SUMMARY AUDIT REPORT

International Cyanide Management Code

Australian Gold Reagents, Australian Supply Chain, Re-certification Audit

Submitted to:

International Cyanide Management Institute
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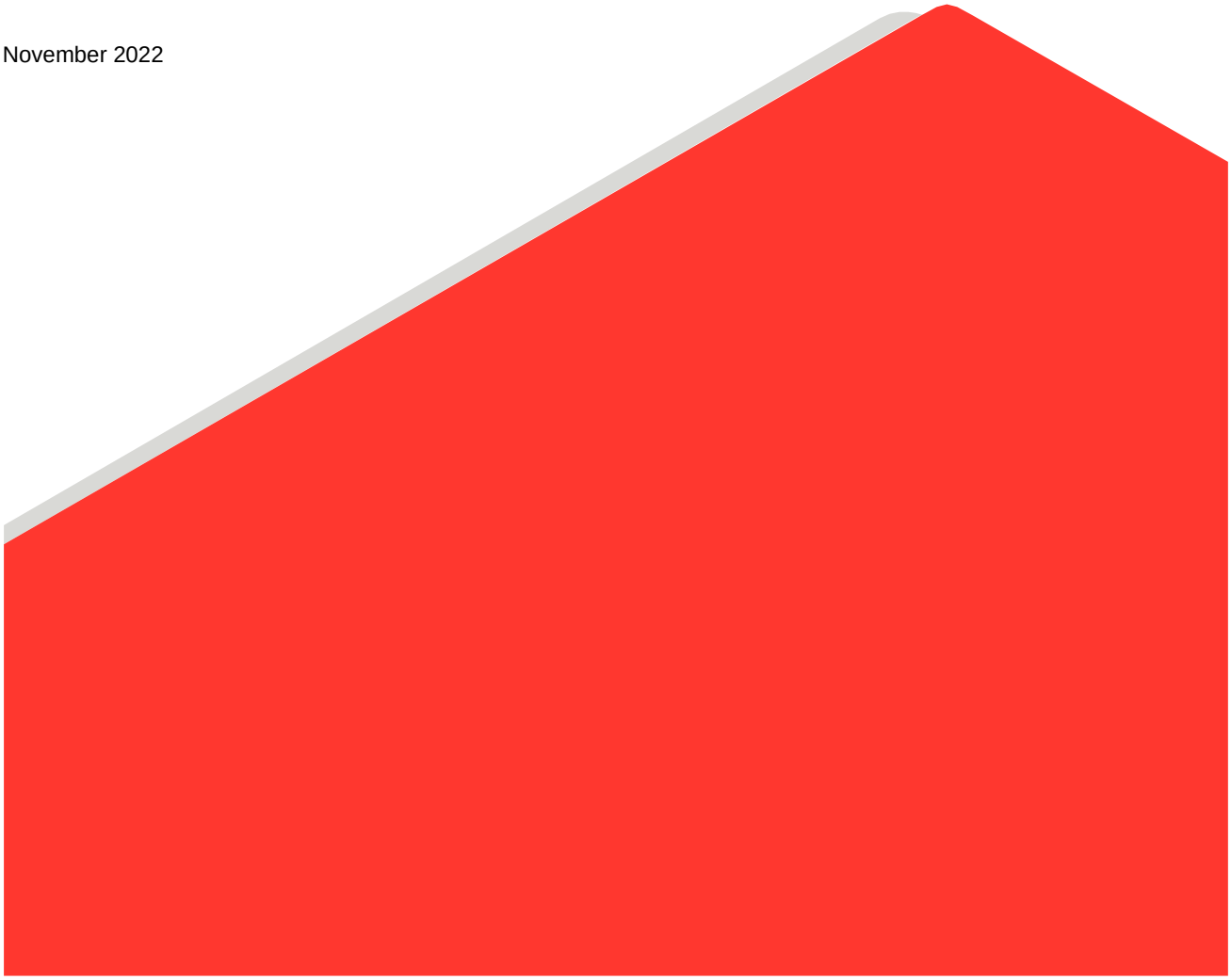

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APPENDIX A
Important Information

1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Australian Supply Chain
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Australian Gold Reagents Pty Ltd
Name of Responsible Manager:	Darren Gould, Product Support & Logistics Specialist
Address:	Kwinana Beach Road, Kwinana
State/Province:	Western Australia, 6966
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2.0 CYANIDE TRANSPORTATION

2.1 Australian Gold Reagents Ltd

Australian Gold Reagents (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 Australian Supply Chain

AGR's Australian Supply Chain (formerly referred to as the Western Australian Supply Chain) covers transport from the Kwinana production facility, using rail and road transport to end user mine sites in Western Australia and rail transport to South Australia and Victoria; 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 Australian Supply Chain was previously re-certified as being in full compliance with the Code on 15 November 2019.

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. The Kwinana production facility is not part of the scope of this audit.

2.4 Toll Global Express (Toll)

Toll Global Express completes road transport from the Kwinana Production Facility to the Kewdale Rail head for onward rail shipment to Kalgoorlie, Western Australia and to Adelaide, South Australia and Melbourne, Victoria.

This division was covered for part of the audit period under Toll Global Logistics (TGLs) ICMC certification; however, as this division was sold to another entity during the period it is no longer independently certified. For completeness the elements of transport completed by Toll Global Express during the audit period were assessed and are included in this audit report.

