**SUMMARY AUDIT REPORT**

# International Cyanide Management Code

*AGR African Supply Chain, Re-certification Audit*

Submitted to:

International Cyanide Management Institute
1400 I Street, NW – Suite 550
WASHINGTON, DC 20005
UNITED STATES OF AMERICA

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Submitted by:

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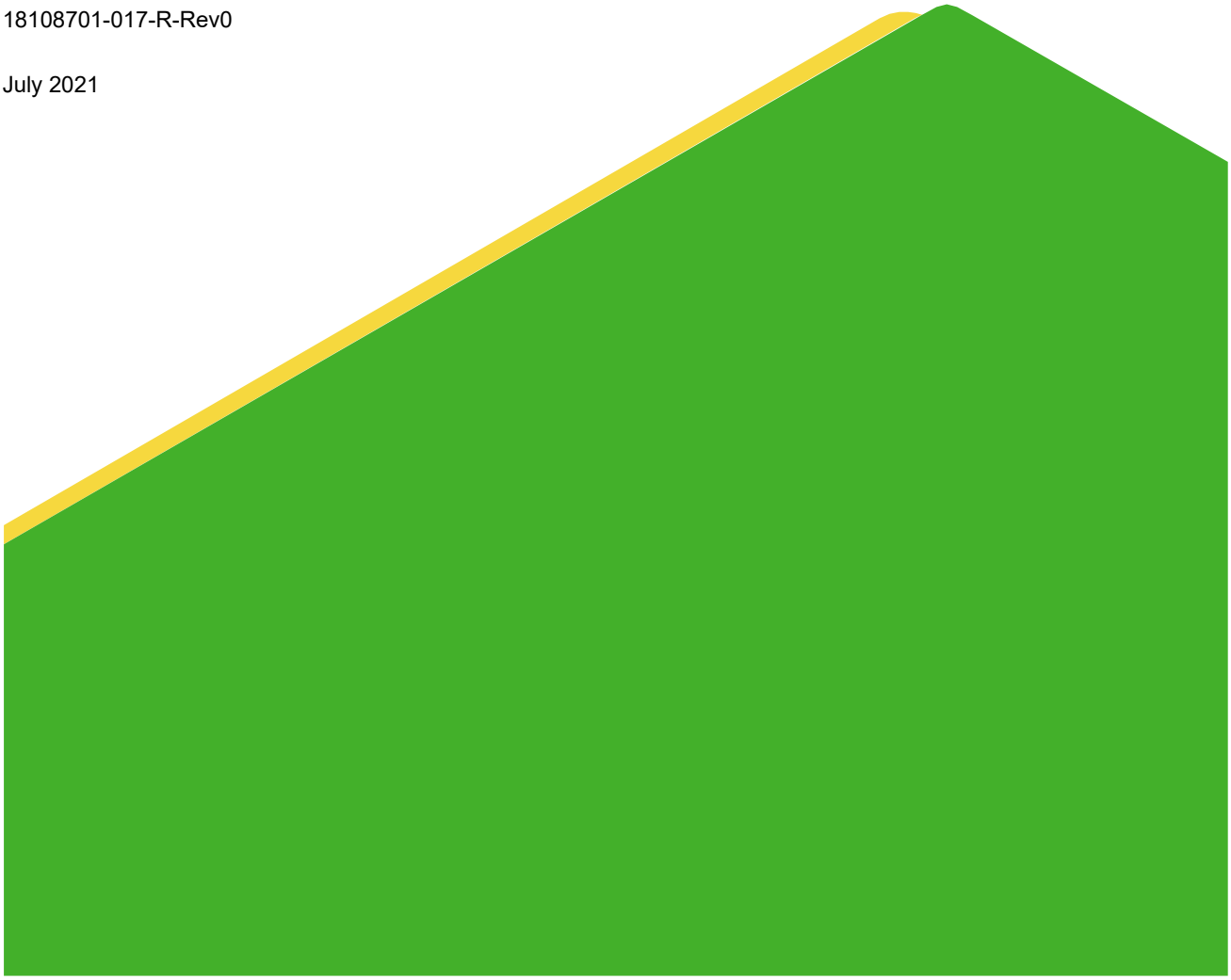

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**APPENDICES**

# 1.0 INTRODUCTION

## 1.1 Operational Information

| | |
|---|---|
| **Name of Transportation Facility:** | African Supply Chain |
| **Name of Facility Owner:** | Not Applicable |
| **Name of Facility Operator:** | Australian Gold Reagents Pty Ltd |
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# 2.0 CYANIDE TRANSPORTATION

## 2.1 Australian Gold Reagents Ltd

AGR is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd (Coogee Chemicals). CSBP, a subsidiary of Wesfarmers Ltd is the major participant in the venture and acts as both plant operator and sales agent. Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

AGR, in its capacity as the sales agent, is the consigner and is responsible for the overall management of the cyanide transportation activities.

## 2.2 West Australian Supply Chain

AGR's West Australian supply chain is from the Kwinana production facility, using rail and road transport to end user mine sites in Western Australia, as well as road transport to Fremantle Port for export supply. For export product this supply chain is up to and includes the stevedore operation at Fremantle Port.

AGR's West Australian Supply Chain was re-certified as being in full compliance with the Code on 15 November 2019. The West Australian Supply Chain is not part of the scope of this audit.

## 2.3 Kwinana Production Facility

The AGR cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, some 40 km south of Perth within the state of Western Australia. AGR produces and transports two different forms of cyanide from the Kwinana production facility, namely solution and solids. Cyanide solution is produced as a 30% strength liquid and solid cyanide as a >97% strength white briquette.

The production facility was re-certified as being in full compliance with the Code on 22 September 2020.

## 2.4 Ocean Freight Supply Chain

The scope of AGR's Ocean Freight supply chain includes the marine transportation of solid cyanide (in intermediate bulk containers (IBCs) within shipping containers) from the Fremantle Port, Western Australia, to various interstate and international Ports. The carriers used are the Mediterranean Shipping Company (Aust) Pty Ltd (MSC), Maersk Australia Pty Ltd (Maersk), and Ocean Network Express (ONE)[1].

The carriers' roles within AGR's cyanide distribution network, or the Ocean Freight Supply Chain itself, are not part of the scope of this audit.

## 2.5 Africa Supply Chain

This supply chain is a consolidation of AGR's West African and Côte d'Ivoire Supply Chains. The Africa supply chain covers the land-based transportation of AGR's solid cyanide from the ports of Dar es Salaam in Tanzania, the ports of Takoradi and Tema, in Ghana, Walvis Bay in Namibia, the port of Durban in South Africa the port of King Abdullah in Saudi Arabia, the port of Conakry in Guinea and port of Abidjan in Côte d'Ivoire to end point users.

Bolloré, Burkina Logistics, and Mining Services (BLMS), Vehrad and TTM are the contracted road transporters within this supply chain. FP Du Toit transport was used for a portion of the certification period and AGR ceased their use prior to their withdrawal from the Code.

The elements of the Africa Supply chain included in this certification are described below:

### 2.5.1 Ports

The international sales and exports of cyanide, by AGR, take into consideration the ports and their extended infrastructure available to service the intended target area. AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from point of origin to destination. Each port is selected on the basis that it is the closest port to the customer and that it meets all reasonable industry standards for safety, security, and emergency response.

#### *2.5.1.1 Port of Abidjan, Côte d'Ivoire*

The port of Abidjan is West Africa's biggest, most modern port. With a central location and a well-developed infrastructure, it is a major point for trans-shipments to West and Central Africa over the Côte d'Ivoire's modern rail and road systems. Since opening of the Vridi Canal, the Port of Abidjan has handled nearly all commercial trade for the Côte d'Ivoire.

Port of Abidjan facilities contain warehouses, specialized facilities for handling bananas, logs, and offshore tankers. The Côte d'Ivoire is the third largest cocoa bean exporter in the world. It is also an important distribution point for imports to Africa. Imports include foodstuffs, machinery, equipment, pharmaceuticals, and manufactured goods going to the south. Exports include rubber, cotton, timber, fruit, fish, vegetables, and cocoa.

With a total of 6 km of quay, the Port of Abidjan has 34 berths including berths dedicated for timber, cereals, fruits, petroleum products, and containers. Three berths specialise in container-handling, and one berth is devoted to roll-on/roll-off cargoes.

[1] ONE was established on 7 July 2017 by the merging of three international shipping companies, these were K-Line Kawasaki Australia Pty Ltd (K-Line), Mitsui OSK Lines (MOL) and Nippon Yusen Kaisha (NYK Line). ONE's regional headquarters have been established in Hong Kong, Singapore, UK, USA and Brazil and services commenced in April 2018.

Bolloré Africa Logistics, which has a workforce of nearly 500 on site, is continuously modernising Abidjan's container terminal in order to increase the yard's container storage capacity. Eight new RTG have been introduced on the terminal's n° 21 wharf, raising the total number of gantries to 16.

