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SUMMARY AUDIT REPORT

AUSTRALIAN GOLD REAGENTS PTY LTD
OCEAN FREIGHT SUPPLY CHAIN

**ICMI CYANIDE TRANSPORTATION
VERIFICATION PROTOCOL
RECERTIFICATION AUDIT
JUNE 2020**

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APPROVAL & CHANGE HISTORY

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			MSA	MSA	AGR
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1. INTRODUCTION

1.1. Operator Details

Name of Cyanide Transportation Facility:	Ocean Freight Supply Chain
Name of Facility Owner:	Australian Gold Reagents Pty. Ltd.
Name of Facility Operator:	CSBP Limited
Name of Responsible Manager:	Darren Gould, Product Support and Logistics Specialist - Australian Gold Reagents Pty Ltd
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Audit Protocol Employed:	International Cyanide Management Institute, Cyanide Transportation Verification Protocol, December 2016 www.cyanidecode.org

1.2. Description of Operation

1.2.1. Australian Gold Reagents Pty Ltd

Australian Gold Reagents Pty. Ltd. (AGR) is the management company of the unincorporated joint venture between CSBP Limited (CSBP) and Coogee Chemicals Pty Ltd. CSBP is part of the Wesfarmers Chemicals, Energy and Fertilisers Division of Wesfarmers Limited. CSBP is the major participant in the venture and acts as both operator and sales agent of the entire business. Coogee Chemicals Pty Ltd is a local manufacturer and distributor of industrial chemicals. As the operating agent, CSBP employees act on behalf of AGR.

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

AGR's Kwinana production facility was recertified in full compliance with the Production Verification Protocol in August 2017.

AGR's **Western Australian Supply Chain** is from the CSBP Kwinana production facility using road and rail to transport to user mine sites in Western Australia as well as road transport to Fremantle Port for export to overseas customers.

This supply chain includes the stevedoring operation at Fremantle Port. AGR's West Australian supply chain was recertified as being in full compliance with the Cyanide Transportation Verification Protocol in November 2019.

The West Australian Supply Chain is outside of the scope of this audit.

AGR's **Marine Transportation** constitutes the Ocean Freight Supply Chain and it is a consolidation of all marine carriers used or proposed to be used by AGR to distribute their solid sodium cyanide from Fremantle Port in Western Australia to their global customers. The supply chain forms the marine link between the certified West Australian Supply Chain and the certified supply chain or certified transporter relevant to the customer site.

AGR's Ocean Freight Supply Chain comprises the following **Marine Carriers**:

- a) Regularly used:
 - MSC (Mediterranean Shipping Company)
 - Maersk
 - ONE (Ocean Network Express) (Formerly K-Line)
 - Hamburg Sud (a subsidiary of Maersk Shipping)
- b) New carriers used since the last recertification audit (ICMI were advised of their use in September 2019):
 - Inchcape Shipping Services
 - Swire Shipping
- c) Carriers not used since the last recertification audit but are proposed to be used:
 - Hapag-Lloyd

Main routes used by the carriers are briefly summarised below:

Inchcape Shipping Services: to South America and then AGR is bound to use cabotage from San Antonio to Punta Arenas.

Swire Shipping: Papua New Guinea – Lihir.

Hamburg Sud, Hapag Lloyd, MSC, Maersk and ONE: to South Africa, Tanzania, Namibia, Saudi Arabia, Ghana, Vietnam, Indonesia, Dominican Republic, Argentina, Peru and Chile.

The selection of a particular carrier depends on pricing, routes, logistics and performance. As with all services providers, AGR continues to review and monitor their performance.

1.2.2. Inchcape Shipping Services

Inchcape Shipping Services traces its origins back to 1847, when two Scottish merchants, from Campbelltown, William Makinnon and Robert Makenzie met in Calcutta and formed a general merchant partnership, Makinnon Makenzie and Company (MMC).

Today, the company is one of the largest maritime service providers with 300 offices in 68 countries and a team of over 3,000 professional staff.

Inchcape operates an integrated management system certified to the Quality and Environmental Standards, ISO9001 and ISO14001.

