ICMI CYANIDE CODE
SUMMARY AUDIT REPORT
RE-CERTIFICATION AUDIT

CYANIDE TRANSPORTATION
SUPPLY CHAIN #6
FROM KEMI PORT (KEMI, FINLAND)
TO AGNICO EAGLE MINE SITE (KITTILÄ, FINLAND

CYPLUS GMBH
RODENBACHER CHAUSSEE 4
63457 HANAU-WOLFGANG
GERMANY

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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 gold mines can be found on different sites across the world. Accordingly different supply chains are utilized. In this report, the supply chain no. 6 is covered, starting from Kemi Port (Kemi, Finland) to Agnico Eagle Mine Site (Kittilä, Finland). CyPlus's supply chain no. 6 starts at that point, where the ICMC certified supply chain no. 1 ends.

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 gold-mines all over the world. The CyPlus company acts also as a consignor for cyanide transportations. The scope of the CyPlus consignment is covering different supply chains. All ICMC certified CyPlus supply chains are actually listed at the http://www.cyanidecode.org – webpage.

Supply Chain no. 6 covers the portion from Kemi Port (Kemi, Finland) to Agnico Eagle Mine Site (Kittilä, Finland).

The driving initiator of these activities is the CyPlus organization (a 100 % subsidiary of Evonik Industries AG) who is acting as a consignor. 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 GmbH. Each single transportation order is released by CyPlus and regulated by Evonik Services GmbH. They appoint the forwarding company Leschaco (located in Bremen/Germany and Hamburg/Germany) as Lead Logistics Provider (LLP) for the entire Evonik group of companies. Leschaco puts the different ocean carriers (Mediterranean Shipping Company, Maersk, Hamburg Süd or Hapag Lloyd) in charge to organize the complete transportation chain including the precarriage to the respective port of departure (so-called "carrier´s haulage"). At the end of this complex construction the single transportations are initiated by the consignor CyPlus in Hanau/Germany (headquarter) in close cooperation with their production facility in Wesseling/Germany. Evonik Services GmbH, having the mandate of CyPlus for logistics services procurement and transportation safety, is responsible for negotiation of sea freight rates and the respective contraction of the ocean carriers and for the maintenance of the dangerous goods data in the IT system. The subcontractors acting in the precarriages (e.g. TFG Transfracht as a

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super operator for road and rail transportation or the terminal operating companies such as HHLA Container Terminals or Eurogate Terminals) are directly contracted by the respective ocean carrier.

The organizations which are involved in this Supply Chain #6 and their roles or functions are as follows:

1) Kemi Shipping Oy, Ajoksentie 708, FI-94900 Kemi, Finland

Kemi port was founded in 1894. Currently –in 2017- it produces a turnover of 19,5 M€. The handled tons are 1,55Mton. Currently 130 permanent employees are on site, further 10 temporary contracted. The operating company (Kemi Shipping Oy) is owned by the forest / paper industry. The main business area is stevedoring, forwarding, ship's agency operations (e.g. ship clearance) and operating a repair shop for heavy machinery (e.g. reach stackers, trucks). Handling of dangerous goods is not a core business; nonetheless a so-called IMO area is established (see scheme). Kemi Shipping is holding current certifications according to ISO 9001, 14001, OHSAS 18001 and ISPS (valid certificates DNV, from August 2016 – September 2018). The IMO area is qualified to be used as an interim storage area for cyanide, but it is Kemi Shipping's policy to have no DG on site, but the material should be directly transferred to the customers with no stop at the port site.

2) Korsu Oy, Ollinkalliontie 10, FI-98100 Raahe, Finland

Transport company Korsu Oy is operating the truck transport of cyanide containers between Port of Kemi and Agnico Eagle mine site in Kittilä. Korsu Oy is family owned. They operate currently 42 trucks and 62 trailers. The total km of the full fleet is 5,3 Mio km in one year's time (June 2016 – May 2017). Focus business is tank transport services (powder and grain material, ADR transportations), container transport services (dry cargo, tank and bulk containers, sideloader, ADR transportations) and oversized load transport services. Korsu operates the road haulage in the Scandinavian area (Finland, Sweden, Norway and Denmark). Korsu is holding ISO 9001 and ISO 14001 BVQI certificates (recertification successful in 2016). New, additional quality manager engaged.

Concerning ICMC code requirement introduction, understanding and fulfilment Korsu Oy was and is supported by CyPlus and also by local Finnish Algol Chemicals company www.algolchemicals.com.

