

PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

Operation General Information

Name of Cyanide Transportation Facility:	PT Trans Continent (PTTC)
Name of Facility Owner:	Mr Ismail Rasyid
Name of Responsible Manager:	Mr Ismail Rasyid
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Operation Location Detail and Description

PTTC is using cyanide transportation to mine located at Marissa as pre-operational scope of supply chain covering the Port of Surabaya by Commercial shipping vessel to Port of Gorontalo or Angrek Port and rework of cyanide packages at PTTC interim storage (HUB) located at Gorontalo and thereafter transportation to mine site located at Marissa (Approximately 180 km) Port of Surabaya by Chartered LCT (Landing Craft Tank) to Bumbulan Jetty and road transportation to Mine Site approximated 20 km.

PTTC
Name of Operation:

2 Oct 2024
Date:

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Signature of Lead Auditor
& Technical Expert

PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

Auditor Information

Audit Company: Danny Tan

Lead Auditor: Danny Tan

Lead Auditor Email: dannytan163@yahoo.com.sg

Dates of Audit: 29 Aug to 1 Sep 2024

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.

PTTC
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2 Oct 2024
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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC conducted a comprehensive route assessment (road assessment dated 14 Feb 2024) Port Anggrek through PTTC HUB at Gorontalo to Pani Gold Mine Site and Port of Gorontalo through PTTC HUB at Gorontalo to Pani Gold Mine Site on 14 Feb 2024. Based on documented information and on-site verification, selection of route was based on the minimizing the potential accidents and releases or the potential impacts of accidents with due consideration given for the following: a) traffic conditions, b) road conditions, c) environmental impacts d) community relations and reactions e) daily commuting habits

Based on the route selected, PTTC conducted a Route Risk Assessment covering a) Population Density b) Infrastructure construction and condition c) Pitch and grading d) Prevalence and proximity of water bodies and fog

Based on evaluation of P210 – Route Risk Assessment Procedure v4 dated 3 Feb 2023, PTTC implemented a process and written document to address the evaluation of risks in the selection of the cyanide transportation routes with appropriate risk management controls. A process on collecting feedback on route condition from the PTTC drivers were verified in accordance with implemented road transport procedure.

Community consultation from port authorities and village chiefs for route to Pani Mine was conducted as part of the route assessment based on the review of letters (District Permit) from both port authorities from Anggrek (dated 4 Sep 2024) and Gorontalo (dated 6 Sep 2024)

PTTC
Name of Operation:

2 Oct 2024
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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

Based on review of Road Transport Procedure (P209 v4 Feb 2022), PTTC will use convoy and escorts as part of overall safe cyanide transportation protocols.

PTTC do not contract entities to conduct land transportation.

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:

PTTC outlines the training requirements for personnel operating cyanide handling and transport equipment as reflected in F102 HSEC Matrix (Training) spelt out the qualifications and internal training that is required for each employee such as driving and forklift which includes key aspects of personnel operating cyanide handling and transport equipment.

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PTTC
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2 Oct 2024
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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC has made provisions as reflected in updated P212 Vehicle Management Procedure (v4 dated 25 July 2023:

- Appropriate equipment, which is designed and maintained to operate within the permitted loads of cyanide shipments.
- Records of new and existing vehicles, such as maintenance schedule, logbooks, pre-start checklists, drivers' handbook, update training programs as required.
- Ensure vehicle maintenance is kept up to date; and ensure vehicles are used to their rated capacity.
- maintenance schedule and scope of works in place for verification of vehicle that is safe and suitable for transportation.

This includes prevention of overloading of the transport vehicle being used for handling cyanide as reflected in procedure P224 and pre-start vehicle checklist signed off by supervisor prior to each departure.

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PTTC
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2 Oct 2024
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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC had made provisions along with the following three procedures to address the requirements for this Transport Practice 1.4

- P201 – HSEC Management System (v4.0 dated 5 May 2023)
- P203 – Cyanide Management Procedure (v4.0 dated 25 Mar 2023)
- P209 – Road Transport Procedure (v4 Feb 2022)
- identification of shipment as cyanide in accordance with local regulations and/or international standards
- Vehicle inspections prior to each departure/shipment
- A preventive maintenance program
- Limitations on operator or drivers' hours
- Rotating shifts for drivers
- Transportation can be modified depending on external conditions such as weather or community unrest
- Prevention of loads from shifting during transportation
- Alcohol tests are being conducted on a random check basis
- Retention of documented implemented records such as (F215 – Pre-start vehicle checks)

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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC made provisions as reflected in Due Diligence Procedure (v4.0 dated 10 May 2023) for the conduct of due diligence investigation to evaluate contracted commercial shipping such as vessels and Landing Craft Tank are in compliance with prevailing IMDG:

- Packing list - Packaged as required by Part 4 of the IMDG Code and according to the packaging instructions and packaging provisions indicated on the DG List.

