

**ICMI CYANIDE CODE  
SUMMARY AUDIT REPORT  
CERTIFICATION AUDIT**

**CYANIDE TRANSPORTATION**

**ZAFER TANK**

**TASIMA ULUS NAKLİYAT TURİZM TİCARET LTD. STİ.  
Balçık Mah., Kamber Kaynağı  
Sk. No: 39 Gebze/Kocaeli, Turkey**

**Submitted to:  
International Cyanide Management  
Institute 1400 I Street, NW, Suite 550  
Washington, DC 20005  
USA**

**AUTHOR:**

**LULU INTELLIGENT ORGANIZATION**

**CONSULTING • TRAINING • AUDITS • CERTIFICATION • VERIFICATION**

**DR.-ING. BENNO STEINWEG**

**REGISTERED LEAD AUDITOR**

**ISO 9001, ISO 14001, ISO 50001, ICMC**

**HASLACH 4**

**WEITNAU 87480 - GERMANY**



Name of Cyanide Transportation Facility: ZAFER TANK TASIMA ULUS NAKLİYAT  
TURIZM TICARET LTD.  
Name of Facility Owner: ZAFER TANK TASIMA ULUS NAKLİYAT  
TURIZM TICARET LTD.  
Name of Facility Operator: ZAFER TANK TASIMA ULUS NAKLİYAT  
TURIZM TICARET LTD.  
Name of Responsible Manager: F. Onur Yılmaz, Managing Director  
Address: Balçık Mah., Kamber Kaynağı, Sk. No: 39  
Gebze/Kocaeli  
State/Province: Turkey  
Telephone: +90-216-575 0317  
E-Mail: [onur@zaferlogistics.com](mailto:onur@zaferlogistics.com)

Additional contact person:

O. Tahir Ađlamaz | HSEQ Manager  
Phone:+90-533-603 8490, tahir.aglamaz@zaferlogistics.com

The company, referred to as "Zafer Tank" in short, began its history in 1998 as a transporter of chemicals and liquid food. In a short period, Zafer Tank has evolved into a player in the tank container logistics sector, expanding its scope of operations in line with its growth strategy.

In 2005, the company embarked on internationalization, initiating its services in the field of tank container transportation. Currently, it offers comprehensive logistic operations with tank containers for the transportation of ADR chemicals (Classes 3, 4, 5, 6, 8, and 9), as well as non-ADR chemicals. Additional locations in the USA and Germany have been added over the years.

Four main services are provided for hazardous liquids and chemical products: tank container transportation, storage, heating, and customs clearance. The entire process is offered for each of these services.

Zafer Tank specializes in the transportation of ADR chemicals (Classes 2, 3, 4, 5, 6, 8, and 9), as well as non-ADR chemicals, collaborating with large and established tank container operators worldwide.

The initial certification according to ICMC Transportation is scheduled for the end of 2023. However, the company has already been active as a transport partner in various Cyanid Supply Chains of different Transportation Signatories in Turkey in previous years. Therefore, the ICMC Guidelines are familiar requirements for the company.

In Turkey, Zafer Tank operates with its headquarter in Atasehir, Istanbul region, and its Logistics Operations Center in Gebze, Kocaeli region, from where all cyanide transports are planned and executed.

For several years, Zafer Tank has held and currently maintains several internationally recognized certifications that form a crucial foundation for hazardous materials transportation: ISO 9001, ISO 14001, and ISO 45001.

The company intends to conduct cyanide transports from various Turkish ports (Pendik, Mersin, Trabzon, and Izmir) to different mine locations. Experience in this regard already exists, specifically as part of ICMC-certified supply chains.



(Signature Lead Auditor Dr. Steinweg)

Zafer Tank collaborates on all cyanide transports with the one and only Turkey-wide Emergency Response Service Provider: Hydra/Meke, who are actively involved in all (not only operated by Zafer Tank) cyanide transports taking place in Turkey. These transports are organized by mine operators, other consignors, or even Zafer Tank's competitors. The company Hydra/Meke brings valuable and extensive experience to the table. According to the leadership of the company, Zafer Tank has not experienced any incident in the past that would have been reportable to ICMI.

Auditor's Finding: This operation is

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


with the International Cyanide Management Code.

