

# SUMMARY AUDIT REPORT

## Operation General Information

Name of Transportation Operation: PT Trans Continent

Name of Facility Owner: Mr Ismail Rasyid

Name of Facility Operator: Mr Ismail Rasyid

Name of Responsible Manager: Mr Ismail Rasyid

Address: Jl. Tebet Raya No. 22A, Tebet Barat

State/Province: South Jakarta 12810

Country: Indonesia

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## Operation Location Detail and Description

Overview of existing supply chains

PTTC Inbound shipments of cyanide containers consists of two supply chains for two mines sites as follows:

1. PT Meares Sopotang Mineral (MSM) / PT Tambang Tonando Nusajaya Gold Mines (TTN)

*PTTC imports cyanide in the form of intermediate bulk containers (IBCs) CIF terms shipped via commercial vessel to PT Terminal Petikemas Surabaya (TPS). Thereafter these containers are being transported by Subcontractor to Surabaya Tanjung Perak Domestic seaport (outside this assessment scope)*

Followed by loading onboard TANTO commercial vessel for sea transportation to Port of BITUNG. Upon arrival at Bitung; these containers will be stored at PTTC interim storage (i.e. inside the harbor of Port of Bitung) before land transportation for delivery to MSM/TTN in North Sulawesi by PTTC own transportation and drivers.

2. PT Nusa Halmahera Minerals (NHM)

*PTTC imports cyanide in the form of intermediate bulk containers (IBCs) stored inside General Purpose (GP) containers, Cost Insurance Freight (CIF) terms shipped via commercial vessel to PT Terminal Petikemas Surabaya (TPS). Thereafter these containers are being*

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*transported by Hacaca (Subcontractor) to Surabaya Tanjung Perak Domestic seaport; (outside this assessment scope)*

Followed by loading onboard TANTO commercial vessel for sea transportation to Port of BITUNG. Upon arrival at Bitung; these containers will be stored at PTTC interim storage (i.e. inside the harbor of Port of Bitung). Delivery to NHM is by sea transportation from Port of Bitung to Tanjung Barnabas Port by Landing Craft Tank (LCTs) operated by subcontractors; 'Christine Line' and 'PT Karya Bahari' will take over the responsibility for sea transportation using Landing Craft Transport (LCT).

*Once the cyanide shipments via LCTs arrived at the Tanjung Barnabas Port and subsequent truck transportation to Nusa Halmahera Minerals are not included within the current assessment, as these are the responsibility of Nusa Halmahera Minerals. (outside this assessment scope)*

## **Outbound shipments of cyanide containers**

No return containers for the Cyanide Shipment, as all containers are Shipper Owned Containers (SOC). MSM/TTN & NHM purchased SOC from the Cyanide producer to minimise the change of contamination from the return empty container.

## **Scope of Recertification:**

agreed with PTTC as below with 2 routes and (in accordance with International Scope of Recertification Cyanide Management Institute – Cyanide Transportation Verification Protocol; – Guidance for Recertification Audits dated December 2016)

### **MSM/TTN Scope of Recertification:**

- 1). Transportation of solid sodium cyanide from International Port of Surabaya (Terminal Petikemas Surabaya), Indonesia by road to Port Perak (Domestic Port of Surabaya), Indonesia.
- 2). Sea transportation from Port of Perak to Port of Bitung, Indonesia by Commercial Vessel.
- 3). Road transportation from Port of Bitung interim storage (Terminal Petikemas Bitung) to gold mine (MSMTTN) by PTTC Transportation located in North Sulawesi.

### **NHM Scope of Recertification**

- 1). Transportation of solid sodium cyanide from International Port of Surabaya (Terminal Petikemas Surabaya), Indonesia by road to Port Perak (Domestic Port of Surabaya), Indonesia,
- 2). Sea transportation from Port of Perak to Port of Bitung, Indonesia by Commercial Vessel.
- 3). Sea transportation (Landing Craft Transport - LCT) to port of Tanjung Barnabas.