#### 2.5.1.2 Port of Conakry, Guinea

The port is managed by the Government Port Authorities and terminal handling by Bolloré Guinea. The Port activity is to remove the shipping containers from the vessel and place the shipping containers on the wharf or onto in-port transport for transfer to a storage area. If containers are placed on the wharf they will be later removed by in-port transport to a storage area. The terminal operations manager and staff are aware when sodium cyanide containers are to arrive at the Port.

Customs clearance procedures are usually completed prior to the vessel arrival to ensure direct loading onto vehicles for delivery to the mine sites. Once the consignment is cleared through customs and a release certificate is issued for each container. The port has a strict security process managing the transporter's vehicle entering the terminal to collect a designated container.

Sodium cyanide containers are cleared and loaded directly from the shipping vessels onto trucks as soon as they arrive in the port as sodium cyanide are not stored on the terminal. The cyanide containers are cleared and loaded as soon as possible from the shipping vessels upon arrival. This is in place with the objective of removing the containers from the Port and under the Convoy system have then delivered safely to the mine operation.

#### 2.5.1.3 Port of Takoradi, Ghana

The port of Takoradi is located 230 kilometres east of Accra. Takoradi is strategically positioned to service the northern hinterland of Ghana and serve as an alternative port for economic operators in the landlocked countries of Burkina Faso, Niger, and Mali. Historically, the port has handled up to 27% of Ghana's seaborne traffic, 68% of Ghana's seaborne exports and 15% of Ghana's seaborne imports. Major commodities handled through the port are manganese, bauxite, wheat, bulk and bagged cocoa, quicklime, containerised cargoes, equipment for the mining and oil/gas industry. Traffic through the port is facilitated by leading shipping lines and the port's wide range of equipment along with stevedoring services provided by the private sector enable it to offer a wide range of services.

Cyanide manufacturers and suppliers have the ability to ship product to the port from different parts of the world. The port allows for the unloading of shipments for final road transportation to the mining operations in Ghana as well as Burkina Faso and Eastern Mali.

The Ghana Ports and Harbour Authority (GPHA) oversees port operations.

#### 2.5.1.4 Port of Tema, Ghana

The port of Tema is the largest port in Ghana and located 30 km from Accra. The port handles about 12 million tonnes of cargo annually and receives over 1,650 vessel calls per year, including container vessels, general cargo vessels, tankers, Roll-on/Roll-off (Ro-Ro) and cruise vessels.

Tema port is the main container port servicing Ghana and its neighbouring landlocked countries. The port area includes a 1 million twenty-foot equivalent units (TEUs) container terminal, a fishing harbour, a shipyard with the largest dry dock in West Africa and a range of deep-water berths. Recent expansion projects, including a new dedicated 840 point reefer terminal and a 450 m long by 50 m wide bulk jetty, increased the port's berthing capacity from 14 to 16 berths.

Cyanide manufacturers and suppliers have the ability to ship product to the port from different parts of the world. The port allows for the unloading of shipments for final road transportation to the mining operations in Ghana as well as Burkina Faso and Eastern Mali.

The Ghana Ports and Harbour Authority (GPHA) oversees port operations.

#### 2.5.1.5 Port of Walvis Bay, Namibia

The Port of Walvis Bay is the main port serving the country of Namibia. The Port of Walvis Bay is strategically located half-way down the coast of Namibia with direct access to principal shipping routes. Walvis Bay is a natural gateway for international trade.

The Port of Walvis Bay is Namibia's largest commercial port, receiving approximately 3,000 vessel calls each year and handling about 5 million tonnes of cargo. The port is a secure, efficient, and world-class port. Temperate weather conditions are experienced all year round and no delays are caused by weather. Its world-class infrastructure and equipment ensure reliable and safe cargo handling.

The Port of Walvis Bay handles container imports, exports, and trans-shipments, as well as bulk and break-bulk of various commodities. The port serves a wide range of industries such as the petroleum, salt, mining, and fishing industries. Both bulk and bagged salt are exported from the Port of Walvis Bay. The port is compliant with the International Ship and Port Facility Security code (ISPS).

The Port of Walvis Bay is operated by the National Port Authority known as NAMPORT and the port is owned by the government of Namibia. The container terminal at the port of Walvis Bay can accommodate about 4000 containers with provision for 482+ reefer container plug points. The port can handle about 750,000 containers per annum.

The vessels operated by Mediterranean Shipping Company (MSC) and Maersk who handle AGR's shipping requirements from Fremantle, Australia to Namibia use the services of the Walvis Bay Stevedoring Company for their unloading and stevedoring requirements. The port of Walvis Bay handles container imports, exports and transhipments, as well as bulk and break-bulk of various commodities. NAMPORT serves a wide range of industries such as the petroleum, salt, mining, and fishing industries. Both bulk and bagged salt are also exported from the port of Walvis Bay.

#### 2.5.1.6 Port of King Abdullah, Saudi Arabia

King Abdullah Port is Saudi Arabia's newest port facility which opened in September 2013. It is part of a large new development project 'King Abdullah Economic City' (KAEC); the project takes up 160 $km^2$ of what is ultimately a new city including residential areas, industrial areas, and port and rail transport terminals. This new city is located 100km north of Jeddah on the Red Sea.

The Port falls under the Ports Developing Company (PDC); this company was formed in 2010 by the Saudi BinLaden Group and Emaar, the Economic City. The Joint venture is based on both companies having strengths in construction and operation of large infrastructure projects including Ports. Emaar, The Economic City (Emaar TEC) company is the master developer and planner of the KAEC including the Port.

The planning of the KAEC and KAP has allowed the development the city and port facilities to be laid out and planned which includes direct access from the Port to national roads servicing the major centres in Saudi Arabia. This direct access to and from the Port includes the industrial areas of the KAEC area and onto the national roadways in Saudi Arabia, the access away from the residential parts of KAEC.

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company for the shipment of product from Fremantle Western Australia. The Port allows unloading of the shipments for the subsequent road transport of the containers to the various mine sites within the Kingdom of Saudi Arabia. The new Port with its modern infrastructure and roadways and 24/7 direct access to the national road network offers has improvements over the Jeddah Islamic Port.

Phase 1a of the container terminal was completed in 2013 offering two container vessel berths, with 700 m of quay length, and the capacity to handle 1.3 million twenty foot equivalent units (TEU) per annum. This also includes 300,000m2 of container storage areas with a capacity of 700,000 TEU.

Phase 1b was completed in 2015 adding two additional berths, 740 m of quay length to increase the overall capacity to 2.7 million TEU.

#### *2.5.1.7 Port of Durban, South Africa*

The Port of Durban commonly called Durban Harbour, is the second largest port of South Africa and one of the busiest ports in Africa. Durban Port is South Africa's main cargo and container port, handling the largest volume of sea-going traffic of any port in southern Africa.

Ideally placed on major shipping routes and with excellent rail and road links, the port plays an integral role in the country's economy. The port occupies the natural expanse of Durban Bay – an area of 1850 ha, with the water area being 892 ha in extent at high tide and 679 ha at low. The entrance channel is 122 m wide and is maintained at a dredged 12.8 m draught (depth of water).

The port is managed by Transnet National Ports Authority (TNPA), which is a government corporation of South Africa and subsidiary of Transnet. Transnet is responsible for managing and governing eight South African seaports.

Almost all containers are handled at Durban Container Terminal (DCT) which is the largest of its kind in the southern hemisphere. Containers handled at the terminal currently represent more than 60% of the total number handled at all South African ports. DCT serves as a pivotal hub for the entire Southern African region, serving trade links to the Far East, Middle East, Australasia, South America, North America, and Europe. It also serves as a transhipment hub for East Africa and Indian Ocean islands.

The terminal has 2,128 m of quayside divided into seven berths. DCT has more than 13,000 ground slots and 600 reefer points and handles an average of 50 000 TEUs per month. A rail terminal receives and dispatches containers to Johannesburg and other destinations as far as Zambia. DCT has expanded its capacity from 1.9 million TEUs to 2.9 million TEUs per annum.

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

#### *2.5.1.8 Port of Dar es Salaam, Tanzania*

Dar es Salaam Port is the main container port servicing Tanzania; AGR has ability to ship to this port by utilising the Mediterranean Shipping Company for the shipment of product from Fremantle Western Australia and the shipping line's service through to Dar es Salaam. The Port allows unloading of the shipments of containers and the subsequent road transport section to the Geita Mine site located in the north-western part (Mwanza region) of Tanzania.

The port of Dar es Salaam is owned by The Tanzania Ports Authority (TPA) and contains 2 km of quays with a total of eleven deep water berths. These berths are used for the import and export of conventional break bulk cargo, containerised cargo, motor vehicles, bulk liquids, and grains.

Tanzania Ports Authority (TPA) regulates and licenses port and marine services and facilities. It also manages vessel traffic in the port while ensuring safety and security. TPA operates a system of ports serving the Tanzania hinterland and the landlocked countries of Malawi, Zimbabwe, Zambia, Democratic Republic of Congo (DRC), Burundi, Rwanda, and Uganda.

