REPORT

M+L LOGISTIK

ICMI CERTIFICATION SUMMARY REPORT

Submitted to:

International Cyanide Management Institute (ICMI)
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Washington, DC 20005
UNITED STATES OF AMERICA

Submitted by:

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Summary Report

January 2025

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1.0 SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Name of Cyanide Transportation Facility: M+L LOGISTIK – Czech Republic

Name of Facility Owner: M+L LOGISTIK – Czech Republic

Name of Facility Operator: M+L LOGISTIK – Czech Republic

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2.0 M+L LOGISTIK OVERVIEW

This report focuses on transport of Cyanide by M+L LOGISTIK (M+L) from the Lučební závody Draslovka a.s. Kolín (Draslovka) manufacturing plant in Kolin (Czech Republic) to rail terminals in the Czech Republic. Transport of cyanide for other customers by M+L is not excluded, nor are other planned locations and routes.

M+L are one of the named road transporters in Draslovka's Supply Chain 1, which has been certified by ICMI. M+L will continue to transport cyanide to the Melnik rail terminal under Draslovka's Supply Chain No 1. In addition, M+L will transport cyanide to the Obrnice rail terminal in the Czech Republic, or other locations requested by the customer. Other parties may be added by M+L in the future (e.g., rail terminals and rail and road carriers) and M+L will follow the ICMI protocols for notification and due diligence or auditing of these parties as required by the code.

M+L will be supported by Draslovka for transport routes named in Draslovka's Supply Chain No 1 where Draslovka will provide the route risk assessment. At other times M+L will develop and use their own route risk assessments. M+L have also developed their own emergency plan which relies on the fact that national emergency responders are legally responsible for medical, fire and rescue and police intervention in the event of any incident involved with cyanide transport in the Czech Republic.

M+L may also consider additional routes in the future. If these are used, they will develop appropriate systems in advance of transportation taking place and notify ICMI in accordance with the Cyanide code requirements.

2.1 M+L LOGISTIK

The following parties are involved in M+L LOGISTIK's road transport of cyanide from Draslovka to rail terminals in the Czech Republic:

1) M+L LOGISTIK; Czech Republic

M+L LOGISTIK (M+L) are a Czech road transportation company that has been operational in transport logistics since 1992. The main mission of M+L LOGISTIK is to operate domestic and foreign road transport, provide combined transport services and complete complex logistics solutions.

M+L LOGISTIK will transport containers initially between the Draslovka Manufacturing site in Kolin, Czech Republic to rail terminals in Melnik and Obrnice in the Czech Republic. The method of transportation and the means of transport used will be determined in accordance with the customer's requirement.

The company is part of the ML group along with sister companies UPLINE CZ who operate an Intermodal and Bulk Terminal (including rail terminal) in Obrnice in the Czech Republic and Vellerin who provide support in logistics, including technical service, construction and modernization of combined transport terminals, consultancy and project solutions for transport, storage and handling.

M+L specialises in container transport (maritime), dangerous goods, bulk cargo, food, pharmaceuticals and temperature-controlled transport. They provide a high-level transport service.

M+L have wide experience of transporting dangerous goods (known as ADR (Agreement concerning the International Carriage of Dangerous Goods by Road) in Europe) and have over 50 ADR certified drivers who are trained and licensed and operate ADR approved vehicles. ADR transport experience ranges from transport of cyanides and other chemicals, pharmaceutical materials and gas (cylinders, tanks). Many of M+L's contracts for dangerous goods transport have been long term.

M+L LOGISTIK transport dangerous goods in accordance with the International ADR agreement which includes:

- Unit and carload transport of hazard classes 1-9 (outside class 1 and 7)
- ADR (International Carriage of Dangerous Goods by Road) transport in combined mode and taking advantage of this system (e.g. high transport capacity, weight)
- Online monitoring of goods (vehicles) by GPS, which supports the supervision of transport safety
- Equipment according to ADR (regular inspections and maintenance provided within the information system, online telematic information on the vehicle – tyre inflation, brake wear, driving style, braking rate, etc.)
- Professionally trained drivers for the given type of transport (taking courses in defensive driving and prevention of the vehicle overturning beyond the scope of the law)
- Appropriate personal protection equipment for vehicle crew
- Consulting an internal ADR safety adviser regarding the transport of dangerous goods

Draslovka carry out the route risk assessments for the transport between Draslovka and the Melnik rail terminal. Draslovka also provides Cyanide and Emergency Plan training for M+L staff. M+L have also developed their own route risk assessments for transport to Orbnice rail terminals and can do the same for Melnik and other rail terminals should Draslovka not provide them. M+L can also develop their own mock drills should this be required in the future.

