

SUMMARY AUDIT REPORT

Operation General Information

Name of Transportation Operation: PT CIPTA KRIDA BAHARI

Name of Facility Owner: Iman Sjafei

Name of Facility Operator: Mohammad Nasrul Yusni

Name of Responsible Manager: Mohammad Nasrul Yusni

Address: Central Osowilangun Business Park Blok 7-K Jl. Tambak Osowilangun 81-D Surabaya

State/Province: East Java

Country: Indonesia

Telephone: (031) 98541000

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Operation Location Detail and Description

Scope of Verification Audit (in accordance with International Cyanide Management Institute – Cyanide Transportation Verification Protocol for the International Cyanide Management Code dated June 2021)

PT BSI Mine – Supply chain covers land transportation from Surabaya Port to Banyuwangi.

Name of Operation:
CKB

Danny Tan
Signature of Lead Auditor
& Technical Expert

Date:
3 Oct 2025

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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

The Summary Audit Report for a recertification audit must include one additional statement that is not required in the Summary Audit Report for an initial certification audit. For a transportation operation found in full compliance with the Code, the report must indicate whether the operation had any compliance issues or significant cyanide incidents since its previous certification and identify where in the report such information can be found.

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

Auditor Information

Audit Company: Danny Tan

Lead Auditor: Danny Tan

Lead Auditor Email: dannytan163@yahoo.com.sg

Dates of Audit: 22 to 25 Jul 2025

Name of Operation:
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Danny Tan
Signature of Lead Auditor
& Technical Expert

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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 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.

CKB

Danny Tan

3 Oct 2025

Name of Operation

Signature of Lead Auditor

Date

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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.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB conducted a comprehensive route assessment in accordance with Sodium Cyanide Shipment/Transportation (WI-OPS-ILS-06 Rev.01 dated 10 Jul 2025), verified with an on-site sample of the route risk assessment, along with the cyanide transportation route to PT BSI mine supply chain, which covers land transportation from Surabaya Port to Banyuwangi.

The review of risk assessment [Rev1 2025] to PT BSI mine and based on documented information and on-site verification, the selection of route was based on minimising the potential accidents and releases or the potential impacts of accidents with due consideration given for the following:

- a) Population density (Industrial and Housing Estate)
- b) Infrastructure (roadway, rail, port) construction and condition (Railway track)
- c) Pitch and grade (Highway up to bridge)
- d) Prevalence and proximity

To mitigate identified transportation risks, PT CKB implements several control measures, including fatigue management, speed control in accident-prone and populated areas, use of vehicle escorts, pre-transportation vehicle inspections, toolbox briefings, and regular driver training.

Periodic evaluations are conducted every six months or whenever there are significant changes in the situation or conditions (e.g., re-routing assessments). Feedback is gathered from the assigned drivers as part of the journey report to assess route conditions.

PT CKB documented the measures taken to address risks identified in its route risk assessments, as reflected in the Route Assessment and Documentation Reports dated Mar 19-20 and May 28-29, 2025.

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CKB actively seeks input from local communities, relevant stakeholders, and applicable governmental agencies, as needed, during the selection of transportation routes and the development of risk management measures. This process was verified through socialisation and consultations on the transportation of hazardous materials (Sodium Cyanide) in coordination with the East Java Provincial Department of Transportation, held on 22 Aug 2025.

As part of the overall risk assessment, provisions are in place to address specific safety or security concerns that may require the use of convoys, escorts, or other enhanced safety and security measures.

CKB do not contract entities to conduct land transportation.

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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.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.2

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

A review of the work instructions for driver recruitment and selection, including qualification licenses from March and December 2022, confirmed that personnel operating forklifts and associated equipment are selected based on formally documented criteria (Selection Criteria - Sodium Cyanide Shipment/Transportation, (WI-OPS-ILS-06 Rev.01 dated 10 Jul 2025)).

Training records for all personnel handling cyanide and operating transport equipment were reviewed on August 11, 2025.

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Standard of Practice 1.3:

Ensure that transport equipment is suitable for the cyanide shipment.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.3

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Interviews with site personnel confirmed that procedures are in place to prevent the overloading of transport vehicles used for handling cyanide, including verifying the adequacy of the equipment to handle the required load.

This is validated by the documented guidelines outlined in the Sodium Cyanide Shipment/Transportation (WI-OPS-ILS-06 Rev.01 dated 10 Jul 2025).

The reach stacker is used to verify that the 20FT container's gross weight does not exceed the fleet capacity of 25 tons (25,000 kg) before loading it onto the trailer. The verified weight is then recorded in the form FRM-ILS-ILS-03 Rev. 00, Inspection of Container Payload Before Shipment.

