

# ***INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE***

## ***Cyanide Transportation Summary Audit Report***

***For the  
International Cyanide Management Code***

**UNID Global Corporation  
West Africa Supply Chain**

**07 December 2018**

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 1 / 16

07 December 2018

**Name of Cyanide Supply Chain : West Africa Supply Chain**  
**Name of Supply Chain Owner : UNID Global Corporation**  
**Name of Supply Chain Operator : UNID Global Corporation**  
**Name of Responsible Manager : Mr. Hyun-Soo Kim / Assistant Manager, Fine Chemicals Team, UNID Global Corporation**  
**Address : 16<sup>th</sup>, Ferrum Tower, #19 Eulji-ro 5-gil, Jung-gu**  
**State/Province : Seoul, 04539 Country : South Korea**  
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**E-Mail : hskim@unidcorp.co.kr**  
**Website: www.unidglobalcorp.co.kr**

**Location detail and description of operation:**

The head office of UNID Global Corporation is located in Seoul, Korea. In UNID Global Corporation, there are several trading business divisions. Related to the supplying of sodium cyanide, the main jobs of Fine Chemicals Team in Chemicals Business Division are making agreement with mining companies, receiving customer orders, review of customer orders and arrangement of shipping. Those were conducted by Fine Chemicals Team in Chemicals Business Division of UNID Global Corporation.

The UNID Global Corporation applied the West Africa Supply Chain as ICMC signatory during September 2017 year. And they have updated safety system and applied to West Africa Supply Chain according to ICMC requirements. The West Africa Supply Chain includes the transportation of sodium cyanide from manufacture in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire. According to the sodium cyanide supplying contracts with gold mining customers, the UNID Global Corporation is responsible for supplying sodium cyanide from manufacture in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire. The customs clearance and transportation from the ports to gold mining sites are controlled and implemented by gold mining customers. So the road transportation from Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire to gold mining sites is excluded in West Africa Supply Chain.

The road transportation companies, ports and shipping company are included in West Africa Supply Chain as below.

- (1) Sodium cyanide manufacture : TaeKwang Industry Co., Ltd. Ulsan Plant in Korea.
- (2) Transportation from sodium cyanide manufacture to Busan New Port in Korea : By Hae Dong Logistics and SAM IK Logistics Co. Ltd.
- (3) Marine transportation from Busan New Port in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire : By SAFMARINE Ltd.

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 2 / 16

07 December 2018

*Auditor's Finding*

**This operation is**

**X in full compliance**

in substantial compliance \*(see below) with the International Cyanide Management Code  
not in compliance

**with the International Cyanide Management Code.**

**Audit Company : 3Points Co., Ltd.**

**Audit Team Leader : Mr. Sang-Ho Ahn**

**E-mail: triplepoint@naver.com**

**Dates of Audit : 26 and 30 November 2018**

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 the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

UNID Global Corporation

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Name of Supply Chain Operator

  
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Lead Auditor Signature

07 December 2018

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Date

UNID Global Corporation

\_\_\_\_\_  
Name of Supply Chain Operator

  
\_\_\_\_\_  
Lead Auditor Signature

07 December 2018

## Summary Audit Report

### ***1. TRANSPORT : Transport cyanide in a manner that minimizes the potential for accidents and releases.***

*Transport Practice 1.1 : Select cyanide transport routes to minimize the potential for accidents and releases.*

<b>The operation is</b>	<b>X in full compliance with</b>	
	in substantial compliance	<b>with Transport Practice 1.1</b>
	not in compliance with	

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

During May 2016 year and March 2018 year, the UNID Global Corporation established and updated supply chain organization and control procedure in which detail process for selection of sodium cyanide transportation routes and control methods were defined. According to the procedure, they considered overall transportation route from sodium cyanide manufacture in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire. They identified several possible routes from sodium cyanide manufacture in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire. They considered and evaluated the routes for such items as population density, infrastructure, prevalence of water, security, possibility of hijacking and cost effectiveness. And then they finally decided the transportation routes as below.

