergency response plan is specific for solid NaCN transportation by road. The emergency response plan is specific for solid cyanide transportation by road (truck + tent trailer), always in convoys. The emergency response plan is specific to the routes (roads) defined to be used from the seller (Saratovorgsyntez) to the buyer (the mining operation). The emergency response plan is specific for the transportation resources (truck + tent trailer) used to transport solid cyanide from the seller to the buyer. It was evidenced that the emergency response plan describe the specific response actions that shall be applied to each emergency situation/ scenario, such as accident with fire, fall into a river, cyanide leakage on a rainy day, cyanide intoxication, among other specific emergency scenarios. The "emergency card" and the MSDS provided by Saratovorgsyntez, also address information related to emergency activities to be followed during the road transportation of solid cyanide. It was evidenced that the emergency response plan describes the roles of several external stakeholders, in Russian Federation and in Kazakhstan, that should be involved in the emergency response, such as road police, state owned emergency responders and firefighters, reference hospitals along the routes, and environmental and security authorities.

Transport 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 Transport Practice 3.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All the necessary contact information with stakeholders (e.g: the NaCN seller, the operation headquarters, the mining operation, road police, environmental and security department)) is addressed at the Emergency Plan. All protocols related to emergency notification and reporting are kept updated and the critical stakeholders to be notified are clearly identified. There were no emergencies related to cyanide transportation between 2022 and 2023. ICMI is one external stakeholder addressed at the contact master list that will be promptly communicated in the event of a cyanide related emergency. All duties and responsibilities, for each identified scenario, are addressed in the operational & emergency management procedures, that are part of the approved emergency plan. The required emergency response resources master list is part of the traveling documentation and checked before each travel. Usual emergency hardware to be available at the truck is: safety glasses, helmets, rubber gloves, ear protectors, masks for powder (P3 type) and HCN (ABEK1 type), Tychem type overall, fire extinguishers (dry chemical powder/ 9 kg), plastic bags, plastic shovel and brush and drinking water.



SUMMARY AUDIT REPORT (draft # 1)

First aid instructions are part of the driver's documentation. Sodium thiosulfate 25% will be used in the event of cyanide intoxication. Antidote expire date are managed by the medical team that shall attend the emergency. This antidote will be applied by medical professionals only. The convoy drivers will act as a support team in the event of a cyanide related emergency. As previously mentioned, there is an emergency kit for the truck driver (which includes the PPEs) and the emergency response resources, transported in the truck. All emergency response resources are inspected before each departure, as well as the driver's emergency kit. Records of such pre-departure inspections are retained by the operation and were reviewed during this opportunity. The cyanide producer and the environmental and security agencies of Russian Federation and from Kazakhstan will play the main role in any emergency related to cyanide, mainly related to the mitigation of all the impacts caused by cyanide. As previously mentioned, the operation's drivers' documentation also addresses directions to other stakeholders, such as public entities (road administrator, road police, medical resources, firefighters, mining operation) that could attend the emergency local. If an emergency happens in the vicinity of a gold mining operation, the mining operation will also attend the emergency scene.

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

The operation is: in full compliance with
 in substantial compliance with Transport Practice 3.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

All the necessary contact information with stakeholders (e.g: the NaCN seller, the operation headquarters, the mining operation, road police, environmental and security department)) is addressed at the Emergency Plan. All protocols related to emergency notification and reporting are kept updated and the critical stakeholders to be notified are clearly identified. There were no emergencies related to cyanide transportation between 2022 and 2023. ICMI is one external stakeholder addressed at the contact master list that will be promptly communicated in the event of a cyanide related emergency.

Transport 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 Transport Practice 3.4
 not in compliance with



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Summarize the basis for this Finding/Deficiencies Identified:

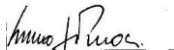
Two of emergency scenarios are the impact of solid NaCN on soil (dry and wet) and on the surface waters. Emergency protocols for these situations clearly defines the neutralization process to be used in the event of NaCN impact on the soil, using CaO powder, removal of neutralized soil (into plastic bags) and final disposition at the mining operation. Monitoring soil samples will be taken to confirm the neutralization process effectiveness. For surface water, in the event of any impact caused by solid NaCN briquettes, these shall be removed (if possible), neutralized with CaO powder, collected in plastic bags and disposed at the mining operation. Oxidation through bubbles will be tried. An emergency environmental monitoring plan will be implemented to collect and analyze the extent of the contamination plume. No chemical products are allowed to be used to neutralize cyanide in surface water. Suck kinds of products are not included in the truck emergency resources. The prohibition to use such chemicals is clearly addressed at the operation Emergency Response Plan.

Transport 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 Transport Practice 3.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan is kept updated by the operation through the feedback of real emergencies, emergencies occurred with other transporters in Kazakhstan or Russia, after the realization of mock emergency drills. Last updated was performed in December 2023. The operation plans and performs mock drills annually. One mock drill was performed in 2023. The scope of the mentioned performed drill included the release of solid NaCN briquettes in wet soil and the intoxication of one person. The report related to the above-mentioned mock drill was reviewed in this opportunity. The emergency mock drill was performed in conjunction with the Pustynoye Gold Mining emergency response team. Every mock drill has defined planned objectives to be achieved. After the drill, it is reviewed, and conclusions are defined in order to confirm (or not) if the planned objectives were reached or not. Improvement actions plans are defined and implemented, resulting in the update of the Emergency Response Plan. The Emergency Response Plan was found updated at revision dated 31/12/2023.



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Audit team conclusions:

Based on the sampled evidences, the physical conditions of the site (installations) and the trucks/ trailers, in the interviewed personnel and in the reviewed documentation, the audit team concludes that the SHEQ management system is FULLY implemented and maintained in accordance with the International Cyanide Management Protocol for Transporters (June 2021) for cyanide transport operations (principles 1.5 and 2.1 are not applicable to the operation transport scope).



Rio de Janeiro, RJ, Brasil.

16/03/2024