2) Lučební závody Draslovka a.s. Kolín, Kolin, Czech Republic

Lučební závody Draslovka a.s. Kolín (Draslovka) has an ICMI certified supply chain (No 1) from its manufacturing plant in Kolin, Czech Republic to Sea Ports in Germany via rail terminals in the Czech Republic. They are based at the Draslovka cyanide manufacturing facility in Kolin which is ICMC certified as a producer. Draslovka currently provide cyanide training for the M+L team and host mock drills that M+L attend.

2.2 Transport Stages

M+L will enter into a contract (order) with Draslovka, or other party, to transport cyanide by road to a rail terminal (Melnik or Obrnice) in the Czech Republic (we note above that this remit may be expanded in the future). Depending on the contract (order) M+L will transport this under the requirements of Draslovka's Supply Chain No 1 or under a direct contract whereby M+L will hold the responsibility for compliance with the ICMI code requirements.

Transport of cyanide will initially start from Draslovka's main operations base which is situated in Kolin in the Czech Republic and solid cyanide is planned to be transferred from this site to the relevant rail terminal (Melnik or Obrnice) in the Czech Republic. This is the extent of this Supply Chain and other parties will be responsible following delivery to the relevant rail terminal.

M+L's code responsibilities (within these planned transport routes) commence on collection and loading of the containers (goods) at Draslovka's Kolin site until delivery to the relevant rail terminal in the Czech Republic.

M+L considered 2 different options for transport of solid cyanide between Draslovka and the Obrnice rail terminal, both predominately on main carriage ways, and these were subject to route assessments by M+L.

Draslovka completed a route assessment of the road transport between Draslovka and the Melnik rail terminal in Prague which was described in Draslovka's Supply Chain 1. M+L will complete their own route risk assessment of this route should this be required in the future. Otherwise, M+L will apply the route risk assessment completed by Draslovka.

For the above noted routes, transport routes have been planned, appropriate systems developed and applied, and in some cases, transportation has been undertaken under separate contracts.

3.0 SUMMARY AUDIT REPORT

Auditors Findings

☒ **in full compliance with The international Cyanide Management Code**

M+L LOGISTIK – Czech Republic

☐ in substantial compliance with

☐ not in compliance with

This operation is in FULL COMPLIANCE with the International Cyanide Management Code.

Audit Company: Whatton Consulting Limited

Audit Team Leader: Dale Haigh - Lead Auditor

Email: dalehaigh@whattonconsulting.com

Dates of Audit

The Certification Audit was undertaken over 3 days, between 5 November and 7 November 2024.

The audit was undertaken by Dale Haigh of Whatton Consulting. Dale Haigh is pre-certified as an ICMI Lead Auditor and ICMC Transport Specialist and he acted in this capacity during the audit.

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Certification Auditors. I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

M+L Logistik, Czech Republic		
Name of Facility	Signature of Lead Auditor	Date
M+L LOGISTIK, Czech Republic		January 2025

4.0 PRINCIPLE 1 – TRANSPORT

Transport cyanide in a manner that minimizes the potential for accidents and releases.

Transport Practice 1.1: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.1? Explain the basis for the finding.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The transporter implements processes and procedures to select transport routes that minimize the potential and potential impacts of accidents and/or releases.

M+L has a documented procedure for selecting transport routes and has used this to identify transport routes from Draslovka to rail terminals in the Czech Republic. The procedure states that it will use the criteria set by the cyanide code to consider specific concerns including population density, infrastructure pitch and grade etc. Weather issues are also considered prior to the start and during each trip. It has been identified that there are no significant issues related to the presence/proximity of water bodies in the area of the planned routes, with high quality bridges on first class roads in place.