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Standard of Practice 1.4:

Develop and implement a safety program for transport of cyanide.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.4

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was found that adequate procedures are in place to ensure cyanide is transported in a way that maintains the integrity of the producer's packaging, especially during rework or repackaging activities. Confirmation was obtained from AGR regarding the measures taken to maintain packaging integrity after rework.

Based on onsite observations, it was noted that placards were used to identify the shipment as cyanide, as required by local regulations, including international standards.

The procedure for Sodium Cyanide Shipment/Transportation (WI-OPS-ILS-06 Rev.01 dated 10 Jul 2025) was reviewed, covering key topics such as coupling and decoupling procedures, road safety, fatigue control, speed limits, pre-trip inspection checklists, response actions in the event of road accidents, and the use of Personal Protective Equipment (PPE). This was validated through an on-site interview with personnel, and vehicle maintenance records for both the vehicle and trailer were verified.

PT CKB has an established preventive maintenance system for its transport equipment, operating independently without contractor support. This is substantiated by vehicle and equipment maintenance records covering the period from June to November 2024. The company is also responsible for conducting maintenance inspections of sea containers to ensure they are well-maintained, as verified by inspection records dated 20 Aug 2025.

The limitations on operator and driver working hours are outlined in the Sodium Cyanide Shipment/Transportation (WI-OPS-ILS-06 Rev.01 dated 10 Jul 2025), which includes a fatigue management plan. This plan ensures that drivers receive a minimum of 6 to 8 hours of rest before driving

Procedures to prevent load shifting during transportation, as documented in the Sodium Cyanide Shipment/Transportation (WI-OPS-ILS-06 Rev.01 dated 10 Jul 2025), were verified onsite.

PT CKB has established procedures that allow transportation activities to be modified or suspended, when necessary, particularly under adverse conditions such as heavy rain, dust, fog, minimal lighting, or any situation that limits visibility to less than 10 meters. These procedures include reducing speed, maintaining communication with other convoy vehicles, and jointly deciding whether to continue or halt the trip. These protocols are outlined in the Sodium Cyanide Transportation document dated 10 Jul 2025.

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A drug abuse prevention program is in place, as documented in the same procedure. This was confirmed through sample drug tests conducted in August 2023 for seven hazardous goods (DG) drivers, all of whom tested negative. Records of these tests are retained, including pre-transportation tests conducted in Jul 2025.

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Standard of Practice 1.5:

Follow international standards for transportation of cyanide by sea.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.5

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB intended scope of ICMI cyanide transportation does not apply to transport of cyanide by sea.

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Standard of Practice 1.6:

Track cyanide shipments to prevent losses during transport.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.6

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Communication during transport is facilitated through mobile phones and walkie-talkies, as verified through onsite observations and functionality checks, as outlined in the Sodium Cyanide Transportation Pre-Departure Checklist (FRM-OPS-OPS-08 Rev.00).

Following the evaluation of these reviews, it was confirmed that CKB has an established system in place to track the progress of its cyanide shipments.

During on-site route assessment and interviews with the transport manager, it was noted that the system is in place to ensure tracking of cyanide shipments and loss prevention. Additionally, screenshot records of car track streaming systems were obtained for the livestreaming of transportation vehicles.

Verify that communication blackout areas along transport routes have been identified and special procedures implemented for the blackout areas. (WI-OPS-ILS-07 Rev.00_Blackout Areas Instruction dated 5 Oct 23)

Following the evaluation of these reviews, it was confirmed that CKB has an established system in place to track the progress of its cyanide shipments.

Inventory controls and chain of custody documentation have been implemented, as outlined in [WI/OPS-03, dated April 21, 2025], to prevent the loss of cyanide during shipment. This includes shipping records that detail the amount of cyanide in transit, as well as the availability of Material Safety Data Sheets (MSDS) during transportation.

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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:

CKB had made provisions based on established procedure (Sodium Cyanide Storage – WI-OPS-ILS-05 Rev.01 dated 10 Jul 2025) that warning signs are visible in both Indonesia and English language at the entrance of the open space Warehouse to alert personnel to the presence of cyanide; that smoking, open flames, eating and drinking are not allowed and what personal protective equipment is needed to be worn.

Security is being ensured with a security post managed by outsourced security services, as observed during on-site visits at the existing warehouse storing dangerous goods. Visitors' access control is in place and monitored for entrance to the warehouse.

The cyanide storage open yard is dry and not waterlogged. Installing concrete blocks as pedestals for containers, as an alternative to preventing waterlogging during rainy days, will enhance the safety of containers containing Sodium Cyanide. - The required stack height of the filled containers is two tiers. - Water drainage in the open yard area shall be self-collected in the waste control.

Adequate spill containment systems, including appropriately sized spill kits, are in place to effectively manage any cyanide spills and minimise the impact of a release within interim storage. This was verified through the emergency response equipment checklist for interim storage, dated 8 Aug 2025.