- 1) From sodium cyanide manufacture TaeKwang Industry Co., Ltd. Ulsan Plant to Busan New Port in Korea : Roadway transportation by truck
- 2) Busan New Port in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire : Marine transportation by ship

The subcontractor evaluation process was defined in supply chain organization and control procedure. Such items as ICMC signatory or safety system certification, history of accident, compliance of target delivery, price and cooperation etc. were evaluated for sodium cyanide manufacture, road transporters, shipping companies and ports. According to the procedure they evaluated and chose sodium cyanide transportation companies and shipping companies as below.

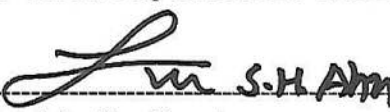
- 1) Sodium cyanide manufacture : TaeKwang Industry Co., Ltd. Ulsan Plant
- 2) Roadway transportation from cyanide manufacture to Busan New Port in Korea : Hae Dong Logistics and SAM IK Logistics Co. Ltd.  
\* Actually the Hae Dong Logistics and SAM IK Logistics Co. Ltd. are sub-contractors of TaeKwang Industry Co., Ltd. Ulsan Plant not chosen by UNID Global Corporation.
- 3) Marine transportation from Busan New Port in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire : SAFMARINE Ltd.

The UNID Global Corporation decided the control methods for each segment in West Africa Supply Chain as below.

- 1) Roadway transportation companies in Korea as Hae Dong Logistics and SAM IK Logistics Co. Ltd.
  - (1) Periodic supplier evaluation by UNID Global Corporation Fine Chemicals Team
  - (2) Implementation and certification of ICMC by Hae Dong Logistics and SAM IK Logistics Co. Ltd.
- 2) Busan New Port in Korea
  - (1) Periodic route evaluation by UNID Global Corporation Fine Chemicals Team

UNID Global Corporation

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Name of Supply Chain Operator

  
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Lead Auditor Signature

07 December 2018

- (2) Periodic due diligence investigation by UNID Global Corporation Fine Chemicals Team
- 3) Marine transportation by shipping company SAFMARINE Ltd.
  - (1) Periodic route evaluation by UNID Global Corporation Fine Chemicals Team
  - (2) Periodic due diligence investigation by UNID Global Corporation Fine Chemicals Team
- 4) Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire
  - (1) Periodic route evaluation by UNID Global Corporation Fine Chemicals Team
  - (2) Periodic due diligence investigation by UNID Global Corporation Fine Chemicals Team

According to the above control methods, the UNID Global Corporation have implemented the selection of ICMC certified manufacture and road transportation companies, supplier evaluation, route evaluation and due diligence investigation.

The UNID Global Corporation established risk assessment and high risk control procedure in which hazard identification for sodium cyanide supply chain, risk assessment for identified hazards and high risk control were defined. According to the procedure, the UNID Global Corporation Fine Chemicals Team have identified hazards and evaluated the risks for West Africa Supply Chain. Below high risks were identified.

- 1) Release of sodium cyanide powder to road, land and surface water during roadway transportation by transporters.
- 2) Damage to sodium cyanide container and human contact during loading and unloading works.
- 3) Release to sea water during marine transportation by shipping company
- 4) Robbery during road transportation, storage in ports and marine transportation.
- 5) Taken away by criminal suspect during road and marine transportation

The UNID Global Corporation documented the control measures to address the risks in West Africa Supply Chain. They prepared and completed the control measures such as supplier evaluation, checked the certification of ICMC by roadway transporters and due diligence investigation for ports and shipping company. And also they established emergency response plan for sodium cyanide release, robbery and taken away by criminal suspect. The communication channel with government body, safety agency, police, manufacture and transporter defined in the emergency response plan.