M+L carry out own their assessments. They detail each step of the route. They identify status (1st class road) and presence of roundabouts and other potential hazards etc. M+L staff confirmed that there is no difficult terrain present along the planned routes. Risk assessments will be reviewed periodically and they will also review feedback from drivers who travel the routes.

Draslovka carry out the route selection on behalf of M+L LOGISTIKs for any transport that follows Draslovka's Supply Chain No 1. Ongoing monitoring of the routes produced by both M+L LOGISTIK and Draslovka will occur through daily use by the road transporters and any issues reported back to M+L LOGISTIK and Draslovka

Drivers and other staff from M+L LOGISTIKs were interviewed and confirmed that they are aware of and follow the selected transport routes and are aware of the hazards identified. Drivers are provided with the details of the relevant route risk assessment in advance of each trip and are tracked through the use of GPS (Global Positioning System).

In the event of any incidents or accidents on the road then the route may be subject to alteration. M+L has continual access to their own GPS system and local government transport networks that provide updates on road conditions. Should any issues be identified, they will be fed back and a decision made on whether the transport should be delayed or if the route should be temporarily amended and how. This is then fed through to the driver.

The transporter seeks input from stakeholders such as communities, applicable governmental agencies and others with an interest in the selection of routes and in developing risk management measures where necessary.

The selected routes are relatively short and use good quality main roads between Kolin and the rail terminals in the Czech Republic. However, despite the short transport route, M+L and Draslovka identify issues through

a review of community and stakeholder websites. These web sites are used to identify any accidents and upcoming road works and include the State Operator of Czech Roads, and also the Municipality. Any issues identified are considered and changes to routes may be made or additional risk management measures applied and included in feedback to the drivers at the start of the day.

M+L and Draslovka report that there are no special safety or security concerns currently in the Czeck Republic or within the specific areas of the transport routes.

M+L do not use any contractors to carry out cyanide transportation.

All drivers from M+L are provided with specific training including cyanide hazards, safe handling of cyanides, and the emergency plan. They are also provided with details of the selected transport routes and carry driver packs containing the routes, emergency contacts and plan, ADR details and Material Safety Data Sheets (MSDS) for the cyanide transported.

Transport Practice 1.2: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.2? Explain the basis for the finding.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with 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.
M+L use only trained and qualified and licensed operators. Evidence including driving licences, ADR licences, valid tachograph card, cyanide training and emergency plan training was reviewed on site for several M+L drivers.

A sample of road transport drivers were also interviewed about their knowledge of the procedures and practices involving cyanide and provided good responses indicating effective knowledge and experience.

M+L LOGISTIKs personnel (i.e. including drivers) have undertaken a range of training. The training programme includes the following modules:

- ADR (Dangerous Goods Driving) and emergency response;
- Cyanide Hazard Awareness and Emergency Response (includes hazards, Personal Protective Equipment (PPE), general rules of handling cyanide, first aid, basics, procedures, emergency procedures, basic introduction of cyanide, ICMC certification and requirements, how packed, how used, transport and labelling, emergency equipment, antidote use).

M+L maintains records of the training provided.

A selection of drivers (Fisher Milan), and team members (David Chromy, David Marek) were interviewed about their knowledge of the procedures and practices involving operating cyanide handling and transport equipment. Responses received indicated that they were competent to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

M+L LOGISTIKs do not use sub-contractors.

Transport Practice 1.3: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.3? Explain the basis for the finding.

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

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.3; ensure that transport equipment is suitable for the cyanide shipment.

Equipment used to transport cyanide loads by road consists of road vehicles (tractor units and trailers) that were purchased to a design specification appropriate for the cyanide transport task and confirmed by representatives of M+L. These include main tractors with articulation and trailers which can carry only one container. M+L LOGISTIKs provided government registration certificates for tractor units and trailers confirming the maximum load they could carry. Samples of these were reviewed and confirmed that tractor units were all capable of carrying loads of 44 tonnes and that trailers were capable of carrying between 43 tonnes and 44 tonnes. These registered limits are more than sufficient to carry the cyanide loads. A container with 20 one tonne cyanide packages weighs just under 24 tonnes including packaging and container weight. Similarly, 414 fifty kilogramme drums are transported in a container giving a total weight with packaging and container of just under 24 tonnes.