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

Audit Company .....	LULU Intelligent Organization
Audit Team Leader .....	Dr. Benno Steinweg
Email .....	<a href="mailto:Benno.Steinweg@hs-kempten.de">Benno.Steinweg@hs-kempten.de</a>
Names / Signatures of other auditors ...	n/a
Date of audit .....	November 03 and 13, 2023

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

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

  
\_\_\_\_\_  
(Signature Lead Auditor Dr. Steinweg)

## PRINCIPLE 1 – TRANSPORT

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

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

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

#### *Summarize the basis for this Finding:*

Zafer Tank fully complies with Transport Practice 1.1, which prescribes that routes for cyanide transport should be selected to minimize the potential for accidents and releases. Zafer Tank adheres to the regulations of the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR). The company has ADR specialists responsible for ensuring that all ADR requirements are met, and planning for the safe transport of shipments is appropriately completed. During the planning process, considerations such as population density, infrastructure (especially tunnels), road gradient, proximity of the transport route to water bodies, and route safety are taken into account. Interviews were conducted with drivers, dispatchers, Emergency Response Service provider personnel, and an ADR transportation expert. Awareness of the need for a designated route and a transportation security plan was very good. Routing considerations were consistent with those required by the Code.

Only roads that have been fundamentally designated as acceptable for the transport of dangerous goods are utilized. According to interviews, one of several risk mitigation measures applied by drivers is the use of truck stops specifically designated as suitable resting areas for drivers transporting hazardous goods.

In each and every case of cyanide transport, Zafer always deploys a fully equipped escort vehicle provided by their service provider Hydra. Hydra assumes responsibility for the risk assessment of the currently traversed route. Even if the route assessment does not indicate any particular danger, a temporary hazard may be present on the day of transport itself. Identifying and addressing this risk is also the responsibility of the accompanying service provider Hydra.

According to interviews, feedback from drivers is provided by the dispatch operation during each delivery. Routes are also re-evaluated annually, and after each trip, feedback is given in case potential problems were identified. Any issues or changes to allowed truck stops and routes from the previous year are taken into consideration. The route planning information reviewed during the audit is current as of 2023.

Risk mitigation measures to be taken by drivers are documented in route-specific transportation security plans. The routes traveled are generally considered safe. The driver is obligated to have the transportation security plan available at all times during the transport. This practice was confirmed through interviews with drivers and by evaluating the documentation available in the truck at the time of transport.

According to interviews with drivers, dispatchers, Emergency Response Service provider personnel, and an ADR transportation expert, acceptable routes for hazardous goods and truck stops are defined in the Emergency Response Plan. This is based on publicly available information from the road traffic authority and the police. Zafer Tank uses this information when determining

acceptable routes. Additionally, only dangerous goods routes approved by the governments through which the load is transported are used, ensuring compliance with local requirements for dangerous goods. No parts of the routes present special or additional security concerns.

Discussions were held with Zafer Tank management to confirm that the cyanide producer, the respective mine, and Zafer Tank interact with local emergency responders and hospitals, and that these responders and medical facilities understand their roles in an emergency response. The cyanide producer, with whom cooperation has taken place, is ICMC-certified and has been found to be compliant with ICMC requirements.

The European infrastructure for managing emergency situations is highly mature. According to European law, to which Turkey has also adhered, the responsibility for managing emergency situations in the transportation sector lies with the competent emergency authorities in each country. These competent emergency authorities are supported by a comprehensive emergency response network of companies and responders known as ICE (International Chemical Environment). This European emergency response network of national programs has been tasked with providing information, advice, and emergency response resources to address transportation emergencies.

Zafer Tank exclusively uses its own trucks and trailers for the transport of cyanide. Procedures and contractual agreements are in place to ensure that all subcontractors (here: truck repair workshops and Emergency Response Service providers) meet all ICMC requirements. Zafer Tank maintains a formal list of approved service providers that have been evaluated by Zafer Tank management and the Zafer Tank ADR specialist for their capabilities. Relevant qualification information and contracts were reviewed for each of these subcontractor companies during the audit. An in-depth subcontractor interview was conducted, and trucking equipment was observed.

All interviewed personnel demonstrated a good awareness of ICMC requirements. All equipment was in excellent condition. The loading process at the ICMC-certified cyanide producer was part of the audit.

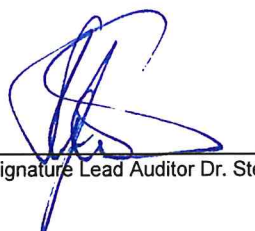
Procedures and contractual agreements are in place to ensure that transportation operations meet all ICMC requirements. During the audit, signed ICMC-related agreements, maintenance orders (contracts) with specified ICMC requirements, records of communication between Zafer Tank and its subcontractors, and legal authorizations were confirmed. Additional subcontractor controls include periodic inspections by Zafer Tank and the inclusion of subcontractors in the ICMC audit process. Records were available to demonstrate that subcontractor controls are in place.

