

**ICMI CYANIDE CODE
SUMMARY AUDIT REPORT
CERTIFICATION AUDIT**

**CYANIDE TRANSPORTATION
SUPPLY CHAIN #5 - TURKEY SUPPLY CHAIN**

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**Submitted to:
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Location detail and Description of operation:

The German company CyPlus GmbH is part of the Evonik Industries Group. CyPlus produces cyanide as a manufacturer in the German Wesseling plant. From Wesseling, Germany the cyanide is distributed in different packaging variations using different supply chains. The customers / the mines can be found on different sites across the world. Accordingly different supply chains are utilized. In this report, the supply chain no. 5 is covered, starting from Izmir port, Turkey, the port of entry.

Supply from the production site to the customers / mines

CyPlus's production site in Wesseling, Germany is ICMC-certified and registered since July 24, 2006 with no suspension since then. From Wesseling site the cyanide is shipped to mines all over the world. The CyPlus company acts as a consignor for cyanide transportations. This report is focussing on the Supply Chain #5: Izmir port to mine sites in Turkey.

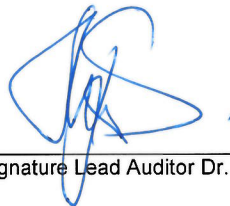
Description of supply chain #5

Operating parties:

- Oversea vessel transport coming in across Mediterranean sea: MSC (part of supply chain #1; see the respective report; not in scope of this report)
- Party No. 1 of Supply Chain #5: Port of Izmir (TCDD); Receiving the vessels, port operations
- Party No. 2 of Supply Chain #5: Limar Port and Ship Operators; subcontracted by Port of Izmir to perform portions of port operations just at the port site using port installations.
- Party No. 3 of Supply Chain #5: Anhan Nakliyat; transportation company, picking the containers from the Izmir port site installations and performing the transport to mine site in Turkey
Party No. 4 of Supply Chain #5: Meke Environmental Protection Services Ltd.; Emergency Response Service company (supporting party no. 3)

Short description of location detail and description of operation:

Anhan Nakliyat Transportation company (AN) is contracted as a cyanide transporter for CyPlus GmbH to transport cyanide by road from Izmir harbour to mine sites in Turkey. Cyanide is received at the port of Izmir by sea in containers. The containers are offloaded at the port by TCDD respectively Limar Port and Ship Operators and short-term stored at their facility. TCDD respectively Limar Port and Ship Operators are part of the ICMI audited supply chain of the cyanide producer and consignor bringing the cyanide in. For the purposes of Cyanide Code transportation compliance, AN's Code responsibilities commence on collection of the containers from TCDD port site location. Containers are delivered from the quay to the TCDD port's container depot where they are stacked and short-term stored for handling and commissioning purposes. Control and monitoring of the containers is undertaken by TCDD who subscribe to the IMDG Code. AN's Cyanide Code responsibilities commence once they take the containers from the TCDD storage area. AN clears the consignment and AN's vehicles collect the containers with the documentation and manage them under a transport management plan process.



Involved parties in supply chain #5

1) CyPlus GmbH, Hanau, Germany

CyPlus is the signatory company which is in the role of the ICMI Code's Consignor. The organization is not active in transporting cyanide but is contracting the full transport service by Evonik Services.

2) CyPlus GmbH, Wesseling, Germany

The CyPlus site at Wesseling is the production plant of sodium cyanide. Initial packaging is done there. The overall supply chain starts here.

3) Evonik Services GmbH, Hanau-Wolfgang, Germany

The technical procurement is purchasing transportation and logistics services from dedicated suppliers and is following strictly defined processes to evaluate appropriate suppliers who are able to perform cyanide shipment under controlled conditions.

4) TCDD – Port Operator in Izmir, Turkey (TCDD Liman İşletmesi Müdürlüğü İzmir)

Government facility, subordinated to Turkish Ministry of Transport; operating all facilities of the Izmir port.