Czech legal road requirements set a 48T maximum weight limit. M+L uses 20 foot containers for one tonne boxes and 40 foot containers for 50kg drums, both of which result in a total load just below 24 tonnes (20 tonnes of cyanide plus packaging). Containers are weighed at the Draslovka site before and after loading to ensure that the vehicle is below the legal limits and example Bill of Delivery documents which include weigh bridge information, confirm that total weights are well below the legal maximum allowed and are also within the truck and trailer weight limits.

For all cyanide transportation, cyanide is loaded into sea containers within sealed containers (drums or IBCs) and the loads are then secured inside the container and inspected by Draslovka and the M+L drivers. Check lists from M+L and Draslovka are completed and examples have been reviewed.

Service plans were observed for M+L. In addition, maintenance history examples (shown in vehicle logbooks and available in electronic form at the M+L offices) are kept with each vehicle. In addition, each year vehicles (trucks and trailers) are required to complete a legal inspection (known as STK). These are only required after three years of age. M+L do not keep tractor units over three years of age but do hold trailers over three years of age. Example STKs were observed for trailers at the M+L offices.

M+L dispatchers on taking an order for transportation of cyanide check that the truck and trailer can handle the load required and this is detailed in M+L's Cyanide Manual.

A driver of cyanide was also interviewed who confirmed they carry out these checks.

Pre and post loading inspection is carried out in accordance with M+L's Cyanide procedure and using a specific inspection form for cyanide loads.

M+L do not currently use contractors.

Transport Practice 1.4: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.4? Explain the basis for the finding.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 1.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.4; develop and implement a safety program for transport of cyanide.

M+L have significant experience in handling dangerous goods including cyanide. They are also provided with training in Cyanides (including handling and emergency procedures) by Draslovka. The route risk assessments (completed by M+L and Draslovka) ensure routes are selected to minimise damage to vehicles and transported cyanide. The routes are relatively short and along good quality roads.

Vehicles and trailers used by the road transporters are designed, maintained and inspected to carry the loads safely. Inspections carried out by M+L and Draslovka at the start of the journey ensure that the integrity of the producer's packaging is maintained.

Vehicles carrying cyanide are also tracked by M+L using GPS system. Monitoring is maintained and the drivers also carry mobiles and in the event of an issue Draslovka are informed. M+L use Echotrack GPS system to monitor their vehicles. They are monitored live and reports can be produced showing current status, speed, route and stop locations. Records are held for at least three years.

Vehicles and their loads are inspected during the convoy.

M+L also carry an ADR (International Carriage of Dangerous Goods by Road) Emergency and Safety Plan (M+L's Emergency Plan) as required by Czech law. The requirements of this include specific Cyanide Emergency elements and M+L have to call the National Emergency Services in the event of an incident. The carrying of the Safety and Emergency plan was confirmed through inspection of vehicles and interview with drivers.

Placards and signage are used to identify the shipment as cyanide and are as required by local regulations or international standards. Signage is placed on all shipping cyanide boxes, drums and on the outside of the shipping containers. The placards used on containers, include UN Numbers; and Hazchem classification.

Example check lists from M+L and Draslovka and discussion with M+L confirmed that the presence of placards/signs is checked before transportation commences. The placards were inspected on trucks at the M+L site.

M+L implement a safety program for cyanide transport that includes (where appropriate or applicable) the following aspects:

a) Vehicle inspections prior to each departure/shipment. Vehicle inspections are completed by M+L during loading and prior to shipping. Examples of the check lists have been observed. M+L have also recently updated the checklist. M+L's checklist is also available on line as observed on 5/11/24