According to supply chain organization and control procedure, the UNID Global Corporation should reevaluate the overall routes of West Africa Supply Chain every year periodically. And if there are some changes related to routes, transporters, facilities and relevant legal requirements, they will reevaluate the routes non-periodically. As they completed the route evaluation during April 2018 year for West Africa Supply Chain, they will reevaluate the routes of West Africa Supply Chain during April 2019 year.

The process for getting feedback on route condition from each segment in West Africa Supply Chain was defined in supply chain organization and control procedure. According to the procedure, UNID Global Corporation Fine Chemicals Team established communication channel and received information related to cyanide transportation routes from sodium cyanide manufacture, road transporters, shipping company and ports. Since April 2018 year when they initially completed route evaluation, there is no special issue from received information.

When the UNID Global Corporation selected the transportation route of West Africa Supply Chain and developed the control measures for high risk, they considered and reflected the comments from communities and stakeholders such as sodium cyanide manufacture TaeKwang Industry Co., Ltd. Ulsan Plant, road transporters as Hae Dong Logistics and SAMIK LOGISTICS Co., Ltd., shipping company, Ulsan government office, Busan local government office, Good Morning Hospital, Korea Occupational Health and Safety Agency and local fire fighting agency.

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 5 / 16

07 December 2018



The UNID Global Corporation informed the sodium cyanide transportation and received some general comments. The UNID Global Corporation have informed their sodium cyanide transportation and storage procedure, material safety data sheet and emergency response plan to above communities and stakeholders.

The UNID Global Corporation reviewed the overall route for West Africa Supply Chain. According to the review results, they decide that convoys and escorts are unnecessary from sodium cyanide manufacture TaeKwang Industry Co., Ltd. Ulsan Plant in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire as sodium cyanide production and roadway transportation by ICMC certified transporters and implementation of IMDG code by big shipping company.

The UNID Global Corporation established emergency response plan for sodium cyanide release to land and water and human exposure. In the emergency response plan, role and mutual aid with sodium cyanide transporters, ports, safety agency, police, fire fighting agency, hospital etc. were defined. They advised the emergency response plan to relevant bodies and informed their sodium cyanide transportation and storage procedure and material safety data sheet. Those activities were also implemented by ICMC signatories and certified manufacture and transporters.

*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.*

<b>The operation is</b>	<b>X in full compliance with</b>	<b>with Transport Practice 1.2</b>
	in substantial compliance not in compliance with	

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

According to supply chain organization and control procedure prepared by the UNID Global Corporation, they evaluated subcontractors during April 2018 year. During the subcontractor evaluation, they checked and confirmed that sodium cyanide transportation subcontractors have used only trained, qualified and licensed operators. And also those transportation subcontractors were ICMC signatories and certified. The UNID Global Corporation have prepared and communicated sodium cyanide transportation and storage procedure, material safety data sheet and emergency response plan to manufacture, transporters, ports and shipping company to use for training, daily operation and emergency situation.

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


<b>The operation is</b>	<b>X in full compliance with</b>	<b>with Transport Practice 1.3</b>
	in substantial compliance not in compliance with	

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

According to supply chain organization and control procedure, the UNID Global Corporation evaluated subcontractors during April 2018 year. During the subcontractor evaluation, they checked and confirmed that sodium cyanide transportation subcontractors have used only equipment designed

UNID Global Corporation

\_\_\_\_\_  
Name of Supply Chain Operator

  
\_\_\_\_\_  
Lead Auditor Signature  
Page 6 / 16

07 December 2018

and maintained to operate within the designed capacity. During the due diligence investigation, they checked and confirmed that the ports and shipping companies have used suitable equipment. And also the UNID Global Corporation confirmed that transporters, ports and shipping company have preventive maintenance procedure to control the transport equipment. And container itself designated to prevent overloading.

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

**The operation is** **X in full compliance with**  
in substantial compliance **with Transport Practice 1.4**  
not in compliance with

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

As the UNID Global Corporation is a trading company, they do not actually need the detail safety program for transport of sodium cyanide. During the subcontractor evaluation and due diligence investigation, they checked and confirmed that sodium cyanide transporters, ports and shipping company developed and implemented the safety program. As a consigner, they requested to transporters for the compliance of local regulation, international standards and safety program. If the transporters violate the local regulation and international standards, they are not able to be registered as approved subcontractor to UNID Global Corporation.