All relevant players and involved organizations had been inspected during the audit. Those assessments were covering visits at the locations (Korsu's depot incl. repair and maintenance shop; Port facilities incl. IMO area and repair and maintenance shop) and administration offices. Interviews with the involved partners and employees were held, inspections of IT systems and checks of documents were performed.

Representatives and managers of both companies took part in the due diligence audits, done by CyPlus in advance of the ICMC audit. To verify the statements of the involved parties, complete consignments of sodium cyanide along the transportation chain from Kemi port to the mine site were checked partially on-site and on the basis of documents, records and evidences.

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Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

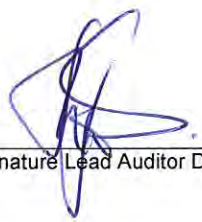
This operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle.

* 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	June 01 - 02, 2017

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.



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A) ROAD TRANSPORTATION:

PRINCIPLE 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.**

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 GmbH operates a certified management system, taking the aspects quality, safety, security and environmental protection into account. The system contains the Emergency Response Plan (ERP). Within this ERP a process is maintained to select transport routes in conjunction with supply chain partners. It is meant to reduce potential risks with respect to accidents and releases. It takes into account the population density along the potential route, infrastructure installations (e.g. bridges, road foundations), rivers, creeks, ponds, ditches, in general proximity to water. It also considers grade and pitch of the roads as a criterion to select the route and as a criterion to pay special attention during transports. Korsu Oy –the operating transport company- documents the risk reduction measures taken when specific risks are identified during the road assessment process.The mentioned process gives advice in detail with respect to the periodically performed re-evaluation and selection process. CyPlus does not contract this selecting process, but organizes and runs it in cooperation and in collaboration with the transporting company "Korsu Oy".

The road assessment and the selection of the routes from Kemi port of entry to the mine site demonstrated the evaluation also of alternatives (route 1, route 2). Potential scenarios have to be taken in consideration (e.g. point of danger in winter time because of short, steep ascent followed by a narrow curve) and have to be evaluated.

In close cooperation with CyPlus the transporting company "Korsu Oy" got in contact with local authorities, other production facilities, police, hospitals to select the possible routes, based on a risk assessment process. This was done intensively during initial ICMC compliance process and is updated routinely, focusing on changes.

According to Finnish law it is not allowed to perform any emergency response activities on a private basis, but it is mandatory that certified public fire and rescue brigades are in charge to coordinate and do all emergency activities – in close cooperation with the local police. Except: very initial first aid without self-endangerment.

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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:

The transport company "Korsu Oy" uses only trained, qualified and ADR - licensed drivers to operate its trucks. All current drivers are fully qualified and certified for cyanide transportation. Operating personnel (drivers) does not have to do any handling activities with cyanide, but only transport activities and handling activities with originally closed and sealed containers.

Commissioning, loading, handling, reach stacker transportation and interim storage activities at the Kemi port facility are performed by the Kemi Shipping Oy personnel. Kemi Shipping is running a Safety Plan that includes – among other topics- the training of personnel, e.g. handling of dangerous goods and reactions on accidents and other critical / unusual events. The procedures describe on the one hand equipment handling / operating as intended and on the other hand the reactions on abnormal operations / accidents. All of the persons are trained in the procedures. Specific procedures and the MSDS for cyanide is also part of the training sessions. Lists of persons and their respective training obligations were present during the audit.

If emergency action needs to be taken by drivers when leaks, spills or fire occur during transport, the instruction given in the "Transport Emergency Card" (ADR "Instructions in writing") must be followed immediately. In this special case, the external responders such as police and fire brigades, the regional medical organization, local fire-brigades or the local hospitals are well informed about the handling and transportation of cyanide and the potential risks of cyanide.

In addition, the consignor CyPlus has implemented a Standard Operating Procedure (SOP) "Supervision – Internal Audits" to ensure that the procedures of the established system to manage cyanide shipments (as mentioned above) are reviewed at regular intervals.

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 physically by truck on the road. But their subcontracted transporter "Korsu Oy" does. The Korsu owned transport equipment (trucks and trailers) is mostly brand new (generally heavy load trucks). In each case the trucks are heavy load trucks, the trailers are in each case 40-foot-trailers, thus the uptake of a typical 20-foot-container with a cyanide load is clearly within the designed load capacity of the equipment. Different maintenance scenarios are in place: (1) Checks in advance and after each transport, defined in each individual transport folder, (2) planned routine technical checks and small standard maintenance items every month, (3) routine expert maintenance activities, mileage driven and done by external garages and (4) an annual check by officially recognized and accredited technical surveillance agency for traffic equipment safety. A supervisor is installed at Korsu's own garage to support in trucking equipment maintenance monitoring. The maintenance schedules are visible by using controlled docs. The trucks and the respective tools, technical

equipment and trailers are obviously maintained to operate within the loads they are handling. As it was made sure on site Korsu is using exclusively their own trucks. 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:

Korsu Oy company operates a safety program, named "Korsu-Security-Plan". It was designed with main input from CyPlus incl. different due diligence audits. The safety program results in the Cyanide Driver's Manual. One tool being part of the manual is the "Cyanide checklist", that is part of each and every cyanide transportation basic package of documents. The Cyanide Driver's Manual contains general advices (loading, road check en route and in internet in advance, behaviour on the road), basic instructions on cyanide, the routes, information on possible safety stops to rest, procedure "How to act when problems with the truck / trailer occur", list of safety equipment, emergency actions to be done in case of accident, MSDS and the pre-trip-checklist. The "Korsu-Security-Plan" includes a procedure to keep the integrity of producer's primary and secondary packaging maintained.

The Cyanide Driver's Manual specifies the maximum hours of duty for the drivers. The Cyanide Driver's 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 recognizes alcohol and drug dependence as a treatable condition and the company 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, placarding according to international CLP requirements and performing preventive and reactive maintenance activities (done by own workshop and by OEM garages). 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 operation is
- ☒ in full compliance with
- ☐ in substantial compliance with Transport Practice 1.5
- ☐ not in compliance with

Summarize the basis for this Finding:

This section is not applicable with respect to sea transport mode, as no sea transport is used.

This section is not applicable with respect to air transport mode, as no air transport is used.

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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:

The "Korsu-Security-Plan" contains detailed and strict regulations regarding communication by using mobile phones. This is based on CyPlus's requirements laid down in its Emergency Response Plan. Trucks have mobile phones with them, as defined in driver's manual. The relevant phone is tested before each and every start of a cyanide tour. This is laid down in the driver's checklist accordingly. Additionally a GPS based system (AC Panther; http://www.acev.fi) is installed, so that every participant with login admission can see the truck's position - and also: truck's engine on / off status, loaded, unloaded, loading, unloading, velocity in real time.

The route assessments were / are performed taking CyPlus's procedure into account. Thus the checking of the availability of mobile phones is part of the route assessment, as can be verified during route assessments of Route 1 and Route 2. In both cases full cell phone connection is given at all the way

No blackout areas have been identified, as defined in road assessment. Thus no additional activities are necessary, e.g. satellite phone or calling before entering blackout areas. As demonstrated during the audit by using a specific internet application Finland has a very high coverage of cell phone functionality, especially in the region where both cyanide transportation routes are located.

Sealing of the container is done at the production site and the seal is not broken until arrival at the mine site. Each and every receiver in the supply chain has to check the integrity and the identity of the seal.

Each and every cyanide transportation is accompanied by a waybill, pre-trip-checklist, alcotest result, invoice from carrier, order and Cyanide Driver's Manual – specific for each driver. The current NaCN MSDS is always part of the documentation because it is part of the Cyanide Driver's Manual. Waybill, checklist, invoice and order contain the information about the gross weight.

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:

During CyPlus's Supply Chain No. 6 there is one dedicated place, where interim storage can occur as intended. The used containers filled with solid NaCN are transferred from production site to the port's facilities (using CyPlus's

ICMC certified supply chain no. 1). The Port of Kemi offers a total of 60,000 m² of storage space, partially as in-house areas. Both the cold and heated storage areas are fenced and monitored. The area is equipped with access control systems. The Port of Kemi also has storage areas for dangerous goods (open space). In case of storage capacity limitations at the mine site it can occur that containers may be interim stored at the port's dedicated non-roofed outdoor area (called "IMO-area") for dangerous goods. If this occurs, it can happen to last max. 3 – 4 days but not longer. In this case warning signs are installed to alert all relevant persons on site with respect to presence of DG (here: cyanide), prohibition of eating, drinking, smoking and open fire and general instruction on PPE to be used. This non-roofed outdoor area is designed according to national legal requirements, e.g. to keep potential material spill off the ground, and potential mixture of spill with storm water is collected in a dead end canal system, that has no connection to outside and can be used in a similar way as a pump sump. The volume of the area including canal collecting system is sufficient to store storm and potential firefighting water during a period until local fire brigade with mitigation equipment appears at the scenery. The design, the installation and the operational functionality is verified and qualified and finally approved by the local authorities.
Kemi Shipping's management system is certified according to ISO 9001, ISO 14001, ISPS and OHSAS 18001, valid until September 2018 (certification body Det Norske Veritas; partially certified since more than 13 yrs.). A list for dangerous goods separation acc. IMDG code is installed and maintained. Additionally specific Finnish regulation Asetus 251/2005 ("Government Decree on the Transport and Temporary Storage of Dangerous Goods in a Port Area") has to be followed. Kemi Shipping's policy is to have no DG on site, but the material in general should be directly transferred to the customers with no stop at the port site.