b) A preventive maintenance program.
c) M+L has implemented a preventative maintenance program which is in line with vehicle manufacturer's guidance and includes both tractor and trailer units. M+L use Prytanis software to track and flag maintenance records and requirements and which flag the requirement 30 days before maintenance is needed. The Pryantis system and service records were observed on site on 5/11/24. Planned maintenance is based on time (6 monthly and annually for internal and government checks) and also by distance travelled for trucks (e.g. oil changes etc) and is completed by M+L's own technicians as well as the vehicle main dealers. Containers are maintained by the container owner in accordance with IMO requirements but are inspected by M+L before each use.
d) Limitations on operator or drivers' hours. Limitations on operator driver hours are managed by M+L. The limitation requirements are indicated in training and within employment contracts. Journeys between Draslovka and rail terminals are relatively short. Vehicles are also fitted with GPS systems which track operational hours and were observed at M+L. Tagra (tachograph system) also analyses driver hours and reports if any drivers exceed legal limits.
e) Procedures to prevent loads from shifting. Solid cyanide is loaded into the sea containers by M+L's client; Draslovka. The cyanide containers are sealed before loading into the container and are then fixed when in the container. The vehicles and trailer units are designed to hold these containers in a secure manner with locks on the trailer that are inspected during loading by M+L drivers and recorded on check lists, which were also observed.
f) Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered. Civil unrest is unlikely in this region based on current experience. However, if severe weather is encountered transport can be delayed as the journeys are relatively short. M+L would notify Draslovka if this was a concern and the situation discussed between them. Any such issues would be recorded.

   M+L have also empowered drivers to make the decision to delay transport in the event of poor weather. The driver would call the dispatcher to let them know if this was an issue. Example training slides were observed for M+L drivers and this re-enforces this idea.
g) A drug abuse prevention program. M+L has an alcohol and drug abuse prevention procedure and has confirmed that they carry out random testing. The prohibition of drugs and alcohol is discussed during cyanide training. Drug and alcohol testing is completed by M+L. They have a certificate to be able to carry out these tests and use only certified testing kits. Drivers are made aware of the possibility of testing. Results are maintained in a table. Some other M+L clients (including Draslovka) can also carry out random testing.
h) Records are maintained and inspected for all relevant parts of this element. Records are retained by M+L.

M+L do not use any sub-contractors.

Transport Practice 1.5: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.5? Explain the basis for the finding.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 1.5**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 is not applicable as the transporter does not ship cyanide by air or by sea within this supply chain.

The Supply Chain ends at the relevant rail terminal before transport of cyanide by sea or air. This Transport Practice is therefore not applicable to this supply chain.

Transport Practice 1.6: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 1.6? Explain the basis for the finding.**

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 1.6**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.6; track cyanide shipments to prevent losses during transport.

M+L drivers carry mobile phones and driver's packs which have details of contact numbers for an emergency, for Draslovka, as well as their own M+L team. Check lists are used to confirm that the drivers carry phones and carry the driver's packs. All M+L vehicles are also fitted with the Echotrack GPS system (which were inspected at each of the road transporters) and allow constant monitoring of cyanide transport. In addition, flagging of arrival at Draslovka for loading, and the rail terminal for off-loading were observed.

There are no black spots for the GPS or mobile phone system for the routes that M+L is currently involved with. The communication equipment is regularly tested to ensure that it functions correctly. GPS equipment is constantly monitored each day (as seen on-line at each of the transporters).

The system and procedures include post load inspection of the vehicles (by M+L drivers), active GPS tracking of transport during the route from pick up to delivery (with flagging at entry to Draslovka and at the rail terminal) by M+L, and use of mobile phones to confirm arrival at Draslovka and at the rail terminal and for use in emergency.

In addition, documents are prepared at the start of the transportation by M+L's client, Draslovka including Bill of Delivery, CMR (International Goods Transport Consignment Note), International Maritime Organization (IMO) Dangerous Goods Declaration, and Draslovka weighbridge documents of transport. These documents are presented at each stage of the transport route.

M+L's client, Draslovka or the ordering company also advise the mine, ports and shippers when shipments leave the departure point and estimated time and date of arrival of the consignment.

Shipments are inspected at the start of the transport and at periods during the transportation. These include visual integrity checks on loading, and delivery at rail terminals. In addition, the weighbridge confirms the weight on loading.

M+L also monitor container locations and movement on an internal tracking system. This system was observed at the M+L site. M+L also receive confirmation when they deliver to the rail terminal destination and confirm that they will scan this and add to the other documents.