All containerised cargo is handled by TICTS at a dedicated container terminal. The terminal has three berths totalling 540 meters in length with a capacity to handle approximately 400,000 TEUs, per year which includes many classes of Dangerous Goods cargo.

TPA is equipped with an array of machinery and equipment to handle a wide range of cargo. The port has highly trained professionals in various fields work around the clock to ensure that cargo entering and exiting the ports is in pristine condition and on time.

The terminal has undergone major changes that include the installation of a new sophisticated terminal software operating system known as the Next Generation Terminal Management System (nGEN). nGen, the award-winning proprietary system developed in-house, is a modular, scalable terminal-management platform that controls the entire scope of operations including ship and yard planning, gate operations, vessel operations and interactions, yard configuration and performance, overall operations monitoring, equipment utilisation, productivity, and cost optimisation.

Tanzania International Container Terminal Services Ltd (TICTS), located at Dar es Salaam, is the country's largest container terminal. The port has strengthened its role as the country's maritime gateway, investing in modern IT systems and mobile equipment while constantly improving its productivity levels, efficiency, and customer service.

### 2.5.2 Road Transportation

Depending on the end point destination within the African Supply Chain, AGR contracts the road transportation of cyanide to one of the following groups, deliveries are carried out on behalf of AGR:

- Bolloré Logistics
- BLMS
- Vehrad
- TTM
- FFT
- Stella Logistics.

Some transportation from the ports Takoradi, Tema, Walvis Bay, Durban, and Abidjan are affected by end user arranged transportation.

### 2.5.2.1 Bolloré Logistics, France

The Bolloré Group was founded in 1822. Bolloré Logistics' range of services extends across five core categories: multimodal transport, customs and regulatory compliance, logistics, global supply chain, and industrial projects.

The Africa transportation arm of the Group is managed by Bolloré Logistics (France), which has been established for more than 50 years. The company is involved in port activity, freight forwarding, stevedoring and railway transport, as well as providing international logistics solutions. Bolloré Africa Logistics is one of the largest transport and logistics operators in Africa.

Bolloré has a number of certified transport operations within West Africa:

- Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020
- Bolloré Transport & Logistics Sénégal, Certified 16 January 2020
- Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020
- Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.

### 2.5.2.2 Burkina Logistics and Mining Services (BLMS)

BLMS is a subsidiary of Bolloré Logistics and was formed in July 2008 to service the developing mining industry within Burkina Faso. The company specialises in the transport and logistics of dangerous goods. BLMS conducts the transport of hazardous goods for Bolloré Logistics in Burkina Faso and operates out of the Bolloré offices in Burkina Faso.

Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.

### 2.5.2.3 Stellar Logistics

Stellar Logistics Limited (Stellar Logistics) is a division of the Stellar Group of Companies. Stellar Logistics is a wholly owned Ghanaian entity that was established in 2007 to provide freight forwarding and logistics services. The Company's head office is located in Accra, with branches in Takoradi, Accra, Tema, Ouagadougou, Burkina Faso, and Lagos, Nigeria.

The Group of companies provides logistics, hospitality, travel, power, ship broking, and property maintenance and retail services. The logistics arm transports bulk dangerous goods and containerised products to the mining industry in Ghana.

Stellar Logistics currently transports solid sodium cyanide in 20-foot general purpose shipping containers or bulk sparge isotainers from the port of Takoradi, Ghana to transfer facilities in located in Tarkwa, Ghana and/or to end user destinations within West Africa by road.

### 2.5.2.4 Transport Terrassement Minier (TTM)

Established in 1995, TTM is a Guinean-owned company providing civil engineering, construction and transportation services to major clients within West Africa. TTM is an authorised dangerous goods transporter within Guinea and also provide customs clearance, logistics, and warehousing services.

TTM was recertified as being fully compliant with the Code on 29 January 2020.

#### 2.5.2.5 Vehrad Transport and Haulage Co Ltd (Vehrad)

Vehrad is contracted to transport solid cyanide by road from Tema and Takoradi ports to mines in Ghana, Burkina Faso, Niger, and Mali. Vehrad's main operations base is located at Plot 16/17, Heavy Industrial Area, Tema, Ghana, (Tema yard), located approximately 2 km from the Tema harbour, within the greater Accra region.

Vehrad was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.

#### 2.5.2.6 Freight Forwarders Tanzania (FFT)

FFT coordinate cyanide transportation within Tanzania and subcontracts the trucking component of transportation to ICMC certified Golden Coach Limited (GCL) and Mainline Carriers Limited (MCL). The trucks supplied by the contractors are accompanied by FFT escort vehicles. FFT was originally certified in 2008 and have remained certified since.

#### 2.5.2.7 FP Du Toit Transport Pty Ltd (FP Du Toit)

FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to its withdrawal from the Code.

## 2.6 Transit Storage

Within the scope of this audit, transit storage is associated with port operations where containers of cyanide are removed from the vessels and may be temporarily stored and then placed on road vehicles for the next part of the journey. These transit storage depots are managed by the relevant port authorities and due consideration of relevant protocol requirements has been made through the due diligence process.

There is no interim storage outside of the Port operations included within this supply chain.

## 2.7 Auditors Findings and Attestation

☒ **in full compliance with**

**AGR is:**

☐ in substantial compliance with **The International Cyanide Management Code**

☐ not in compliance with

No significant cyanide exposures or releases were noted to have occurred during AGR's recertification audit.

**Audit Company:** Golder Associates Pty Ltd

**Audit Team Leader:** Mike Woods, Exemplar Global (113792)

**Email:** mwoods@golder.com.au

AGR Africa Supply Chain — Name of Facility

Signature of Lead Auditor

July 2021 — Date

## 2.8 Name and Signatures of Other Auditors

| Name | Position | Signature | Date |
|---|---|---|---|
| Mike Woods | Lead Auditor and Transport Technical Specialist | | |

## 2.9 Dates of Audit

The ICMC Recertification Audit was conducted over three days between 31 January to 3 February 2021 at AGR facilities in Kwinana, Western Australia.

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 verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the *Cyanide Transportation Verification Protocol for the International Cyanide Management Code* and using standard and accepted practices for health, safety, and environmental audits.

AGR Africa Supply Chain — Signature of Lead Auditor — July 2021

Name of Facility — Date

# 3.0 CONSIGNOR SUMMARY

## 3.1 Principle 1 – Transport

**Transport Cyanide in a manner that minimises the potential for accidents and releases**.

### 3.1.1 Transport Practice 1.1

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

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 1.1** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

**AGR**

AGR, through the use of ICMC-certified road carriers, has a process for the selection of transport routes that minimise the potential for accidents and releases or the potential impacts of accidents and releases.

AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

Selection is a three-stage process and, broadly, involves:

1) Identification of potential suitable carriers in the country of desired operation. It is generally not possible to call for tenders in the countries in which AGR operates and as such, AGR carry out due diligence of existing ICMI certified carriers or other approved dangerous goods transporters.

2) Following the identification of potential international carriers, AGR completes an assessment of whether the carriers satisfy AGR's minimum requirements for the transport of cyanide.

3) Prior to acceptance of the preferred international carrier, an overall risk assessment of the carrier is conducted. The outcome of the risk assessment is the generation of an overall risk rating for the international carrier, as either a Low, Medium, or High risk carrier. The risk rating is used to determine the frequency and scope of ongoing audits and other reviews.

The process outlined above is used to verify that:

- Suitable transport equipment that is fit for the purpose of transporting cyanide.
- A preventative maintenance programme in place for its transport equipment, and it can provide evidence to indicate that this preventative maintenance programme is adhered to.
- Complied with and continues to comply with, all statutory and legal requirements of the Relevant Country(s) in which they operate or through which they transport.

- Policies and procedures in place in relation to emergency response, fatigue management, driver training and performance management; and drugs and alcohol, and can demonstrate adherence to them.
- A sound reputation and there is no evidence to suggest that the carrier is not in a sound financial position.

AGR implements a procedure to evaluate the risks of selected cyanide transport routes and takes the measures necessary to manage these risks.

A route review, from the port to the mine site(s), is undertaken as part of the international carrier risk assessment. This process involves representatives of both AGR and the international carrier driving the proposed route(s) and documenting the risks. Recommendations are then made as to route changes, additional safety controls or security considerations where necessary.

AGR requires subsequent route surveys on a routine basis according to the carrier's overall risk rating.

AGR conducts triennial due diligence assessments on ports used in the Supply Chain to identify potential risks.

**Ports**

The international sales and exports of cyanide by AGR take into consideration the ports and their extended infrastructure available to service the intended target area. The destination port is selected on the basis that it is the closest port to the customer and that it meets reasonable industry standards for safety, security and emergency response.

The requirement to seek input from communities, other stakeholders and applicable governmental agencies as necessary is not relevant to the port component of this Supply Chain.

Due diligence assessments of the ports used in the supply chain were completed by AGR (within their three year cycle) and reviewed by Golder. Golder's assessments concluded that AGR's due diligence assessments have reasonably evaluated these facilities. The due diligence assessment did not identify additional management measures needed for the ports.