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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.

## Compliance Statement

The Summary Audit Report for a recertification audit must include one additional statement that is not required in the Summary Audit Report for an initial certification audit. For a transportation operation found in full compliance with the Code, the report must indicate whether the operation had any compliance issues or significant cyanide incidents since its previous certification and identify where in the report such information can be found.

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

## Auditor Information

Audit Company: Paul Ng

Lead Auditor: Paul Ng

Lead Auditor Email: pau.ng.esg@gmail.com

Dates of Audit: 25-27 Jan. 2023

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## Auditor Attestation

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.

PT Trans Continent

Paul Ng

2 May 2023

Name of Operation

Signature of Lead Auditor

Date

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## Principles and Standards of Practice

### Principle 1 | TRANSPORT

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

Standard of Practice 1.1:

Select cyanide transport routes to minimize the potential for accidents and releases.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.1

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

**Land transportation:**

The following procedures and records are sampled, reviewed and evaluated with the interviewees.

|                              |                    |
|------------------------------|--------------------|
| Business development manager | Sam, Nursan Nurdin |
| HSEC Manager                 | Welem Bambulu      |
| HSE officer                  | Rugdham Lahode     |
| Branch manager               | Mundhar            |

PTTC conducted a comprehensive route assessment for both

- 1). PTS to Port of Perak and
- 2). port of Bitung to MSM/TTN

for selection of routes based on site verification and procedures requirement of P209 Road Transport Procedure updated 21 July 2021 required biannually route risk assessment, management of equipment and vehicles, safety, cargo tracking, interim storage, emergency response plan (ERP), personnel and equipment, notification, neutralization of chemical evaluation of ERP that planned in 'HSEC Schedule'.

Using P210 Route Risk Assessment Procedure (June 2021 updated), consider:

- a) Population density
- b) Infrastructure (roadway, rail, port, runway, helipad) construction and condition
- c) Pitch and grade
- d) Prevalence and proximity of water bodies and fog

P233 Cyanide Route Risk Assessment - Bitung Port to MSM/TTN, updated on 10 Aug. 2021, the content (i.e. community consultation) was updated in 2023 as the procedure requirement P210, 'update and involve communities, other stakeholders and applicable governmental agencies.'

Journey management plan (for port of Surabaya to Port Perak) (July 2019) updated using the new template.

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As result of route selection, 'P214 Driver Brief – Bitung, updated 12 Aug. 2021, requires speed limit, Hazards to watch, periodically re-evaluate every 2 years; Driver Brief – PTS to port of Perak' and Driver briefing photo and attendance record (21 Sept. 2022) at Surabaya evident;

After risk assessment there is no specific safety or security concerns for 2 road transportation routes; and include local police as escort to prevent potential safety or security concerns.

Supporting evidence: photo provided 15 May 2022.

## **Sea Transportation:**

PTTC subcontracts TANTO commercial vessel for sea transportation from TPS to Port of Bitung; and 'Christine Line' and PT Karya Bahari for sea transportation using Landing Craft Transport (LCT) from TPS to port of Tanjung Barnabas.

There are no known regulations pertaining to sea transportation of cyanide products but SOLAS regulations for safe sea passage is applicable.

A statement letter (PTTC Incident Declaration 2017-2022) was provided from PTTC authorized person (i.e. Mr. Welem, the group HSEC manager) to confirm there is no incident or accident by PTTC for the assessment scope since last assessment.

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## Standard of Practice 1.2:

*Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.2

not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

### **Land transportation**

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

#### Drivers (name) & Truck (number) sampled

TR01: Melvan, TR02: Ridwan, TR06: Roy, CT01: drivers on leave

All with valid licenses from government and kept on file.

Training and training record reviewed and verified: for both PTS to Perak and Port of Bitung to MSM/TNN.

for emergency response drill in Sept 2022 for drivers (cyanide) with photo evident. Other training e.g., toolbox meeting taken with record.