5) Limar Port and Ship Operators S.A.

In the 1990's, due to insufficient investment, Istanbul's ports were unable to meet the needs and demand of Turkish importers and exporters. Limar Port and Ship Operators S.A., was founded in 1996 with the objective of eliminating congestion in Istanbul, the most important destination for Turkey's imports. With the dynamism of the private sector, Limar began providing port services to importers and exporters as well as scheduled container lines. By the end of 1998, it had achieved a job volume of 441 vessels. Limar signed a long-term agreement with the Ministry of Transport's General Directorate of Railroads (TCDD) of –among others- Izmir port, to upgrade their existing equipment stock and thus to contribute to improvements in service quality at the port. As part of this agreement, a new mobile cranes went into service at the Izmir port.

6) Loxx Holding GmbH, Gelsenkirchen, Germany

Loxx is the overall coordinator of transport services for CyPlus respectively Evonik Industries; Loxx contracts Anhan Nakliyat to perform the local Turkish transports starting from Izmir port to the mine; no operating activities during supply chain #5

7) Anhan Nakliyat İnşaat Turizm, Sanayi Ticaret Limited Sirketi, Izmir, Turkey

Transport company Anhan Nakliyat is operating the truck transport of cyanide containers between the Izmir port to the mine site in Turkey.

8) MSC Mediterranean Shipping Company S.A. Geneva, Italy, Hapag Lloyd Hamburg, Germany

MSC and Hapag Lloyd are operating the ocean shipments to the port of Izmir. Both the MSC organization and Hapag Lloyd have implemented an international structured management system to regulate and to control the shipments of dangerous goods with high expertise, responsibility and experience. Acting during supply chain #1, so no operating activities during supply chain #5.

9) Meke Environmental Protection Services Ltd.; Istanbul, Turkey

Meke Marine Environmental Protection Services Ltd is recognized as leading environmental company in Turkey's marine and inland pollution response sectors. Meke is contracted by CyPlus to run and update the Emergency Response Plan for the transporting company Anhan Nakliyat, derived from CyPlus's Emergency Response Plan.

Meke also provides trainings for the Anhan Nakliyat persons, involved in transportation and transportation organisation.

The transporter as a consigner is **CyPlus GmbH** and the on-site transportation operation is performed by **Anhan Nakliyat** company.

Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three – year audit cycle.

* For cyanide production operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company	LULU Intelligent Organization
Audit Team Leader	Dr. Benno Steinweg
Email	Benno.Steinweg@gmail.com
Names / Signatures of other auditors ...	n/a
Date of audit	Apr 01 - 02, 2015

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 Production Operations and using standard and accepted practices for health, safety and environmental audits.

PRINCIPLE 1 – OPERATIONS:

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.

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 1.1
☐ not in compliance with

Summarize the basis for this Finding:

CyPlus as the transport company has subcontracted the (global) transport operation activities to the German Loxx company. On the other hand, under authorization of CyPlus, Loxx subcontracts the local activities to their partner company Anhan Nakliyat. Additionally the ERP consultant Meke is also subcontracted by CyPlus to support with emergency assessment, planning and assistance services, as well as trainings. All of the parties are required to fulfill CyPlus' quality and HSE requirements, controlled by service level agreements. This contracting scheme is clearly defined in CyPlus' ERP. ERP Within this ERP a process to select transport routes to reduce potential risks with respect to accidents and releases is included. This process takes into account the population density along the potential route, infrastructure installations (e.g. bridges, road foundations etc.), rivers, creeks, ponds, in general proximity to water. The total transportation route from Izmir port to the mine site is clearly defined. Potential scenarios have to be taken in consideration; advice is given on how to react with respect to detected risks. The "Selection of Routes" process is clearly defined and carried out. During the road risk assessment and selection process input from communities, police, public agencies and further interested parties is required to have the full set of information for performing a risk assessment. This is also to cooperate with the authorities.. CyPlus' ERP deals in detail with the involvement of external interested parties (mutual aid scheme). Further regulations are defined focusing on communication during routine operation and during emergency cases (alerting).