2.5 QUBE

Qube Bulk Pty Ltd (Qube) provides road transportation of cyanide for AGR in Western Australia and replaced TGL and Coogee Chemicals in May 2018. Qube is a signatory to the International Cyanide Management Code (ICMC or the Code) and was certified as fully compliant with the Code on 29 November 2018 and re-certified on 03 February 2022.

2.6 Aurizon

Aurizon provides rail transportation of liquid sodium cyanide and solid sodium cyanide in isotainers for transport to the West Kalgoorlie facility for interim storage (if needed) and intermodal transfer road for transport to regional customers. A due diligence of Aurizon was undertaken by AGR on in April 2022.

2.7 Pacific National

Pacific National provides rail transportation of solid sodium cyanide in containers for transport to the interstate customers and intermodal transfer road for transport. A due diligence of Pacific National was undertaken by AGR on in August 2022 and includes rail heads in Perth (Kewdale), Adelaide (Regency Park) and Melbourne (Docklands).

2.8 Patricks Terminal/Fremantle Port

Patrick Terminals operates stevedoring facilities at Fremantle Ports inner harbour container port. There is a dedicated storage area for interim storage of up to 100 tonnes solid sodium cyanide within shipping containers. Typically, cyanide is transported from the Kwinana production facility and loaded directly onto the vessel. A due diligence of Patrick's was undertaken by AGR on in April 2022.

2.9 DP World

DP World operates stevedoring facilities at Fremantle Ports inner harbour container port. There is a dedicated storage area for interim storage of solid sodium cyanide within shipping containers. Typically, cyanide is transported from the Kwinana production facility and loaded directly onto the vessel. A due diligence of DP World was undertaken by AGR on in May 2022.

2.10 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 or rail facilities and due consideration of relevant protocol requirements have been made through the due diligence process.

There is no interim storage undertaken during road transport to the end user.

2.11 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: mike.woods@wsp.com

2.12 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		3 November 2022

2.13 Dates of Audit

The ICMC Audit was conducted over three days on 22, 29 June and 26 August 2022.

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.

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 has implemented a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. AGR's *Transport Management Plan* (TMP) is the primary reference for the management of cyanide transport activities and commits AGR to only transport its product along routes approved by the Department of Mines, Industry, Regulation and Safety– Dangerous Goods Safety Branch and Main Roads WA. The specific routes that AGR use are selected based on their load rating, location and surroundings, where possible, bypassing built up areas.

AGR has implemented the procedure for *Cyanide Transport Route and Risk Assessment* to guide the assessment and review of transport routes.

A sample of completed Route Assessments for customers in WA and the Cyanide Solids and Solution Transport Route Risk Assessment was reviewed.

AGR has implemented a procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks.

The approach to route assessments is outlined in the TMP and further detail on the assessment and review process is detailed in the *Cyanide Transport Route Review and Risk Assessment* procedure.

Each proposed route is assessed by AGR by driving the road components of the route and identifying hazards along the route and documenting this in a route assessment. AGR then assesses each route documents the assessment in the *Cyanide Solids and Solution Transport Route Risk Assessment.* This assessment also considered the rail components of the supply chain. A sample of route assessments were reviewed to confirm implementation of the process including a new customer.

AGR has implemented a Journey Management Plan process that details the key aspects and hazards along the route to be communicated to the drivers.

Subcontractor transport companies are required under the contract to follow the route assessed and approved by AGR. The routes are loaded into subcontractor GPS tracking systems and AGR are notified by the subcontractor should deviation from an approved route is necessary.

The routes selected by AGR have not identified special safety or security concerns that would trigger additional security measures that are implemented across the Australian Supply Chain.

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

AGR does subcontract the transport and handling of cyanide and has established procedures to inform subcontractors of the requirements of Transport Practice 1.1 and monitor compliance.

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.

AGR commissions an independent Transport Management Plan audit of its operations including its subcontractor transport operations to confirm compliance with Ministerial Conditions and the Transport Management Plan requirements.

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 and DP World at the Fremantle container terminal and Aurizon (Rail Operator and West Kalgoorlie Depot) and Pacific National (Rail Operator) is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

AGR utilise a ICMC certified transporter Qube Bulk Pty Ltd (Qube) for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 3 February 2022.

Toll Global Express

AGR subcontract the transport of cyanide product from the Kwinana Production Facility to the Kewdale rail terminal to Toll Global Express. Toll Global Express were part of the Toll group of companies for the majority of the audit period with the divestment of Toll Global Express being completed in 2022.

Interviews with Toll Global Express confirmed that AGR provide the route assessments and approved transport route.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's awareness and management of the handling and systems in place for the sodium cyanide product.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regards to Pacific National's awareness and management of the handling and systems in place for the sodium cyanide product.

Ports (Fremantle)

Patricks

AGR completed a due diligence assessment on Patricks on 11 April 2022. AGR found no issues of concern with regard to the Patrick Terminals awareness and management of the handling and systems in place for the sodium cyanide product.

DP World

AGR completed a due diligence assessment on DP World on 17 May 2022. AGR found no issues of concern with regard to the DP World Terminals awareness and management of the handling and systems in place for the sodium cyanide product.

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 its selection and management of road transport subcontractors does only use trained, qualified and licensed operators for its transport vehicles. All drivers undertaking cyanide transport must have a government issued current driver's license with relevant category along with mandatory internal training.