F402 Training and License Register kept on file as evidence and reviewed

P206 Fit-for-Work Policy updated Mar. 2021, requires conditions to be followed, e.g. Drugs & Alcohol checks, health checks and Drugs & Alcohol screening before employment, training.

### **Sea Transportation:**

PTTC subcontracts the TANTO commercial vessel for sea transportation from TPS to the Port of Bitung, as well as the 'Christine Line' and PT Karya Bahari for sea transportation using Landing Craft Transport (LCT) from TPS to the Port of Tanjung Barnabas.

PTTC has implemented a due diligence procedure (P205) to guarantee that its subcontractors maintain compliance with the ICMI requirements to ensure that transport equipment is suitable for the cyanide shipment.

P205 Due Diligent Procedure (updated 19 Aug. 2021) with templates below for contracting/agreement and selection of contractors.

F603 Cyanide Code Due Diligence Questionnaire – Port (15 questions, updated Jan. 2021)

F604 Cyanide Code Due Diligence Questionnaire - Port Stevedore (15 questions, updated Jan. 2021)

F605 Cyanide Code Due Diligence Questionnaire - Marine Transport (22 questions, updated Jan. 2021)

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The latest DDI records reviewed as below:

DDI of 'PT Christine Line' (15 Nov. 2022),

DDI of 'PT Karya Bahari Line' (9 Feb. 2022),

DDI of port of terminal surabaya (23 Nov. 2022),

DDI of TANDO (3 Mar. 2019) evident

DDI of Port of Bitung (interim storage) (9 Feb. 2022) evident

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## Standard of Practice 1.3:

*Ensure that transport equipment is suitable for the cyanide shipment.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.3

not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

### **Land transportation**

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

P212 Vehicle Management Procedure updated in June 2021 that requires Vehicle Records, Maintenance and Servicing, Government Inspections, Pre-Start Checklist (Cyanide Pre-Departure Checklist), new Vehicle Register.

Evidence of Vehicle Records, Maintenance and Servicing (F219 vehicle maintenance schedule v3 EN Aug 2022), accepted.

P213 Driver Handbook v3 14 July 2021 available, requires emergency contact & equipment list, fit for work policy, log book (replaced by MaxxFleetPro), securing a load, breakdowns, refueling, driver training, PPE, cyanide first aid.

Refer P209 Road Transport Procedure v4, section 9, 10 & 11 required loading, unloading and securing a load to be checked in 'Pre-Start Vehicle Checklists and Pre-delivery checklist' to ensure within its rated capacity for overload prevention,.

### **Sea Transportation:**

PTTC subcontracts the TANTO commercial vessel for sea transportation from TPS to the Port of Bitung, as well as the 'Christine Line' and PT Karya Bahari for sea transportation using Landing Craft Transport (LCT) from TPS to the Port of Tanjung Barnabas.

PTTC has implemented a due diligence procedure (P205) to guarantee that its subcontractors maintain compliance with the ICMI requirements to ensure that transport equipment is suitable for the cyanide shipment.

With DDI, check to verify the sea transportation service adequacy of the equipment and to prevent overloading of the transport.

The latest DDI records reviewed as below:

DDI of 'PT Christine Line' (15 Nov. 2022),

DDI of 'PT Karya Bahari Line' (9 Feb. 2022),

DDI of port of terminal surabaya (23 Nov. 2022),

DDI of TANDO (3 Mar. 2019) evident

DDI of Port of Bitung (interim storage) (9 Feb. 2022) evident

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## Standard of Practice 1.4:

*Develop and implement a safety program for transport of cyanide.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.4

not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

### **Land transportation**

As for safety program, pre-Start Checklist (Cyanide Pre-Departure Checklist) used from procedures required below:

P201 HSEC Management System · P203 Cyanide Management Procedure · P209 Road Transport Procedure, updated 21 July 2021. (incl. communication and test procedure)

P213 Driver Handbook v3 14 July 2021 available, requires emergency contact & equipment list, fit for work policy, log book (replaced by MaxxFleetPro), securing a load, breakdowns, refueling, driver training, PPE, cyanide first aid, also requires securing a load with tips of how to secure loads.