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

This operation is  in full compliance with  
 in substantial compliance with Transport Practice 1.2  
 not in compliance with

*Summarize the basis for this Finding:*

Zafer Tank fully complies with Transport Practice 1.2, which requires that personnel operating cyanide handling and transport equipment perform their tasks with minimal risk to communities and the environment. Zafer Tank exclusively employs trained, qualified, and licensed drivers. The transport of dangerous goods is carried out in accordance with the regulations of the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR). These regulations stipulate that drivers transporting dangerous goods undergo specific training, obtain authorization specific to the hazard class being transported (6.1 for cyanide), and undergo regular health examinations. Training and driver qualification records were reviewed and deemed acceptable. Drivers receive training from an external training organization (Meke Marine Technology) authorized to provide the legally required dangerous goods training. The training is designed to instruct drivers on performing their duties in a manner that minimizes the potential for chemical releases and exposures. According to interviews with the Zafer Tank Training Coordinator, drivers transporting cyanide undergo training every five years, in accordance with ADR regulations. Confirmation was provided that driver license qualifications are checked as part of the dispatch process when the cargo is picked up from the producer. Contracted cyanide drivers interviewed during the audit demonstrated excellent vigilance and were able to verify compliance with all aforementioned requirements of Zafer Tank (and ADR). Driver credentials were confirmed during the audit and found to be in order. Signed ICMC-related agreements, formal procedures that are part of the company's ISO 14001/9001/45001 management system, transportation orders (contracts) with specified ICMC requirements, records of communication between Zafer Tank and its subcontractors, legal authorizations, shipping paperwork demonstrating compliance with chain of custody requirements, shipping weight information, placarding practices, driver awareness, and suitability of subcontractor equipment were assessed during the audit. Additionally, drivers, dispatchers, and management personnel were randomly selected and interviewed or observed in daily operations during the audit. All documents, records, and activities reviewed during the audit were found to be compliant with ICMC requirements.



(Signature Lead Auditor Dr. Steinweg)

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

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

*Summarize the basis for this Finding:*

Zafer Tank fully complies with Transport Practice 1.3, which stipulates that transport equipment must be suitable for the shipment of cyanide. Zafer Tank utilizes trucks and trailers to transport solid sodium cyanide, as well as the returning SLS containers in which solid sodium cyanide was liquefied at the mine. These containers may still contain remnants of the liquid. Documents related to the transport equipment were reviewed, and the specifications for the trucks and trailers were specifically examined for weight capacity. The weights of shipments on Bills of Lading (BoL) were compared to the equipment design specifications. The equipment used by Zafer Tank can operate with loads much heavier than the heaviest shipment reviewed. Interviews and a review of ADR regulations confirmed that only specially equipped trucks and trailers are allowed for the transport of hazardous goods.

As shipments occur in various regions of Turkey, inspections regarding weight, equipment maintenance, and shipping documentation were conducted for the reviewed shipments. It is well-known that the Turkish police and road monitoring authorities rigorously enforce compliance with legal obligations, including the European ADR regulations. No issues were identified.

Interviews and a review of ADR regulations confirmed that vehicles and equipment must undergo regular maintenance and inspections as part of the ADR equipment approval process. Three specialized large workshops, authorized by the original manufacturers of trucks and trailers, are primarily used for this purpose. Random checks have shown that these procedures are fully implemented.

Trailers are loaded at the respective port by the respective port infrastructure organization. Zafer's truck personnel are responsible for ensuring that the trailers are evenly loaded, and that all containers are properly blocked and secured. The trucks transporting the cyanide are heavy-duty commercial vehicles pulling trailers capable of handling loads significantly heavier than these standard-weight shipments. ADR (European Transport Regulations) require that equipment authorized for the transport of hazardous materials meets fitness for duty requirements and undergoes proper maintenance and inspection. Authorities frequently inspect equipment and confirm valid equipment certifications and proper loading practices during roadside checks in all regions of Turkey.

A random check of shipping documents was conducted during the audit. This review of shipping weights and the number of loads or containers confirmed that the loads always adhere to standard weights communicated in advance by the shipper. These loads consistently remain well below the capacity of the trucks and trailers.

