SUMMARY AUDIT REPORT

International Cyanide Management Code

Australian Gold Reagents, European Supply Chain, Certification Audit, Summary Audit Report

Submitted to:

International Cyanide Management Institute
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WASHINGTON DC 20005 USA

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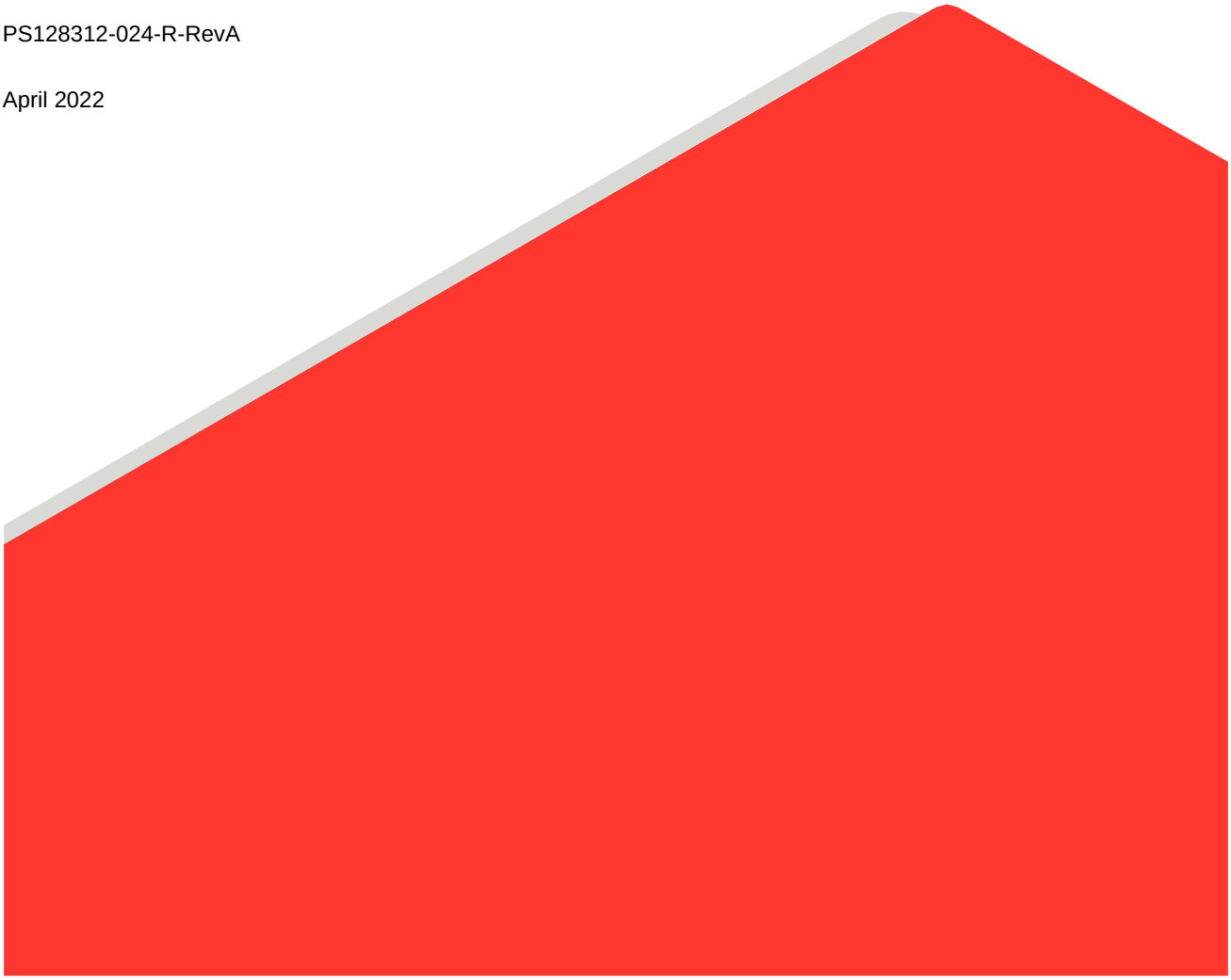

Distribution List

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1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	European 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
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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. The Kwinana production facility is not part of the scope of this audit.

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 production facility was re-certified as being in full compliance with the Code on 23 September 2020. The carrier's 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 European Supply Chain

The European supply chain covers the land-based transportation of AGR's solid cyanide from the ports of Izmir, Turkey and the port of Mersin, Turkey to end point users. Within the European supply chain, To-Pet transport cyanide by road. The elements of the European 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 Izmir

The port of Izmir is situated on the eastern end of Izmir Bay, within the Konak district of Izmir Province in Turkey and is approximately 200 km from end user mine sites. The port is divided into an outer, middle and inner harbour and an explosives anchorage.