1.2.3. Swire Shipping

Swire Shipping is a carrier service providing international shipping of containers on a fleet of their own container vessels and in some cases contracted container vessels.

The Swire Shipping head office is situated in Singapore. They have representative offices in Sydney, Hong Kong, Mumbai, London and Auckland. These regional offices are supplemented by an agency network providing AGR links to the various services and local knowledge. Swire Shipping is the brand name for all the shipping services provided by the China Navigation Company Pty. Ltd. (CNCo). They have provided niche, regional, multipurpose shipping services since 1883 when CNCo established liner services to Australia.

The traditional core trading area is the Asia – South Pacific Region, where they offer shipping links between over 130 ports in Asia and the Pacific Islands, New Zealand, North America, Europe, Middle East and the Indian sub-continent.

Their fleet of multimodal vessels operate regular sailing schedule capable of carrying a wide range of general cargoes, bulk parcels as well as containerised cargo. Swire Shipping is affiliated to and compliant to the International Maritime Organization (IMO) and cargo superintendents are employed to ensure that cargo is handled in accordance with the Australian Maritime Safety Authority (AMSA), UN and Safety of Lives at Sea (SOLAS) requirements.

Swire Shipping vessels are IMDG compliant and their crew are trained in IMDG Code requirements.

Swire Shipping operates its own vessels for the Papua New Guinea (PNG) service with cargo receivals in Sydney, Newcastle, Melbourne and Brisbane.

1.2.4. Hamburg – Sud

Hamburg – Sud is a commercially independent company within the Maersk family. All vessels and containers are deployed via a joint equipment pool. The fleet consists of more than 600 container vessels with the capacity to handle more than 2, 225,000 20-foot containers.

Hamburg Sud operates a container booking and tracking system called *Global Customer Service System* (GCSS) and the system is also the management tool for handling the dangerous goods cargo and the proper control of the stowage of hazardous cargoes.

Hamburg Sud Shipping is accredited or affiliated with:

- Safety of life at Sea (SOLAS)
- International Air and Shipping Association (IASA)
- International Chamber of Shipping (ICS)
- The Federation of National Associations of Ships Brokers and Agents (FONASBA)

AGR utilises Hamburg Sud to move solid sodium cyanide from Fremantle Port in Western Australia to customers worldwide.

1.2.5. Hapag-Lloyd

Hapag-Lloyd is a global organisation with four regional headquarters in Hamburg, Piscataway, Valparaíso, and Singapore. Group headquarters is in Hamburg. On 1st September 1970, Hapag-Lloyd AG was formed from the amalgamation of two shipping companies Hamburg-Amerikanische Packetfahrt-Actien- Gesellschaft and North German Lloyd (NDL). Both companies had already been active for over a century.

Approximately 230 modern ships can carry 7.6 million twenty-foot equivalent containers a year with staff in 600 locations and 112 centres. Hapag-Lloyd is a leading global shipping company.

After the merger with CSAV's container business in December 2014 Hapag-Lloyd offers a fleet with a total capacity of around one million TEU (Twenty Foot Equivalent Units) as well as a container stock of more than 1.6 million TEU.

The combination of more than 100 liner services operated by Hapag-Lloyd and almost 40 services by CAVS (Compania Sudamerica de Vapores) guarantees fast and reliable connections between all continents.

All Hapag-Lloyd are Lloyds registered and Hapag-Lloyd operates an integrated Quality and Environmental Management System certified to ISO9001 and ISO14001.

1.2.6. MSC

Mediterranean Shipping Company, (MSC) was founded in 1970 and is headquartered in Geneva, Switzerland, and since 1978 is a privately owned organization driven by the Aponte family.

MSC operates a fleet of 520 vessels with more than 70,000 staff. MSC calls into 500 ports and 200 trade routes carrying over 21 million TEU annually. Through a network of 493 offices, MSC ensures shippers can talk directly to AGR representatives as well as using a variety of e-business solutions for digitalised cargo bookings.

MSC has provided container shipping services to AGR since AGR commenced export of solid sodium cyanide in 2002.