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

**The operation is** **X in full compliance with**  
in substantial compliance **with Transport Practice 1.5**  
not in compliance with

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

As the UNID Global Corporation is trading company, they do not actually perform the transportation of cyanide by sea and air. They evaluated shipping company according to supply chain organization and control procedure. They applied such evaluation items as compliance with IMDG Code, legal requirements and international standards, accident cases during marine transportation, compliance of target delivery and cost of transportation. Considering the evaluation results, they selected SAFMARINE Ltd. as shipping company for sodium cyanide transportation from Busan New Port in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire. The UNID Global Corporation completed the due diligence investigation during November 2018 year for the shipping company. According to the due diligence investigation, the UNID Global Corporation confirmed that shipping company were comply with IMDG Code. The UNID Global Corporation do not transport sodium cyanide by air.

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

**The operation is** **X in full compliance with**  
in substantial compliance **with Transport Practice 1.6**  
not in compliance with

UNID Global Corporation

Name of Supply Chain Operator

Lead Auditor Signature  
Page 7 / 16



07 December 2018

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

As the UNID Global Corporation is trading company, they do not actually perform the transportation of cyanide. During the subcontractor evaluation, they checked and confirmed that the sodium cyanide transportation vehicles have pager, mobile phone and communication channel sheet in which telephone numbers of transportation companies, the manufacture and emergency responders defined. And also during the subcontractor evaluation, they checked and confirmed that the transporters periodically have tested the communication equipment.

The UNID Global Corporation checked the overall routes of West Africa Supply Chain. And found no blackout area. And they requested to transporters to identify blackout area and alternative procedure to control the blackout area. Until now they have not received any identified blackout area from transporters.

The UNID Global Corporation have procedure to track the progress of cyanide shipments. And if needed, they tracked the progress of cyanide shipments by contact with sodium cyanide manufacture TaeKwang Industries Co., Ltd. Ulsan Plant, transporters as Hae Dong Logistics and SAM IK Logistics Co. Ltd. and communication with shipping company SAFMARINE Ltd. And also during the subcontractor evaluation, they checked and evaluated the tracking of cyanide shipments by transporters.

As the UNID Global Corporation receive purchasing orders from customers as gold mining company, they review the target delivery and quantity and input the orders in computer network system. They requested to sodium cyanide manufacture TaeKwang Industries Co., Ltd. Ulsan Plant to dispatch the amount of sodium cyanide and nominate the shipping company. The individual customer order including target delivery and amount, dispatched date and quantity of sodium cyanide from manufacture to shipping company were registered in computer network system of UNID Global Corporation. And also the progress of marine transportation by shipping company can be checked for individual customer orders by communication with shipping company SAFMARINE Ltd. So the inventory control and custody documentation were properly implemented to prevent loss of sodium cyanide during transportation.

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 8 / 16

07 December 2018



**2. INTERIM STORAGE : Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.**

*Transport Practice 2.1 : Store cyanide in a manner that minimizes the potential for accidental releases.*

<b>The operation is</b>	<b>X in full compliance with</b> in substantial compliance not in compliance with	<b>with Transport Practice 2.1</b>
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*Summarize the basis for this Finding/Deficiencies Identified:*

The UNID Global Corporation Fine Chemicals Team checked over all routes of West Africa Supply Chain and identified interim storage areas as below.

- 1) Busan New Port in Korea
- 2) Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire

The Busan New Port in Korea, Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire are controlled by national port control agency and interim storage areas are rent and controlled by shipping company.

