REPORT

International Cyanide Management Code

Toll Global Logistics, Recertification
Summary Audit Report
Australian Supply Chain - Amendment

Submitted to:

International Cyanide Management Institute
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WASHINGTON, DC 20005
UNITED STATES OF AMERICA

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Table of Contents

APPENDICES

APPENDIX A
Important Information

1.0 INTRODUCTION

1.1 Operational information

Name of Transportation Facility:	Toll Global Logistics – Australian Supply Chain
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Toll Global Logistics
Name of Responsible Manager:	Shayne Holman, Regional HSE Manager
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2.0 CYANIDE TRANSPORTATION

2.1 Toll Global Logistics

Toll Global Logistics provides transportation of cyanide within the Australian Supply Chain through the use of various divisions and subcontractors. All road transporters operate under TGL procedures for transport and are required to have maintenance systems in place that meet TGL standards.

TGL provides road transportation to customers in Queensland and the Northern Territory and to customers in NSW and Western Australia via other Toll divisions. The TGL Australian Supply Chain covers:

- The transportation of solid cyanide within containerised intermediate bulk containers (IBCs) and sparge isotainers, and liquid cyanide in isotainers from Orica Australia Limited's (Orica) Yarwun Production Facility, Australia to the customer mine sites throughout Australia by rail and road.
- The transport of solid cyanide within containerised intermediate bulk containers (IBCs) and liquid cyanide in isotainers produced by Australian Gold Reagents' (AGR) Kwinana Production Facility from the Kalgoorlie Rail Terminal to customer mine sites by road. AGR is a certified transporter and the transport of cyanide from AGRs production facility to the Kalgoorlie Rail Terminal is part of AGRs certified supply chain.

Both Orica and AGR are certified under the Code as transporters and have systems in place that meet Code requirements. TGL implements and maintains their client's systems, tools and procedures where required and has interfaces with both AGR and Orica systems for their respective client supply chains particularly in relation to emergency response.

2.2 Audit Scope

The scope of this Transportation Recertification Audit includes road transportation of cyanide from the manufacturing facilities in Yarwun, Queensland (Orica) and Kwinana, Western Australia (AGR) to customers within Australia.

The scope of the 2017 Australian Supply Chain audit covers:

Road Transportation by

- TGL and is subsidiary business units in Queensland (QLD), New South Wales (NSW), Western Australia (WA), Victoria (VIC), South Australia (SA), Tasmania (TAS) and the Northern Territory (NT).
- TGL Subcontractor road transporters KJP Haulage (QLD/NT), MJL Landforming (QLD/NSW) and Skynight (WA).

Rail Transportation by Aurizon or Pacific National with the following nodes:

- Dynon North Rail Terminal, VIC.
- Acacia Ridge Rail Terminal, QLD.
- Mount Miller Dangerous Goods and Industrial Siding, QLD.
- West Kalgoorlie Rail Terminal, WA.
- Chullora Rail Terminal, NSW.
- Adelaide Freight Terminal, SA

As noted previously, rail transport from Australian Gold Reagents (AGR) production facility in Kwinana to West Kalgoorlie Rail Terminal is not within the scope of this audit.

2.3 Road Transportation

2.3.1 KJP Haulage

KJP Haulage provides bulk tanker haulage on a subcontracting basis to TGL out of Gladstone, QLD. KJP Haulage delivers to a number of customer mines in Queensland and New South Wales. Transportation of cyanide is undertaken utilising the systems and procedures established by TGL. KJP Haulage was audited by Golder as part of the audit of TGL.

2.3.2 MJL Landforming

MJL Landforming provides bulk tanker haulage on a subcontracting basis to TGL out of Gladstone, QLD. MJL Landforming primarily delivers to the Dubbo NSW replacing the previous rail connection. Transportation of cyanide is undertaken utilising the systems and procedures established by TGL. MJL Landforming were audited by Golder as part of the audit of TGL.

2.3.3 Skynight

Skynight provides bulk tanker haulage on a subcontracting basis to TGL out of Kalgoorlie. Skynight delivers to a number of customer mines in the Kalgoorlie region of Western Australia. Transportation of cyanide for TGL is undertaken utilising the systems and procedures established by TGL. Skynight was audited by Golder as part of the audit of TGL.

2.4 Rail Transportation

2.4.1 Aurizon Rail

Aurizon's intermodal business transports general freight, industrial freight and specialised bulk freight to a diverse customer base across Australia. Within the scope of this audit, Aurizon transport cyanide via rail to a number of Rail Terminals in Queensland, New South Wales and Western Australia, whereby the cyanide is transited through to a road transporter for onward delivery.

2.4.2 Pacific National Rail

Pacific National is one of Australia's largest rail freight businesses. The Pacific National Chullora rail terminal facility is a transitory facility for inbound and outbound goods and cyanide units pass through Chullora on their way to South Australia and NSW. This was previously used for rail transport to Dubbo, which has been replaced by a road connection. Pacific National also operate the Adelaide Freight Terminal in South Australia where cyanide units pass through on their way to Western Australia.

2.5 Trans-shipping and interim storage

Within the scope of this audit, there are two trans-shipping depots, one located in Dubbo, NSW and the other in Kalgoorlie, Western Australia.

2.5.1 TGL West Kalgoorlie Depot

The TGL West Depot in Kalgoorlie, Western Australia, provides ad-hoc interim storage for cyanide shipments in transit. Cyanide is collected from the Kalgoorlie Rail Terminal and transported via road to the depot. The trailer with the liquid cyanide container is parked in the designated bunded location. Typically storage at the depot is limited to two days in duration.

Solid cyanide is iso-containers for sparge are stored in a designated area of the hard stand.

At no stage is the cyanide removed from the container or the container removed from the trailer.

2.5.2 TCL Dubbo Depot

At the Toll Chemical Logistics (TCL) Dubbo Depot in New South Wales, cyanide is delivered via transported via road to the site. The trailer with the cyanide container is either parked on site for less than 24 hours or the container is placed in a designated area for up to a week. The storage area is located within a designated major hazard facility and there is a dedicated pad for transit storage. Cyanide is not removed from the container.

2.6 Auditors Findings and Attestation

☒ **in full compliance with**

TGL is: ☐ in substantial compliance with **The International Cyanide Management Code**

☐ not in compliance with

No significant cyanide exposures or releases were noted to have occurred during TGL's Supply Chain recertification audit.

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Mike Woods, Exemplar Global (110895)

Email: mwoods@golder.com.au

2.7 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		7 January 2019

2.8 Dates of Audit

The ICMC Recertification Audit was conducted over 5 days between 9 -12 and 18 October 2017 at TGL facilities in Gladstone (QLD) Arndell Park (NSW), Dubbo (NSW) and Kalgoorlie (WA) with the Detailed Audit Report being finalised in February 2018. The components for the amendment were audited over 3 days 11-12 September and 20 December 2018 with the amendment report finalised in January 2019.

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

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

3.0 CONSIGNOR SUMMARY

3.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

3.1.1 Transport Practice 1.1

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

	☒ **in full compliance with**	
TGL is	☐ in substantial compliance with	**Transport Practice 1.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

TGL has implemented a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. TGL has a procedure for conducting route assessments that does include the assessment of schools, factories, infrastructure, intersections, towns and city, construction activities, sharp turns and steep gradients, bridges, tunnels, area known for instability, rivers, lakes, speed limits, seasonal weather conditions (snow, ice, flooding, fog) and medical facilities.

The route assessment documents the hazards/threats identified and details the control measure for the hazards and are documented on a route assessment form which is used to generate a journey management plan (JMP) that conveys key hazards and controls to the drivers.

TGL does implement a process or procedure to periodically re-evaluate routes used for cyanide deliveries. TGL has implemented a *Safe Driving Plan* that details the specifics of the trip, driver declaration, origin and destination and includes a section for any trip issues. The drivers are required to submit the form upon completion and it is signed off by their supervisor.