MSC Shipping is accredited or affiliated with:

- Safety of life at Sea (SOLAS)
- International Air and Shipping Association (IASA)
- International Chamber of Shipping (ICS)
- The Federation of National Associations of Ships Brokers and Agents (FONASBA)

AGR utilises MSC shipping to move solid sodium cyanide from Fremantle Port in Western Australia to customers worldwide. AGR exports are shipped from Fremantle Port to a SE Asian Hub, then transhipped on to a main line carrier to a Mediterranean or European Hub and again transhipped on to a feeder vessel servicing African ports.

1.2.7. Maersk

Maersk Shipping office is situated in Copenhagen, Denmark. Maersk Line operates a fleet of container vessels with worldwide shipping coverage, consisting of more than 600 container vessels with a capacity to handle over 2,225,000 20-foot containers.

Maersk Shipping operates a container booking and tracking system called *Global Customer Service System* (GCSS) and the system is also the management tool for handling the dangerous goods cargo and the proper control of the stowage of hazardous cargoes.

Maersk Shipping is accredited or affiliated with:

- Safety of life at Sea (SOLAS)
- International Air and Shipping Association (IASA)
- International Chamber of Shipping (ICS)
- The Federation of National Associations of Ships Brokers and Agents (FONASBA)

AGR utilises Maersk Shipping to move solid sodium cyanide from Fremantle Port in Western Australia to customers worldwide.

The carrier's larger vessels cover the main route from Europe via the Mediterranean, Subcontinent, SE Asia, China and on to the West Coast of America. Feeder vessel servicing other destinations will link services through these hubs.

AGR exports are shipped from Fremantle Port in Western Australia to the SE Asian Hub then transhipped on a main line carrier to a Mediterranean or European Hub and again transhipped on to a feeder vessel servicing the African ports.

1.2.8. ONE

Ocean Network Express Ltd. (ONE) is a 100% owned subsidiary of Japan's Kawasaki Kisen Kaishu and was established in 1970 to represent ONE's interests and business in Australia.

As at the end of March 2019, its fleet size stood at 1,522,000 TEU making it the 6th largest carrier in the world. Operations are performed through a fleet of 224 vessels with a service network covering 130 service loops around the world. The fleet includes 30 super large ships (20,000TEU and 14,000 TEU).

ONE has recently commenced providing AGR with container shipping services.

All ONE vessels are Lloyds registered and it is certified or has membership of the following organizations:

- CLEAN CARGO – reducing environmental impact of global goods transportation
- ISO 14001 Environmental Management System
- World Shipping Council
- Global Maritime Forum – decarbonisation of shipping.

1.2.9. Transit Storage

Depending on weather, cargo types, journey length and other operational matters, carriers may trans-ship their cargo from one vessel to another. This involves unloading the cargo at a terminal facility, temporary set down and loading onto another vessel for the continuation of the delivery. Such trans-shipping does occur within AGR's Supply Chain. AGR has no control over when and where this happens, but through its due diligence assessments has satisfied itself that the carriers used undertake the shipping of the product in accordance with the IMO DG Code and in a professional and safe manner.

1.2.10. Exposure and Environmental Incidents

Since the last recertification audit there have been no reported incidents of cyanide exposure or transport accidents involving AGR's Ocean Freight Supply Chain.

AGR have not consigned via Ocean Freight Supply Chain any non-certified solid sodium cyanide with any of the cited carriers.

2. AUDIT TEAM FINDINGS AND ATTESTATION

AGR Ocean Freight Supply Chain is

- ☒ in full compliance with the International Cyanide Management Code
☐ in substantial compliance
☐ not in compliance

This Operation has not experienced compliance problems during the previous three-year audit cycle.

It is also confirmed that this Operation has not experienced any significant cyanide incidents during the preceding audit cycle.

Audit Company:	Michael Sputore & Associates Pty. Ltd
Date(s) of the Audit	22 to 25 June 2020 inclusive
Audit Team Leader:	Michael Sputore
E-mail:	msa@iinet.net.au
Names and Signatures of Other Auditors:	Santino Zanotti



6 July 2020

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 International Cyanide Management Code Verification Protocol for Cyanide Transportation and using standard and accepted practices for health, safety and environmental audits.