AGR requires subcontractor drivers to complete cyanide awareness training modules through the WESCEF learning management system (LMS). Records of completion and assessment are maintained within the system.

AGR does subcontract the transport and handling of cyanide and has established procedures to inform subcontractors of the requirements of Transport Practice 1.1 and monitor compliance.

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.

AGR commissions an independent Transport Management Plan audit of its operations including its subcontractor transport operations to confirm compliance with Ministerial Conditions and the Transport Management Plan requirements.

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 and DP World at the Fremantle container terminal and Aurizon (Rail Operator and West Kalgoorlie Depot) and Pacific National (Rail Operator) is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

AGR utilise a ICMC certified transporter Qube Bulk Pty Ltd (Qube) for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 3 February 2022.

Toll Global Express

Interviews and training record review confirmed that Toll Global Express drivers are qualified and licensed operators. The drivers have the necessary licenses and training to transport and handle dangerous goods and have also completed AGR's cyanide specific training.

Rail Transportation

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's awareness and management of the handling and systems in place for the sodium cyanide product.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regards to the Pacific National's awareness and management of the handling and systems in place for the sodium cyanide product.

Ports (Fremantle)

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.

Patricks

AGR completed a due diligence assessment on Patricks on 11 April 2022. AGR found no issues of concern with regard to the Patrick Terminals awareness and management of the handling and systems in place for the sodium cyanide product.

DP World

AGR completed a due diligence assessment on DP World on 17 May 2022. AGR found no issues of concern with regard to the DP World Terminals awareness and management of the handling and systems in place for the sodium cyanide product.

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 only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. The dispatch operation at the AGR production facility has a large Hyster forklift for moving containers and two small forklifts for moving IBCs and packing sea containers.

Maintenance is undertaken through third party service providers and records were available for review.

AGR does subcontract the transport and handling of cyanide and has established procedures to inform subcontractors of the requirements of Transport Practice 1.1 and monitor compliance.

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.

AGR commissions an independent Transport Management Plan audit of its operations including its subcontractor transport operations to confirm compliance with Ministerial Conditions and the Transport Management Plan requirements.

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 and DP World at the Fremantle container terminal and Aurizon (Rail Operator and West Kalgoorlie Depot) and Pacific National (Rail Operator) is satisfied that these facilities meet AGR's operational requirements.

Road Transportation

Qube

AGR utilise a ICMC certified transporter Qube Bulk Pty Ltd (Qube) for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 3 February 2022.

Toll Global Express

A site inspection, interviews and maintenance records confirmed that Toll Global Express has process in place to maintain its transport equipment. The equipment is suitable to handle the cyanide containers.

Rail Transport

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's handing equipment and maintenance.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regard to Pacific National's handing equipment and maintenance.

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 periodic 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.

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.

AGR has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging.

Solid cyanide is package into wooden intermediate bulk containers (IBCs) and the lid secured with screws and then packing straps are applied. IBCs are inspected prior to loading and damage containers are marked and placed in a designated area for re-dissolving on site.

IBCs are loaded into shipping containers with the number of each IBC and shipping container recorded on the loading sheet. Once the container is loaded the doors are closed and unique seal applied. The seal number and container number are recorded on shipping documentation that accompanies the shipment through to the customer.

Solid sodium cyanide is also loaded into solid to solution (STS) isotainers via hatch in the end of the vessel. Once the vessel has been filled the hatch is replaced and seals applied.

Liquid sodium cyanide is loaded into a dedicated fleet of isotainers and red seals are applied to the coaming lid of the isotainer.

AGR has procedures in place for the inspection of shipping containers prior to use and containers with damage that could impact the integrity of the container or door seals are not used.

AGR has a preventative maintenance program for isotainers and STS isotainers that addresses structure, integrity, valves, locks, and placarding. Inspections are completed on a 2.5 year and 5 year program scheduled and monitored through the JDE preventative maintenance platform.

An inspection of containers and interviews confirmed procedures are implemented to maintain integrity of the packaging.

Road Transportation

Qube

AGR utilise a ICMC certified transporter Qube Bulk Pty Ltd (Qube) for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 3 February 2022.

Toll Global Express

A site inspection, interviews and delivery records confirmed that Toll Global Express has process in place to maintain the integrity of AGR's packaging. Toll Global Express have systems in place for the following:

a) *Vehicle inspections prior to each departure/shipment?*

Pre-trip and pre-start inspections are completed by the driver prior to each trip. A review of convoy documentation confirmed that pre-start checks are completed. Toll Global Express holds accreditation which has mandatory elements of fatigue, maintenance and dimension and loading which are audited by accredited auditors.

b) *A preventative maintenance program?*

Toll Global Express operate a tiered maintenance program for prime movers and trailers which is scheduled and recorded. A review of maintenance records and interviews confirmed the implementation of a preventative maintenance program

c) *Limitations on operator or drivers' hours?*

Toll Global Express has implemented a fatigue management program that meets mandated requirements for heavy vehicle transporters operating in Western Australia.

d) *Procedures to prevent loads from shifting?*

Cyanide is stowed into the freight containers or isotainers by the producer. Solid cyanide is packed into United Nations approved wooden IBCs that are stowed within containers to minimise movement in transport. The securing systems appear to be as effective as reasonably practicable. Containers are secured using twist locks, which are designed and constructed to international transport standards. Twist locks are inspected prior to each departure and periodically during the journey.