TGL does document the measures taken to address risks identified with the selected routes. The route assessment document details the measures taken to address risks identified with the selected routes and the JMP process summarises and documents the control measure for the individual route.

TGL, through collaboration with the Australian based cyanide producers, seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. The community is indirectly consulted.

Within Australia, cyanide can only be transported along government-designated dangerous goods routes with the designation of any new routes a consultative process between the government and stakeholders, including affected communities.

Where multiple designated dangerous goods routes exist, the route selection and risk assessment process is used to ascertain which the preferred route is and what management measures should be utilised in the transportation of cyanide along the route.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

Direct engagement of communities by TGL within Australia did not occur for the following reasons:

- The community has the opportunity to comment during the designation of dangerous goods routes.
- The community was not designated a role as part of the planned response to an emergency involving cyanide, negating the need for community consultation on this issue.
- The risk management measures implemented for the cyanide transportation are considered a high standard and negate the need for community consultation in the development of such measures.

Risk management measures used by TGL include during cyanide transportation include daylight only travel restrictions, speed limitations in built up areas, the use of locked and sealed containers, GPS tracking and alert system of shipments, audit schedules, avoidance of school entry and exit hours, and detailed risk assessment of the designated route to identify other management measure.

TGL has assessed its routes and considered that no routes require specific additional control measures for special safety or security considerations.

The notification of external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response is undertaken by Producer's as part of their responsibilities.

Within Australia, the State Governments have established civil response capabilities whose remit includes responding to hazardous materials incidents. The governments control the dangerous goods routes and collect information on the nature of dangerous goods transported. Civil response agencies such as the Department of Fire and Emergency Services (DFES) in Western Australia, Queensland Fire and Rescue, Melbourne Fire Brigade together with assistance from State Police take control on emergency situations to protect the public.

The TGL emergency response process is to isolate the area and contact the emergency services and the cyanide producer. The two Australian cyanide producers have established 24 hour emergency contact centres to provide advice and technical support to responders. The TGL emergency response process does not designate roles for other entities or have mutual aid agreements outside of the agreements with the cyanide producers.

TGL does subcontract the road transport and handling of cyanide to the following entities:

- KJP Haulage (Queensland)
- MJL Landforming (Queensland)
- Skynight (Western Australia).

The subcontracted transporters all operate under TGL procedures for the transport of cyanide. When transporting cyanide the subcontractor trucks and drivers are subject to the same rules, expectations and management as TGL applies to its own drivers and vehicles. Subcontractors must follow TGL rules and completing TGL designated training for cyanide transport.

TGL implements a procedure to ensure its subcontractors meets the requirements of the Code. TGL audits its subcontractors to ensure compliance with their procedures.

TGL has completed periodic due diligence assessments of the rail components of their supply chains and the assessments concluded that the rail transporters and terminals are considered to meet TGL operational requirements.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

KJP Haulage

KJP Haulage implements TGL's systems and procedures for the transport of cyanide. Subcontractors must follow TGL rules and completing TGL designated training for cyanide transport

As noted above TGL is responsible and conduct route assessments, document controls, assess security risks and engage with external stakeholder.

MJL Landforming

MJL Landforming implements TGL's systems and procedures for the transport of cyanide. Subcontractors must follow TGL rules and completing TGL designated training for cyanide transport

As noted above TGL is responsible and conduct route assessments, document controls, assess security risks and engage with external stakeholder.

Skynight

Skynight implements TGL's systems and procedures for the transport of cyanide. Subcontractors must follow TGL rules and completing TGL designated training for cyanide transport.

As noted above TGL is responsible and conduct route assessments, document controls, assess security risks and engage with external stakeholder.

Due Diligences – Rail Operators

Aurizon

TGL conducted compiled a due diligence of Aurizon on 1 August 2017. The assessment found that Aurizon meets TGL's operational requirements.

Pacific National

TGL conducted compiled a due diligence of Pacific National on 1 August 2017. The assessment found that Pacific National meets TGL's operational requirements.

Due Diligences – Rail Terminals and Sidings

The selection of rail terminals is dictated by the rail carrier.

Aurizon West Kalgoorlie Rail Terminal

TGL conducted a due diligence of the Aurizon West Kalgoorlie Rail Terminal on 18 August 2017. The assessment found that the facility meets TGL's operational requirements.

Aurizon Mount Miller Dangerous Goods and Industrial Siding

TGL conducted a due diligence of the Aurizon Mt Miller Dangerous Goods and Industrial Siding on 29 September 2017. The assessment found that the facility meets TGL's operational requirements.

Aurizon Acacia Ridge Rail Terminal

The selection of rail terminals is dictated by the rail carrier. TGL conducted a due diligence of the Aurizon Acacia Ridge Rail Terminal on 1 August 2017. The assessment found that the facility meets TGL's operational requirements.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

Aurizon Dynon Melbourne, Rail Terminal

TGL conducted a due diligence of the Aurizon Dynon Rail Terminal on 19 September 2017. The assessment found that the facility meets TGL's operational requirements.

Pacific National Chullora Rail Terminal

TGL conducted a due diligence of the Pacific National Chullora Rail Terminal on 12 October 2017. The assessment found that the facility meets TGL's operational requirements.

Adelaide Freight Terminal

TGL conducted a due diligence of the Adelaide Freight Terminal on 20 November 2018. The assessment found that the facility meets TGL's operational requirements.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

3.1.2 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.

	☒ **in full compliance with**	
TGL is	☐ in substantial compliance with	**Transport Practice 1.2**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

TGL does only use trained, qualified and licensed operators for its transport vehicles. All drivers undertaking cyanide transport must have a government issued current driver's license with relevant category along with mandatory internal training. The internal training specific to cyanide transport includes Cyanide Awareness and Transport Emergency Response Plan (TERP).

New drivers are trained using a buddy system to familiarise them with the route and check that driving skill and behaviour aligns with TGL standards.

All personnel operating cyanide transport equipment are trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. TLG use an online learning system to deliver and record mandatory training content. In addition to the online training, driver briefings and toolbox sessions are also used to provide information and instruction to drivers.

KJP Haulage

KJP Haulage drivers must meet TGL training, qualification and licensing requirements prior to transporting cyanide. The TGL training matrix includes KJP Haulage drivers.

MJL Landforming

MJL Landforming drivers must meet TGL training, qualification and licensing requirements prior to transporting cyanide. The TGL training matrix includes MJL Landforming drivers.

Skynight

Skynight drivers must meet TGL training, qualification and licensing requirements prior to transporting cyanide. The TGL training matrix includes Skynight drivers.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

The operation only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. The operation maintains a dedicated fleet of prime movers and trailers to transport cyanide freight containers, liquid isotainers and sparge isotainers. Equipment specifications are recorded on an approved equipment register. TGL and its subcontractors operate under the National Heavy Vehicle Accreditation Scheme (NHVAS).

TGL vehicles involved in the transportation of cyanide are subject to two layers of preventative maintenance:

- TGL servicing comprising an “ABC” maintenance scheme that includes checks on the structural integrity of the vehicles
- Maintenance Management Accreditation Servicing as part of the NHVAS.

TGL also utilises documented pre-departure checks that also require drivers to comment on the condition of the vehicle, including frame and panel security and tyre condition.

TGL does subcontract the transport and handling of cyanide to the following entities:

- KJP Haulage (Queensland)
- MJL Landforming (Queensland)
- Skynight (Western Australia).

TGL does subcontract the transport and handling of cyanide. TGL implements a procedure to ensure its subcontractors meets the requirements of the Code. Subcontract transporters operate under TGL procedures following TGL rules and completing TGL designated training for cyanide transport. TGL audits its subcontractors to ensure compliance with their procedures.