Signature of Lead Auditor: Michael Sputore



6 July 2020

3. AUDIT FINDINGS

AGRs Ocean Freight Supply Chain is:

☒ in full compliance with the International Cyanide Management Code
in substantial compliance with
not in compliance with

This finding is relevant to AGR's activities in ensuring compliance of its Ocean Freight Supply Chain with the Code transport standards of practices, and its activities in the transport of solid sodium cyanide by sea to customers worldwide.

1. TRANSPORT: *Transport cyanide in a manner that minimizes the potential for accidents and releases.*

Transport Practice 1.1: *Select cyanide transport routes to minimize the potential for accidents and releases.*

AGRs Ocean Freight Supply Chain is:

☒ in full compliance with Transport Practice 1.1
in substantial compliance with
not in compliance with

Basis for this Finding:

AGR utilizes Inchcape Shipping Services, Swire Shipping, Hamburg Sud, Mediterranean Shipping Company (MSC), Maersk and Ocean Network Express (ONE) for interstate and international shipping of solid cyanide. Hapag-Lloyd is not currently used as a carrier but is proposed to be used. Containers are placed and secured on their vessels at the loading Port (Fremantle Port) by the Port stevedoring company or service provider, and removed at the Port of destination by the stevedoring company or service provider at that Port. As such the cited carriers provide a marine carrier service and all actual handling of containers (on and off vessels) is predominately undertaken by stevedoring companies at each Port. There are some exceptions where the port does not have equipment to lift containers on and off the vessel; Maersk, Inchcape and Hamburg Sud service Punta Arenas and Maersk service Puerto Deseado with "geared" vessels that have their own lifting gear.

Almost all of AGR's cyanide product is trans-shipped at terminals or hubs en-route to its final destination port. AGR has no control over when and where this happens, but through its due diligence process has satisfied itself that the carriers used undertake the shipping of the product in accordance with the IMO DG Code and in a professional manner. This extends to the selection of terminals for trans- shipping.

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 country. AGR does not consign any solid sodium cyanide on a vessel that is not a container vessel.

AGR does not have control of the routes taken by the carriers, but has undertaken due diligence assessments of the cited carriers to verify that the shipments are in accordance with the IMO DG Code. AGR's due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers. In addition, through their dealings with the carriers, AGR has found the cited carriers to be professional organizations.

The routes taken are not 'definitive' routes as ships can take various routes to arrive at the same destination, taking into account tides, currents, wind and storms. This is also noted in the schedules with estimated travel times between Ports.

AGR conducts triennial due diligence assessments of carriers to identify potential risks. The measures taken to address risks identified for carriers are addressed within the due diligence process. The due diligence assessments did not identify any requirement for additional safety or security measures.

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.*

AGRs Ocean Freight Supply Chain is:

☒ **in full compliance with Transport Practice 1.2**
in substantial compliance with
not in compliance with

Basis for this Finding:

AGR utilizes the cited carriers for marine transport of cyanide to various destination Ports. Containers are placed and secured on their vessels at the loading Port by the Port stevedoring company or service provider and removed at the Port of destination by the stevedoring company or service provider at that Port. There are some exceptions where the port does not have equipment to lift containers on and off the vessel; Maersk, Inchcape and Hamburg Sud service Punta Arenas and Maersk service Puerto Deseado with "geared" vessels that have their own lifting gear.

These Ports are not included in the scope of this audit and are assessed under due diligence as part of a separate supply chain.

All cited carriers' vessels are registered by the Lloyd's Register Group, which provides classification and certification of ships, and inspects and approves important components and accessories.

The cited carriers undertake to provide their employees with all the necessary training to support them in their jobs. Generally the carriers coordinate training and offer guidance in the handling and management of hazardous materials, dangerous goods and chemicals to which operating personnel may be exposed. For example, Swire Shipping has a dedicated marine training center at Loyang, Singapore providing ongoing professional development for its seafarers.