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
  - Bolloré Transport & Logistics Sénégal, Certified 16 January 2020.
  - Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020.
  - Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.
- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.
- Verhrad, AGR's transport based in Ghana, was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.

- TTM, AGR's transporter based in Guinea, was recertified as being fully compliant with the Code on 29 January 2020.
- FFT, AGR's transporter based in Tanzania, was recertified as being fully complaint with the Code on 31 July 2018.
- FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to its withdrawal from the Code.

### 3.1.2 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.**

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 1.2** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

**AGR**

AGR, through the use of ICMC-certified road carriers, has a process in place for the use of only trained, qualified and licensed operators in operating transport vehicles during the transportation of its cyanide.

AGR has undertaken audits of its supply chain carriers and has monitoring systems in place to assess transporter's ongoing compliance with ICMI and AGR cyanide handling and transportation requirements.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.2.

AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

**Ports**

AGR does not operate transport vehicles or equipment at port facilities used in its supply chain, operation is undertaken by the managing Port Authority or stevedoring service provider at the port.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with international and local regulations. Ports selected in the Supply Chain are located in IMO member countries, member nations must ensure that ports comply with the requirements of the IMO DG Code 2018.

AGR conducts triennial due diligence assessments of port facilities used in the supply chain.

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
  - Bolloré Transport & Logistics Sénégal, Certified 16 January 2020.
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- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.
- Verhrad, AGR's transport based in Ghana, was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.
- TTM, AGR's transporter based in Guinea, was recertified as being fully compliant with the Code on 29 January 2020.
- FFT, AGR's transporter based in Tanzania, was recertified as being fully complaint with the Code on 31 July 2018.
- Stella Logistics was recertified a being fully compliance with the Code on 9 August 2018.
- FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to their withdrawal from the Code.

### 3.1.3 Transport Practice 1.3

**Ensure that transport equipment is suitable for the cyanide shipment.**

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 1.3** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

**AGR**

AGR does not directly operate transport vehicles, though through the use of ICMC-certified road carriers has a process in place requiring that only equipment designed and maintained to operate within the loads it will be handling is used.

AGR has monitoring systems in place to evaluate the transporter's compliance with the Code and AGR's requirements.

AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

**Ports**

Ports used by AGR have equipment operation and maintenance capabilities and procedures that are not dependent on AGR. The ability of the port facilities to operate safely, and their capability to handle dangerous goods is assessed during the due diligence process.

AGR conducts triennial due diligence assessments for ports used in its Supply Chain.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with AGR's requirements and relevant regulations.

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
  - Bolloré Transport & Logistics Sénégal, Certified 16 January 2020.
  - Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020.
  - Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.
- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.
- Verhrad, AGR's transport based in Ghana, was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.
- TTM, AGR's transporter based in Guinea, was recertified as being fully compliant with the Code on 29 January 2020.
- FFT, AGR's transporter based in Tanzania, was recertified as being fully complaint with the Code on 31 July 2018.
- Stella Logistics was recertified a being fully compliance with the Code on 9 August 2018.
- FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to its withdrawal from the Code.

### 3.1.4 Transport Practice 1.4

**Develop and implement a safety program for transport of cyanide.**

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 1.4** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

**AGR**

AGR has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. AGR's cyanide is packaged at its ICMC certified production facility in Kwinana Western Australia, in accordance with the packaging and labelling requirements required by the political jurisdictions through which the load will pass. Individual IBCs are loaded into sea containers and which are sealed prior to departure from the facility.

The production facility was last fully recertified against the Code on 3 August 2017 and AGR have conduct the recertification audit assessment in March 2020.

AGR, through the use of ICMC-certified road carriers, has a process to ensure that cyanide is transported in a manner that maintains the integrity of the packaging. AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
  - Bolloré Transport & Logistics Sénégal, Certified 16 January 2020.
  - Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020.
  - Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.
- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.
- Verhrad, AGR's transport based in Ghana, was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.
- TTM, AGR's transporter based in Guinea, was recertified as being fully compliant with the Code on 29 January 2020.

- FFT, AGR's transporter based in Tanzania, was recertified as being fully complaint with the Code on 31 July 2018.
- Stella Logistics was recertified a being fully compliance with the Code on 9 August 2018.
- FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to their withdrawal from the Code.

### 3.1.5 Transport Practice 1.5

**Follow international standards for transportation of cyanide by sea and air.**

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 1.5** |
| | ☐ not in compliance with | |

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

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to AGR.

AGR does not and does not intend to transport consignments of cyanide by sea or air within the scope of this audit.

### 3.1.6 Transport Practice 1.6

**Track cyanide shipments to prevent losses during transport.**

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 1.6** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

**AGR**

AGR, through the use of ICMC-certified road carriers, has a process in place to track cyanide shipments and prevent losses during transport. AGR has undertaken audits of the carriers to verify that tracking capabilities and suitable arrangements for response are in place.

**Ports**

Ports used by AGR have shipment tracking systems and procedures to prevent losses during transport. The ability of the port facilities to operate safely, and their capability to handle dangerous goods is assessed during the due diligence process. AGR conducts triennial due diligence assessments for ports used in its Supply Chain.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with AGR's requirements and relevant regulations.

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
  - Bolloré Transport & Logistics Sénégal, Certified 16 January 2020.
  - Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020.
  - Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.
- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020
- Verhrad, AGR's transport based in Ghana, was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.
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- Stella Logistics was recertified a being fully compliance with the Code on 9 August 2018.
- FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to their withdrawal from the Code.

## 3.2 Principle 2 – Interim Storage

**Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures**.

### 3.2.1 Transport Practice 2.1

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

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 2.1** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 2.1 that requires transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

AGR does not operate trans-shipping or interim storage facilities within its Supply Chain, but circumstances may arise where trans-shipping of cyanide product is required. This involves unloading the cargo at a terminal facility, temporary set down and loading onto another vehicle for the continuation of the delivery.

AGR has no control over when and where this happens, but via the due diligence process has satisfied itself that the transhipment of product occurs in accordance with relevant legislation and complies with standards for the carriage of dangerous goods.

Within the scope of this audit, a trans-shipping depot and interim storage site is not applicable to the port of Abidjan, port of Conakry, the port of King Abdullah. The normal operation is for the containers of cyanide to be unloaded from the vessels and loaded directly onto road transport trailers for immediate transport from the Port.

Within the scope of this audit, a trans-shipping depot and interim storage site is applicable to the port of Tema, port of Takoradi, port of Walvis Bay, port of Durban, and port of Dar es Salaam.

At these ports containers of cyanide are removed from the vessels, temporarily stored, and then placed on road vehicles for the next part of the journey. The transit storage depot is managed by the relevant port authority and due consideration of relevant protocol requirements has been made through the due diligence process.

**Port of Tema**

Meridian Port Services (MPS) activities are to remove the shipping containers from the vessel and place the shipping containers on the wharf or onto in-port transport for transfer to a designated storage area or to an off dock bonded terminal, Tema Bonded Terminal (TBT). If containers are placed on the wharf they are later removed by in-port transport to a designated area in TBT.

Currently all dangerous goods including sodium cyanide TEU's are conveyed from the MPS terminal to TBT where they are picked up by transporters. Cyanide containers are segregated and stacked separately. All cyanide containers of cyanide shipped by AGR are received at the wharf by MPS and stored in TBT. Transporters trucks are loaded from the TBT to various mine destinations.

AGR's Consultant in Ghana has been working with the safety and ER department regarding cyanide handling and product awareness.

**Port of Takoradi**

Takoradi Port has been ISPS compliant since July 2004 and operating at MARSEC level 1. All port installations are manned by 24-hour CCTV surveillance plus professionally trained security personnel. Cyanide is unloaded and placed into the designated storage area at Takoradi Port.

Cyanide transiting through the port remains within the Shipping container and is briefly held in the designed area on the port while customs clearance processes are completed. The consignment is collected from the Port and delivered to the mine site by AGR's selected road transport companies which are ICMI-accredited road transport companies.

**Port of Durban**

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

The container storage area within the port is fully lit at night and the whole of the port area has controlled access. Product is in shipping containers ready for loading onto transport for onward transport to the mine site are packed into containers or bucket trailers and delivered to the mines. The containers are not opened at the Port.

**Port of Walvis Bay**

The container storage area within the port has full CCTV coverage, is fully lit at night and the whole of the port area has controlled access. The containers of cyanide are stores in a separate DG storage area within the port confines.

Product is in shipping containers ready for loading onto transport for onward transport to the mine site and remains in the containers that were packed at the production facility. The containers are not opened and are kept sealed until they arrive at the mine site. The containers are placed on a concrete surface within the port area.

AGR conducted training for the port authority and the other stakeholders in Namibia in 2018. The training was attended by some port operations people, staff from NAMPORT Fire Brigade including their station manager.

Sodium cyanide containers are stacked separately and segregated from other containers until customs clearance is completed and containers cleared from the port. The maximum clearance of DG goods from the port is 48hrs.