TGL have completed periodic due diligence assessments of the rail components of their supply chains.

KJP Haulage

KJP Haulage operates under and is guided by the procedures and process put in place by TGL to ensure that transport equipment is suitable for the cyanide shipment.

All KJP Haulage vehicles used to transport cyanide for TGL are subject to TGL's systems and procedures to ensure that equipment is designed and maintained to operate within the loads it will be handling, verify the adequacy of the equipment for the load it must bear and prevent overloading of the transport vehicle being used for handling cyanide.

MJL Landforming

MJL Landforming operates under and is guided by the procedures and process put in place by TGL to ensure that transport equipment is suitable for the cyanide shipment.

All MJL Landforming vehicles used to transport cyanide for TGL are subject to TGL's systems and procedures to ensure that equipment is designed and maintained to operate within the loads it will be handling, verify the adequacy of the equipment for the load it must bear and prevent overloading of the transport vehicle being used for handling cyanide.

Skynight

Skynight operates under and is guided by the procedures and process put in place by TGL to ensure that transport equipment is suitable for the cyanide shipment.

All Skynight vehicles used to transport cyanide for TGL are subject to TGL's systems and procedures to ensure that equipment is designed and maintained to operate within the loads it will be handling, verify the adequacy of the equipment for the load it must bear and prevent overloading of the transport vehicle being used for handling cyanide.

3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

TGL has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. Cyanide product is loaded and sealed by the producer and TGL has written procedures to check seals on all vessels and containers. Seal numbers are recorded and cross checked at each point of the delivery chain through the delivery dockets.

Delivery dockets are also carried on all vehicles. These documents are carried for each leg of the journey and they require the carrier and customer to sign that all seals have been checked and are intact and the material grade is detailed on the seals.

TGL uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards. Vehicle placarding consists of Emergency Information Panels (EIPs) placed on each of the long sides of the container and on the vehicle so that it is visible from the rear. One Class 6 dangerous goods class label is placed at the front of the vehicle.

The TGL pre-departure checks include checks on placarding for the presence of dangerous goods diamonds, EIPs and dangerous goods labels.

TGL implements a safety programme for cyanide transport that includes:

- Vehicle inspections prior to each departure that covers both the prime mover and trailer and includes vehicle roadworthiness, dangerous goods requirements, PPE, communication equipment, etc.
- A preventative maintenance program including two layers of preventative maintenance annual audits of its subcontractors.
- Limitations on operator or drivers' hours through a management standard that aligns with standard hours in states and territories governed by the Heavy Vehicle National Law (HVNL). Drivers complete a plan that defines and records rest breaks and driving time. The operation also uses in vehicle management systems to monitor vehicle operation times and driver fatigue.
- Cyanide is stowed into the freight containers by the producer. Isotainers and freight containers are the only containment methods used during transport and these are secured using twist locks, which are designed and constructed to international transport standards. Twist locks are inspected prior to each departure and periodically during the journey.
- Procedures by which transportation can be modified or suspended

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

- A Drugs and Alcohol Policy, and a drug abuse prevention programme.
- Records are maintained that the above activities have been conducted.

TGL does subcontract the transport and handling of cyanide. TGL implements a procedure to ensure its subcontractors meets the requirements of the Code. Subcontract transporters operate under TGL procedures following TGL rule and completing TGL designated training for cyanide transport. TGL audits its subcontractors to ensure compliance with their procedures.

KJP Haulage

KJP Haulage abides by TGL's systems and procedures for the safe transport of cyanide including procedures to maintain the integrity of the cyanide producer's packaging and placarding of cyanide shipments.

KJP Haulage is required to abide by the following TGL safety programs:

- Vehicle inspections
- Preventative maintenance
- Limitations on driver hours
- Load shifting prevention
- Procedures for the suspension or modification of routes
- Drug abuse prevention.

MJL Landforming

MJL Landforming abides by TGL's systems and procedures for the safe transport of cyanide including procedures to maintain the integrity of the cyanide producer's packaging and placarding of cyanide shipments.

MJL Landforming is required to abide by the following TGL safety programs:

- Vehicle inspections
- Preventative maintenance
- Limitations on driver hours
- Load shifting prevention
- Procedures for the suspension or modification of routes
- Drug abuse prevention.

Skynight

Skynight abides by TGL's systems and procedures for the safe transport of cyanide including procedures to maintain the integrity of the cyanide producer's packaging and placarding of cyanide shipments.

Skynight Haulage is required to abide by the following TGL safety programs:

- Vehicle inspections
- Preventative maintenance
- Limitations on driver hours
- Load shifting prevention
- Procedures for the suspension or modification of routes
- Drug abuse prevention.

3.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

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

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to TGL.

TGL does not intend to transport consignments of cyanide by sea within the scope of this audit.

TGL Transport does not intend to transport consignments of cyanide by air within the scope of this audit.

KJP Haulage

KJP Haulage does not transport consignments of cyanide by sea or by air within the scope of this audit.

MJL Landforming

MJL Landforming does not transport consignments of cyanide by sea or by air within the scope of this audit.

Skynight

Skynight does not transport consignments of cyanide by sea or by air within the scope of this audit..

3.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

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

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

TGL transport vehicles have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

All vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Trucks are fitted with duress buttons.

Consignees are advised of dispatch time, estimated arrival time and extensive information on the container that was dispatched (i.e. container number, safety equipment on board, security seal numbers for outgoing and return loads, etc.)

TGL periodically tests the communication equipment including prior to each delivery as part of the pre-departure checks and through the continuous operation of the systems.

TGL ensures communication blackout areas along transport routes are identified and special procedures are implemented for within these blackout areas. This process is undertaken during the route assessment process.

TGL has identified communication blackout areas for phone coverage along transport routes. The occurrence of blackout areas is offset by the presence of satellite tracking and satellite phone systems installed within the trucks. In the event that a driver is unable to use the UHF radio or mobile phone to communicate with TGL, the satellite phone is used.

TGL has extensive procedures to track the progress of cyanide shipments including advising consignees estimated consignment departure/arrival, and the use of satellite tracking, phone and UHF systems to monitor progress along transport routes.

TGL has appropriate inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. Inventory controls are the primary method of preventing product loss during shipment. These controls include the following:

- Consignments are identified and documented (individual IBCs are identified by number, and each freight container and each isotainer number is recorded).
- All containers are locked with seals and the seal numbers are recorded and checked by the consignee. Seals are also checked at transfer locations and on route.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

- The shipments are weighed when leaving the production facility and again when arriving at the mine site.
- The identifying container numbers are transmitted to the consignee and are checked off by the representative (driver) and consignee at the point of delivery.

The controls placed on empty containers on the return journey are the same as full ones.

Shipping records indicating the amount of cyanide in transit and Safety Data Sheets are available during transport. A copy of the emergency response plan with the SDS booklet held within the cabin of each vehicle.

TGL does subcontract the transport and handling of cyanide. TGL implements a procedure to ensure its subcontractors meets the requirements of the Code. Subcontract transporters operate under TGL procedures following TGL rules and completing TGL designated training for cyanide transport. TGL audits its subcontractors to ensure compliance with their procedures.

KJP Haulage

KJP Haulage abides by TGL's systems and procedures for the tracking of cyanide to prevent losses during transport.

KJP Haulage vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Communication with consignees is by telephone and email and coordinated by through TGL.

KJP Haulage's communication equipment, communication blackout areas and cyanide tracking is managed through processes established by TGL. KJP Haulage has adopted TGL's inventory controls and shipping records, as described for TGL, are available during the transport of cyanide by KJP Haulage.

MJL Landforming

MJL Landforming abides by TGL's systems and procedures for the tracking of cyanide to prevent losses during transport.