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.

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 1.2
☐ not in compliance with

Summarize the basis for this Finding:

CyPlus is not active in transport operating activities on site. This activity is subcontracted, as described in Transport Practice 1.1, to the Anhan Nakliyat transportation company. Nevertheless: the transport company Anhan Nakliyat uses only trained, qualified and licensed drivers to operate its trucks. This is basically required in CyPlus' ERP and in the service level agreement between the parties CyPlus, Loxx, Anhan Nakliyat and Meke. The qualification requirements are focused on both, routine activities during normal operation and actions / behavior during emergency cases / situations. Special training is planned, scheduled and executed, too.

Operating personnel does not have to do handling activities with cyanide, but only transport activities and handling activities with originally closed containers. The trainings do focus on scenarios and potential incidents and accidents. Exercises are performed routinely, e.g. simulation of spills and the respective reaction on that. Basic trainings are required according to training matrix (knowledge about procedures, forms, processes etc.). These basics are replenished by further trainings with respect to spill handling, emergency reaction etc. The documentation shows the training history and the respective effectiveness checks of the trainings. This is completed by specific Turkish re-qualification documentation for truck drivers that is mandatory.

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

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 1.3
☐ not in compliance with

Summarize the basis for this Finding:

CyPlus as an organization does not transport loads on site at the Izmir region. But their subcontracted transporter Anhan Nakliyat (AN) does. Various maintenance scenarios are in place: (1) Checks in advance and after each transport, defined in each individual transport folder / documentation. (2) Planned routine technical checks and small standard maintenance items and (3) Routine expert maintenance activities, done by external garages, dedicated to truck-brand, mostly certified by the respective truck OEMs. The trucks and the respective tools, technical equipment and trailers are obviously maintained to operate within the loads they are handling.

Anhan Nakliyat runs procedures to require a verification of each single weight-amount to be transported. Nevertheless: they use only new, heavy load platform trailers, that are (far more as) sufficient for the load they must bear.

AN uses trucks for the cyanide transportation on transport route No. 5. No ferry, barge or other means of transportation is in use. When using a TEU (20 foot equivalent unit) the maximum load is defined. No unloading / re-loading etc. activities are done by Anhan Nakliyat. So the container – once loaded and primary / secondary packed by CyPlus in Germany – will not be opened and thus the load amount will not be changed. The use of heavy load trucks safeguards, that no overload will occur.

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

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 1.4
☐ not in compliance with

Summarize the basis for this Finding:

The container is sealed by CyPlus in Germany and only opened at the mine, thus internal damage cannot be identified in route #5. A Container Interchange Report is completed and jointly signed by the shipper's representatives and the cyanide transporter's representatives to agree on any damage that may be sighted on the container at the port. The Vehicle Trip Checklist is completed at the mine, on delivery of the container and a section reports on container seals, labelling and general container condition. This checklist is counter signed by the mine representative. Turkish transport regulations with respect to marking and placarding according is followed. A pre-trip checklist is completed for the truck and trailer before the vehicle is loaded with the cyanide containers. The Fleet Preventative Maintenance (PM) policy states that preventative maintenance is performed on each vehicle. PM tasks are clearly identified and followed. These tasks are identified in the scheduled maintenance system of truck OEM's manual.

The Vehicle Operators Manual specifies the maximum hours of duty for the drivers. The Vehicle Operators Manual includes a section on drug and alcohol policy. The policy includes specific statements on drug and alcohol usage, testing, alcohol and drug dependence, use of drugs and alcohol on the company premises or whilst driving and the consequences of positive test results. The policy also covers random testing and searches. The policy and company recognizes alcohol and drug dependence as a treatable condition and will provide appropriate support and assistance within the bounds of the policy.