Drivers receipt record of 'P213 Driver's Handbook' with signature (Jan. 2023)

Evidence of Government Inspections (Jan. 2023) reviewed, all are valid by Jan. 2023 with a control list of expired day. No new Vehicle purchased.

Refer P209 Road Transport Procedure v4, required and emphasized PTTC to comply with all provisions of the ICMI Code and continue to comply with the applicable terms and regulations issued by the land transportation department regarding standard placards. On site check and sampling records confirmed proper used of signages.

Refer P209 Road Transport Procedure v4, section 18 required 'If there is change requirement to the route due to natural disaster, security issues, or road / weathers conditions a Risk Assessment must be carried out by the Branch Manager, Mine Safety & Transportation Supervisor.'

A refresher been carried out for all drivers for proper use of 'Pre-Start Checklist'

Using driver's and vehicle logbook (replaced by MaxxFleetPro) to record work time, date, driver and delivery info; MAXXFleet Pro with GPS system, real time monitoring driver working hours, working hour limitation that can ask drivers to take break.

### **Sea Transportation:**

PTTC subcontracts the TANTO commercial vessel for sea transportation from TPS to the Port of Bitung, as well as the 'Christine Line' and PT Karya Bahari for sea transportation using Landing Craft Transport (LCT) from TPS to the Port of Tanjung Barnabas.

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PTTC had implemented due diligence procedure (P205) to ensure that subcontractors continue to make compliance with ICMC requirements to ensure that safety program was implemented and maintained properly; and vessel deploys appropriate equipment, which is designed and maintained to operate within the permitted loads of cyanide shipments.

There is no manipulation of the packing as the tank containers are sealed and not opened. As part of continual assessment of subcontractor; PTTC had established a procedure to periodically audit TANTO that they comply with the Code requirement.

Due diligence investigations' records conducted were verified and no significant lapses were noted.

The latest DDI records reviewed as below:

DDI of 'PT Christine Line' (15 Nov. 2022),

DDI of 'PT Karya Bahari Line' (9 Feb. 2022),

DDI of port of terminal surabaya (23 Nov. 2022),

DDI of TANDO (3 Mar. 2019) evident

DDI of Port of Bitung (interim storage) (9 Feb. 2022) evident

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## Standard of Practice 1.5:

Follow international standards for transportation of cyanide by sea.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.5

not in compliance with

## Summarize the basis for this Finding/Deficiencies Identified:

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

### **Sea Transportation** (TPS to Bitung domestic seaport)

PTTC subcontracts TANTO commercial vessel for sea transportation from TPS to Port of Bitung. Due diligence review was conducted to verify compliance with the prevailing IMDG code.

### **Sea Transportation** (Bitung domestic seaport to port of Tanjung Barnabas)

PTTC subcontracts 'Christine Line' and PT Karya Bahari for sea transportation using Landing Craft Transport (LCT) from TPS to port of Tanjung Barnabas. Due diligence review was conducted to verify compliance with the prevailing IMDG code.

During assessment, the following were verified for compliance:

- Sampled the packaging instructions and packaging provisions indicated on the DG List that according to requirement Part 4 of the IMO DG Code.
- Not applicable for Section 5.2.1 and 5.2.2 of the IMDG code as cyanide is being shipped in form of intermediate bulk containers (IBCs) stored inside GP containers
- Sampled DDI records (F604 Cyanide Code Due Diligence Questionnaire - Ports stevedores V3) about labelling requirements.
- Sampled DDI records and reviewed the transportation on truck and cargo photo that used placarded and marked that according to Chapter 5.3 of the IMO DG Code.
- Placards and hazardous signage used to identify the shipment as cyanide, for Cyanide requires 4 DG placards with 4 hazards on trucks from sampling.
- Sampled DDI records and reviewed the dangerous goods transport document been prepared with the information that according to IMO Chapter 5.4 DG code.
- Not applicable for Section 5.4.2 of the DG code as the cyanide is packaged by producer as well as for outbound empty tank containers.
- Sampled DDI records and reviewed the shipment list, manifest identifying the location of cyanide cargo in a stowage plan that according to IMO Section 5.4.3.1 of the DG Code.
- Sampled DDI records and reviewed the emergency response information/plan in place that according to the requirements Section 5.4.3.2 of the DG Code.