Twist locks are also used to secure isotainers and STS to trailer and rail cars.

e) *Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered?*

Toll Global Express operates under AGR's transport management plan and there are processes in place for modification and suspension of transport.

f) *A drug abuse prevention program?*

Toll Global Express has in place a program for drug abuse prevention including a periodic medical and drug and alcohol testing.

g) *Retention of records documenting that the above activities have been conducted?*

Records are maintained that the above activities have been conducted. Maintenance records, inspection, and convoy records were samples through the audit period.

Rail Transport

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's handing equipment and maintenance.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regard to Pacific National's handing equipment and maintenance.

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 periodic 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.

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 requires subcontractor transport vehicles to have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

The main form of communication is mobile phone provided by the company for official use only. The trucks are also fitted with duress alarms (when activated, it provides time, location and identification number).

AGR requires transporters to fit their vehicles with tracking systems and the Vehicle Operators handbook specifies the alarm conditions and driver actions.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.6.

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.

Road Transportation

Qube

AGR utilise a ICMC certified transporter Qube Bulk Pty Ltd (Qube) for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 3 February 2022.

Toll Global Express

A site inspection, interviews and delivery records confirmed that Toll Global Express has process in place to for tracking shipments. The transport route is within the metropolitan area of Perth to transfer to the Kewdale Rail head and there are no black spots.

Rail Transport

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's handing equipment and maintenance.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regard to Pacific National's handing equipment and maintenance.

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.

AGR is

☒ **in full compliance with**

☐ 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.

Road Transport

There are no interim storage facilities within the road transport component of the supply chain.

Rail Transport

Interim storage of cyanide within the supply chain is carried out Aurizon West Kalgoorlie Interchange Terminal and AGR completed a due diligence review of Aurizon operations including this facility confirmed storage at the site meet the requirements of Transport Practice 2.1.

There is no interim storage at the rail facilities operated by Pacific National in Perth, Adelaide and Melbourne as noted in the due diligence completed on 19 July 2022. Accordingly, Transport Practice 2.1 is not applicable to Pacific National.

Ports

Interim storage at the Port may occur and AGR conducted a due diligence of Patricks on 11 April 2022 and DP World 17 May 2022 and confirmed that storage at the site meet the requirements of Transport Practice 2.1.

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.

	☒ **in full compliance with**	
AGR is	☐ 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 does have an Emergency Response Plan that has been developed for the road transportation of cyanide. AGR's response to cyanide is detailed in the TMP and supported by CSBPs emergency management processes that are described in the Management of Emergencies Procedure, Sodium Cyanide Response to Emergency Situations and standard operating procedures for solid and liquid cyanide release.

Within the Western Australia, the Department of Fire and Emergency Services (DFES) is the primary combat agency for hazardous material incidents and AGR's and CSBPs procedures have been designed to interface with DFES. CSBP is an accredited responder for hazards materials incidents in Western Australia.

Subcontractor transport driver responsibilities in the event of an emergency are to:

- Ensure personal safety first
- Secure the area
- Communicate/report the situation
- Contain the situation if possible
- Stand-by in the area

These are detailed in the Vehicle Operators Handbook for Sodium Cyanide.

The AGR emergency response procedures are considered appropriate for the selected transportation routes and AGR does not directly operate an interim storage facilities. The TMP has been developed to address foreseeable transport emergency situations and hazards identified through the route assessment process.

The AGR emergency response procedures consider both the physical and chemical form of cyanide. The plan has been developed around the transport of sodium cyanide in solid form in IBCs within shipping containers or within STS isotainers and in liquid form within isotainers for both road and rail transport.

AGR have a new fleet of 22 kilolitre isocontainers that standardise its fleet for liquid cyanide transport. Vessel design and security measures are detailed in the TMP.

The AGR emergency response procedures do include descriptions of response actions, as appropriate for the anticipated emergency situation. The TMP details various actions:

- The alerting system
- Assembly of response organisations
- Spill site actions
- CSBP offsite emergency response
- Isolation distances
- Road transport incidents
- Rail transport incidents

The TMP outlines responsibilities of key stakeholders including:

- Vehicle operator
- DFES
- CSBP emergency response team
- AGR/CSBP Emergency management team

The TMP also clearly outlines the roles and responsibilities for outside responders.

Road Transport

Qube

AGR utilise a ICMC certified transporter Qube Bulk Pty Ltd (Qube) for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 3 February 2022.

Toll Global Express

A site inspection and interviews with driver personnel confirmed they were aware of their role in an emergency situation and had a copy of the Vehicle Operators Handbook for Sodium Cyanide.

Rail Transport

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's awareness and management of the handling and systems in place for the sodium cyanide product.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regard to Pacific National's awareness and management of the handling and systems in place for the sodium cyanide product.

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 and respond to dangerous goods incidents is assessed during the due diligence process.

AGR conducts periodic 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.

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 maintains a list of emergency response equipment that is available along road transport routes within Western Australia. The majority of the equipment for response to cyanide transport events is stored and maintained at its Kwinana production facility. There are procedures and check lists for the periodic inspection of emergency equipment.

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. 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 and DP World (Fremantle container port), Aurizon (Rail Operator and West Kalgoorlie Depot) and Pacific National rail and is satisfied that these facilities meet AGR's operational requirements.