MJL Landforming vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Communication with consignees is by telephone and email and coordinated by through TGL.

MJL Landforming communication equipment, communication blackout areas and cyanide tracking is managed through processes established by TGL. MJL Landforming has adopted TGL's inventory controls and shipping records, as described for TGL, are available during the transport of cyanide by MJL Landforming.

Skynight

Skynight abides by TGL's systems and procedures for the tracking of cyanide to prevent losses during transport.

Skynight vehicles have comprehensive communications systems that include GPS tracking, mobile telephones, satellite telephones and UHF radios that are on for the duration of each trip. Communication with consignees is by telephone and email and coordinated by through TGL.

Skynight communication equipment, communication blackout areas and cyanide tracking is managed through processes established by TGL. Skynight jas adopted TGL's inventory controls and shipping records, as described for TGL, are available during the transport of cyanide by Skynight.

3.2 Principle 2 – Interim Storage

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

3.2.1 Transport Practice 2.1

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

	☒ **in full compliance with**	
TGL is	☐ in substantial compliance with	**Transport Practice 2.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 2.1 that requires transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

There are two trans-shipping depots or interim storage sites within the Toll Australian Supply Chain.

Toll's Dubbo Depot has a dedicated storage area within a chemical storage facility. The cyanide (typically solid cyanide in sparge isocontainers) are left on a trailer that is parked over a concrete bay.

Toll's Kalgoorlie Depot has two dedicated areas of hardstand where the cyanide is stored. Liquid cyanide in isocontainers on trailers are parked over a concrete bund. The solid cyanide (typically in sparge isocontainers) are placed on a dedicated area of hard stand.

Both depot facilities have a full perimeter fence and access control system to prevent unauthorised access to the depot. The cyanide is stored within the sealed and locked isocontainers that prevent access. There are warning signs that alert works to the hazard and that smoking, open flames, eating and drinking are not allowed. The cyanide is stored in the open air, which would prevent the build-up of HCN gas.

Due Diligences – Rail Terminals and Sidings

The selection of rail terminals is dictated by the rail carrier.

Aurizon West Kalgoorlie Rail Terminal

TGL conducted a due diligence of the Aurizon West Kalgoorlie Rail Terminal on 18 August 2017. The assessment found that the facility meets TGL's operational requirements including those for the interim storage of cyanide should it be necessary, further detail is provided in Section 4.0.

Aurizon Mount Miller Dangerous Goods and Industrial Siding

TGL conducted a due diligence of the Aurizon Mt Miller Dangerous Goods and Industrial Siding on 29 September 2017. The assessment found that the facility meets TGL's operational requirements including those for the interim storage of cyanide should it be necessary, further detail is provided in Section 4.0.

Aurizon Acacia Ridge Rail Terminal

The selection of rail terminals is dictated by the rail carrier. TGL conducted a due diligence of the Aurizon Acacia Ridge Rail Terminal on 1 August 2017. The assessment found that the facility meets TGL's operational requirements including those for the interim storage of cyanide should it be necessary, further detail is provided in Section 4.0.

Aurizon Dynon Melbourne, Rail Terminal

TGL conducted a due diligence of the Aurizon Dynon Rail Terminal on 19 September 2017. The assessment found that the facility meets TGL's operational requirements including those for the interim storage of cyanide should it be necessary, further detail is provided in Section 4.0.

Pacific National Chullora Rail Terminal

TGL conducted a due diligence of the Pacific National Chullora Rail Terminal on 12 October 2017. The assessment found that the facility meets TGL's operational requirements including those for the interim storage of cyanide should it be necessary, further detail is provided in Section 4.0.

Adelaide Freight Terminal

TGL conducted a due diligence of the Adelaide Freight Terminal on 20 November 2018. The assessment found that the facility meets TGL's operational requirements. Transitional storage is provided at this location for onward road or rail transport. Further detail is provided in Section 4.0.

3.3 Principle 3 – Emergency Response

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

3.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

	☒ **in full compliance with**	
TGL is	☐ in substantial compliance with	**Transport Practice 3.1**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

The management of cyanide related emergencies is an integrated approach with the assistance of the cyanide producers (Orica and AGR). The TERP details the interface and responsibilities of the transporter (TGL) and the producer.

TGL's TERP is the emergency response document that will be used in the case of a cyanide related incident and covers all transport emergencies. The TERP breaks down emergencies into the following categories:

- Vehicle breakdown
- Minor vehicle incident
- Major vehicle incident.

TGL has a *Subcontractor and Driver's TERP*, under which road transport subcontractors operate.

The TERP covers all transport movements controlled by TGL and is appropriate for the selected transportation route or interim storage facility. The TERP requires notification of Emergency Services, TGL Operations Manager and the cyanide producer's emergency response service (ERS) in the event of a cyanide emergency during transport.

The drivers have a copy of the *Subcontractors and Driver's TERP* and the ISS First Response number, which is a 24-hour emergency contact centre that relays information to TGL's Management, the cyanide producer's ERS and Emergency Services as needed.

TGL access the resources of the respective producer for cyanide related incidents. Both producers approached off-site releases as a shared responsibility and transporters have access to both producer's 24-hour emergency call centres.

The two interim storage facilities have emergency response plans that detail response actions at the depot including notification, evacuation and containment. The actions within the plans are considered appropriate for the cyanide material storage and the method of packaging/storage.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

The TERP does consider both the physical and chemical form of cyanide. The TERP prompts activation of the producer's ERS and thus addresses both the chemical and physical forms of cyanide. The TERP also includes the SDS, which provides information on the physical and chemical form of cyanide and the associate hazards and response actions.

TGL operates the road component of the supply chain, with rail transport covered by due diligences. The TERP has been developed specifically for road transportation.

The consideration of transport infrastructure has also been undertaken by TGL through route risk assessments and route assessments. Route assessments detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route.

The plan does consider the design of the transport vehicle. The plans are based around the road transportation of isocontainers and freight containers.

The plans do include descriptions of response actions, as appropriate for the anticipated emergency situation. The *Subcontractor and Drivers TERP* provides actions and responsibilities for Drivers/Subcontractor Drivers, ISS Responder and Operations Manager. The TERP outlines responsibilities for Drivers, Subcontractors, ISS First Response Responder, Incident Coordinator, Incident Responder, General Manager and National HSE Manager.

There are procedures for response to break down, product recovery, threats and motor vehicle incidents.

The plan does identify the role of emergency responders through the use of the national emergency number and through contacting the producer. Specific responder actions are not detailed in the plan as government emergency response agencies assume control of an incident initially until satisfied that public safety is no longer a concern.

KJP Haulage

KJP Haulage operate under TGL's emergency response processes and procedure. They follow TGL's Subcontractors and Driver's TERP which provides the information needed for the vehicle operators to response to in an emergency. Drivers have a notification roles and scene isolation and control role as far as circumstances allow.

MJL Landforming

MJL Landforming operate under TGL's emergency response processes and procedure. They follow TGL's Subcontractors and Driver's TERP which provides the information needed for the vehicle operators to response to in an emergency. Drivers have a notification roles and scene isolation and control role as far as circumstances allow.

Skynight

Skynight operate under TGL's emergency response processes and procedure. They follow TGL's Subcontractors and Driver's TERP which provides the information needed for the vehicle operators to response to in an emergency. Drivers have a notification roles and scene isolation and control role as far as circumstances allow.

Due Diligences – Rail Terminals and Sidings

The selection of rail terminals is dictated by the rail carrier.

Aurizon West Kalgoorlie Rail Terminal

TGL conducted a due diligence of the Aurizon West Kalgoorlie Rail Terminal on 18 August 2017. The assessment found that the facility meets TGL's operational requirements.

Aurizon Mount Miller Dangerous Goods and Industrial Siding

TGL conducted a due diligence of the Aurizon Mt Miller Dangerous Goods and Industrial Siding on 29 September 2017. The assessment found that the facility meets TGL's operational requirements.