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Overall, TANTO, PTTC subcontracts 'Christine Line' and PT Karya Bahari were found to be in compliance with the stowage and separation requirements of Part 7 of the IMDG Code concerning cyanide shipments.

The latest DDI records reviewed as below:

DDI of 'PT Christine Line' (15 Nov. 2022),  
DDI of 'PT Karya Bahari Line' (9 Feb. 2022),  
DDI of TANDO (3 Mar. 2019) evident

PTTC does not transport cyanide by air transportation.

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## Standard of Practice 1.6:

*Track cyanide shipments to prevent losses during transport.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.6

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

### **Land transportation**

P201 – HSEC Management System, P202 – Cargo Tracking Procedure, P203 – Cyanide Management Procedure, P209 – Road Transport Procedure

P202 Cargo Tracking Procedure v3 EN 10 June 2021 updated.

Since 2019, using MAXXfleetPro with GPS monitoring system to track, (today, week and month), incl. position, speed, historic route, status of truck (parking and driving), managed in central control room.

The system can monitor the distance, time operation, moving, mileage and produce routine report.

In addition, Mobile phone, walkie talky were used for normal and emergency communications to enable two-way communications with operations room.

Communication blackout areas along transport routes been identified during route risk assessment result and remind in the 'driver brief'.

P202 Cargo Tracking Procedure required to use F239 Chain of Custody Forms to track the progress of cyanide shipments, evidences of 15 Nov. & 07 Mar. 2022 for cargo 'Sodium Cyanide' with container number list. No transfers of shipments during the entire of land transportation.

In addition, MAXXfleetPro with GPS monitoring system to track progress on road, incl. position, speed, historic route, status of truck (parking and driving), and also to track the cargo real time from the electronic map.

Indonesian version of the MSDS available in all truck units and was familiar during the cyanide product introduction training for understanding and proper use of drivers. Receipt record of 'MSDS' with signature evident.

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## Sea Transportation

(1). TPS to Bitung domestic seaport and 2).Bitung domestic seaport to port of Tanjung Barnabas)

PTTC subcontracts TANTO commercial vessel for sea transportation from TPS to Port of Bitung. PTTC subcontracts 'Christine Line' and PT Karya Bahari LCT for sea transportation from Bitung domestic seaport to port of Tanjung Barnabas that they comply with the ICMI and contractual requirements via DDI.

All tracked the vessel movements and status such as vessel port of departure, daily situation reports and vessel ETA at port of destination. Based on interview held with operation staff, there are no known blackout spots for the communication at sea during the planned voyage.

TANTO, PTTC SUBCONTRACTS 'CHRISTINE LINE' and PT KARYA BAHARI maintains inventory control of cyanide shipments by means of the shipping manifest along with designated loading areas for DG cargoes.

The cyanide information is available with updated MSDS during voyages.

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## Principle 2 | INTERIM STORAGE

### Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

#### Standard of Practice 2.1:

*Store cyanide in a manner that minimizes the potential for accidental releases.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 2.1

not in compliance with

#### *Summarize the basis for this Finding/Deficiencies Identified:*

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

The interim storage is situated within the Port of Surabaya (TPS) and Port of Bitung (TPB) for PT MSM.

P228 Bitung Warehouse & Yard Management Procedure (updated 10 Jun. 2021) requires management and inspection of warehouse & yard (interim storage), security, emergency response plan, training.