**Port of Dar es Salaam**

Product is in shipping containers ready for loading onto transport for onward transport to the mine site and remains in the containers that were packed at the sodium cyanide factory. The containers are not opened and kept sealed until they arrive at the mine site. The containers are placed on a concrete surface within the port area while clearance is obtained and the consignment is collected by the road transport company.

The container storage area within the port is fully lit at night and the whole of the port area has controlled access. TICTS and the Inland Port Container Depot are in possession of an Emergency Procedure Guide developed for Cyanide and other hazardous chemicals. TICTS hold a mock DG spill exercise at least once per year although this is not Cyanide specific. The ICDs also undergo yearly cyanide training module for hazardous materials.

## 3.3 Principle 3 – Emergency Response

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

### 3.3.1 Transport Practice 3.1

**Prepare detailed Emergency Response Plans for potential cyanide releases.**

**AGR is**

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.1**

☐ not in compliance with

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

AGR is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

**AGR**

AGR, through the use of ICMC-certified road carriers addresses the requirements to prepare detailed emergency response plans for potential cyanide releases.

AGR does not physically transport cyanide within the scope of this Supply Chain. AGR's procedure International Carrier Selection and Performance Management details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.

**Ports**

AGR conducts triennial due diligence assessments on port facilities used in the Supply Chain, emergency response capabilities are assessed during this process.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with international and local regulations. Ports selected in the Supply Chain are located in IMO member countries, member nations must ensure that ports comply with the requirements of the IMO DG Code.

The port due diligence reviews assess emergency response capabilities, identify emergency response plans and outline additional information specific to the emergency response infrastructure and resources located at each port.

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
  - Bolloré Transport & Logistics Sénégal, Certified 16 January 2020.
  - Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020.
  - Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.

- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.
- Verhrad, AGR's transport based in Ghana, was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.
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- Stella Logistics was recertified a being fully compliance with the Code on 9 August 2018.
- FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to their withdrawal from the Code.

### 3.3.2 Transport Practice 3.2

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

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 3.2** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

**AGR**

AGR does provide emergency response training of appropriate personnel. CSBP has an Emergency Response Team and is an accredited responder by the Regulator for sodium cyanide. Cyanide transport incident response is provided through the CSBP response team based at Kwinana and technical support can be provide by AGR and CSBP production personnel.

Training of CSBPs emergency response team (ERT) is done via a combination of in-house training and accredited third-party trainers. The ERT members are trained in hazardous material response including use of personal protective equipment, neutralising agents, first aid and decontamination processes. Inhouse training is provided through theory and practical training sessions and periodically tested through mock drill exercises. A review of training records and training matrix for the ERT confirm training is undertaken.

In addition to training provided to the ERT members, AGR provides training to subcontractor transporters through mock drill activities. AGR has completed a number of exercises, both desktop and practical, involving their transporters.

General response to emergencies is also covered in AGR's online learning modules completed periodically by transport drivers.

AGR's emergency procedures do identify the specific emergency response duties and responsibilities of personnel for response in the event of an incident.

The TMP outlines responsibilities for Rail Operators, Transport Drivers, CSBP ERT, AGR, and DFES. The TMP provides an overview of the incident management team structure and the roles of the incident controller and on-scene commander.

The TMP fits within a tier emergency response framework with overarching emergency management and crisis management processes depending on the scale of the incident.

The TMP does list the response equipment that is available to respond to an incident during transport. CSBP has an equipped off-site response vehicle and two support vehicles that can be mobilised in the event of an incident. There are checklists for the equipment on the vehicles and equipment checks are performed regularly.

AGR maintain stores of ferrous sulphate at strategic locations around the state conducts period inspection of the neutralising agent. The locations and quantities are detailed in the Vehicle Operators Handbook. The Vehicle Operators Handbook also details the equipment that the driver needs to have with them when transport cyanide and checks are to be completed weekly.

AGR does have the necessary emergency response and health and safety equipment, including personal protective equipment available during transport.

Equipment inspection checklists were viewed showing checks in line with CSBPs procedures. Emergency response equipment was inspected during the site visit and appeared to be in good working condition.

AGR does provide initial and periodic refresher training in emergency response procedures.

As noted previously, AGR has developed and implemented an online training program that is completed by drivers. The training modules contain information on emergency response actions and are completed periodically, and records are retained within the LMS.

Interviews and inspections of the checklists by the Auditor indicate that the equipment inspections are occurring as stipulated and the equipment is available.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 3.2.

AGR has contracts in place with subcontracted transporters and those contracts contain conditions relating to compliance with AGR's Transport Management Plan and Vehicle Operators Handbook for Sodium Cyanide Product. The Vehicle Operators Handbook clearly delineates the roles and responsibilities of the contractors during an emergency.

AGR also conducted mock exercises with subcontractors in relation to emergency response as part of its emergency preparedness. The 2017 and 2018 Transport Management Plan reports were provided for review and confirm that AGR assesses compliance of subcontractors with the requirements of Transport Practice 3.2. AGR has also implemented periodic performance meetings with subcontractor transporters to monitor compliance between the formal audit programs.

AGR has completed due diligence assessments of Patricks (Fremantle container port) and Aurizon (Rail Operator and West Kalgoorlie Depot) and is satisfied that these facilities meet AGR's operational requirements.

| AGR Africa Supply Chain | | July 2021 |
|---|---|---|
| Name of Facility | Signature of Lead Auditor | Date |

**Coogee Chemicals**

Coogee Chemical drivers have completed the online AGR training modules that detail the actions to take in an emergency. The expectation is for drivers to report the incident and make the scene safe if able to do so until responders arrive.

**TGL**

TGL is a certified transporter initially certified on 30 September 2014 and was recertified on 9 October 2018.

**Qube**

Qube is a certified transporter initially certified on 29 November 2018. Qube commenced transport for AGR in May 2018.

**Aurizon**

AGR completed a due diligence on Aurizon Rail system on 3 April 2019. AGR found no issues of concern with regard to the Aurizon's awareness and management of the handling and systems in place for the sodium cyanide product.

**Patricks**

AGR completed a due diligence assessment on Patricks on 9 April 2019 and found no issues of concern with regards to the Patricks Terminals awareness and management of the handling and systems in place for the sodium cyanide product.

### 3.3.3 Transport Practice 3.3

**Develop procedures for internal and external emergency notification and reporting.**

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 3.3** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

**AGR**

AGR through the use of ICMC certified road carriers does provide emergency response training of appropriate personnel. AGR does not physically transport cyanide within the scope of this Supply Chain. AGR's procedure *International Carrier Selection and Performance Management* details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.

Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the carriers.

| | | |
|---|---|---|
| AGR Africa Supply Chain | | July 2021 |
| Name of Facility | Signature of Lead Auditor | Date |

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving cyanide.

AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

**Ports**

AGR conducts triennial due diligence assessments on port facilities used in the Supply Chain, emergency response capabilities are assessed during this process.

The due diligence assessments found that the ports used by AGR have appropriate emergency response capabilities to deal with potential dangerous goods releases.

Individual port due diligences identify the emergency response plans and outline additional information specific to the emergency response infrastructure and resources located at each port.

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
  - Bolloré Transport & Logistics Sénégal, Certified 16 January 2020.
  - Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020.
  - Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.
- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.
- Verhrad, AGR's transport based in Ghana, was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.
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- Stella Logistics was recertified a being fully compliance with the Code on 9 August 2018.
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### 3.3.4 Transport Practice 3.4

**Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.**

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 3.4** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

**AGR**

AGR, through the use of ICMC-certified road carriers addresses the requirements to develop procedures for internal and external emergency notification and reporting.

AGR does not physically transport cyanide within the scope of this Supply Chain. AGR's procedure International Carrier Selection and Performance Management details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.

Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the carriers.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving cyanide

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
  - Bolloré Transport & Logistics Sénégal, Certified 16 January 2020.
  - Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020.
  - Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.
- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.
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- Stella Logistics was recertified a being fully compliance with the Code on 9 August 2018.
- FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to their withdrawal from the Code.

### 3.3.5 Transport Practice 3.5

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

| | | |
|---|---|---|
| | ☒ **in full compliance with** | |
| **AGR is** | ☐ in substantial compliance with | **Transport Practice 3.5** |
| | ☐ not in compliance with | |

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

AGR is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

**AGR**

AGR, through the use of ICMC-certified road carriers addresses the requirements to develop procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

AGR does not physically transport cyanide within the scope of this audit. AGR's procedure *International Carrier Selection and Performance Management* details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.

Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the carriers.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving cyanide.

**Road Transportation**

AGR utilises ICMC certified transporter for road transportation elements of its supply chain.