Aurizon Acacia Ridge Rail Terminal

The selection of rail terminals is dictated by the rail carrier. TGL conducted a due diligence of the Aurizon Acacia Ridge Rail Terminal on 1 August 2017. The assessment found that the facility meets TGL's operational requirements.

Aurizon Dynon Melbourne, Rail Terminal

TGL conducted a due diligence of the Aurizon Dynon Rail Terminal on 19 September 2017. The assessment found that the facility meets TGL's operational requirements.

Pacific National Chullora Rail Terminal

TGL conducted a due diligence of the Pacific National Chullora Rail Terminal on 12 October 2017. The assessment found that the facility meets TGL's operational requirements.

Adelaide Freight Terminal

TGL conducted a due diligence of the Adelaide Freight Terminal on 20 November 2018. The assessment noted that the terminal has an emergency response plan in place and training is provided on first response. Cyanide is not stored at the facility. The assessment found that the facility meets TGL's operational requirements.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

3.3.2 Transport Practice 3.2

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

	☒ **in full compliance with**	
TGL is	☐ in substantial compliance with	**Transport Practice 3.2**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

TGL does provide emergency response training of personnel to fulfil the duties outlined in the TERPs. Drivers are trained in the response actions to take in the event of an incident.

Mock emergency drills with debriefs are held periodically as part of TGL's training and evaluation process. Transport subcontractors will participate in or review these exercises as required.

The TERP does identify the specific emergency response duties and responsibilities of personnel for response in the event of an incident. The TERP outlines responsibilities for Drivers, ISS First Response Responder, Incident Coordinator, Incident Responder, General Manager and National HSE Manager.

The TERP lists general items that should be available for incident responders in a major incident.

TGL does have the necessary emergency response and health and safety equipment, including personal protective equipment available during transport. This is checked through a checklist completed by the driver prior to departure. TGL also undertake vehicle audits that checks the driver has the correct PPE and understands that hazards of cross contamination of different dangerous goods.

TGL does provide initial induction training on cyanide awareness and emergency response procedures for drivers and subcontractor drivers. The TERP requires regular exercises to be carried out with the National HSE Manager having responsibility for ensuring emergency exercises are carried out and involve all personnel and Emergency Services, where appropriate.

KJP Haulage

KJP Haulage follow TGL's *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency. It states that in a major incident, a representative of TGL must attend the scene. Drivers have a notification role and a scene isolation and control role as far as circumstances allow. Emergency response equipment was available to KJP Haulage drivers in the event of an emergency as listed in the TGL management system. KJP Haulage has implemented TGL's *Cyanide Driver Checklist*, which drivers must complete prior to departure. This checklist includes a check on emergency response equipment. Completed checklists were viewed by the Auditor.

MJL Landforming

MJL Landforming follows TGL's *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency. It states that in a major incident, a representative of TGL must attend the scene. Drivers have a notification role and a scene isolation and control role as far as circumstances allow. Emergency response equipment was available to MJL Landforming drivers in the event of an emergency as listed in the TGL management system. MJL Landforming has implemented TGL's *Cyanide Driver Checklist*, which drivers must complete prior to departure. This checklist includes a check on emergency response equipment. Completed checklists were viewed by the Auditor.

Skynight

Skynight follow TGL's *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency. It states that in a major incident, a representative of TGL must attend the scene. Drivers have a notification role and a scene isolation and control role as far as circumstances allow. Emergency response equipment was available to Skynight drivers in the event of an emergency as listed in the TGL management system. Skynight has implemented TGL's *Cyanide Driver Checklist*, which drivers must complete prior to departure. This checklist includes a check on emergency response equipment. Completed checklists were viewed by the Auditor.

3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

TGL has procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

The TERP requires notification of Emergency Services (ERS) and the cyanide manufacture's ERS service in the event of a cyanide emergency during transport. The drivers have a copy of the *Subcontractor and Driver's TERP*. In addition, the drivers have the number for ISS First Response, which is a 24-hour emergency contact centre that relays information to TGR Management, cyanide manufacture's ERS services and Emergency Services as needed.

The role of cyanide manufactures ERS services is one of communication. ERS operates 24 hours a day providing telephone advice and assistance to the public, emergency services and others on incidents relating to the transport, storage and use of chemical products and raw materials in emergency situations.

TGL has provisions to ensure that internal and external emergency notification and reporting procedures are kept current. The TGL document distribution system ensures drivers and subcontractor receive and verify they have received information and updates including emergency contact details for use in the event of an emergency. TGL has set up designated numbers to allow for consistency in the notification of emergencies. The JMP cover page has key contact information for supervisors, delivery site and emergency contacts and is updated regularly.

KJP Haulage

KJP Haulage follows TGL's *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency, which provides that external communication with stakeholders is coordinated through TGL. It states that in a major incident, a representative of TGL must attend the scene.

Notification and reporting procedures are contained within TGL's *Subcontractor and Drivers TERP*. This procedure is maintained by TGL and provided to KJP Haulage.

MJL Landforming

MJL Landforming follows TGL's *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency which provides that external communication with stakeholders is coordinated through TGL. It states that in a major incident, a representative of TGL must attend the scene.

Notification and reporting procedures are contained within TGL's *Subcontractor and Drivers TERP*. This procedure is maintained by TGL and provided to MJL Landforming.

Skynight

Skynight follow TGL's *Subcontractor and Driver's TERP,* which provides information for subcontractors to respond to a transport emergency, which provides that external communication with stakeholders is coordinated through TGL. It states that in a major incident, a representative of TGL must attend the scene.

Notification and reporting procedures are contained within TGL's *Subcontractor and Drivers TERP*. This procedure is maintained by TGL and provided to Skynight.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

3.3.4 Transport Practice 3.4

Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

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

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

TGL does not undertake the remediation or recovery of cyanide as this is managed through their relationship with cyanide manufactures. In the event of a cyanide emergency TGL will contact cyanide manufactures and their product specialists will assist emergency services as needed.

The Orica *Emergency Response Guide – Sodium Cyanide* includes procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management of spill clean-up debris.

AGR's *Transport Emergency Response Plan* included procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management of spill clean-up debris.

Both Orica and AGR are certified producers and transporters under the Code.

KJP Haulage

KJP Haulage follows TGL's *Subcontractor and Driver's TERP,* which provides drivers with a notification role and a scene isolation and control role as far as circumstances allow. Remediation would be coordinated by Toll and the product supplier.

MJL Landforming

MJL Landforming follows TGL's *Subcontractor and Driver's TERP,* which provides drivers with a notification role and a scene isolation and control role as far as circumstances allow. Remediation would be coordinated by Toll and the product supplier.

Skynight

Skynight follows TGL's *Subcontractor and Driver's TERP,* which provides drivers with a notification role and a scene isolation and control role as far as circumstances allow. Remediation would be coordinated by Toll and the product supplier.

3.3.5 Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

	☒ **in full compliance with**	
TGL is	☐ in substantial compliance with	**Transport Practice 3.5**
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

TGL is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

The TERP contains provisions for periodically reviewing and evaluating the plan's adequacy and they are being implemented including reviewing:

- At least annually
- After any deficiencies are identified during exercises or incidents
- Whenever a significant change is made to the operations, e.g. change to key personnel, suppliers, equipment, products, routes etc.

The TERP includes provisions for periodically conducting mock emergency drills. The document requires exercises be conducted to ensure effectiveness of the Plan. The operation has conducted several mock exercises during the audit period.

There is a procedure to evaluate the TERPs performance after its implementation and revise it as needed. The operation has conducted several mock exercises during the audit period with documented debriefs. The outcomes of the reviews have not triggered a revision of the plan but actions have been developed and are tracked through TGL's HSE system.