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:

As defined in ICMI's *Auditor Guidance for Use of the Cyanide Transportation Verification Protocol* (Dec. 2016) in developed countries with robust emergency response capabilities, transporters of dangerous goods can often rely on the established in-place services (e.g. TUIS in Germany). A single telephone call may be sufficient to trigger a rapid and comprehensive response by prepared and well-trained personnel capable of managing cyanide and other hazardous materials emergencies. This response may even include a pre-planned command structure, with the local fire authorities having designated incident command authority once on the scene.

Finland and it's established national safety management system with police and professional fire and rescue brigades as the main players on the scene can unambiguously classified as an emergency response organization that corresponds to the greatest extent to high developed capabilities. Thus the nature of Korsu's and Kemi Shipping's emergency response programs is highly dependent (because integrated) on those Finnish local circumstances, that are very highly developed with respect to emergency response preparedness and capabilities.

Korsu's ERP considers all aspects of the transport infrastructure. Special attention is given to the road assessment, where the specific conditions of the route and the respective installations are focused (e.g. bridges over water bodies). 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.

"Kemi Shipping Oy" as the port facility and terminal operator company (operating also the dangerous goods IMO area) is operating an emergency plan. It is written in conjunction with the emergency plan of "Port of Kemi", the port authority organization.

The emergency scenarios, the general emergency response instruction, and the scenario-specific instructions from both "Korsu Oy" and "Kemi Shipping Oy" consider the solid state of the cyanide and its incompatibility with water and other substances.

Both plans also identify 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:

Both relevant parties in CyPlus's supply chain No. 6 –Korsu Oy and Kemi Shipping Oy- have nominated specific personnel for emergency responding, and sufficient emergency response training resources are provided.

Korsu's management system acc. to ISO 9001 and ISO 14001 require specific processes and determinations on designation of responsibility for responding to emergencies during transport of dangerous goods as well as having an effective organization that is reliable and effective with respect to emergency responding. As a specialist in dangerous goods handling a local Finnish dangerous goods consulting expert company is engaged to set up cyanide specific trainings for the respective persons and functions (e.g. drivers). This cyanide specific training is derived from CyPlus's current training system. The truck drivers receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan. All dangerous goods drivers have to have ADR certification and to do a Refresher-Training each 5 years after initial qualification.

Key roles for emergency responding are defined at both companies.

Korsu's Cyanide Driver's Manual (derived from the "ADR Safety Plan") contains –among other topics- the pre-trip-checklist, that has to be filled-out before each and every cyanide transportation. The checklist requires the full ADR equipment. Korsu's truck drivers have to check their equipment in advance of each cyanide transport. This is required in Korsu's Cyanide Driver's Manual and documented in a check list that is used in each and every dangerous goods transportation case. A list of all emergency response equipment, that has to be available during transport and along the transportation route, is available in each truck. This is also clearly defined by ADR regulation. In total "Korsu" has to have an emergency response kit in each dangerous goods transporting truck.

Kemi Shipping's management system acc. to ISO 9001, ISO 14001, ISPS and OHSAS 18001 also requires specific processes and determinations on designation of responsibility for responding to emergencies during handling and interim storage of dangerous goods as well as having an effective organization that is reliable and effective with respect to emergency responding. As at the Korsu company, also at the port the same local dangerous goods consulting company is engaged.

All trainings are planned by using a database, the training records are provided in this database, respectively. Examples for topics to be trained: basic training for new personnel, annual basic update training, work safety, fire emitting works. The transporter provides emergency response training for the appropriate personnel. The training matrix requires different kinds of trainings. Driver's training on how to act and react as well as information on the product Cyanide is performed.

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:

Both relevant parties in CyPlus's supply chain No. 6 –Korsu Oy and Kemi Shipping Oy- are using certified management systems. All of them, whether ISO 9001 or the other management system standards ISO 14001, OHSAS 18001 require the keeping-current of specifications and relevant documents. Korsu's procedure requires the supervisor to check phone numbers routinely.

Both relevant parties have processes, procedures and specifications on how notification shall be done in case of emergency. These procedures are laid down in the response plans and applicable documents and they include a description when, who and how communication should be done.