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

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

*Summarize the basis for this Finding:*

Zafer Tank fully complies with the requirements of Transport 1.4, which mandate the development and implementation of a safety program for the transport of cyanide.

The cyanide containers are loaded onto Zafer Tank trailers by the port operator or its logistics company. According to documented safety instructions and interviews with drivers, Zafer Tank personnel must confirm that the cargo has been properly secured after loading. Zafer Tank drivers block, secure, and stow the cargo, confirming that it is properly secured before leaving the shipping facility. The results of this loading activity are documented on checklists that are part of the Zafer Management System (ISO 9001). The corresponding placards are affixed to the trucks, trailers, and containers. Interviews with drivers confirm the proper use of placards during pre-trip inspections.

According to driver interviews, pre-trip inspections are conducted before each departure. Additionally, interviews with a contracted driver and the accompanying Emergency Response Service company also confirmed that trucks are visually inspected before each journey. Vehicles used for the transport of hazardous goods in Europe must comply with specific technical specifications and undergo regular maintenance. ADR vehicle technical certificates are issued for each piece of equipment (trucks and trailers). The vehicle certificates are renewed annually. Zafer Tank equipment is regularly maintained, and maintenance records have been found to be comprehensive and plausible for the equipment used.

The safety program includes restrictions on drivers' hours in accordance with ADR regulations. Driver hours are logged and monitored to ensure compliance with regulations and adherence to company policies.

The Vehicle Operator's Manual (included in each truck as part of the standard documentation always carried by the driver) contains a section on the drug, medication, and alcohol policy. The policy includes specific statements on drug, medication, and alcohol consumption, testing, alcohol and drug dependence, use of drugs and alcohol on the company premises or while driving, and the consequences of positive test results. Documents for conducting these tests were verified. The policy also covers random tests and searches. The policy and the company recognizes alcohol and drug dependence as a treatable condition and will provide appropriate support and assistance within the policy's bounds. These requirements are detailed in the same manner for the drivers of Hydra's escort vehicles (as detailed in Hydra's ERP Chapter 12).

Drivers are authorized and instructed to pull over in case of unsafe weather conditions, fatigue, or other circumstances affecting the safety of the journey. The Security/Route Plan designates acceptable truck stops for breaks and rest during transport. According to interviews, drivers maintain close communication with the dispatcher and personnel at the destination. However, in all cases, the accompanying Emergency Response (ER) Service company is the primary point of contact. This ER company also leads the necessary communication, especially the alarm reporting chain, as defined in the Emergency Response Plan (see. Transport Practice 3.1). In extraordinary conditions, the ER company would call the dispatcher to inform them of the situation.

Procedures and contractual agreements are in place to ensure that the company, especially in trucking operations, fulfills all ICMC requirements. Signed ICMC-related agreements, maintenance



contracts incl. ICMC requirements, communication protocols between Zafer Tank and its subcontractors (especially the Emergency Response Service company accompanying each transport and the truck maintenance workshops) were reviewed during the audit. All safety-related provisions and processes, the relevant technology, and the qualification level of the involved individuals were assessed and found to be acceptable. Finally, it should be noted that the company since several years holds an internationally recognized ISO 45001 registration and corresponding certificate.

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

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

*Summarize the basis for this Finding:*

Zafer Tank does not ship cyanide by sea or by air.

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

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

*Summarize the basis for this Finding:*

Zafer Tank fully complies with Transport Practice 1.6, which mandates the tracking of cyanide shipments to prevent losses during transport. Zafer Tank utilizes GPS and communication systems to ensure that drivers can communicate with dispatch personnel and other individuals, particularly with the accompanying Emergency Response (ER) company, at all times if necessary. According to interviews, the functionality of the communication system is confirmed during the pre-trip inspection process. In addition to GPS tracking, drivers update dispatch personnel at defined intervals to keep them informed about the status of the delivery. Dispatch activities and communications were observed throughout the audit, demonstrating that dispatchers have a very precise understanding of the delivery status and the location of the cargo.

The communication/tracking equipment (mobile phones and GPS tracking) is used daily. The proper functioning of the equipment is checked during driver pre-trip inspections. No dead zones were identified during road assessments on any route.

Drivers carry shipping documents, including the Bill of Lading, at all times during a delivery. Bills of Lading were reviewed for cyanide deliveries, and information about the transported material, the type of container, and the weight of the delivery is consistently entered by the shipper on the Bill of Lading. Drivers also carry Safety Data Sheets during deliveries, a practice confirmed through interviews.