The UNID Global Corporation completed the due diligence investigation for Busan New Port during February 2017 year, Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire during November 2018 year. The due diligence investigation activities are site visit and interview with employees for those ports, national port agency and shipping company. They found the interim storage areas were controlled properly in compliance with legal requirements and ICMC requirements. But some minor nonconformity items issued during due diligence investigation, they requested corrective actions and confirmed the corrective action results from shipping company. And also they informed their sodium cyanide transportation and storage procedure, material safety data sheet and emergency response plan to employees in ports, national control port agency and shipping company.

UNID Global Corporation

\_\_\_\_\_  
Name of Supply Chain Operator

  
\_\_\_\_\_  
Lead Auditor Signature  
Page 9 / 16

07 December 2018

**3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities**

*Transport Practice 3.1 : Prepare detailed emergency response plans for potential cyanide releases.*

**The operation is** **X in full compliance with**  
in substantial compliance **with Transport Practice 3.1**  
not in compliance with

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

The UNID Global Corporation established and updated emergency response plan considering the possible emergency situations as sodium cyanide release to road, land, surface water and sea water, robbery during transportation and interim storage and taken away by criminal suspect during transportation. The emergency response plan considered the solid sodium cyanide packaged in film and box and transported in container, transportation method, interim storage areas, infrastructure as road condition, ports and marine transportation. In the emergency response plan, they defined what they should do, communication channel and relevant external responders such as sodium cyanide manufacture, transporters, shipping company, mining customers, safety agency, police and hospitals. Detail emergency response plans considering road transportation were prepared by ICMC certified transporters as Hae Dong Logistics and SAM IK Logistics Co. Ltd. and checked by UNID Global Corporation. The UNID Global Corporation checked that shipping company SAFMARINE Ltd. issued commitment to comply with IMDG Code in which the emergency response plan required. For interim storage areas such as ports, they informed the emergency response plan and MSDS of sodium cyanide in which handling and treatment for released sodium cyanide defined.

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

**The operation is** **X in full compliance with**  
in substantial compliance **with Transport Practice 3.2**  
not in compliance with

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

The UNID Global Corporation Fine Chemicals Team have conducted the emergency response training during October 2018 year. The director of Fine Chemicals Team participated the emergency response training by TaeKwang Industries Co., Ltd. Ulsan plant. And director implemented the training for their team members for the emergency response plan and MSDS during October 2018 year. During the emergency response training, the communication channel, duties of relevant external agency and main activities of Fine Chemicals Team were introduced and training records were maintained.

In the emergency response plan prepared by UNID Global Corporation, the roles and responsibilities of team leader, team member, other relevant team and external agency were defined. And also in their emergency response plan and MSDS, the emergency response equipment such as shovel, sawdust, glove, mask etc. were defined.

The roadway transporters as Hae Dong Logistics and SAM IK Logistics Co. Ltd. have trained their

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 10 / 16

07 December 2018

employee and vehicle operators as yearly training program. The Fine Chemicals Team did not provide emergency response trainings directly to vehicle operator. Instead the Fine Chemicals Team checked the implementation of emergency response training by roadway transporters during supplier evaluations. And also shipping company SAFMARINE Ltd. have implemented training for their employee to comply with IMDG Code. For interim storage areas, they informed their emergency response plan and MSDS of sodium cyanide in which handling and treatment for released sodium cyanide defined. For interim storage areas, the training or introduction with their emergency response plan and MSDS is enough for emergency situations in ports.

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

<b>The operation is</b>	<b>X in full compliance with</b>	<b>with Transport Practice 3.3</b>
	in substantial compliance not in compliance with	

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

The UNID Global Corporation prepared the emergency response plan appropriate to the overall emergency situations possibly expected in West Africa Supply Chain. In the emergency response plan, contact information as telephone number, relevant person name and address of sodium cyanide manufacture, road transporters, shipping company, safety agency, fire fighting agency and hospital were defined. According to emergency response procedure, the UNID Global Corporation should check the emergency response plan every year and update the contact information and detail process as needed. According to their emergency response procedure, the emergency response plan was prepared and updated during April 2018 year including contact information, notification method, detail process as what UNID Global Corporation should do. The emergency response plan will be checked and updated every year according to emergency response procedure. Current internal and external notification was prepared and updated during April 2018 year including the contact information of sodium cyanide manufacture, road transporters, shipping company, safety agency, fire fighting agency, hospital and local government office.