KJP Haulage

KJP Haulage follows TGL's Subcontractor and Driver's TERP, which is developed and maintained by TGL. The TERP contains provisions for periodically conducting mock emergency drills. KJP Haulage participates in these drills at the request of TGL.

MJL Landforming

MJL Landforming follows TGL's *Subcontractor and Driver's TERP,* which is developed and maintained by TGL. The TERP contains provisions for periodically conducting mock emergency drills. MJL Landforming participates in these drills at the request of TGL.

Skynight

Skynight follows TGL's *Subcontractor and Driver's TERP,* which is developed and maintained by TGL. The TERP contains provisions for periodically conducting mock emergency drills. Skynight participates in these drills at the request of TGL.

4.0 DUE DILIGENCE

TGL's due diligence process and findings for rail operators and rail terminals and sidings used as part of the Toll Mining Services Australian Supply Chain are summarised in the following sections. These have been reviewed by Ed Clerk of Golder. Ed is pre-certified by the ICMI as a Transport Technical Specialist.

4.1 Rail Operators

4.1.1 Aurizon

TGL conducted a due diligence of Aurizon on 1 August 2017. The due diligence was based on a site visits to the Acacia Ridge Rail Terminal. Previous due diligence assessments were based on site visits at multiple Aurizon locations. The due diligence was conducted by Olivia Cuthbertson, HSE Advisor, Mining and Energy, Toll Global Logistics.

TGL has template due diligence assessment format and report and the following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

Facility Description

Aurizon is Australia's largest rail freight operator. Aurizon shows a downward trend in its annual Injury Frequency rates.

General Data

Cyanide packaged in purpose built and designed bulk sparge isotainers and IBCs contained with standard 20-foot end door freight containers are transited by Aurizon through its facilities.

Aurizon has implemented appropriate security and emergency response plans at its facilities.

Aurizon has implemented appropriate maintenance programmes for lifting equipment at its facilities.

All containers are inspected on receipt at the facility and as an integral facet of the train safety-walk through prior to departure.

Additional Information

Dangerous goods training is provided by Aurizon to its employees, but this is not cyanide specific. Training records are maintained by Aurizon. Appropriate warning signage is in place at all Aurizon facilities used. Container EIPs are an integral element of this signage regime. Segregation and separation practices are in accordance with ADG Code requirements.

Aurizon has emergency response plans in place for all sites inspected, which are suitable for the product carried and type of operation.

Where sites inspected were within an 80 m radius of neighbours, evidence was available to show that neighbouring companies had been made aware of the site's operations and associated hazards.

Report Completion and Summary

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this company does meet Toll Global Logistics requirements.*

4.1.2 Pacific National

TGL conducted a due diligence of Pacific National on 1 August 2017. The due diligence was based on a site visits to the Acacia Ridge Rail Terminal. Previous due diligence assessments were based on site visits at multiple Aurizon locations. The due diligence was conducted by Olivia Cuthbertson, HSE Advisor, Mining and Energy, Toll Global Logistics.

TGL has template due diligence assessment format and report and the following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel, and review of applicable documentation.

Facility Description

Pacific National is Australia's largest rail freight business. Operating in all states and the Northern Territory. Pacific National is fully owned by Asciano. Pacific National has a number of facilities in Australia that TGL utilises for its Cyanide Transportation.

General Data

Cyanide packaged in purpose built and designed bulk sparge isotainers and IBCs contained with standard 20-foot end door freight containers are transited by Pacific National through its facilities.

Pacific National has implemented appropriate security and emergency response plans at its facilities.

Pacific National has implemented appropriate maintenance programmes for lifting equipment at its facilities.

All containers are inspected on receipt at the facility and as an integral facet of the train safety-walk through prior to departure.

Additional Information

Dangerous goods training is provided by Pacific National to its employees, but this is not cyanide specific. Training records are maintained by Pacific National. Appropriate warning signage is in place at all Pacific National facilities used. Container EIPs are an integral element of this signage regime. Segregation and separation practices are in accordance with ADG Code requirements.

Pacific National has emergency response plans in place for all sites inspected, which are suitable for the product carried and type of operation.

Where sites inspected they were found to be sufficient distance from public buildings and thoroughfares.

Report Completion and Summary

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this company does meet Toll Mining Services requirements.*

4.2 Rail Terminals and Sidings

4.2.1 Dynon North Rail Terminal

TGL conducted a due diligence of the Dynon North Rail Terminal on 19 September 2017. The due diligence was conducted by Shayne Holman, Terminal Manager, Toll Global Logistics.

TGL has a template due diligence assessment format and report, and the following items were addressed within the due diligence exercise:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

Facility Description

Dynon North Rail Terminal is a transition point in the overall supply chain for Sodium Cyanide. Units arrive into Dynon North from Yarwun and are either collected by Toll or transitionally stored and continue onto the relevant connections. Empty containers or sparges contained residual sodium cyanide are received and returned to Yarwun, QLD.

General Data

Sodium cyanide sparges and containers arrive into Dynon North from Yarwun and are either collected by Toll or transitionally stored on wagons and continue onto the relevant connections. Empty containers or sparges contained residual sodium cyanide are received and returned to Yarwun, QLD.

To prevent unauthorised access to the facility, the entire site is securely fenced and appropriately monitored by CCTV 24/7. Security seals are provided by Orica. Security patrols are also utilised to conduct regular security checks.

This facility does not store or handle product as it is a transitional point in the supply chain only (i.e. in-transit storage only), therefore the requirement for the facility to be licenced for Dangerous Goods does not apply.

The facility has a lifting equipment register available detailing the current inspections and certifications. All lifting equipment is owed and managed by QUBE and is subject to a maintenance program with an external contractor. All operators of lifting equipment (i.e. forklift, mobile gantry, crane etc) must be appropriately licenced and follow procedures for the lifting equipment operations. Pre-start checks of equipment are conducted to ensure that it is safe to operate. All pre-start checks, training and current licence records for the lifting equipment operators are maintained by Aurizon and are available upon request.

The facility has a procedure in place for examining product loads for possible damage or leakage, prior to 'in-transit' handling. On acceptance of containers, a terminal check is conducted and prior to the train departing a 'load advice' check is conducted by terminal staff. Also, prior to departure a visual inspection (Train Safety Test) of the containers/sparges is conducted by the train crew.

The facility has a current emergency response plan in place.

Additional Information including ICMC Transport Practice 2.1

Personnel involved in the 'in-transit' handling of the product receive sodium cyanide awareness training via the Aurizon Dangerous Goods Online Training Package, which includes training such as segregation, placarding and DG class etc. The on-site inductions cover the appropriate PPE requirements.

Appropriate warning signage is in place. As the facility is an 'in-transit' storage facility only, there are designated eating and drinking facilities provided for site personnel. The facility is a no smoking site, with appropriate warning signage located at the front gate.

Product is contained in sparges/containers and is appropriately segregated on wagons as per the ADG Code requirements to ensure that it is separated from incompatible materials such as acids, strong oxidizers and explosives. DG Segregation Charts are generated by Aurizon and are available upon request.

Purpose built tanks utilised by Orica, are designed to minimise the potential for contact of solid cyanide with water. The facility is an open area, allowing adequate ventilation to prevent the build-up of hydrogen cyanide gas. A windsock is in place to indicate wind direction.

Appropriate spill kits are available on site. In the event of a Cyanide spill the Orica Emergency Response number will be called (as displayed on the EIP) to appropriately respond to any incident that may occur. The facility is located within an industrial area, therefore any cyanide that passes through in-transit is more than 80 m from the nearest public building/thoroughfare.