Trailers are sealed after loading and are not opened by Zafer Tank. Shipping documents were

reviewed, and the seal numbers on the containers, as well as the weight of the delivery, are confirmed at the transfer of custody point. The shipping documents were in compliance with coding requirements, including chain of custody requirements.

Signed ICMC-related agreements, formal procedures that are part of the company's ISO 14001/9001/45001 management system, transportation orders (contracts) with ICMC requirements stated in them, records of communications between Zafer Tank and its partners, legal authorizations, shipping documents showing compliance with chain of custody requirements, shipping weight information, placarding practices, subcontractor driver awareness, and subcontractor equipment suitability were evaluated during the audit. Additionally, drivers, dispatchers, and management personnel were randomly selected and interviewed or observed during their daily operations.

A comprehensive review was conducted during the audit of shipping papers. This review of shipping weights and the number of containers (chain of custody) confirmed that loads always adhere to standard weights predetermined by the shipper as within the equipment capability and legal road weight limits. Activities and records were found to be acceptable.

## PRINCIPLE 2 – INTERIM STORAGE

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

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

in full compliance with

This operation is  in substantial compliance with Transport Practice 2.1

not in compliance with

*Summarize the basis for this Finding:*

Zafer Tank fully complies with the requirements of Transport Practice 2.1, which mandates that trans-shipping depots and interim storage sites must be designed, constructed, and operated in a way that prevents releases and exposures. Zafer Tank has no responsibility for the interim storage of cyanide. At the time of the audit, Zafer Tank had not stored any cyanide. The cargo is transported directly from the cyanide producer to customers or to customer/consignor warehouses in Europe. For Zafer Tank, the transport always commences at the Turkish ports where the material arrives in containers. The arrival time is communicated to all parties involved, allowing Zafer Tank to pick up directly from the port and drive straight to the mine. Zafer Tank stated that they have not stored cyanide at any time or location since the beginning of this operational activity. Transport documents also confirm this, with the start and end times of each transport recorded. These details indicate that the direct route from the port to the mine is always taken, only interrupted by breaks and rarely by an overnight stop.

It was recognized that -also at the port sites- **no need for interim storage facilities and warehousing** in terms of Cyanide Code definitions do occur.

## PRINCIPLE 3 – EMERGENCY RESPONSE

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

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

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

*Summarize the basis for this Finding:*

Zafer Tank has documented an Emergency Response Plan (ERP; SIYANÜR ACİL DURUM PLANI; Doc. No. 85PL1, date Sep 11, 2023) for handling emergencies and responding to transportation accidents. The emergency documents were created in 2022, and with the certification according to ISO 14001 and particularly ISO 45001, these regulations were already integrated into the company's management system. When transporting cyanide, a specific specialized company is always engaged as an escort service. This company is a leading national provider of Emergency Response services in Turkey. In such cases, the ERP of the escort service company becomes the primary document. The company's ERP (Doc. No. SEC-PL-005 Fr 002, Rev. 00, date Nov 01, 2023) underwent a thorough review, especially in terms of its interactions with Zafer Tank's safety rules.

These documents are appropriately detailed. Although the escort service company takes the lead responsibility for the Emergency Response process during transportation, Zafer Tank drivers carry instructions for emergency measures, the Safety Data Sheet, the security plan, and emergency contact numbers during all deliveries. In addition to emergency measures, information is also included in Zafer Tank's security plan.

The Emergency Response Plan (ERP) of the escort service company, as well as the security plan of Zafer Tank and their interaction, is considered suitable for the equipment and types of cargo and has been deemed acceptable. Zafer Tank exclusively transports cyanide by truck, and all scenarios considered in the emergency plan relate to truck accidents or minor cyanide spills from packaging. The emergency plan covers solid sodium cyanide (as well as liquid cyanide in the case of return from the mine using SLS containers), differences in road infrastructure, and the specific roles of emergency responders. These details have been reviewed and found to be appropriately detailed for the operation.

**Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response**

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

*Summarize the basis for this Finding:*


Zafer Tank fully complies with Transport Practice 3.2, which prescribes that adequate response personnel have been designated, and necessary resources have been provided for emergencies. All drivers undergo emergency response training every five years as part of a government-approved Dangerous Goods training program. This training is a requirement for license renewal and includes practical emergency response exercises. Additionally, Zafer Tank personnel (dispatchers and office staff) receive regular training on the company's emergency procedures to stay up-to-date. The information in the emergency and security plans has been reviewed and deemed appropriately detailed.