"Korsu Oy": the procedure is described in the Cyanide Driver's Manual that is covering also the "Korsu" organization. A list of phone numbers is included. This list is also available on the trucks. The Manual contains information – among others- about "Emergency actions in case of accident", referring to a mandatory telephone number list (police, medical support, safety manager, mine site, CyPlus and fire brigade).

"Kemi Shipping Oy" emergency response plan describes the safety organization contacts in detail, especially all relevant contact information (phone numbers) of internals and externals (Police, Medical support, Safety manager, Mine site, CyPlus and fire brigade).

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:

In Finland it's not intended to do any remediation activities by transporters or their truck drivers. As defined in ICMI's *Auditor Guidance for Use of the Cyanide Transportation Verification Protocol* (Dec. 2016) in developed countries with robust emergency response capabilities, transporters of dangerous goods can often rely on the established in-place services. A single telephone call is sufficient to trigger a rapid and comprehensive response by prepared and well-trained personnel capable of managing cyanide and other hazardous materials emergencies. This response includes a pre-planned command structure, with the local fire authorities having designated incident command authority once on the scene. Finland and its established national safety management system with police and professional fire and rescue brigades as the main players on the scene can unambiguously classified as an emergency response organization that corresponds to the greatest extent to high developed capabilities. Thus the nature of Korsu's and Kemi Shipping's emergency response programs is highly dependent (because integrated) on those Finnish local circumstances, that are very highly developed with respect to emergency response preparedness and capabilities.

Korsu's Cyanide Driver's Manual contains –among other topics- detailed descriptions of "How to act when problems with the truck / trailer occur". According to Finnish law it is not allowed to perform any emergency response activities on a private basis, but it is mandatory that the police, certified public fire and rescue brigades and local medical ambulances are in charge to coordinate and do all emergency activities – in close cooperation with the local police.

Except: very initial first aid without self-endangerment. Thus the advice to the drivers is in general, to call police (national uniform number 112) and afterwards call Korsu's base safety manager.

Kemi Shipping Oy's emergency response plan contains –among other topics- detailed descriptions of safety organization contacts, job descriptions, work procedures in case of emergency incl. preventive and mitigation measures, handling of cyanide related special risks and first aid advices. But also here: according to Finnish law it is not allowed to perform any emergency response activities on a private basis, but it is mandatory that the police, certified public fire and rescue brigades and local medical ambulances are in charge to coordinate and do all emergency activities – in close cooperation with the local police. Except: very initial first aid without self-endangerment. Thus the advice to all terminal personnel is in general, to call police (national uniform number 112) and afterwards call Kemi Shipping Oy's dangerous goods security adviser

Finally these definitions and requirements are nearly of no relevance, because of first responder's (police, professional fire brigade) key role in chemical accidents, including remediation, decontamination and disposal of spill debris – incl. State regulated tender obligation for debris to the one and only Finnish disposal plant in the south of Finland.

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:

CyPlus's emergency management system consists of a sum of documents, where the ERP is just one document out of many (e.g. "emergency management list"). It is required, that all the documents have to be kept current. This "keeping up to date" is not driven by time, but by event. Thus a revision will be done, when necessary (e.g. phone number in ER organization changes). A general time-driven review is not foreseen. The most documents within emergency management system are found not to be older than one year, especially the ERP itself (umbrella document character). Up to now no case of emergency occurred, that made a revision of the ERP necessary.

Korsu's Cyanide Driver's Manual and related "ADR Safety Plan": same practice. Revision not driven by time, but by event / change.

Kemi Shipping Oy: ERP and related documents are in place and under documentation control resp. revision. There's a mixture of time and event driven review and revision, if necessary.

Both parties in CyPlus's supply chain no. 6 define provisions for performing mock emergency drills, although ADR regulations do not require regular emergency drills based on periodically scheduling.

Korsu's approach is to perform the annual driver's cyanide safety training and training on the procedures described in the security report and possibly join the mine's and the port's emergency drills in future.

Kemi Shipping Oy: mock drills are planned, scheduled and performed, also caused by ISO 14001, OHSAS 18001 and ISPS requirements. Last drill was done in Oct. 2015, table top drill in Feb 2017. Next drill is scheduled.

B) RAIL TRANSPORTATION

No rail transportation during supply chain no. 6 (from Kemi Port to Agnico Eagle Mine Site (Kittilä, Finland))

C) SEA TRANSPORTATION

No sea transportation during supply chain no. 6 (from Kemi Port to Agnico Eagle Mine Site (Kittilä, Finland))

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