Due diligence assessments of the cited carriers were undertaken by AGR to verify that the shipments are conducted in accordance with the IMO DG Code. AGR's due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

Transport Practice 1.3: *Ensure that transport equipment is suitable for the cyanide shipment.*

AGRs Ocean Freight Supply Chain is:

☒ **in full compliance with Transport Practice 1.3**
in substantial compliance with
not in compliance with

Basis for this Finding:

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

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

In addition, all vessels that bring trade to and from Australia are required under the Australian Customs Act to be Lloyds registered. Lloyd's Register Group provides classification and certification of ships and inspects and approves important components and accessories.

They are also subject to Port State Control (PSC) where the vessels can be randomly inspected to ensure that vessels are seaworthy, do not pose a pollution risk, provide a healthy and safe working environment and comply with relevant international regulations.

The completed due diligence assessments found that there were no issues of concern with regards to the management and shipping of cyanide product by any of the carriers.

Transport Practice 1.4: *Develop and implement a safety program for transport of cyanide.*

AGRs Ocean Freight Supply Chain is:

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

Basis for this Finding:

Product packaging is undertaken at the ICMI certified Kwinana production facility and cyanide is packaged and transported in accordance with international regulatory standards, thereby meeting the requirements of the political jurisdictions through which the loads will pass.

All the cited carriers require from AGR, evidence that products booked for transport meet the packaging requirements of the IMO DG Code. Some carriers reserve the right to refuse acceptance of cargo that does not meet packaging, container and documentation standards as set out in the Code.

Due diligence assessments of the cited carriers were undertaken to verify that the shipments are conducted in accordance with the IMO DG Code. AGR's due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

Solid sodium cyanide remains sealed and packaged within locked shipping containers until it reaches the end use destination.

Transport Practice 1.5: *Follow international standards for transportation of cyanide by sea and air.*

AGRs Ocean Freight Supply Chain is:

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

Basis for this Finding:

All shipments of AGR cyanide comply with the IMO DG Code. This includes packaging, labelling of IBCs, placarding of containers, damage inspections, supply of correct documentation and appropriate stowage and separation.

No consignments of cyanide are transported by air within the scope of this audit.

Transport Practice 1.6: *Track cyanide shipments to prevent losses during transport.*

AGRs Ocean Freight Supply Chain is:

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

Basis for this Finding:

The due diligence reviews for the cited carriers state that all vessels have continuous means of tracking and communication during their voyages.

Additionally, each service provider has systems in place to track individual containers from point of origin through to the destination Port.

Communication equipment is tested through continuous use. Ships subject to SOLAS requirements are required to test key communication equipment annually.

All cited carriers' vessels are registered by the Lloyd's Register Group, which provides classification and certification of ships, and inspects and approves important components and accessories.

Blackout areas have not been identified. However, all vessels have continuous means of tracking and

Blackout areas have not been identified. However, all vessels have continuous means of tracking and communication during their voyages.

The cited carriers have software that tracks containers from the time they are released by AGR, right through the shipping process and until they are received back at their container yards.

Chain of custody documentation is used by the carriers to prevent the loss of AGR cyanide during shipment. This documentation includes the MO41 Document, which accompanies each container, and the ships manifest, which identifies the location and content of each container on the vessel. In addition, all carriers have computer tracking software to allow them to identify at which phase of shipment each container is in.

AGR requires that their contractors carry records indicating the amount of cyanide in transit and that Safety Data Sheets (SDSs) are available during transport.

The amount of cyanide in transit, the packing certificates and the SDS are contained within the marine documentation, this includes the shipper's declaration, container packing certificate and quarantine certificate, which accompany the cargo throughout the journey.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

AGRs Ocean Freight Supply Chain is:

☒ in full compliance with Transport Practice 2.1
in substantial compliance with
not in compliance with

Basis for this Finding:

Almost all of AGR's cyanide product is trans-shipped after leaving Australia, however AGR has no control over where trans-shipping of cyanide product is required. Depending on weather, cargo types and other operational matters, carriers may trans-ship their cargo from one vessel to another. This involves unloading the cargo at a terminal facility, temporary set down and loading onto another vessel for the continuation of the delivery.