- Bolloré has a number of certified transport operations within West Africa:
  - Bolloré Transport & Logistics Ghana & Ghana Warehouse, Certified 16 January 2020.
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  - Bolloré Transport & Logistics Burkina Faso, Certified 16 January 2020.
  - Bolloré Transport & Logistics Côte d'Ivoire, 20 February 2019.
- BLMS, Bolloré's Burkina Faso Supply Chain, which includes the transporter BLMS, was recertified as fully compliant on October 16 January 2020.
- Verhrad, AGR's transport based in Ghana, was recertified as being fully compliant with the Code on 8 January 2018 and has currently been granted an extension for the recertification audit due to the global Coronavirus (COVID-19) pandemic.
- TTM, AGR's transporter based in Guinea, was recertified as being fully compliant with the Code on 29 January 2020.
- FFT, AGR's transporter based in Tanzania, was recertified as being fully complaint with the Code on 31 July 2018.
- Stella Logistics was recertified a being fully compliance with the Code on 9 August 2018.
- FP Du Toit was recertified as being fully compliant with the Code on 21 June 2017 and withdrew from the Code effective 3 January 2020. AGR ceased using FP Du Toit prior to their withdrawal from the Code.

# 4.0 DUE DILIGENCE

## 4.1 Port of Abidjan, Côte d'Ivoire

The port of Abidjan in Côte d'Ivoire is utilised as part of AGR's African Supply Chain. The due diligence of the port dated 1 August 2019 was prepared by AGR's Darren Gould, Product Support and Logistics Specialist.

The due diligence reports were reviewed by Mike Woods of Golder during January 2021, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

### 4.1.1 Summary of Port Operations

The port of Abidjan is West Africa's biggest, most modern port. With a central location and a well-developed infrastructure, it is a major point for trans-shipments to West and Central Africa over the Côte d'Ivoire's modern rail and road systems. Since opening of the Vridi Canal, the Port of Abidjan has handled nearly all commercial trade for the Côte d'Ivoire.

Port of Abidjan facilities contain warehouses, specialized facilities for handling bananas, logs, and offshore tankers. The Côte d'Ivoire is the third largest cocoa bean exporter in the world. It is also an important distribution point for imports to Africa. Imports include foodstuffs, machinery, equipment, pharmaceuticals, and manufactured goods going to the south. Exports include rubber, cotton, timber, fruit, fish, vegetables, and cocoa.

With a total of 6 km of quay, the Port of Abidjan has 34 berths including berths dedicated for timber, cereals, fruits, petroleum products, and containers. Three berths specialise in container-handling, and one berth is devoted to roll-on/roll-off cargoes.

Bolloré Africa Logistics, which has a workforce of nearly 500 on site, is continuously modernising Abidjan's container terminal in order to increase the yard's container storage capacity. Eight new RTG have been introduced on the terminal's n° 21 wharf, raising the total number of gantries to 16.

### 4.1.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Abidjan has been chosen as the preferred port in Côte d'Ivoire as it is the country's main container ports and has all the standards and equipment expected of an international port. In addition, the location of the port of Abidjan means that the road transport to the mine is of the shortest route and is able to avoid the main centres and busier pathways of the cities.

### 4.1.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20-foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

### 4.1.4 Transport Practice 1.6

The Terminal has a state-of-the art CCTV surveillance system ensuring the security of goods at all times including video cameras installed at strategic locations in the terminal. The implementation of strict internal controls and a state-of-the art surveillance system contribute to the optimisation of operations and cargo security.

All containers with dangerous goods (with the exception of Cyanide and Explosives) are stored in a designated area within the terminal and segregated according to the international segregation guidelines. A mobile safety bund is available within the terminal to isolate spillage from any containers.

All shipments of cyanide are escorted by the transporters own escort vehicles as well as:

- Two representatives from the Office of the Permanent Secretary against Trading of Chemical Weapons.
- One representative from the Environment Ministry
- Four members of the Republic Force of Côte d 'Ivoire (Army)

### 4.1.5 Transport Practice 2.1

All containers of cyanide must be pre-cleared by the time of the vessels arrival and must be taken as a direct discharge from the vessel to the transporters' vehicles. There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

### 4.1.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

## 4.2 Port of Conakry, Guinea

The port of Conakry in Guinea is utilised as part of AGR's African Supply Chain. The due diligence of the port dated 10 January 2020 was prepared by Ben Amoo-Mensah AGR's African Consultant and Darren Gould, AGR Product Support & Logistics Specialist.

The due diligence reports were reviewed by Mike Woods of Golder during January 2021, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

### 4.2.1 Summary of Port Operations

The port is managed by the Government Port Authorities and terminal handling by Bolloré Guinea. The Port activity is to remove the shipping containers from the vessel and place the shipping containers on the wharf or onto in-port transport for transfer to a storage area. If containers are placed on the wharf they will be later removed by in-port transport to a storage area. The terminal operations manager and staff are aware when sodium cyanide containers are to arrive at the Port.

Customs clearance procedures are usually completed prior to the vessel arrival to ensure direct loading onto vehicles for delivery to the mine sites. Once the consignment is cleared through customs and a release certificate is issued for each container. The port has a strict security process managing the transporter's vehicle entering the terminal to collect a designated container.

Sodium cyanide containers are cleared and loaded directly from the shipping vessels onto trucks as soon as they arrive in the port as sodium cyanide are not stored on the terminal. The cyanide containers are cleared and loaded as soon as possible from the shipping vessels upon arrival. This is in place with the objective of removing the containers from the Port and under the Convoy system have then delivered safely to the mine operation.

### 4.2.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Conakry has been chosen as the preferred port in Guinea as it is one of the country's main container ports and has the standards and equipment expected of an international port. Alternative Ports are available in Liberia, Sierra Leone, and other West African locations however the inland road transport legs are very far from the mine site. The distance also involves border crossings and therefore with the long driving distances poses a far higher risk.

### 4.2.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

### 4.2.4 Transport Practice 1.6

The shipping line's manifest which includes the DG cargo containers information is sent to the port and terminals before the entry of DG cargo. This information helps the movement of the container is arranged in a safe way in the port and terminal.

Conakry receive the vessels manifest which includes the containers for unloading and handling by the Port. This information is then captured in the port's container terminal software program. This program then assists with the movement of the container from arrival to handover to transport company and the eventual return of the empty container.

Once the clearing and Port formalities are complete the consignment is collected by the Port by the road transport company. The trucks have GPS tracking devices which are monitored by the transporter until they convoy arrives at the mine site. The convoy is escorted by escort team, police, and the gendarme. At the mine site the delivery notes are signed by the mine site personnel acknowledging receipt of the shipment.

### 4.2.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

### 4.2.6 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

## 4.3 Port of Dar es Salaam, Tanzania

The port of Dar es Salaam in Tanzania is utilised as part of AGR's African Supply Chain. The due diligence of the port dated August 2020 was prepared by AGR's Peter Cooper Export Manager and updated by Darren Gould, AGR Product Support & Logistics Specialist.

The due diligence reports were reviewed by Mike Woods of Golder during January 2021, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

### 4.3.1 Summary of Port Operations

Dar es Salaam Port is the main container port servicing Tanzania; AGR has ability to ship to this port by utilising the Mediterranean Shipping Company for the shipment of product from Fremantle Western Australia and the shipping line's service through to Dar es Salaam. The Port allows unloading of the shipments of containers and the subsequent road transport section to the Geita Mine site located in the north- western part (Mwanza region) of Tanzania.

The port of Dar es Salaam is owned by The Tanzania Ports Authority (TPA) and contains two kilometres of quays with a total of eleven deep water berths. These berths are used for the import and export of conventional break bulk cargo, containerised cargo, motor vehicles, bulk liquids, and grains.

Tanzania Ports Authority (TPA) regulates and licenses port and marine services and facilities. It also manages vessel traffic in the port while ensuring safety and security. TPA operates a system of ports serving the Tanzania hinterland and the landlocked countries of Malawi, Zimbabwe, Zambia, Democratic Republic of Congo (DRC), Burundi, Rwanda, and Uganda.

All containerised cargo is handled by TICTS at a dedicated container terminal. The terminal has three berths totalling 540 m in length with a capacity to handle approximately 400,000 TEUs per year which includes many classes of Dangerous Goods cargo.

TPA is equipped with an array of machinery and equipment to handle a wide range of cargo. The port has highly trained professionals in various fields work around the clock to ensure that cargo entering and exiting the ports is in pristine condition and on time.

The terminal has undergone major changes that include the installation of a new sophisticated terminal software operating system known as the Next Generation Terminal Management System (nGEN). nGen, the award-winning proprietary system developed in-house, is a modular, scalable terminal-management platform that controls the entire scope of operations including ship and yard planning, gate operations, vessel operations and interactions, yard configuration and performance, overall operations monitoring, equipment utilisation, productivity, and cost optimisation.

Tanzania International Container Terminal Services Ltd (TICTS), located at Dar es Salaam, is the country's largest container terminal. The port has strengthened its role as the country's maritime gateway, investing in modern IT systems and mobile equipment while constantly improving its productivity levels, efficiency, and customer service.

### 4.3.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Dar es Salaam has been chosen as the preferred port in Tanzania as it is one of the country's main container ports and has all the standards and equipment expected of an international port. In addition, it handles more than 85% of Tanzania's trade and is a vital gateway not just to Tanzania, but also to eastern, central, and Southern Africa.