Shipping records indicate the amount of cyanide in transit and Materials Safety Data Sheets are available during transport.

M+L do not use contractors.

5.0 PRINCIPLE 2 – INTRIM STORAGE

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

Transport Practice 2.1: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 2.1? Explain the basis for the finding.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 2.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 is not applicable as M+L does not undertake any interim storage of cyanide.

6.0 PRINCIPLE 3 – EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

Emergency Response Practice 3.1: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.1? Explain the basis for the finding.**

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 3.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.1; prepare detailed emergency response plans for potential cyanide releases.

By law M+L have to carry an ADR (Dangerous Goods Transport) Emergency Plan in accordance with Section 1.10.3.2 of the European ADR Regulations (Directive 2008/68/EC). This is M+L's emergency plan and is noted as the emergency plan in this report. This includes reference to Section 6.1 (Toxic Substances which includes cyanides) and provides guidance such as contact the emergency response services in the event of an incident. The emergency plan includes specific sections for cyanide transport and emergency response for cyanide transport.

The requirements of this plan are not in conflict with the Draslovka Emergency Response plan which M+L carry when they are transporting cyanide under Draslovka's Supply Chain No 1.

M+L's emergency plan is appropriate for the selected transportation route. The Emergency Plan states that transport includes road transport.

The plans consider the physical and chemical form of the cyanide. The Emergency Plan states specifically that solid sodium and potassium cyanide will be transported.

The plans consider the methods of transport. For this supply chain the transport methods include road transport. This is mentioned in the Emergency Plan.

The transport infrastructure. The Emergency Plan consider all aspects of the transport infrastructure relevant to M+L's activities which involve transfer of solid sodium and potassium cyanide from the Draslovka site to the rail terminals in the Czech Republic. Transport by road is subject to route risk assessments (which is mentioned in the emergency plan) which assess the hazards on possible routes and covering all road transporters.

The Emergency Plan considers the design of the vehicles being used. The emergency response plans state the cyanide is transported in drums or closed containers which are then secured in locked road containers with rear doors, and is transported by road.

The Emergency Plan includes descriptions of response actions as appropriate for anticipated emergency situations. We note that the response to emergency incidents in the Czech Republic is solely the responsibility of the national emergency services.

Each driver carries the emergency plan which includes instructions in writing according to the ADR Regulations which states for any incident involving cyanide that the driver should ensure they are safe and it includes several actions including distance, location and use of RPE (Respiratory Protective Equipment)/PPE (Personal Protetive Equipment) to help them. These instructions are included in the Instructions in writing according to ADR Regulations which are kept in the cab of each vehicle. The driver should then contact the emergency response services who will take over management of any cyanide incident. The driver should then contact the M+L Dispatcher.

The plans and instructions are appropriate for the potential release scenarios along the route.

Details of roles for police, firefighters, medical services are identified within the Emergency Plan.

Emergency Response Practice 3.2: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.2? Explain the basis for the finding.

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.2**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.2; designate appropriate response personnel and commit necessary resources for emergency response.

M+L have had initial cyanide and emergency response training from Draslovka in December 2023 and will carry out annual refresher training. This annual training is to be provided by Draslovka. However, M+L will undertake their own cyanide and emergency plan training should Draslovka not be able to provide this in the future.

Draslovka provides training on cyanide including the Emergency Plan and mock drills to M+L. This training is to be refreshed each year and this commitment is also stated within Draslovka's Guidelines for ICMI Certification

(Supply Chain No 1) and confirmed by M +L staff. The training slides were provided for review and covered all the areas required by the code and including emergency response.

Interviews were conducted with a selection of staff from M+L. This demonstrated that personnel operating cyanide transport equipment or involved in the road transport are appropriately trained and had a good understanding of what to do in the event of an emergency.

ADR (Dangerous Goods transport) training is also completed by M+L drivers every 5 years and examples of ADR training cards were inspected for M+L drivers. The drivers have to carry these cards with them when transporting dangerous goods including cyanide.

Descriptions are provided of specific emergency response duties and responsibilities of personnel.