The emergency response procedures and security plans specify that in the event of an accident, Zafer Tank drivers transfer responsibility for any actions and communication to the accompanying safety company (see TP3.1: this company is the leading company in Turkey that provides nationwide Emergency Response services). The driver ensures his own safety and makes himself available as a helper for the safety company.

European ADR regulations define the emergency response equipment that must be present in a truck at all times during the transport of dangerous goods. The emergency equipment evaluated during the audit on a truck transporting cyanide was found to be in excellent condition and suitable for the type of transport and road conditions. The driver's awareness of regularly inspecting the equipment as part of the pre-trip inspection process and ensuring its constant availability was rated as excellent. The driver also mentioned that government authorities inspect this equipment during routine truck stops and inspections. The accompanying safety company's vehicle also contains all ADR equipment, specific equipment required by ICMC, and additional safety gear. The safety company owns five such specially equipped escort vehicles for chemical accidents.

The disposition of drivers and equipment was also included in the audit, and activities and records were deemed acceptable. The last training for drivers related to chemical and cyanide accidents took place on October 14, 2023, with all 16 hazardous goods drivers participating.

Representatives of the safety escort company, along with a fully equipped escort vehicle, were present during the audit. The vehicle (License plate 34 DZJ 051), its contents, condition, and maintenance records were reviewed and found to be in full and in good condition. The two drivers were extensively interviewed, particularly regarding their qualifications and training status. All drivers hold valid Turkish DG licenses (SRC2, SRC4, and SRC5). Furthermore, the drivers of the emergency response vehicle are trained in practical exercises for handling spilled cyanide and its safe disposal. The competence of the personnel is recognized as very high and suitable.

  
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(Signature Lead Auditor Dr. Steinweg)

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

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

*Summarize the basis for this Finding:*

The escort company's ERP as well as Zafer Tank's safety management system include a description of the communication process that ensures complete information for all involved parties in case of an emergency. This includes, among other aspects, lists of members of the internal emergency response team (including the cyanide manufacturer, the escort company, the mine site, and Zafer Tank) as well as external emergency responders (police, fire department, hospitals, authorities, etc.) along the supply chain. The procedures for emergency notification and reporting, especially communication with ICMI, are also included in Zafer Tank's Emergency Response Plan and the escort company's ERP.

The relevant documentation is under the control of the quality and HSE systems of the escort company and Zafer Tank. According to these regulations, the control of the mentioned documents is conducted, ensuring that each involved party always has the current version of the documentation. This is regularly verified through internal audits.

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

This operation is  in full compliance with  
 in substantial compliance with Transport Practice 3.4  
 not in compliance with

*Summarize the basis for this Finding:*

Descriptions of the specific emergency response duties and responsibilities of personnel are defined in detail. The measurements and actions by and during spill are defined and advised in detail. The methods to be used to decontaminate the environment/spillage are described, e.g. prevention of spill entry into waterways, sewers, basements, or confined areas.

It is also established that chemicals should not be added to water bodies to control the pH or to neutralize cyanide. Additionally, it includes instructions for assessing the impact on surface water bodies and to prevent the population to be poisoned by contaminated water. These instructions are part of the emergency response instructions to cyanide spills with contact to water and water bodies.

Leading documents are the escort company's ERP as well as Zafer Tank's Emergency Response Plan (SİYANÜR ACİL DURUM PLANI; Doc. No. 85PL1, date Sep 11, 2023) for handling emergencies and responding to transportation accidents.



(Signature/Lead Auditor Dr. Steinweg)

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

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

*Summarize the basis for this Finding:*

Zafer Tank fully complies with Transport Practice 3.5, which prescribes that emergency procedures and capabilities must be regularly reviewed and, if necessary, revised.

Emergency procedures are reviewed as needed, and contact information is verified at least once annually. An additional review may also be conducted during the year if incidents warrant it (such as an accident, a significant detour, new hazards on the route, etc.). All documents reviewed as part of this evaluation were updated in 2023 (both the documents of the escort company and those of Zafer Tank). The emergency plan states that an emergency drill should be conducted at least once every three years. Records are available to show that a drill was conducted in 2023. Emergency response drills were reviewed for performance and the need for changes in emergency plans. No actions were identified as necessary during the last drill.