Standard operating procedures are available, covering the topics modifying the transport, caused by unexpected incidents, preventing load from shifting during all handling activities etc. Records of evidences demonstrating the operation of the safety program are archived according to general standard operating procedure.

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

This section is not applicable as no modes of air or sea transport are used during supply chain no. 5.

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

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 1.6
☐ not in compliance with

Summarize the basis for this Finding:

Communication with and among Anhan Nakliyat vehicles in the cyanide convoy is undertaken using mobile phones, short-wave radio, and satellite phones. All communication equipment is tested prior to convoy departure. The drivers at the time driving do not use the communications equipment. Anhan Nakliyat's responsible safety officer communicates with the convoy leader and support vehicles. Convoy managers have all the appropriate

telephone numbers to communicate with Anhan Nakliyat head office and appropriate emergency responders and emergency services on the convoy route. A current telephone list is part of the equipment documentation on each vehicle being part of the convoy. The Anhan Nakliyat head office in cooperation with emergency service provider Meke manages all associated communications with the mine and the cyanide producer. Anhan Nakliyat transports and delivers sealed containers. A full and defined standard package of documents is part of the convoy management, also on the road. All communication equipment is tested prior to convoy departure.

The Road Assessment SOP requires to find out potentially blackout area with respect to functionality of communication equipment. The availability of technical equipment and spare parts are objects to be checked routinely in advance of each convoy order to the mine. GPS tracking is implemented for all convoys.

Anhan Nakliyat receives, transports and delivers sealed containers, originally packed by CyPlus in Germany. A waybill accompanies the convoy which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, MSDS, packing list, bill of lading, customs declarations, and producer invoice.

Drivers have shipping documentation including the Bill of Lading with them at all times during a shipment. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment is consistently entered onto the Bill of Lading by the shipper. Drivers also have the sodium cyanide MSDS and Emergency Response Guides with them during deliveries.

PRINCIPLE 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.

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 2.1
☐ not in compliance with

Summarize the basis for this Finding:

In terms of Cyanide Code definitions, CyPlus' subcontracted supply chain partners (transporter Anhan Nakliyat, Port of Izmir, Limar port and ship operator) do not need and thus do not have interim storage facilities. CyPlus itself as an organization does not transport loads on site at the Izmir region. Storage in a warehouse does not occur during the whole transportation chain no. 5.

Due diligence audit at Port site, investigating Port's quality system and respective operations.

The only activities that might be seen close to the definition of interim storage, can occur at the Izmir port, operated by TCDD (General Directorate of Turkish state railways). The regular port process with respect to the needs of CyPlus's supply chain No. 5 was investigated by an due diligence audit, performed by Evonik Industries, covering all the respective requirements of the Code.

Finally, also at the port site, **no interim storage facilities and operations** in terms of Cyanide Code definitions do occur.

In advance of the ICMC Transportation audit CyPlus organized a due diligence audit, referring to all supply chain no. 5 partners, starting at Izmir's port organization TCDD. The result of the due diligence audit was laid down in a report ("Report on ICMC Follow-up audit in Izmir/Turkey (, covering company Limar (Port facilities and handling responsible at the port site), Anhan (transportation company; among others: their activities at the port site) and Meke (externally contracted ER Provider)). The report was made available for the ICMC Transportation Auditor before the on-site audit was performed. Open issues were defined, dates to fulfill them are outlined, responsibilities are clearly defined. The report shows, that the due diligence audit was performed fully (with respect to the relevant ICMC requirements). CyPlus's auditors in charge are clearly qualified and competent to do the audit.

Even when there are **no interim storage facilities and operations** in terms of Cyanide Code definitions the Transport Practice 2.1 topics were discussed with the TCDD and Limar Port and Ship Operators S.A. management.

National and international labeling provisions are maintained. Smoking, open flames, eating and drinking at the port is regulated by the quality system of the port site. Derived from that system, dedicated areas are defined where those special activities are allowed and also special areas, where those are restricted. Requirements covering personal protective equipment is clearly defined and regulated in the TCDD advising system.