Road Transport

Qube

AGR utilise a ICMC certified transporter Qube Bulk Pty Ltd (Qube) for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 3 February 2022.

Toll Global Express

A site inspection and interviews with driver personnel confirmed they were aware of and had been trained in their role in an emergency situation in line with the Vehicle Operators Handbook for Sodium Cyanide.

Toll transport drivers carry basic dangerous goods personnel protective equipment with them in the vehicle and their role in an emergency is to assess the scene, report the incident and warn other road users to stay clear. Toll would provide logistical support in the event of an incident but would not undertake rescue or remediation activities.

Rail Transport

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's awareness and management of the handling and systems in place for the sodium cyanide product.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regard to Pacific National's awareness and management of the handling and systems in place for the sodium cyanide product.

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 and respond to dangerous goods incidents is assessed during the due diligence process.

AGR conducts periodic 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.

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 has procedures and current contact information for notifying the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

CSBP provides AGR with a 24-hour emergency response service in the unlikely event of an emergency and this is displayed on the Emergency Information Panels (EIPs) on the isotainers and shipping containers in addition to the Australian Emergency Services numbers. This number is also provided in the Vehicle Operators handbook supplied to transporters.

AGR maintain a list of contact numbers for the strategic locations of ferrous sulphate throughout the state within the TMP.

AGR have processes in place for notifying regulatory agencies through CSBP and their involvement in the state HAZMAT plan. Contact details are maintained at the Kwinana Emergency Control and Response Centre in hard copy and electronic copy. These are also available to the Duty Incident Controller within the 24 hour emergency service.

AGR has provisions to ensure that internal and external emergency notification and reporting procedures are kept current. The TMP has been updated at least every two years with the latest revision in May 21. The TMP includes contact information and guidance for reporting significant cyanide incidents to the ICMI in accordance with signatory obligations. There have been no significant incidents during the audit period that necessitated reporting. An incident occurred during the audit involving transport of a liquid isocontainer with no loss of containment or emergency response needed. The ICMI was informed of this incident as a curtesy.

Supporting AGR's TMP, CSBP has a Management of Emergencies Procedure that contains the procedural, contact and outside responder information required.

Section 5.3 identifies external emergency responders and their roles, whereas Section 6.3 Notification of Authorities, refers to the process Notification of Incidents to External Authorities – Western Australia which describes the procedure for making contact.

CSBP maintains a list of contacts for use during emergencies. The contact names and numbers are checked and updated in the documentation system and replaced in the Emergency Control Centre (ECC) at least every twelve months by the Emergency Services Supervisor or following organisational changes.

Road Transport

Qube

AGR utilise a ICMC certified transporter Qube Bulk Pty Ltd (Qube) for the majority of road transportation within this supply chain. Qube was initially certified on 29 November 2018 and was recertified on 3 February 2022.

Toll Global Express

A site inspection and interviews with driver personnel confirmed they were aware of and had been trained in their role in an emergency situation in line with the Vehicle Operators Handbook for Sodium Cyanide.

The 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 to using Australia's 000 emergency number and AGR designated emergency number and the details are provided within the Vehicle Operators Handbook and on the EIP on the vehicle.

Rail Transport

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's awareness and management of the handling and systems in place for the sodium cyanide product.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regard to Pacific National's awareness and management of the handling and systems in place for the sodium cyanide product.

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 and respond to dangerous goods incidents is assessed during the due diligence process.

3.3.4 Transport Practice 3.4

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

AGR is

- ☒ **in full compliance with**
- ☐ 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 does have 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.

Section 13 of the TMP provides details on the clean-up requirements and the use and controls for Ferrous Sulphate and neutralisation procedures for both liquid and solid release scenarios.

AGR's procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

The TMP states:

> *While some unique situations may exist where it is acceptable to add neutralising agents to water sources, generally, hypochlorite and ferrous sulphate MUST NOT be allowed to enter any natural body of surface or ground water.*

Road Transportation

Qube

Qube drivers are not expected to undertake remediation activities.

Toll Global Express

Toll Global Express drivers are not expected to undertake remediation activities.

Rail Transport

Rail operators are not expected to undertake remediation activities.

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 does undertake periodic reviews of its emergency response procedures and plans. The TMP is reviewed at least every two years and the most recent review was undertaken in May 2021. AGR has also implemented a Transport Management Plan audit program as part of compliance with Ministerial Conditions and this audit program includes assessment of emergency response including audits of transporters.

In addition to the audit program, AGR uses desktop exercises and mock drills as part of the review process and has completed drills with subcontractors across the audit period.

Road Transportation

Periodic assessment and review of emergency response capabilities is undertaken by AGR. Subcontracted road transporters are not responsible for this activity but are required to participate in mock exercises.

Aurizon

AGR completed a due diligence on Aurizon Rail system on 8 April 2022. AGR found no issues of concern with regard to Aurizon's awareness and management of the handling and systems in place for the sodium cyanide product.

Pacific National

AGR completed a due diligence assessment on Pacific National's on 19 July 2022. AGR found no issues of concern with regard to Pacific National's awareness and management of the handling and systems in place for the sodium cyanide product.

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 and respond to dangerous goods incidents is assessed during the due diligence process.

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.

4.0 DUE DILIGENCE

4.1 Aurizon

4.1.1 Summary of Aurizon Operations

AGR's Technical Support Manager, Darren Gould conducted a due diligence review of Aurizon in April 2022. The Due Diligence Assessment report was reviewed by Mike Woods of Golder in July 2022. Mike is pre-certified by the ICMI as a Transport Technical Specialist.