P232 Risk Assessment - Bitung Warehouse, following new Bitung warehouse opened in 2019 that P232 Risk Assessment - Bitung Warehouse & Yard was updated 10 July 2022 with actions (delay due to COVID).

Site assessment at the Port of Bitung with the following observations:

- Security and access control are being ensured with security post managed by outsourced security services and designated security officers as observed during on site visit. Visitors' access control is in place and monitored for entrance to TPS yard including areas designated for cyanide storage.
- The DG interim storage within the terminal of port Bitung is a controlled area with 24 hours security control, CCTV, security fenced, sufficient light in night-time, for Cyanide stored in container or ISO tank with locks.
- At the entrance gates into the yard with signs of 'No Smoking and Eating'.
- Warning signs (placards) were made available at the DG interim storage within the terminal of port Bitung, with signs of required PPE.
- PPE required included helmet, safety Shoes, glasses, clothing and rubber gloves.

This route handling solid Sodium Cyanide and stored in containers that in nature could be separated from incompatible materials.

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As on site observation and historic photo, separation from incompatible materials such as acids, strong oxidizers and explosives with appropriate barriers to prevent mixing available when PTTC operation.

All cyanide cargo stored inside containers at the interim storage therefore no risk to expose the environment when storage that have equivalent conditions as under a roof, off the ground, or in specially designed containers to prevent potential for contact of solid cyanide with water.

There is no possible build-up of hydrogen cyanide as the storage is in the open air and thus well ventilated.

PTTC had established a procedure (P205 and F203 to periodically audit TPS as Transit shipment/interim (for transit shipment prior to shipment to mine) that they comply with the ICMI and contractual requirements for interim storage.

The latest DDI records reviewed as below:

DDI of port of terminal surabaya (23 Nov. 2022),

DDI of Port of Bitung (interim storage) (9 Feb. 2022) evident

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## Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice 3.1:

*Prepare detailed emergency response plans for potential cyanide releases.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.1

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

**Land transportation**

P235 Cyanide Emergency Response Plan updated & reviewed on 10 Jun. 2021, 27 pages 17 sections.

And required the following identified anticipated emergency resulted from potential cyanide release derived were from risk assessment:

- Chemical Spillage at Interim Storage
- Chemical Spillage during land transportation - Vehicle accidents
- Loading and unloading accidents
- Fire at interim storage

The following ERP for associated routes and situations defined in the assessment scope that covering form of cyanide, method of transport, transport infrastructure of road and port (rail not applicable), transport vehicle or interim storage facility. That detail updated as below.

- P322 EMERGENCY RESPONSE PLAN – MSM updated & reviewed on 10 July 2021, 10 pages 8 sections.
- P323 EMERGENCY RESPONSE PLAN – NHM updated & reviewed on 24 May 2021, 10 pages 8 sections.
- P320 Transport Management - Bitung to MSM updated & reviewed on 20 Aug. 2021, 6 pages 12 sections

that requires delivery priority, convoy formation, emergency PPE kit, MSDS, vehicle, trip stop, container moves inside.

ERP manual was assigned to drivers and available in trucks.

P320 Transport Management - Bitung to MSM updated & reviewed on 20 Aug. 2021, 6 pages 12 sections that requires delivery priority, convoy formation, emergency PPE kit,

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MSDS, vehicle, trip stop, container moves inside.

F247 Emergency Contact List v4 EN (updated Version 4.00 Jan 2022) PTTC at PTS office and PTB office available that included external responders/entities with designated roles in emergency response, such as policy, fire department, hospital, clinic at port, towing services, with written information to contact ICMI when accident happened together with 'EMERGENCY MANAGEMENT STRUCTURE & ERT DUTIES (RESPONSIBILITIES) (PTTC)'.

## Sea Transportation

(1). TPS to Bitung domestic seaport and 2). Bitung domestic seaport to port of Tanjung Barnabas)

PTTC subcontracts TANTO, PTTC subcontracts 'Christine Line' and PT Karya Bahari for sea transportation as above.