The whole port area is protected by a fence and additionally supported by a technical and organizational based access control system. Access to the site is controlled at different control points / entry points. Only authorized persons / equipment are allowed to entry. Gate guard service is part of the TCDD organization. Sufficient security and access measures are in place.

Cyanide containers are not separated from other materials during the short time of intermediate stopover. The location of the containers are well known. So in case of emergency a focused reaction with respect to a cyanide container is possible in any time. Due to the short time of intermediate stopover (no intermediate storage activity) no further separation is required.

During the short time of intermediate stopover at the port site the placement of the container is at the regular outside non-roofed area. The foundation / the ground structure is concrete based. Provisions are made, that spillage or firefighting spill water can be collected to prevent inflow to the sea. Only undamaged containers are stored in this main area. In case of damage or other suspect situations a special area is designed, that is separately fenced and with additional preventive and protective technical and organizational measures / equipment.

Sufficient volume to handle spillage is available. The requirement to fulfill preventive spill handling for all the other potentially handled goods leads to sufficient volume of back-up capacity to contain any spilled materials and minimize the extent of a release.

PRINCIPLE 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.

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 3.1
☐ not in compliance with

Summarize the basis for this Finding:

CyPlus is not active in transport operating activities on site. This activity is subcontracted to the transport company *Anhan Nakliyat*. Anhan Nakliyat has –in conjunction with Meke company (ER service provider)- implemented an Emergency Response Plan, following CyPlus' Emergency Response Plan. This is a detailed document and includes, among other information, the emergency response team organization chart, emergency phone directory, communication channels guidelines, emergency scenarios, and instructions to attend specific and general emergency scenarios. The Emergency Response Plan includes an attachment describing the routes in detail, with the assessment matrices which were used to develop emergency scenarios, the respective preventive and mitigation measures, and emergency response actions. The plan has a detailed explanation of the sodium cyanide characteristics and toxicity based on the MSDS. The emergency scenarios, the general emergency response instruction, and the scenario-specific instructions consider the solid state of the cyanide and its incompatibility with water and other substances. The Emergency Response Plan provides information regarding the packaging and transportation characteristics of the product, the containers, and the transportation units. All emergency scenarios developed are related to ground transportation and include: crash with another vehicle, vehicle rollover in steep slope or curve, rollover with spill, rollover with hurt persons, and rollover with the product reaching a water body, among others. The plan includes the emergency scenarios developed from the route assessment. It also identifies the areas where the different scenarios are most likely to take place. All the scenarios are in relation with accidents of trucks hauling a platform trailer carrying a 20 ft container or a CyPlus transport unit, which is the only transportation modalities used by Anhan Nakliyat on CyPlus' route No. 5. The description of the routes are available in detail in the ERP.

The ERP considers all aspects of the transport infrastructure. Special attention is given to the road assessments, where the specific conditions of the routes and the respective installations are focused (e.g. bridges over water etc.). The plan considers the design of the transport vehicle. Container trailers are specified with minimum load requirements and special adaption points to fix the different container bottom designs.

The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situation. Trainings are done, covering the given scenarios. The plan also shows the respective emergency procedure, phone numbers and persons / functions to be involved in case of emergency / spill etc. as well as addresses of different functions (police, hospital, mayors of different communities along the route etc.). All of the above referenced response actions are actively accompanied by the emergency response service company Meke (contracted by CyPlus).

The plan identifies the roles of outside responders, medical facilities and communities in emergency response processes / cases. The alerting system in case of emergency is described and defined.

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

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 3.2
☐ not in compliance with

Summarize the basis for this Finding:

The transporter provides emergency response training for the appropriate personnel. The training matrix requires different kinds of training. Driver's training on how to act and react as well as information on the product Cyanide etc. is performed. Those trainings are held by different parties. The scheduling is following the training concept, defined in ERP.