Report Completion and Summary

The due diligence concluded that:

Based upon the information obtained in this due diligence assessment, this facility does meet Toll Mining Services requirements.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

4.2.2 Aurizon West Kalgoorlie Rail Terminal

TGL conducted a due diligence of the West Kalgoorlie Rail Terminal on 18 August 2017. The due diligence was conducted by Colin Grove, Operations Supervisor and Shayne Holman, Regional HSE Manager, Toll Global Logistics.

TGL has template due diligence assessment format and report and the following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

Facility Description

The Aurizon West Kalgoorlie Rail Terminal facility is a transitory facility for inbound and outbound goods to and from Kalgoorlie from all parts of Australia. The terminal facility is also the arrival point for Pacific National cargo into the Kalgoorlie area.

General Data

Cyanide packaged in purpose built and designed bulk sparge isotainers and IBCs contained with standard 20 foot' end door freight containers are transited through the facility. Containers arrive at the Kalgoorlie rail terminal facility from western and eastern rail terminals and by road after deliveries have been completed to end user destinations for subsequent return of the empty units to Yarwun.

The facility is fully fenced, gated and locked after hours. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

The facility allows two days storage with storage fees charged thereafter on a daily rate.

The terminal has a separated and bunded facility dedicated for inbound cyanide. All products are in transit only; however, the terminal has a 325 T licence for interim storage of Class 6.1 products at the terminal facility due to quantities that are transited through the terminal facility, in particular, cyanide solution. Segregation/separation within the terminal facility is in accordance with ADG Code requirements.

Top load forklifts are used at the facility. The facility is also due to take delivery of a reach stacker in the near future to augment current lift capacity. All equipment is subject to a maintenance programme by external suppliers. A dedicated bay for servicing and maintenance of mechanical handling equipment is provided, which is bunded to prevent escape of spilled oils and lubricants.

All containers are inspected on receipt at the facility and as an integral facet of the train safety-walk through prior to departure. On arrival at the facility and prior to collection by the transporter for delivery to end user locations, containers are also inspected using check sheet.

There is an existing emergency response plan in place.

Additional Information including ICMC Transport Practice 2.1

Dangerous goods training is provided by Aurizon to its employees, but this is not cyanide specific. Cyanide awareness has been provided by AGR. Orica cyanide awareness information is available at the site. Training records are maintained by Aurizon.

Appropriate warning signage is in place. Container EIPs are an integral element of this signage regime. The terminal facility has a no smoking on the hardstand policy, which is enforced. Eating and drinking facilities are provided for facility personnel.

Cyanide is stored in the open air to allow adequate ventilation. Orica's bulk sparge isotainers are purpose built and designed isotainers with the lifting frame providing clearance of the isotainer barrel off the ground. The isotainer design mitigates against cyanide contact with water. IBCs are contained within a shipping container which provides clearance from the ground. Composite IBC consists of a woven polypropylene flexible intermediate bulk containers inside a polyethylene liner contained within a wooden outer to prevent ingress of water to the product.

A windsock is in place to indicate wind direction.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise. A spill kit is located in a readily accessible area if required.

The terminal is located in an industrial area and the cyanide is stored more than 80 m away from public buildings or thoroughfares.

Report Completion and Summary

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Global Logistics requirements.*

4.2.3 Mount Miller Dangerous Goods and Industrial Siding

TGL conducted a due diligence of the Mt Miller Dangerous Goods and Industrial Siding on 29 September 2017. The due diligence was conducted by Olivia Cuthbertson, HSE Advisor, Mining and Energy, Toll Global Logistics. TGL has template due diligence assessment format and report and the following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

Emergency response was addressed within the *Additional Information* section of the due diligence.

The due diligence was compiled through physical visits, interviews with appropriate personnel and a review of relevant documentation.

Facility Description

The Mt Miller Dangerous Goods and Industrial Siding is the rail facility located in close proximity (1.8 km) from Orica's Yarwun Facility and two kilometres from the main highway. The facility is in a remote area and not within close proximity to any residential or populated areas.

TGL use the Mt Miller facility as the rail connection for transporting the majority of cyanide for Orica Mining Chemicals.

Sodium Cyanide is not stored at this facility and all product is in transit only. Product is loaded onto trains for subsequent departure to southern, western and northern destinations. Empty containers containing residual sodium cyanide are received and collected for return to the Yarwun Facility for subsequent re-utilisation.

No cyanide solution is transited through the Mt Miller facility.

General Data

Bulk sparge isotainers and freight containers containing composite intermediate bulk containers are delivered by road to Mount Miller and then railed to other rail destinations for delivery to Orica customers in Queensland, Western Australia, Northern Territory and South Australia, New South Wales, Victoria and Tasmania. Empty bulk sparge isotainers and empty shipping containers are transited through the facility for return to Orica's Yarwun Facility.

The terminal facility is fully fenced, gated and locked after hours. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

There is no separate area for the storage of dangerous goods as the facility is used for transit only.

The facility has an emergency response plan in place with the last review being undertaken on 7 August 2017.

A maintenance program was evident for the forklifts used at the facility.

All containers are inspected on receipt at the facility and as an integral facet of the train safety-walk through prior to departure. On arrival at the facility and prior to collection by the transporter for delivery to end user locations, containers are also inspected using an Orica check sheet.

Dangerous goods training is provided by Aurizon and external providers to facility personnel. Cyanide safety awareness information has been provided by Orica previously. Emergency response training is appropriate for all products handled at the site not just cyanide. Training records are maintained by Aurizon.

Hazardous chemical signage and SDSs are in place and the facility is a non-smoking facility.

No storage occurs on site. Orica's bulk sparge isotainers are purpose built and designed isotainers with the lifting frame providing clearance of the isotainer barrel off the ground. The isotainer design mitigates against cyanide contact with water. IBCs are contained within a shipping container which provides clearance from the ground. Composite IBC consists of a woven polypropylene flexible intermediate bulk containers inside a polyethylene liner contained within a wooden outer to prevent ingress of water to the product.

A windsock is in place to indicate wind direction.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise. A spill kit is located in a readily accessible area if required.

Report Completion and Summary

The due diligence concluded the Mount Miller Rail Facility is well managed and that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Global Logistics requirements.*

4.2.4 Aurizon Acacia Ridge Rail Terminal

TGL conducted a due diligence of the Aurizon Acacia Ridge Rail Terminal on 1 August 2017. The due diligence was conducted by Olivia Cuthbertson, HSE Advisor, Mining and Energy, Toll Global Logistics. TGL has template due diligence assessment format and report and the following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Emergency response was addressed within the Additional Information section of the due diligence.

The due diligence was compiled through physical visits, interviews and discussions with appropriate personnel.

The Acacia Ridge rail facility is located in an industrial area with all neighbours at a distance of greater than 100 metres.

Facility Description

Aurizon Acacia Ridge is a facility which is secure and lockable; it is a transition point from Aurizon to other Aurizon services and Pacific National Services.

General Data

Dangerous goods containers in transit from the Mt Miller Dangerous Goods and Industrial Siding to the south and west are planned on services that arrive at Acacia Ridge narrow gauge rail yard either the same day or the day prior. Containers are held on wagons under supervision until the planned shunts that occur twice daily. The shunts take wagons from the narrow gauge to the standard gauge container terminal for interstate travel on day of departure. No dangerous goods are held on the ground at the standard gauge container terminal overnight. The wagons, when stored in transit, are held in dedicated rows at the narrow gauge rail yard until the transfer shunt.

Dangerous goods returning to Mt Miller Dangerous Goods and Industrial Siding, are transferred to the narrow gauge wagons on day of arrival and held in the narrow gauge rail yard until the allocated train service.

The facility is fully fenced with security monitoring systems in place. It is manned 24 hours each day and all gates are locked after hours.