The container terminal has seven berths, with a depth of approximately 13 m and length of 1050 m. The terminal covers an area of approximately 15.2 ha with a holding capacity of 7074 TEU. Storage facilities consist of 21.59 ha open and 2.698 ha covered areas including a hazardous cargo warehouse.

2.5.1.2 Port of Mersin

The port of Mersin is a major seaport located in the north-eastern coast of the Mediterranean Sea in Mersin, southern Turkey. It is one of the largest harbours in the country.

The port contains 26 berths along a length of 3673 m, servicing a mix of containers, general cargo, dry bulk, roll-on/roll-off cargoes, live animals, containers, petroleum products, passengers, local trade, and the free zone. Storage includes two 0.9 ha warehouses for transit goods, one 0.24 ha passenger warehouse and an open storage space of approximately 300 ha.

2.5.2 Road Transportation

AGR contracts the road transportation of cyanide within the Supply Chain to To-Pet. Its operations were certified as being in full compliance with the Code on 13 November 2019.

[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.

To-Pet was founded in 1999, with its main operations base closely situated to the Port of Izmir. To-Pet provides a number of services including wholefuel sales, domestic maritime fuel, vehicle recognition systems, and logistical services. To-Pet is contracted as cyanide transporters by cyanide manufacturers and mine sites to transport solid cyanide by road from the relevant ports to gold mines in Turkey.

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 undertaken during road transport to the end user.

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: Jaclyn Ennis-John, Exemplar Global (110895)

Email: jaclyn.ennis-john@wsp.com

2.8 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Jaclyn Ennis-John	Lead Auditor and Transport Technical Specialist		12 April 2022

2.9 Dates of Audit

The ICMC Audit was conducted over three days between 30 March and 1 April 2021.

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, 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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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 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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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 22 September 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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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.

Road Transportation

AGR utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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

AGR does not operate trans-shipping or interim storage facilities within its Supply Chain.

Road Transport

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

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 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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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 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 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.

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 potentially 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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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 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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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 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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

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 for provisions for periodically reviewing and evaluating the adequacy of emergency response documentation.

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 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 have appropriate emergency response capabilities to deal with potentially 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 utilise a ICMC certified transporter for road transportation elements of its supply chain. To-Pet, AGR's Turkey based transporter was certified on 13 November 2019.

4.0 DUE DILIGENCE

4.1 Port of Izmir, Turkey

The port of Izmir, Turkey is utilised as part of AGR's European Supply Chain. The due diligence of the port dated 19 October 2021 was prepared by AGR's Darren Gould, Product Support and Logistics AGR.

The due diligence reports were reviewed by Jaclyn Ennis-John of Golder during April 2022, 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
- Transport Practice 3.1.

4.1.1 Summary of Port Operations

The Port of Izmir is one of the main Container Ports servicing Turkey; AGR has ability to ship to Turkey utilising the Mediterranean Shipping Company (MSC) for the shipment of product from Fremantle in Western Australia. The General Directorate of Turkish State Railways (TCDD) is the port authority for the port of Izmir. Izmir is the third largest city in Turkey and the port facility is connected with Turkey's rail and highway networks providing a key node for import and export for the country. It is the preferred Port for dangerous goods container consignments for AGR's Customer Kisladag.

Access to the harbour from the Aegean Sea is through Izmir Inlet where depths range from 25 to 40 fathoms. Significant differences may exist between actual depth soundings and the charted depths between the seaward approach and the middle harbour anchorage in Izmir Bay. Depths vary by 6 to 8 ft at Pelikan Bank; 6 to 12 ft in the vicinity of Yenikale; and 12 to 18 ft inside the middle harbour anchorage area.

The terminal covers an area of 152,000 m^2, and the holding capacity is 7074 TEU. Container operations at the quays are carried out by five gantry cranes of 40 tons capacity. The operations at the container yard are carried out by 19 rubber-tyred transtainers and 21 reach stackers of 40 tons capacity, together with 28 containers forklifts of up to 42 tons capacity. Reefer facilities for refrigerated containers are also available. The berths and the yard behind are well equipped with modern handling facilities.

The Port of Izmir has a continuous monitoring system, the overall running of which is achieved via the Terminal Operating System (TOS). There are CCTV cameras at numerous points within the port, and entry/exiting is controlled through biometric identification cards.

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 Fremantle Port 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 Izmir was chosen as it is one of the country's main container ports, with access to international standard equipment and standards. It is also one of the shortest routes available to the end user mine sites, avoiding main city centres and traffic.

4.1.3 Transport Practice 1.5

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.

All cyanide packaging and associated documentation meets the requirements of the IMO DG Code.

Turkey is an IMO Member State (1958) and a Safety of Life at Sea (SOLAS) Signatory Nation (1980), thereby requiring the port of Izmir to adhere to the international regulations for the transportation and handling of dangerous goods as set out in the IMDG Code (Parts 4, 5 and 7) (IMO 2018) and the SOLAS Convention 1974 (Chapter 7) (United Nations 1981).