### 4.3.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20-foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

### 4.3.4 Transport Practice 1.6

TICTS receive the vessels manifest which includes the containers for unloading and handling by them. This information is then captured in the container terminal software program. This program then assists with the location where each container from the vessel is to be placed for storage.

The vehicles of the Inland Container Depots pick up the containers under strict supervision in accordance with the Standard Operating Practices (SOPs) to their depot. Once the clearing & port formalities are complete the consignment is collected by the road transport company.

### 4.3.5 Transport Practice 2.1

Product is in shipping containers ready for loading onto transport for onward transport to the mine site and remains in the containers that were packed at the sodium cyanide factory. The containers are not opened and kept sealed until they arrive at the mine site. The containers are placed on a concrete surface within the port area while clearance is obtained and the consignment is collected by the road transport company.

The container storage area within the port is fully lit at night and the whole of the port area has controlled access. TICTS and the Inland Port Container Depot are in possession of an Emergency Procedure Guide developed for Cyanide and other hazardous chemicals. TICTS hold a mock DG spill exercise at least once per year although this is not Cyanide specific. The ICDs also undergo yearly cyanide training module for hazardous materials.

### 4.3.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

## 4.4 Port of Durban, South Africa

The port of Durban in South Africa is utilised as part of AGR's African Supply Chain. The due diligence of the port dated August 2020 was prepared by AGR's Darren Gould, Product Support & Logistics Specialist.

The due diligence reports were reviewed by Mike Woods of Golder during January 2021, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

### 4.4.1 Summary or Port Operations

The Port of Durban commonly called Durban Harbour, is the second largest port of South Africa and one of the busiest ports in Africa. Durban Port is South Africa's main cargo and container port, handling the largest volume of sea-going traffic of any port in southern Africa.

Ideally placed on major shipping routes and with excellent rail and road links, the port plays an integral role in the country's economy. The port occupies the natural expanse of Durban Bay – an area of 1850 ha, with the water area being 892 ha in extent at high tide and 679 ha at low. The entrance channel is 122 m wide and is maintained at a dredged 12.8 m draught (depth of water).

The port is managed by Transnet National Ports Authority (TNPA), which is a government corporation of South Africa and subsidiary of Transnet. Transnet is responsible for managing and governing eight South African seaports.

Almost all containers are handled at Durban Container Terminal (DCT) which is the largest of its kind in the southern hemisphere. Containers handled at the terminal currently represent more than 60% of the total number handled at all South African ports. DCT serves as a pivotal hub for the entire Southern African region, serving trade links to the Far East, Middle East, Australasia, South America, North America, and Europe. It also serves as a transhipment hub for East Africa and Indian Ocean islands.

The terminal has 2,128 m of quayside divided into seven berths. DCT has more than 13,000 ground slots and 600 reefer points and handles an average of 50 000 TEUs per month. A rail terminal receives and dispatches containers to Johannesburg and other destinations as far as Zambia. DCT has expanded its capacity from 1.9 million TEUs to 2.9 million TEUs per annum.

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

### 4.4.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Durban has been chosen as the preferred port in South Africa as it is one of the country's main container ports and has all the standards and equipment expected of an international port. DCT serves as a pivotal hub for the entire Southern African region, serving trade links to the Far East, Middle East, Australasia, South America, North America, and Europe.

### 4.4.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20-foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

### 4.4.4 Transport Practice 1.6

DCT receives the vessels manifest which includes the containers for unloading and handling by them. This information is then captured in the container terminal software program. This program then assists with the location where each container from the vessel is to be placed for storage.

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

The road transporter picks up the containers under strict supervision in accordance with the Standard Operating Practices (SOPs) after completing all clearing documentation.

### 4.4.5 Transport Practice 2.1

Containers of dangerous goods discharged by vessels are temporarily stored in the Durban Container Depot prior to being picked up by trucks. The port conforms to the IMDG code. Incompatible chemicals are segregated in accordance with the IMDG Code.

The container storage area within the port is fully lit at night and the whole of the port area has controlled access. Product is in shipping containers ready for loading onto transport for onward transport to the mine site are packed into containers or bucket trailers and delivered to the mines. The containers are not opened at the Port.

### 4.4.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

## 4.5 Port of King Abdullah, Saudi Arabia

The port of King Abdullah in Saudi Arabia is utilised as part of AGR's African Supply Chain. The due diligence of the port dated 22 July 2019 was prepared by AGR's Peter Cooper, Export Manager.

The due diligence reports were reviewed by Mike Woods of Golder during January 2021, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

### 4.5.1 Summary of Port Operations

King Abdullah Port is Saudi Arabia's newest port facility which opened in September 2013. It is part of a large new development project 'King Abdullah Economic City' (KAEC); the project takes up 160 km$^2$ of what is ultimately a new city including residential areas, industrial areas, and port and rail transport terminals. This new city is located 100 km north of Jeddah on the Red Sea.

The Port falls under the Ports Developing Company (PDC); this company was formed in 2010 by the Saudi BinLaden Group and Emaar, the Economic City. The Joint venture is based on both companies having strengths in construction and operation of large infrastructure projects including Ports. Emaar, The Economic City (Emaar TEC) company is the master developer and planner of the KAEC including the Port.

The planning of the KAEC and KAP has allowed the development the city and port facilities to be laid out and planned which includes direct access from the Port to national roads servicing the major centres in Saudi Arabia. This direct access to and from the Port includes the industrial areas of the KAEC area and onto the national roadways in Saudi Arabia, the access away from the residential parts of KAEC.

AGR has ability to ship to this port by utilising the Mediterranean Shipping Company for the shipment of product from Fremantle Western Australia. The Port allows unloading of the shipments for the subsequent road transport of the containers to the various mine sites within the Kingdom of Saudi Arabia. The new Port with its modern infrastructure and roadways and 24/7 direct access to the national road network offers has improvements over the Jeddah Islamic Port.

Phase 1a of the container terminal was completed in 2013 offering two container vessel berths, with 700 m of quay length, and the capacity to handle 1.3 million twenty foot equivalent units (TEU) per annum. This also includes 300,000 $m^2$ of container storage areas with a capacity of 700,000 TEU.

Phase 1b was completed in 2015 adding two additional berths, 740 m of quay length to increase the overall capacity to 2.7 million TEU.

### 4.5.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of King Abdullah has been chosen as the preferred port in Saudi Arabia as it is a modern planned port facility with good connections to internal transport networks and has all the standards and equipment expected of an international port. It avoids the congestion that surrounds the Jeddah Islamic Port.

### 4.5.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000 kg Intermediate Bulk Containers (IBC). For distribution in Australia and Internationally, the IBCs are packed in 20-foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

### 4.5.4 Transport Practice 1.6

The company's computer systems take the Vessels manifest and have the ability to identify dangerous goods consignments, determine the class of dangerous goods and establish the segregation requirements for that product. The program will then ensure the product (containers) are stacked in the correct area and segregation limits as required by the International Maritime Organisations Dangerous Goods Code are met.

KAP offers fast-track customs clearance through its Clearance Broker System (CBS) which helps in orchestrating the exchange of data among the various parties, allowing customs and other government agencies to release the goods in the most efficient way. The CBS office has been set in a central point in the port area, this central point combines, clearing agent companies, customs, stevedoring and port operations all in the same area to improve the ports efficiency.

Cyanide consignments are pre-cleared and the containers are taken off the vessel on direct lift onto the transport trucks – the objective being no cyanide containers being stored in the Port. The terminal is monitored 24/7 by CCTV and is well illuminated at night time for unloading/loading operations.

### 4.5.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

### 4.5.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

## 4.6 Port of Tema, Ghana

The port of Tema in Ghana is utilised as part of AGR's African Supply Chain. The due diligence of the port dated July 2020 was prepared by AGR's Martin Maloney, Product Support and Logistics AGR and Lee Baker, Global Supply Chain Manager.

The due diligence reports were reviewed by Mike Woods of Golder during January 2021, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

### 4.6.1 Summary of Port Operations

The Tema Port near Accra is the main container port servicing Ghana, and its landlocked neighbouring countries; AGR has ability to ship to these Ports in Ghana by utilising the Mediterranean Shipping Company for the shipment of product from the Fremantle Port in Western Australia and the shipping line's service through to both Tema and Takoradi Ports. The Port allows shipments for the final road transport section to the mining operations in Ghana as well as the landlocked countries within the West Africa region.

The Ghana Ports and Harbour Authority (GPHA) oversees the operation of the overall Port operations; however, the management of dangerous goods terminal is done by Meridian Port Services (MPS). MPS manages the new port expansion terminals they constructed under an agreement with Ghana government and GPHA. MPS is the stevedoring company which manages the on shore (wharf) operations in Tema as well as the new MPS terminal 3 (completed 2019) which they constructed as part of the port expansion project.

Currently all dangerous goods including sodium cyanide TEU's are conveyed from the MPS terminal to the Tema Bonded Terminal (TBT) where they are picked up by transporters. All cyanide containers of cyanide shipped by AGR are received at the wharf by MPS and stored in TBT. Transporters trucks are loaded from the TBT to various mine destinations.