The facility has an emergency response plan in place and training is provided as per the Aurizon emergency response plan to relevant personnel. Spill kits are provided by Aurizon. In the event of a cyanide spill the Product Specialist would be engaged along with the Queensland Fire and Rescue Service for appropriate spill containment.

All container movements and lifting equipment is managed by a third party operator and a maintenance programme is in place.

All containers are inspected on receipt at the facility and as an integral facet of the train safety-walk through prior to departure. On arrival at the facility and prior to collection by the transporter for delivery to end user locations, containers are also inspected using an Orica check sheet.

All containers are inspected (terminal check) on acceptance of the containers. Prior to the train departure a "Load Advice" check is conducted by terminal staff. Prior to departure, a visual inspection of containers and wagons (known as a "Train Safety Test") is conducted by the train crew and a visual roll by is conducted on arrival at the destination.

Report Completion and Summary

The due diligence concluded that:

> *The Acacia Ridge Facility is secured and well managed in accordance with the requirements for Cyanide and Dangerous Goods. Based upon the information obtained in this due diligence assessment, this facility does meet Toll Global Logistics requirements.*

4.2.5 Chullora Rail Terminal

TGL conducted a due diligence of the Pacific National Chullora Rail Terminal on 12 October 2017. The due diligence was conducted by Olivia Cuthbertson, HSE Advisor, Mining and Energy, Toll Global Logistics. TGL has template due diligence assessment format and report and the following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

Facility Description

The Chullora Rail Terminal facility is a transitory facility for inbound and outbound goods to and is cyanide units pass through on the journey to pacific national rail terminal in Kalgoorlie and previously Dubbo.

All products is in transit only.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

General Data

Cyanide, packaged in purpose built and designed isotainers, are transited through this rail terminal. Isotainers arriving and Chullora are destined for delivery to South Australia or Western Australia (and previously Dubbo). Empty isotainers are transited through the facility for return to the Orica plant in Yarwun. No storage occurs at the rail terminal.

The terminal facility is fully fenced and locked after hours. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

An emergency response plan exists for the facility and it is tested annually.

All lifting equipment undergoes maintenance on-site, which is performed by a contractor.

All containers are inspected on receipt at the facility and as an integral facet of the train safety-walk through prior to departure.

Additional Information including ICMC Transport Practice 2.1

Dangerous goods training are provided to Pacific National and external providers. In addition, Orica's cyanide awareness training is given. Records of this training and other training conducted by employees are maintained by Pacific National.

Appropriate warning signage is in place. Container EIPs are an integral element of this signage regimen.

The terminal facility has a no smoking on the hardstand policy, which is enforced. Eating and drinking facilities are provided for facility personnel.

Segregation/separation of materials in accordance with Australia dangerous goods requirements is in effect where required.

Cyanide is stored in the open air to allow adequate ventilation. Orica's bulk sparge isotainers are purpose built and designed isotainers with the lifting frame providing clearance of the isotainer barrel off the ground. The isotainer design mitigates against cyanide contact with water. IBCs are contained within a shipping container which provides clearance from the ground. Composite IBC consists of a woven polypropylene flexible intermediate bulk containers inside a polyethylene liner contained within a wooden outer to prevent ingress of water to the product.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. A spill kit is located in a readily accessible area if required.

An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise.

A windsock is in place to indicate wind direction.

The facility is located in an industrial area with all neighbours at a distance of greater than 80 metres.

Report Completion and Summary

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Global Logistics requirements.*

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

4.2.6 Adelaide Freight Terminal

TGL conducted a due diligence of the Adelaide Freight Terminal on 20 November 2018. The due diligence was conducted by Nathan Hoskins, HSE Advisor and Anthony De Leo, Senior Manager Logistics, TGL. TGL has template due diligence assessment format and report and the following items were addressed within the due diligence:

- Facility Description
- General Data
- Additional information including ICMC Transport Practice 2.1
- Report Completion and Summary.

Although emergency response was not specifically addressed within a separate section, it was discussed satisfactorily within the due diligence.

The due diligence review was compiled through physical visits, interviews and discussions with appropriate personnel and review of applicable documentation.

Facility Description

The Adelaide Terminal facility is a transitory facility for inbound and outbound goods to and is cyanide units pass through on the journey to pacific national rail terminal in Kalgoorlie and via road to sites in South Australia and operated by Pacific National.

All products are in transit only.

General Data

Cyanide, packaged in purpose built and designed isotainers, are transited through this rail terminal. Isotainers arriving are destined for delivery to South Australia or Western Australia. Empty isotainers are transited through the facility for return to the Orica plant in Yarwun. No storage occurs at the rail terminal.

The terminal facility is fully fenced and locked after hours. Visitors are required to sign in and out of the facility and must be escorted at all times whilst within the confines of the terminal facility.

An emergency response plan exists for the facility and it is tested annually.

All lifting equipment undergoes maintenance on-site, which is performed by a contractor.

All containers are inspected on receipt at the facility and as an integral facet of the train safety-walk through prior to departure.

Additional Information including ICMC Transport Practice 2.1

Dangerous goods training is provided to Pacific National and external providers. In addition, Orica's cyanide awareness training is given. Records of this training and other training conducted by employees are maintained by Pacific National.

Appropriate warning signage is in place. Container EIPs are an integral element of this signage regimen.

The terminal facility has a no smoking on the hardstand policy, which is enforced. Eating and drinking facilities are provided for facility personnel.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

Segregation/separation of materials in accordance with Australia dangerous goods requirements is in effect where required.

Cyanide is stored in the open air to allow adequate ventilation. Orica's bulk sparge isotainers are purpose built and designed isotainers with the lifting frame providing clearance of the isotainer barrel off the ground. The isotainer design mitigates against cyanide contact with water. IBCs are contained within a shipping container which provides clearance from the ground. Composite IBC consists of a woven polypropylene flexible intermediate bulk container inside a polyethylene liner contained within a wooden outer to prevent ingress of water to the product.

In event of a spill, drains are able to be blocked to prevent egress from the facility into any surrounding waterways. A spill kit is located in a readily accessible area if required.

An emergency bund is available at the terminal facility for placement of leaking containers into should the need arise.

A windsock is in place to indicate wind direction.

The facility is located in an industrial area with the nearest residential area approximately 100 m to the east of the rail terminal alignment.

Report Completion and Summary

The due diligence concluded that:

> *Based upon the information obtained in this due diligence assessment, this facility does meet Toll Global Logistics requirements.*

4.3 Auditor Review of Due Diligences

The due diligences presented were found by the Golder ICMC Technical Specialist to sufficiently evaluate the rail operations and additional management measures by the consigner were not considered necessary.

5.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – "Important Information Relating to this Report", which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

Toll Global Logistics Australian Supply Chain		7 January 2019
Name of Facility	Signature of Lead Auditor	Date

Signature Page

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APPENDIX A

Important Information

The document ("Report") to which this page is attached and which this page forms a part of, has been issued by Golder Associates Pty Ltd ("Golder") subject to the important limitations and other qualifications set out below.

This Report constitutes or is part of services ("Services") provided by Golder to its client ("Client") under and subject to a contract between Golder and its Client ("Contract"). The contents of this page are not intended to and do not alter Golder's obligations (including any limits on those obligations) to its Client under the Contract.

This Report is provided for use solely by Golder's Client and persons acting on the Client's behalf, such as its professional advisers. Golder is responsible only to its Client for this Report. Golder has no responsibility to any other person who relies or makes decisions based upon this Report or who makes any other use of this Report. Golder accepts no responsibility for any loss or damage suffered by any person other than its Client as a result of any reliance upon any part of this Report, decisions made based upon this Report or any other use of it.

This Report has been prepared in the context of the circumstances and purposes referred to in, or derived from, the Contract and Golder accepts no responsibility for use of the Report, in whole or in part, in any other context or circumstance or for any other purpose.

The scope of Golder's Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder's affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification

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