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

- Transport Practice 1.1
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1.

Aurizon is the main rail service from Perth to Kalgoorlie in Western Australia; Aurizon has ability to rail both 98% Sold Cyanide and 30% Sodium Cyanide Solution from the CSBP plant to the Eastern Goldfields by utilising the Aurizon Rail System. The due diligence covered the Aurizon service and therefore AGR's consignments shipped on the Aurizon Rail System within Western Australia.

The rail route has been tailored to be as efficient and direct as possible removing the requirements for any additional handling or shunting after the train consist has been constructed. After being shunted out of the AGR siding the wagons are placed into the daily rail consist at the Kwinana Rail Yard. Once put together the train departs directly for West Kalgoorlie with no other stops. The monitoring of the freight online system allows AGR to monitor the progress of the rail shipment.

The domestic sales of sodium cyanide take into consideration the transport services available to service the intended target market. AGR only operates in domestic markets that are serviced by major transport companies with the ability to offer scheduled services from CSBP Kwinana to the Mining Operation.

Aurizon personnel are fully trained in their tasks as per Aurizon Rail Safety Document A101-400-013. Procedures are in place which cover documentation, scheduling, signals, shunting, train driving, loading, operations at the sidings and container terminals, and Emergency Response.

Rail operators do not generally complete product specific awareness training. In most cases operators complete generic Dangerous Goods Awareness training to understand basic principles and DG management; however, Aurizon has insisted that all Operators at the West Kalgoorlie Container Terminal complete the AGR Sodium Cyanide awareness. As of 08 April 2022, the training was up to date.

Rail wagons are maintained by Aurizon to the “Railways of Australia Codes of Practice and Conditions for the Cartage of Dangerous Goods”. Aurizon manages a maintenance schedule for all wagons in the AGR fleet. Lifting equipment at the West Kalgoorlie Rail Yard is serviced every 500hrs as per the manufacturers handbook. United Equipment Kalgoorlie are the current providers of all lifting equipment maintenance in West Kalgoorlie at this moment.

The transfer area at the West Kalgoorlie Container Terminal is fully bunded and placarded and also has a container with 16 tonnes of Ferrous Sulphate on site. There is a capacity to store six full isotainers in the transfer area in a dedicated bunded area within the main transfer area.

Aurizon’s online tracking program “freightonline” software package is able to produce an immediate report of all containers, their position, and their contents for the emergency services if an emergency arose. The Aurizon response to a dangerous goods incident with an isotainer/container/product is to raise the alarm, cordon off the area, and stand down operations. The alarm will mobilise local Department of Fire and Emergency Services (DFES) and AGR. CSBP (AGR’s operating and Sales Agent) has 24 hour/7 day week emergency response preparedness.

CSBP’s Emergency Response is registered with the State Authorities as a Clean Up Service Provider for all CSBP’s chemicals including sodium cyanide. CSBP has a significant relationship with the State Authorities and as part of its operating and transport conditions conducts emergency response exercises with the State Authorities for its various chemicals.

A two-yearly audit by an external auditor of the Transport Management Plan (and Aurizon’s compliance therewith) to comply with Ministerial Condition 700 is conducted every two years. The last audit was conducted in June 2021 with no shortfalls with Aurizon’s compliance identified.

The ongoing audit and review as a service provider and this due diligence report has found no issues of concern with regards to the Aurizon’s awareness and management of the handling and systems in place for the sodium cyanide product. AGR will continue to review and monitor Aurizon’s performance; this will include ongoing and regular contact to maintain awareness and preparedness and a two-yearly audit by an external auditor of the Transport Management Plan and Emergency Management Plan to comply with Ministerial Condition 700.

4.1.2 Auditor Conclusion

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

4.2 Pacific National

4.2.1 Summary of Pacific National Operations

AGR's Technical Support Manager, Darren Gould conducted a due diligence review of Aurizon in July 2022. The Due Diligence Assessment report was reviewed by Mike Woods of Golder in July 2022. Mike is pre-certified by the ICMI as a Transport Technical Specialist.

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

- Transport Practice 1.1
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1.

Pacific National as contracted by Toll Global Express as a part of Intermodal services for AGR. acific National is the main rail operator used by Toll Global Express as a part of intermodal services form Perth to Eastern Australia; Pacific National currently provide rail transport of the 98% Solid Sodium Cyanide product from the Kewdale Rail Head Perth to the rail heads in both Adelaide and Melbourne.

Pacific National oversees and operates locomotives and rail wagons which are loaded at the Kewdale Rail Head in Perth and safely transports them interstate to the following rail heads:

- Regency Park Rail Head – Adelaide
- Docklands Rail Head – Melbourne

Management of the transport protocols for rail, e.g., rail wagons are maintained by Pacific National to the "Railways of Australia Codes of Practice and Conditions for the Cartage of Dangerous Goods". The containers are transported on dedicated Pacific National wagons and secured by twist locks. The rail wagons are shunted into position and loaded at the siding Kewdale Rail head following road transport from the AGR production facility by Toll Global Express.

The Pacific National Container Terminal Manager passes on the Shipping Documents and checklists to the truck driver and transfers the containers, either from the rail wagons, dedicated road transport vehicles using suitable and maintained lifting equipment. At no time is cyanide stored at any location on the ground.