AGR's ongoing review as a service provider and this due diligence report has found no issues of concern in regards to the Ghana Ports and Harbour Authority (GPHA), Meridian Port Services Limited and Tema Bonded Terminal's awareness and management of the handling and systems in place for the sodium cyanide product.

### 4.6.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The Tema Port has been chosen as it is one of the country's main container ports and has all the standards and equipment expected of an international port particularly with the new Terminal 3 (completed in 2019). The port provides access to the main arterial roads to transport products to mine in the south west of Ghana and to the north of Ghana and neighbouring countries.

### 4.6.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and Internationally, the IBCs are packed in 20-foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

### 4.6.4 Transport Practice 1.6

GPHA/MPS receive the vessels manifest which includes the containers for unloading and handling by the Port. This information is then captured in the ports container terminal and MPS software programs. The software program then assists with the location where each container from the vessel is to be placed. Similar software is used by TBT.

MPS utilises a designated area in their terminals for the sodium cyanide consignments. This ensures they comply with the segregation requirements. The sodium cyanide containers are then transferred to TBT. TBT also conform with the segregation requirements.

Once the clearing & Port formalities are complete, the consignment is collected from the Port and delivered to the mine site by AGR's selected road transport companies which are ICMI-accredited road transport companies. Cyanide containers are not opened until they reach the mine.

### 4.6.5 Transport Practice 2.1

MPS activities are to remove the shipping containers from the vessel and place the shipping containers on the wharf or onto in-port transport for transfer to a designated storage area or to an off dock bonded terminal, TBT. If containers are placed on the wharf they are later removed by in-port transport to a designated area in TBT.

Currently all dangerous goods including sodium cyanide TEU's are conveyed from the MPS terminal to TBT where they are picked up by transporters. Cyanide containers are segregated and stacked separately. All cyanide containers of cyanide shipped by AGR are received at the wharf by MPS and stored in TBT. Transporters' trucks are loaded from the TBT to various mine destinations.

AGR's Consultant in Ghana has been working with the safety and ER department regarding cyanide handling and product awareness.

### 4.6.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

## 4.7 Port of Takoradi, Ghana

The port of Takoradi in Ghana is utilised as part of AGR's African Supply Chain. The due diligence of the port dated July 2020 was prepared by AGR's Martin Maloney, Product Support and Logistics AGR and Lee Baker, Global Supply Chain Manager.

The due diligence reports were reviewed by Mike Woods of Golder during January 2021, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

### 4.7.1 Summary of Port Operations

The Takoradi Port in south west Ghana is suitably located to service the mining industry located near the town of Tarkwa in the south west region of Ghana. AGR has ability to ship to these Ports in Ghana by utilising the Mediterranean Shipping Company for the shipment of product from the Fremantle Port in Western Australia and the shipping line's service through to both Tema and Takoradi Ports. The Ports allow unloading of the shipments for the final road transport section to the mining operations in Ghana as well as the landlocked countries within the West Africa region.

The Ghana Ports and Harbour Authority (GPHA) oversees the operation of the overall Port operations in the Takoradi port. However, the management of dangerous goods terminal is done by Meridian Port Services (MPS). MPS manages the new port expansion terminals they constructed under an agreement with Ghana government and GPHA.

Takoradi Port has been ISPS compliant since July 2004 and operating at MARSEC level 1. All port installations are manned by 24-hour CCTV surveillance plus professionally trained security personnel.

Cyanide is unloaded and placed into the designated storage area at Takoradi Port by AGR's selected road transport companies which are ICMI-accredited road transport companies. Cyanide containers are not opened until they reach the mine.

### 4.7.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Takoradi has been chosen as one of the preferred ports in Ghana as due to its proximity to the mining hub of Tarkwa in the south west region of Ghana. Its location avoids congestion around the capital of Accra. The port has all the standards and equipment expected of an international port.

### 4.7.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20-foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

### 4.7.4 Transport Practice 1.6

GPHA/MPS receive the vessels manifest which includes the containers for unloading and handling by the Port. This information is then captured in the port's container terminal and MPS software programs. The software program then assists with the location where each container from the vessel is to be placed.

MPS utilises a designated area in their terminals for the sodium cyanide consignments. This ensures they comply with the segregation requirements. Once the clearing and Port formalities are complete, the consignment is collected from the Port and delivered to the mine site by AGR's selected road transport companies which are ICMI-accredited road transport companies. Cyanide containers are not opened until they reach the mine.

### 4.7.5 Transport Practice 2.1

Takoradi Port has been ISPS compliant since July 2004 and operating at MARSEC level 1. All port installations are manned by 24-hour CCTV surveillance plus professionally trained security personnel. Cyanide is unloaded and placed into the designated storage area at Takoradi Port.

Cyanide transiting through the port remains within the Shipping container and is briefly held in the designed area on the port while customs clearance processes are completed. The consignment is collected from the Port and delivered to the mine site by AGR's selected road transport companies which are ICMI-accredited road transport companies.

### 4.7.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

## 4.8 Port of Walvis Bay, Namibia

The port of Walvis Bay in Namibia is utilised as part of AGR's African Supply Chain. The due diligence of the port dated July 2020 was prepared by AGR's Darren Gould, Product Support and Logistics.

The due diligence reports were reviewed by Mike Woods of Golder during January 2021, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

### 4.8.1 Summary of Port Operations

The Port of Walvis Bay is the main port serving the country of Namibia. The Port of Walvis Bay is strategically located half-way down the coast of Namibia with direct access to principal shipping routes. Walvis Bay is a natural gateway for international trade.

The Port of Walvis Bay is Namibia's largest commercial port, receiving approximately 3,000 vessel calls each year and handling about 5 million tonnes of cargo. The port is a secure, efficient, and world-class port. Temperate weather conditions are experienced all year round and no delays are caused by weather. Its world-class infrastructure and equipment ensure reliable and safe cargo handling.

The Port of Walvis Bay handles container imports, exports, and trans-shipments, as well as bulk and break-bulk of various commodities. The port serves a wide range of industries such as the petroleum, salt, mining and fishing industries. Both bulk and bagged salt are exported from the Port of Walvis Bay. The port is compliant with the International Ship and Port Facility Security code (ISPS).

The Port of Walvis Bay is operated by the National Port Authority known as NAMPORT and the port is owned by the government of Namibia. The container terminal at the port of Walvis Bay can accommodate about 4000 containers with provision for 482+ reefer container plug points. The port can handle about 750,000 containers per annum.

The vessels operated by Mediterranean Shipping Company (MSC) and Maersk who handle AGR's shipping requirements from Fremantle, Australia to Namibia use the services of the Walvis Bay Stevedoring Company for their unloading and stevedoring requirements.

### 4.8.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Walvis Bay has been chosen as the preferred port in Nambia as it is one of the country's main container ports and has all the standards and equipment expected of an international port. In addition, the location of the port means that the road transport to the mine is of the shortest route and is able to avoid the main centres and busier pathways of the cities.

### 4.8.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and Internationally, the IBCs are packed in 20-foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

### 4.8.4 Transport Practice 1.6

Port security comprises: 24 hour automated surveillance systems (CCTV), a well trained security work force manning all port zones plus entrance and exit gates (24 hours to ensure security of goods at any time. There are security checks when entering and exiting the port.

Software programs control container movement through the Ports. It is the software programs that control container placement and movement; these software packages identify each individual container placement area in designated stacks or Dangerous Goods storage area. The input information for the placement of containers comes from the vessel's manifest. Sodium cyanide containers are stacked separately and segregated from other containers until customs clearance is completed and containers cleared from the port. The maximum clearance of DG goods from the port is 48hrs.

NAMPORT receives the vessels manifest which includes the containers for unloading and handling by them. This information is then captured in the container terminal software program. This program then assists with the location where each container from the vessel is to be placed for storage. Once the clearing and port formalities are complete the consignment is collected by the road transport company.

### 4.8.5 Transport Practice 2.1

The container storage area within the port has full CCTV coverage, is fully lit at night and the whole of the port area has controlled access. The containers of cyanide are stores in a separate DG storage area within the port confines.

Product is in shipping containers ready for loading onto transport for onward transport to the mine site and remains in the containers that were packed at the production facility. The containers are not opened and are kept sealed until they arrive at the mine site. The containers are placed on a concrete surface within the port area.

AGR conducted training for the port authority and the other stakeholders in Namibia in 2018. The training was attended by some port operations people, staff from NAMPORT Fire Brigade including their station manager.

### 4.8.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

## 5.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder has under the contract between it and its client.

# Signature Page

**Golder Associates Pty Ltd**

Mike Woods
*ICMC Lead Auditor and ICMC Transportation Expert*

CC/MCW/ds

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**APPENDIX A**

# Important Information

The document ("Report") to which this page is attached and of which this page forms a part has been issued by Golder Associates Pty Ltd ("Golder") subject to the important limitations and other qualifications set out below.

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Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder's affiliated companies or the employees, officers or directors of any of them.

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