The Emergency Plan identifies the key roles and responsibilities in the event of an emergency for the following positions:

- M+L Drivers
- Emergency Responders (police, firefighters, medical team)

As emergency measures are the responsibility of the National Emergency services in the Czech Republic, the main actions for M+L drivers is to make themselves safe and contact the emergency services and then the M+L Dispatcher to inform others.

During interviews with M+L staff and drivers, they were asked about their roles in an emergency and the answers were consistent with the emergency procedures.

M+L Emergency response equipment is listed in their Emergency Plan. Equipment is inspected prior to each trip using check list. Expiry dates of equipment are held in M+Ls Prytanis system and are flagged in advance of the expiry dates occurring. The emergency equipment included coveralls, protective gloves, protective glasses, cartridge based respirator with ABEK (ABEK filters are multiple gas filters that protect against several types of gases and vapors) filters, covers, explosion proof approved flash lights, plastic sheet, drain cover and shovel.

Check lists are used at the start of each transport and the equipment is checked at this time. Examples of this have been observed.

The transport company does not sub-contract its activities.

Emergency Response Practice 3.3: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.3? Explain the basis for the finding.**

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

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.3; develop procedures for internal and external emergency notification and reporting.

M+L has an Emergency Plan which details the notification and communication plan in the event of an incident. This includes a flow chart and the main national emergency numbers. The Emergency Plan details the contact numbers which are the relevant national emergency numbers for emergency response providers. All contact details are reviewed at least annually as stated in the Emergency Response Plan. The internal reporting procedure is stated within the Emergency Plan and the flow chart shows that the customer is informed of any incident by M+L.

M+L would contact their client who would contact the relevant Port, and the Mine site in the event of an emergency. M+L have a responsibility to notify Draslovka (where they are the client) in the event of an incident after contacting the national emergency number. Outside emergency response providers including police, fire service and local hospitals are contacted through the national emergency number which is stated in the Emergency Response Plan.

The National emergency number (in the Czech Republic) is 112 and it is unlikely that this number will change and if it does there is likely to be widespread notification in advance of the change. However, the Emergency plan is reviewed annually, and this includes a review of the emergency contact numbers.

Drivers are also provided with the emergency transport contact sheet with current contact numbers just prior to each trip. These were observed at M+L during the interview with staff and drivers.

The transporter has a procedure (emergency plan and manual) for notifying ICMI of any significant incidents. Details of the communication requirements in the event of an emergency are presented in the M+L emergency plan.

Interviews with M+L staff confirmed that they are aware of the communication requirements in the events of an incident.

There have been no cyanide related emergencies in 2024.

Emergency Response Practice 3.4: **Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.4? Explain the basis for the finding.**

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

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.4; develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

Details of the remediation requirements are detailed within M+L's Emergency Plan which states that the responsibility for remediation of any cyanide releases rests solely with the Czech emergency services. The plan also identifies external responders who would provide support in the event of an incident. The procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

M+L's emergency response plan states specifically that "*if cyanide gest into the surface water it is forbidden to use chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide*".

In addition, it was confirmed in interviews that training provided to M+L staff reinforces the requirement that such chemicals cannot be used to treat the cyanide.

Emergency Response Practice 3.5: Is the operation in full compliance, substantial compliance, or non-compliance with Transport Practice 3.5? Explain the basis for the finding.

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 3.5**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.5; periodically evaluate response procedures and capabilities and revise them as needed.

M+L will review the Emergency plan annually.

The Emergency Plan and Manual both state that they will be reviewed annually. M+L also confirmed that their Emergency Plan is reviewed annually following its implementation. There are provisions for periodically conducting mock emergency drills and they have been and will continue to be implemented.

M+L's manual states that M+L employees must annually participate in simulated emergency exercises. M+L staff confirmed that they will participate in Draslovka's mock drills each year. If Draslovka do not go ahead with these drills for any reason, they will carry out mock drills on their own. The last mock drill was provided by Draslovka on 1/12/2023 and was attended by M+L staff.

There have been no cyanide related emergencies since in 2024.

Signature Page

Whatton Consulting Limited

Dale Haigh
Lead Auditor

Date: January 2025

Whatton Consulting Limited