Due diligence review and interview held with operations staff highlighted the contents of the ERP as follows:

- Emergency Committee
- Operation of Emergency Committee
- Drill to encounter an Emergency Hazard
- Emergency Committee Contact List
- Escalation processes

The ERP as part of shipboard management plan covers the voyage route under sea transporters' responsibility.

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## Standard of Practice 3.2:

Designate appropriate response personnel and commit necessary resources for emergency response.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.2

not in compliance with

## Summarize the basis for this Finding/Deficiencies Identified:

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

### **Land transportation**

P235 Cyanide Emergency Response Plan updated & reviewed on 10 Jun. 2021, 27 pages 17 sections.

And required the following identified anticipated emergency resulted from potential cyanide release derived were from risk assessment, ERP training as part of the DG Awareness Training conducted for personnel

involved in port, yard and transportation operations covering the following:

- Specific roles and responsibilities during activation of ERP
- Media liaisons
- Loading/unloading, yard and transportation designated emergency response equipment
- Personal Protective Equipment (PPE)

F102 HSEC Matrix v2 EN: related training defined in the matrix, e.g. 11 CN ERP (re-training cycle 3 years) & 15 Fire Extinguisher Training (re-training cycle 1 years) for relevant personnel in the matrix.

EMERGENCY MANAGEMENT STRUCTURE & ERT DUTIES (RESPONSIBILITIES) & ORGANIZATION CHART PTTC MANADO and Emergency contact of port of Bitung and PTTC Port of Surabaya (PTS) evident with updated contact detail, role/duties and responsibilities.

ERP kit stored in a container, checked condition as dated on 23 June 2022, re-inspection of all rescue equipment has been carried out and inspections carried out routinely to ensure equipment such as SCBA oxygen is full and ready when needed. Accompanied with the land transportation fleet along the transportation route, necessary emergency response and health and safety equipment, including Oxygen cylinder kit (+mask), SCBA set (2 sets), PPE (boots, gloves) total 3 pages 45 items.

Availability of Antidote for NACN checked at the nearest hospital, the Doctor confirmed

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have antidotes and know how to treat Cyanide poisoning.

## Sea Transportation

(1). TPS to Bitung domestic seaport and 2). Bitung domestic seaport to port of Tanjung Barnabas)

PTTC subcontracts TANTO, PTTC subcontracts 'Christine Line' and PT Karya Bahari for sea transportation as above.

Due diligence review and interview held with operations staff ascertain that emergency response training of their vessel were provide for personnel covering the following:

- Emergency Committee
- Operation of Emergency Committee
- Drill to encounter an Emergency Hazard
- Emergency Committee Contact List
- Escalation processes

The Emergency Equipment and PPE available on the vessel focus mainly on firefighting at sea and liquid spills. There is regular training for the vessel crew and the captain and designated persons have been trained on cyanide requirements.

# SUMMARY AUDIT REPORT

## Standard of Practice 3.3:

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.3

not in compliance with

## Summarize the basis for this Finding/Deficiencies Identified:

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

### **Land transportation**

P235 Cyanide Emergency Response Plan updated & reviewed on 10 Jun. 2021, 27 pages 17 sections.

Implemented ERP procedure covers both internal and external emergency notification and reporting as part of the incident response structure (P250).

F247 Emergency Contact List v4 EN (updated Version 4.00 Jan 2022) that included external responders/entities with designated roles in emergency response, such as police, fire department, hospital, clinic at port, towing services, with written information to notify ICMI when accident happened together with 'EMERGENCY MANAGEMENT STRUCTURE & ERT DUTIES (RESPONSIBILITIES) (PTTC)'.  
EMERGENCY MANAGEMENT STRUCTURE & ERT DUTIES (RESPONSIBILITIES) & ORGANIZATION CHART and F247 Emergency Contact List for PTTC at PTS office and PTTC Port of Surabaya (PTS) available as well with written information to notify ICMI when accident happened.