The CSBP Shipping Documents (Road Delivery Note) are in triplicate for sodium cyanide. The white copy accompanies each loaded isotainer / container for the journey from Kwinana. This document is forwarded to CSBP's CDO and becomes AGR/CSBP's proof of delivery. The yellow copy is removed by the CDO and kept as a record of deliveries leaving site. This yellow copy is matched up with the pink copy upon return as proof of delivery.

Once containers are delivered to Kewdale by Toll Global Express, they are loaded into the *freightweb system*. All through this process the containers are referenced and tracked through the system with the position monitored. Access to this system is held by Toll Global Express.

Pacific National engage dedicated specialised safety partners and provide organisation-wide safety training that targets Critical Risk Management (CRM), injury prevention and health and wellness. And we seek ways to use technology to improve safety, including our Driver Performance Program (DPP), which uses a mobile app to monitor driving behaviours, providing our drivers with real time data that has resulted in improved network safety and reduced diesel emissions.

Rail operators do not generally complete product specific awareness training. In most cases operators complete generic Dangerous Goods Awareness training to understand basic principles and DG management.

The Pacific National response to a dangerous goods incident with a container is to raise the alarm, cordon off the area and stand down operations. The alarm will mobilise local Department of Fire and Emergency Services and AGR would be notified. CSBP (AGR's operating and sales agent) has 24 hour/7 day week emergency response preparedness. CSBP's Emergency Response is registered with the State Authorities as a Clean Up Service Provider for all of CSBP's chemicals including sodium cyanide.

CSBP has a significant relationship with the State Authorities and as part of its operating and transport conditions conducts emergency response exercises with the State Authorities for its various chemicals.

The ongoing audit and review as a service provider and this due diligence report has found no issues of concern with regard to the Pacific National's awareness and management of the handling and systems in place for the sodium cyanide product.

4.2.2 Auditor Conclusion

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

4.3 Patricks Terminal

4.3.1 Summary of Patricks Terminal Operations

AGR's Technical Support Manager, Darren Gould conducted a due diligence review of Patricks in April 2022. The Due Diligence Assessment report was reviewed by Mike Woods of Golder in July 2022. Mike is pre-certified by the ICMI as a Transport Technical Specialist.

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

- Transport Practice 1.1
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1

The Fremantle Port is the main Container Port servicing Western Australia; AGR has ability to ship from Fremantle Port by utilising the Mediterranean Shipping Company (MSC), ONE, ANL CMA CGM, and Maersk Shipping lines for the shipment of product from Fremantle Western Australia to AGR's export destination Ports. No alternative Ports with similar services and proximity are available in Western Australia. The routes and transport options to the Port are reviewed every two years as part of the requirement under the Ministerial M700.

The Fremantle Port Authority (FPA) oversees the operation of the overall Port operations including the safe navigation of shipping in the Port's 383 km^2 of water. The stevedoring company manages the on shore (wharf) operations. Fremantle Port has two container terminals; Patricks and DP World.

Software programs (SPARCS) control container placement and movement; these software packages identify each individual container placement area in designated stacks. The input information for the placement of containers comes from the vessel's manifest. It is this program that allows container terminals to allocate dangerous goods storage areas, placement containers to ensure segregation requirements are met.

When the containers have been packed and sealed AGR can proceed with the completing the Pre Receival Advice (PRA), which allows AGR to enter the details of the export consignment into the customs export system for handling goods and containers over the Wharf. Details are entered into the system for each container. Detail includes container reference number, weights, seal number, booking number (Patricks), destination Port, Can Number (customs reference), and details for Hazardous cargo. The PRA system will send an acceptance once all the fields are correctly entered.

Patricks has up to a five-day window before Vessel sails to take hazardous products for loading. The road transporter appointments are made to suit this time slot. The stacking is maximum two containers high as per the dangerous goods regulations. This stacking area is the same area as allocated by the planners from the information received from the PRA system. Applicable Regulations: Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 and Australian Standard: AS3846 The Handling and Transport of Dangerous Cargoes in Port Areas. The cyanide laydown area currently used is segregated with concrete bollards and the lay down area is only used for cyanide. Emergency Information Panels indicate the cyanide laydown area and access is restricted and no smoking, eating or drinking is permitted in the area.

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts, cranes, and ITVs are all designed and sourced to meet the handling requirements. All equipment at Patricks is serviced and maintained to the requirements set out by the manufacturer. Patricks uses the MAXIMO Maintenance system to monitor and manage all their lifting equipment.

All operators are High Risk Work (HRW) trained; this ensures they are licensed to operate a crane, container loader or forklift as required under the High Risk Work requirements in Western Australia.

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.

The loading of the containers onto the vessel will take information provided from Mediterranean Shipping Company as to the stacking allocation and designated area as advised by Mediterranean Shipping Company. Patricks uses a comprehensive software package for the planning and scheduling of containers both for loading and unloading vessels. AGR's shipments of sodium cyanide are scheduled on Shipping Companies service as required from Fremantle Port, Patricks is aware of the product being handled through their Port and the use of the stacking area for the sodium cyanide containers is well known by the planners and operators.