- Cyanide shipments to possess documents and appropriate records to verify that shipments are identified with required placard and marked as required by Chapter 5.3 of the IMDG Code

- Dangerous goods transport with documented records to demonstrate compliance with requirements under Chapter 5.4 of the IMDG Code.

- Vessel carrying the cyanide containers had a manifest identifying the presence of the cyanide.

- Vessel carrying the cyanide containers have an Emergency Response Plan in place with appropriate response structure in place.

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Name of Operation:

2 Oct 2024

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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC had made provisions with the following four procedures to address the requirements for this Transport Practice 1.6:

1. P201 – HSEC Management System (v4.0 dated 5 May 2023)
 2. P202 – Cargo Tracking Procedure (v4.0 dated 26 Mar 2023)
 3. P203 – Cyanide Management Procedure (v4.0 dated 25 Mar 2023)
 4. P209 – Road Transport Procedure (v4.0 dated 25 Feb 2022)
- transport vehicles (convoy and escort vehicle) to have in place mobile phones to enable two-way communications with operations room.
 - Shipments inventory controls to be in place to prevent loss of cyanide shipments during land transportation.
 - ensure no transfers of shipments during the entire land transportation.
 - Communication equipment is tested to ensure proper functioning.
 - Identification of blackout areas and to implement special adjacent procedures (Noted that onsite route assessment did not identify any blackout areas)

PTTC do not contract entities to conduct land transportation.

PTTC
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2 Oct 2024
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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

Interim storage facilities are planned to be located within the Ports of Anggrek and Gorontalo, with due diligence assessments to be conducted according to the F604 Due Diligence Investigation and P205 Due Diligence Procedure (v4.0, dated May 10, 2023).

The PTTC Gorontalo hub, another planned interim storage site currently nearing completion, will be managed in accordance with the P229 – Warehouse and Yard Management Procedure (v4.0, dated April 5, 2023). This will ensure compliance with the requirements outlined in Transport Practice 2.1 upon the commencement of cyanide transportation.

PTTC
Name of Operation:

2 Oct 2024
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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC has procedure (P235 – Cyanide Emergency Response Plan v4.0 dated 1 Feb 2023) in place for emergency response plans (ERP) for potential cyanide releases to address both ERP for interim storage and land transportation. Management of the following identified incidents leading to potential cyanide release derived were from risk assessment:

- Chemical Spillage at Interim Storage
- Chemical Spillage during land transportation
- Vehicle accidents
- Loading and unloading accidents
- Fire at interim storage

Respective classifications of incidents correspond with incident response structure taking into account the physical and chemical form of cyanide during accidental release.

Requirements of transport infrastructure are considered as part of the overall ERP:

- Recovery vehicle
- Evacuation zones
- Communications with external responders
- Respective roles and integrated response with local communities, medical facilities, local authorities, fire departments and Port authorities
- Design of trailers and interim storage areas to minimize the risks

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**PRE-OPERATIONAL CERTIFICATION
SUMMARY AUDIT REPORT**

PTTC
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2 Oct 2024
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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC has established a procedure (P236 – Cyanide Emergency Response Plan) that includes ERP training as part of the Dangerous Goods (DG) Awareness Training for staff involved in port, yard, and transportation operations. This training covers:

- Specific roles and responsibilities during ERP activation
- Media communication protocols
- Emergency response equipment for loading/unloading, yard, and transportation
- Personal Protective Equipment (PPE)

It includes designated duties related to cyanide emergencies for both internal personnel and external responders during incidents like leaks or spills.

The PTTC F102 HSEC Matrix outlines the qualifications and internal training required for employees, with refresher training implemented to keep staff updated on work requirements and emergency protocols.

A maintenance program has been established to ensure emergency response equipment remains functional, with records kept for this maintenance along with a list of emergency responses needed for transportation operations.

Additionally, PTTC does not contract external entities for land transportation.

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2 Oct 2024
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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC has established procedures (P236) and contact information for notifying the appropriate parties in case of emergencies during transportation. The Emergency Response Plan (ERP) includes guidelines for both internal and external notifications as part of the incident response framework.

Additionally, procedure (P222 Incident Management/Flowchart) outlines the process for notifying ICMI regarding significant cyanide incidents.

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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

PTTC ERP procedures (P236) outline the spill contingency plan in the event of accidental spillage; dictates the agreement with mine site to respond including outline procedures for remediation, such as recovery or neutralization of solutions or solids and decontamination of soils or other contaminated media. P236 addresses the prohibition on the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface waters.

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PRE-OPERATIONAL CERTIFICATION SUMMARY AUDIT REPORT

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:

Mock drills were held on 29 Sep 2024, involving the PTTC ERP team and personnel from the Port of Gorontalo. These drills simulated an incident involving a cyanide trailer colliding with a stationary vehicle, resulting in the spillage of cyanide packages. Records of the mock drill were maintained, and key observations were integrated into the emergency response contact list for yard and transportation operations, which has been updated accordingly.

Following a review and observations after the mock drill, it was confirmed that the ERP is established, with trained personnel and the necessary equipment in place.

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