Descriptions of the specific emergency response duties and responsibilities of personnel are defined in detail. The respective documentation is under control of CyPlus' quality and HSE system. Under this regulation the control of the above mentioned docs is executed and thus it is safeguarded that each involved party always holds the current version of the documentation.

There is a list of all emergency response equipment that has to be available during transport and along the transportation route. Meke, the emergency response service company (contracted by CyPlus) is made responsible to have the right and full list and to take care, that the defined equipment and materials are available in full and in full function. The emergency response kit includes all items, as required by the Code and the referenced regulation as well as Turkish legal requirements.

The transport vehicle operators receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan. Anhan Nakliyat has set up a system of initial and refresher trainings, taking into account the individual persons training and experience history.

CyPlus as the transport company has subcontracted the global transport operation activities to the German Loxx company. On the other hand, under authorization of CyPlus, Loxx subcontracts the local transport activities to their partners, here: company Anhan Nakliyat. Additionally the ERP consultant Meke is also subcontracted by CyPlus to support with emergency assessment, planning and assistance services, as well as trainings. All of the parties are required to fulfill CyPlus' quality and HSE requirements, controlled by service level agreements. This contracting scheme is clearly defined in CyPlus' ERP

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

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 3.3
☐ not in compliance with

Summarize the basis for this Finding:

The CyPlus' ERP as well as Anhan Nakliyat / Meke's ERP (derived from CyPlus' ERP) include a communication process description that safeguards the full information of all interested and acting parties in case of emergency. This includes –among other aspects- listings of the members of the internal response team members (including the manufacturer CyPlus, Meke, mine site and Anhan Nakliyat), and those of external emergency responders (police, firefighters, hospitals, authorities, etc.). The emergency notification and reporting procedures are also included within the Emergency Response Plan.

The respective documentation is under control of CyPlus' quality and HSE system. Under this regulation the control of the above mentioned docs is executed and thus it is safeguarded that each involved party always holds the actual version of the documentation. This is routinely checked with / during internal audits.

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

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 3.4
☐ not in compliance with

Summarize the basis for this Finding:

Descriptions of the specific emergency response duties and responsibilities of personnel are defined in detail. The measurements and actions by and during spill are defined and advised in detail. The methods to be used to decontaminate the environment/spillage are described, e.g. prevention of spill entry into waterways, sewers, basements, or confined areas.

It is also established that chemicals should not be added to water bodies to control the pH or to neutralize cyanide. Additionally, it includes instructions for assessing the impact on surface water bodies and to prevent the population to be poisoned by contaminated water. These instructions are part of the emergency response instructions to cyanide spills with contact to water and water bodies.

The procedure prohibits the use of sodium hypochlorite and hydrogen peroxide to treat cyanide that has been released into surface water.

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

This operation is ☒ in full compliance with
☐ in substantial compliance with Transport Practice 3.5
☐ not in compliance with

Summarize the basis for this Finding:

There are the necessary provisions for periodically (min. once per year or driven by events) reviewing and evaluating CyPlus' ERP. In conjunction with a potential adjustment or change all other corresponding response procedures and requirements must be adjusted (e.g. Anhan Nakliyat / Meke's ERP, Meke's procedures coming out of CyPlus' ERP or Anhan Nakliyat's instructions within their quality and HSE system). Examples of change requests coming from events were inspected. In case of any event, the entry in the order folder would –if necessary- drive a change in the ER-plans of the different parties.

Provisions for periodically conducting mock emergency are made. The respective drills are defined in CyPlus' ERP. The training concept intends to involve all relevant parties. It's intended and scheduled to have mock drills minimum once per year, also in close cooperation with the respective mine site.

The revision system of the CyPlus' ERP and Anhan Nakliyat / Meke's ERP is defined. It's required to do revision annually or event driven. Revisions or recommendations are to be implemented as appropriate. It is also planned to have a routine management review respectively a performance evaluation of the plan itself.