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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.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 3.1

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB has implemented an Emergency Response Procedure (Sodium Cyanide Handling Emergency Response Plan WI-HSE-32 dated 10 Jul 2025) to address potential cyanide releases during both interim storage and land transportation. The plan outlines responses to incidents identified in the risk assessment that could lead to cyanide releases, including the following:

- Human exposure that requires an action by an emergency response team, such as decontamination or treatment
- An unpermitted release which enters natural surface waters, on or off-site
- An unpermitted release that occurs off-site or migrates off-site
- An on-site release requiring action by an emergency response team
- A transport incident requiring emergency response for cyanide release
- An event of multiple wildlife fatalities where cyanide is known or credibly believed to be the cause of death
- Theft of cyanide

The classification of incidents, such as accidental sodium cyanide poisoning or spills into waterways, aligns with the incident response structure, including a basic response and a specific emergency response guide. These classifications take into account the physical and chemical form of cyanide during an accidental release. Transport infrastructure requirements are also integrated into the overall Emergency Response Plan (ERP).

1. Personnel Protective Equipment
2. Recovery vehicle
3. Evacuation zones
4. Communications with external responders
5. Respective roles and integrated response with local communities, medical facilities, local authorities and fire department
6. MSDS – Sodium Cyanide

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7. ICMI Notification Process

ERP outlines the roles of external responders, medical facilities, and local communities in emergency response procedures, as reflected in [WI-HSE-32, dated July 10, 2025].

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Standard of Practice 3.2:

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

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 3.2

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB conducted emergency response training on 11 Aug 2025, for personnel designated to respond in the event of an emergency.

CKB had procedure in place (Sodium Cyanide Handling Emergency Response Plan WI-HSE-32 dated 10 Jul 2025) Response Procedure and Emergency Response Plan and based on interview with site personnel including ERP awareness training for personnel involved interim storage and transportation operations covering the following:

1. Specific roles and responsibilities during activation of ERP
2. Interim storage and transportation designated emergency response equipment
3. Personal Protective Equipment (PPE)

This includes specific cyanide emergency response duties and responsibilities assigned to its personnel and outside responders during response to emergency incidents such as leakage or spillage.

- To carry out initial action to contain the leakage
- To alert local authorities
- To minimize the risk to people and environment

A maintenance regime was established to ensure the functionality of the emergency response equipment. Records are maintained for this regime along with the list emergency response required for ERP for transportation operations.

Training records (Emergency and Critical Response Training for Cyanide and Other Hazards) and appropriate materials were reviewed to ascertain the relevancy and application, as verified with training records dated 11 and 28 Aug 2025.

CKB has the necessary emergency response and health and safety equipment readily available, including personal protective equipment (PPE) for the entire convoy, including drivers. This was verified through the Sodium Cyanide Handling Emergency Response Equipment Checklist, dated 22 Aug 2025.

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Standard of Practice 3.3:

Develop procedures for internal and external emergency notification and reporting.

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 3.3

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB's procedure, Sodium Cyanide Handling Emergency Response Plan (WI-HSE-32, dated July 10, 2025), outlines the contact information for emergency notifications in the event of incidents during transportation. The implemented ERP procedure addresses both internal and external emergency notification and reporting as part of the incident response structure. This procedure is reviewed during toolbox meetings before land transportation, with the contact list being updated at each meeting.

Records of emergency response contacts required for the ERP related to yard and transportation operations are maintained. On-site interviews with relevant personnel confirmed that the ERP and associated contact lists are actively implemented and up to date.

A management flowchart is in place to notify ICMI in the event of significant cyanide incidents. Based on interviews with on-site personnel, it was confirmed that, to date, no significant cyanide incidents have occurred that required notification to ICMI.

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Standard of Practice 3.4:

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

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 3.4

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB's procedure, Sodium Cyanide Handling Emergency Response Plan (WI-HSE-32, dated July 10, 2025), outlines the spill contingency plan in the event of an accidental cyanide spill. The plan specifies that external resources will be deployed to manage the required response actions, including procedures for remediation, such as the recovery or neutralisation of solutions or solids and decontamination of soils or other contaminated media. It also addresses the prohibition of using chemicals like sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide released into surface waters. The procedure has been reviewed and verified to reflect these requirements.

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

☒ in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 3.5

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

It was verified that simulation drills and related reports were conducted on 6 Aug 2025, as part of the overall review and evaluation of the established ERP response plans. This included a simulation of a cyanide spill during container rework, as well as an emergency response drill for cyanide transport, held on 11 Aug 2025.

Sodium Cyanide Handling Emergency Response Plan WI-HSE-32 dated 10 Jul 2025, with provision to conduct refresher training for ERP every 6 months.

A procedure [Sodium Cyanide Handling Emergency Response Plan WI-HSE-32 dated 10 Jul 2025] is in place to evaluate the performance of the plan after its implementation and make revisions as necessary

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