Patricks Emergency Response Plan, Emergency Management Plan and Shift Managers Emergency Guide are reviewed annually, this is held in an electronic document management program which 'controls' the review status of all documents. This ER plan includes details for sodium cyanide. Contact details for AGR's emergency response are included in the plan. Patricks response to a dangerous goods incident with a container/product is to raise the alarm, cordon off the area and stand down operations. The alarm will mobilise the State Fire & Rescue Services (DFES) who will respond to the incident.

CSBP (AGR's operating and Sales Agent) has 24 hour/7 day week emergency response preparedness. CSBP's Emergency Response is registered with the State Authorities as a Clean Up Service Provider for all CSBP's chemicals including sodium cyanide. CSBP has a significant relationship with the State Authorities and as part of its operating and transport conditions has emergency response exercises with the State Authorities for its various chemicals.

Neutralising agent – Ferrous Sulphate – a container with 20 tonnes of Ferrous Sulphate is stored at the wharf next to the cyanide lay down area.

The ongoing audit and review as a service provider and this due diligence report has 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. The report is not an acceptance of Patricks for future work and as with all service providers to AGR, AGR will continue to review and monitor their performance; this will include ongoing and regular contact to maintain awareness and preparedness and a two-yearly audit by an external auditor of Patricks Safety Management System and Emergency Management Plan to comply with Ministerial Condition 700.

4.3.2 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 DP World

4.4.1 Summary of DP World Terminal Operations

AGR's Technical Support Manager, Darren Gould conducted a due diligence review of AP World in May 2022. The Due Diligence Assessment report was reviewed by Mike Woods of Golder in July 2022. Mike is pre-certified by the ICMI as a Transport Technical Specialist.

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

- Transport Practice 1.1
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1

The Fremantle Port is the main Container Port servicing Western Australia; AGR has the ability to export product from Fremantle Port by utilising the Mediterranean Shipping Company (MSC), ONE, ANL CMA CGM, and Maersk Shipping lines for the shipment of product to export destination Ports. No alternative Ports with similar services and proximity are available in Western Australia.

The Fremantle Port Authority (FPA) oversees the operation of the overall Port operations including the safe navigation of shipping in the Port's 383 km^2 of water. The stevedoring company manages the on shore (wharf) operations. Fremantle Port has two container terminals; Patricks and DP World.

Container Terminals are set up for the handling of containerised cargos; these standardised cargos all have weight and size specifications (restrictions). The handling equipment, forklifts, cranes, and ITVs are all designed and sourced to meet the handling requirements. All equipment at DP World is serviced and maintained to the requirements set out by the manufacturer.

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.

All operators are High Risk Work (HRW) trained; this ensures they are licensed to operate a crane, container loader or forklift as required under the High-Risk Work requirements in Western Australia.

DP World have a software package which on receival of the PRA information already has knowledge of the expected containers coming to their wharf to meet a particular vessel. The transport company makes a delivery appointment with DP World to deliver the containers to the wharf. This delivery appointment allows the trucks onto the wharf.

The containers are accepted and stacked on the wharf in the designated space allocated by the DP World Terminal Planner. The containers will then be lifted from the stack and placed on the vessel in the designated position as stipulated by the Shipping Company. All through this process the containers are referenced and tracked through the system. At any time, the positions of the containers on the wharf or vessel are known. The containers are managed through manifests and tracking systems during their journey to the destination Port. On arrival at the destination Port the ships manifest is handed over to the Port and stevedoring company at the destination Port. The containers are then captured in the stevedoring company's and customs data. This will manage the containers until they are cleared and released and collected from the Port by the transporter.

The DP World Terminal is managed under Australian Federal, State and IMDG Code regulations. It handles all types of containers and goods. The cyanide lay down area currently used is segregated with concrete bollards and the lay down area is only used for cyanide. Emergency Information Panels indicate the cyanide lay down area. The port is secure with a main security gate and access-controlled gates for staff, CCTV and security patrols.

DP World response to a dangerous goods incident with an isotainer / container / product is to raise the alarm, cordon off the area and stand down operations. The alarm will mobilise the DFES and AGR for action as required.

The alarm will mobilise the State Fire & Rescue Services (DFES) who will respond to the incident.

CSBP (AGR's operating and Sales Agent) has 24 hour/7 day week emergency response preparedness. CSBP's Emergency Response is registered with the State Authorities as a Clean Up Service Provider for all CSBP's chemicals including sodium cyanide. CSBP has a significant relationship with the State Authorities and as part of its operating and transport conditions has emergency response exercises with the State Authorities for its various chemicals.

A container with 20 tonnes of neutralising agent is located nearby (at the Patricks Terminal) and is available as/if required.

4.4.2 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 REFERENCES

Australian Gold Reagents (AGR), Due Diligence Assessment, Aurizon Rail, 8 April 2022

Australian Gold Reagents (AGR), Due Diligence Assessment, DP World, Fremantle Container Port, Western Australia, 17 May 2022

Australian Gold Reagents (AGR), Due Diligence Assessment, Pacific National Rail, 19 July 2022

Australian Gold Reagents (AGR), Due Diligence Assessment, Patricks, Fremantle Container Port, Western Australia, 11 April 2022

6.0 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
ICMI Lead Auditor/Technical Specialist

MCW/hn

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APPENDIX A

Important Information

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

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This Report has been prepared in the context of the circumstances and purposes referred to in, or derived from, the Contract and Golder accepts no responsibility for use of the Report, in whole or in part, in any other context or circumstance or for any other purpose.

The scope of Golder's Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

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.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification

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