The carriers must ensure that the IMO DG Code requirements for stowage and segregation are complied with during any temporary set down and loading on to another vessel.

AGR has no control over when and where this happens, but through the completion of due diligence assessments has satisfied itself that the carriers used undertake the trans-shipping of product in accordance with the IMO DG Code and regulations for the handling of dangerous goods pertinent to that Port.

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

Transport Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

AGRs Ocean Freight Supply Chain is:

☒ in full compliance with Transport Practice 3.1
in substantial compliance with
not in compliance with

Basis for this Finding:

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conduct due diligence assessments of carriers to verify that the shipments occur in accordance with the IMO DG Code. AGR's due diligence assessments found that

there were no issues of concern in regard to the management and shipping of cyanide product by any of the Supply Chain carriers.

AGR require carriers to have appropriate emergency response plans and capabilities for handling any cyanide incident that falls within their contractual responsibility.

Each operator implements their own system of safety and emergency response management that extends to emergency situations involving cyanide and other dangerous goods. Emergency responders, as well as dangerous goods technical experts, are available to respond and assist in emergency situations.

Transport Practice 3.2: *Designate appropriate response personnel and commit necessary resources for emergency response.*

AGRs Ocean Freight Supply Chain is:

☒ **in full compliance with Transport Practice 3.2**

in substantial compliance with

not in compliance with

Basis for this Finding:

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conducts due diligence assessments to verify that the shipments occur in accordance with the IMO DG Code. Due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

AGR require carriers to have appropriate emergency response plans and capabilities for handling any cyanide incident that falls within their contractual responsibility. The level of capability is assessed through the due diligence process.

The due diligences assessments found that the cited carriers each carry out the shipping of dangerous goods in accordance with the requirements of the IMO DG Code.

Each operator implements their own system of safety and emergency response management that extends to emergency situations involving cyanide and other dangerous goods at sea.

Transport Practice 3.3: *Develop procedures for internal and external emergency notification and reporting.*

AGRs Ocean Freight Supply Chain is:

☒ **in full compliance with Transport Practice 3.3**

in substantial compliance with

not in compliance with

Basis for this Finding:

The cited carrier's vessels carrying AGR cyanide have ship manifests held by the captain, which contain emergency response information and contact details.

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conducts due diligence assessments to verify that the shipments occur in accordance with the IMO DG Code. Due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

AGR require carriers to have appropriate emergency response plans, including current contact information, and capabilities for handling any cyanide incident that falls within their contractual responsibility.

Transport Practice 3.4: *Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.*

AGRs Ocean Freight Supply Chain is:

☒ **in full compliance with Transport Practice 3.4**
in substantial compliance with
not in compliance with

Basis for this Finding:

The cited carrier's vessels carrying AGR cyanide have ship manifests held by the captain, which contain emergency response information and contact details.

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conducts due diligence assessments to verify that the shipments occur in accordance with the IMO DG Code. Due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

AGR require carriers to have appropriate emergency response plans, including current contact information, and capabilities for handling any cyanide incident that falls within their contractual responsibility.

Transport Practice 3.5: *Periodically evaluate response procedures and capabilities and revise them as needed.*

AGRs Ocean Freight Supply Chain is:

☒ **in full compliance with Transport Practice 3.5**
in substantial compliance with
not in compliance with

Basis for this Finding:

The cited carrier's vessels carrying AGR cyanide have ship manifests held by the captain, which contain emergency response information and contact details.

Whilst AGR's product is embarked on the cited carrier's vessels, all emergency response is governed by the vessel's captain. AGR conducts due diligence assessments to verify that the shipments occur in accordance with the IMO DG Code. Due diligence assessments have found that there were no issues of concern in regard to the management and shipping of cyanide product by any of the carriers.

AGR require carriers to have appropriate emergency response plans, including current contact information, and capabilities for handling any cyanide incident that falls within their contractual responsibility.