4.1.4 Transport Practice 1.6

MSC utilise their own in-house tracking system to monitor the progress of all containers from the loading port through the various transhipment ports until the final destination port. The vessel's Captain carries a Dangerous Goods manifest (including stowage plan) and Packing Certificates for each of the hazardous cargo transport units which is updated at each port visited.

4.1.5 Transport Practice 2.1

Storage facilities at Izmir consist of 215,940 m^2 open storage and 26,978 m^2 covered areas including a designated hazardous cargo warehouse. Cargo handling and storage services are provided at the port using modern equipment and staff 7 days a week, 24 hours a day. The ISPS "International Ship and port Facilities Safety Code" is implemented, and security and access control are provided at the port including CCTV, controlled access points and perimeter security.

4.1.6 Transport Practice 3.1

Turkey has been a member State of the IMO Council since 1958, it complies with the requirements of the IMDG Code (IMO 2019).

Pollution response in Turkey is governed under Act 5312 Law Concerning the Principles of Emergency Response and Compensation for Damages for Pollution of the Marine Environment by Oil and Other Harmful Substances. The Undersecretariat for Maritime Affairs has ultimate responsibility for dealing with oil pollution at sea and the Ministry of Environment and Urbanisation undertakes or causes to be undertaken the necessary response measures. In the event of an incident, a Damage Commission of these authorities is usually convened and chaired by the Provincial Head of the Ministry of Environment and Urbanisation.

At local level, a governor or mayor may direct the Damage Commission. Local responsibility is designated to managers of individual ports or, in the case of spills at sea, to the Turkish Navy. Oil on shore would normally be dealt with by the municipalities or installation concerned.

Turkey has regional and national emergency response plans based on a tiered response structure.

4.1.7 Transport Practice 3.2

AGR state that the Port of Izmir maintains an Emergency Response process for managing potential spills.

To-Pet personnel are trained to respond in the event of an emergency, and have an agreement with a specialised Emergency Response company for major incidents which are outside the scope of To-Pet's emergency response ability.

4.1.8 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 Mersin, Turkey

The Port of Mersin is a major seaport located on the north-eastern coast of Mediterranean Sea in Mersin, southern Turkey. As one of the largest harbours in the country, it is Turkey's main gateway to the Mediterranean Sea. It is the country's second largest port after Ambarli, near Istanbul. The Port of Mersin is protected by two breakwaters of 2800 and 1525 meters. Inside the breakwaters, the depth ranges from 14 m to 14.5 m.

The port contains 26 berths along a length of 3673 m, servicing a mix of containers, general cargo, dry bulk, roll-on/roll-off cargoes, live animals, containers, petroleum products, passengers, local trade, and the free zone. Storage includes two 0.9 ha warehouses for transit goods, one 0.24 ha passenger warehouse and an open storage space of approximately 300 ha.

The Port of Izmir has a continuous monitoring system, the overall running of which is achieved via the Terminal Operating System (TOS). There are CCTV cameras at numerous points within the port, and entry/exiting is controlled through biometric identification cards.

4.2.1 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 Fremantle Port 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 Mersin has been selected on the basis it provides and has all of the standards and equipment expected of an international port and provides an alternative option for import of product into Turkey. It is also one of the shortest routes available to the end user mine sites, avoiding main city centres and traffic.

4.2.2 Transport Practice 1.5

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.

All cyanide packaging and associated documentation meets the requirements of the IMO DG Code.

Turkey is an IMO Member State (1958) and a Safety of Life at Sea (SOLAS) Signatory Nation (1980), thereby requiring the port of Izmir to adhere to the international regulations for the transportation and handling of dangerous goods as set out in the IMDG Code (Parts 4, 5 and 7) (IMO 2019) and the SOLAS Convention 1974 (Chapter 7) (United Nations 1981).

4.2.3 Transport Practice 1.6

MSC utilise their own in-house tracking system to monitor the progress of all containers from the loading port through the various transhipment ports until the final destination port. The vessel's Captain carries a Dangerous Goods manifest (including stowage plan) and Packing Certificates for each of the hazardous cargo transport units which is updated at each port visited.

4.2.4 Transport Practice 2.1

Access to the port was not possible so in field verifications could not take place. However, AGR do not intend to undertake interim storage at the Port of Izmir.

4.2.5 Transport Practice 3.1

AGR state that the Port of Izmir maintains an Emergency Response process for managing potential spills.

To-Pet personnel are trained to respond in the event of an emergency, and have an agreement with a specialised Emergency Response company for major incidents which are outside the scope of To-Pet's emergency response ability.

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.

5.0 REFERENCES

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Izmir, Turkey, 19 October 2021

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Mersin, Turkey, 1 July 2021

International Maritime Organization [IMO] (2019). International Maritime Dangerous Goods Code- Volume 1, 2018 Edition. International Maritime Organization, 4 Albert Embankment, London UK

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

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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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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.

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