Also required to update internal and external emergency notification in F247 Emergency Contact List

Also required to update internal and external emergency notification in F247 Emergency Contact List

### **Sea Transportation**

(1). TPS to Bitung domestic seaport and 2). Bitung domestic seaport to port of Tanjung Barnabas)

PTTC subcontracts TANTO, PTTC subcontracts 'Christine Line' and PT Karya Bahari for sea transportation as above.

Due diligence review and interview held with operations staff ascertain that no significant cyanide incidents that need to notify ICMI have occurred since the previous audit.

A statement letter (PTTC Incident Declaration 2017-2022) was provided from PTTC authorized person (i.e. Mr. Welem) to confirm there is no incident or accident by PTTC for the assessment scope since last assessment.

Name of Operation:  
PT Trans Continent

Signature of Lead Auditor  
& Technical Expert 

Date: 2 May 2023 (final version)

# SUMMARY AUDIT REPORT

## Standard of Practice 3.4:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.4

not in compliance with

## *Summarize the basis for this Finding/Deficiencies Identified:*

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

### **Land transportation**

For treatment of cyanide that has been released into the water, is not applicable for PTTC as responsibility to treat contaminated product and material is under MSM and NHM responsibility.

P235 Cyanide Emergency Response Plan updated & reviewed on 10 Jun. 2021, 27 pages 17 sections.

The following ERP for associated routes defined in the assessment scope that covering form of cyanide, method of transport, transport infrastructure of road and port (rail not applicable), transport vehicle or interim storage facility. That detail updated as below.

- P322 EMERGENCY RESPONSE PLAN – MSM updated & reviewed on 10 July 2021, 10 pages 8 sections.
- P323 EMERGENCY RESPONSE PLAN – NHM updated & reviewed on 24 May 2021, 10 pages 8 sections.
- P320 Transport Management - Bitung to MSM updated & reviewed on 20 Aug. 2021, 6 pages 12 sections

that requires delivery priority, convoy formation, emergency PPE kit, MSDS, vehicle, trip stop, container moves inside.

In the ERP, mentioned about neutralization, decontamination, use of ferrous sulfate, procedure (P319 Cyanide Emergency Response Plan v2 EN (Revision) May 2022) prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

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Signature of Lead Auditor  
& Technical Expert 

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# SUMMARY AUDIT REPORT

Standard of Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.5

not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:*

The following procedures, equipment and records are sampled, reviewed and evaluated with the interviewees.

## **Land transportation**

P235 Cyanide Emergency Response Plan updated & reviewed on 10 Jun. 2021, 27 pages 17 sections.

The following ERP for associated routes defined in the assessment scope that covering form of cyanide, method of transport, transport infrastructure of road and port (rail not applicable), transport vehicle or interim storage facility. That detail updated as below.

- P322 EMERGENCY RESPONSE PLAN – MSM updated & reviewed on 10 July 2021, 10 pages 8 sections.
- P323 EMERGENCY RESPONSE PLAN – NHM updated & reviewed on 24 May 2021, 10 pages 8 sections.
- P320 Transport Management - Bitung to MSM updated & reviewed on 20 Aug. 2021, 6 pages 12 sections

that requires delivery priority, convoy formation, emergency PPE kit, MSDS, vehicle, trip stop, container moves inside.

HSEC SCHEDULE (2019-2022): mock drill quarterly, ERP Contact Review & Due Diligence Subcon review annually for a branch office.

The HSEC SCHEDULE sampled (July 2022) and planned and made available for 2023 to ensure periodically conducting mock emergency drills.

Drill was normally joined with the client, e.g. MSM.

Drill planned and taken annually, evidence with photo available and reviewed (sampled 2022, 2023).

Drills were taken for spillage of NACN at PTS (Mar. 2019) training (2017).

Name of Operation:  
PT Trans Continent

Signature of Lead Auditor  
& Technical Expert 

Date: 2 May 2023 (final version)