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

<b>The operation is</b>	<b>X in full compliance with</b>	<b>with Transport Practice 3.4</b>
	in substantial compliance not in compliance with	

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

The UNID Global Corporation prepared and updated the emergency response plan appropriate to overall emergency situations possibly expected in West Africa Supply Chain. In the emergency response plan, the remediation as recovery and protect for released sodium cyanide, decontamination of soil and water, control and disposal of wastes were defined. And also the prohibit of the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat sodium cyanide that has been released into surface water was defined. The emergency response plan and MSDS were informed to road transporters as Hae Dong Logistics, SAM IK Logistics Co., Ltd., shipping company

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 11 / 16

07 December 2018

SAFMARINE Ltd. and ports as Busan New Port in Korea, Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire.

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

<b>The operation is</b>	<b>X in full compliance with</b>	<b>with Transport Practice 3.5</b>
	in substantial compliance not in compliance with	

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

The UNID Global Corporation established and updated emergency response procedure. According to the procedure, the emergency response plan shall be checked every year and contact information updated as needed. During April 2018 year, the Fine Chemicals Team updated the emergency response plan appropriate to overall emergency situations possibly expected in West Africa Supply Chain.

According to the emergency response procedure, they shall do the mock emergency drill once per year. The mock emergency drill was implemented in their office during October 2018 year. They checked the overall process and adequacy of emergency response plan and recorded the results.

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 12 / 16

07 December 2018



## Summary Report of Due Diligence Investigations

### 1. Background of due diligence investigation

- 1) Inability as consigner for ports and shipping company lead to ICMC implementation and certification The West Africa Supply Chain includes sodium cyanide manufacture, roadway transporters, ports and shipping company as below.
  - (1) Roadway transportation from sodium cyanide manufacture to Busan New Port by Hae Dong Logistics and SAM IK Logistics Co. Ltd. in Korea
  - (2) Control of storage in Busan New Port in Korea
  - (3) Marine transportation from Busan New Port in Korea to Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire by SAFMARINE Ltd.
  - (4) Control of storage in Dakar Port in Senegal and Abidjan Port in Côte d'IvoireAs consigner the UNID Global Corporation Fine Chemicals Team controls overall West Africa Supply Chain and will choose ICMC certified subcontractors or lead the ICMC implementation and certification to sodium cyanide manufacture, road transporters, ports and shipping company. So they successfully have chosen ICMC certified subcontractors as TaeKwang Industry Co., Ltd. Ulsan Plant, Hae Dong Logistics and SAM IK Logistics Co. Ltd. However they can't choose the ICMC certified national port control agency and shipping company. And also they can't lead ports and shipping company to ICMC implementation and certification due to their inability to affect change in the operating practices of those national port control agency and shipping company.  
So the UNID Global Corporation Fine Chemicals Team planned and implemented due diligence investigation for ports and shipping company as required by ICMC.

- 2) Scope of due diligence investigation

The Busan New Port in Korea, shipping company, Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire were includes in West Africa Supply Chain. So the due diligence investigations were implemented for Busan New Port in Korea, shipping company SAFMARINE Ltd., Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire.

### 2. Progress of due diligence investigation

- 1) Development of checklist

The UNID Global Corporation Fine Chemicals Team reviewed the ICMC requirements, IMDG Code, West Africa Supply Chain, property of sodium cyanide and information from TaeKwang Industry Co., Ltd. Ulsan Plant. They have developed checklist for due diligence investigation applicable to the control of sodium cyanide storage in ports and marine transportation.

- 2) Nomination of investigation team leader and member

Considering the work experience and knowledge of ICMC, director Mr. Sung-Hwan Ji of UNID Global Corporation Fine Chemicals Team nominated team leader and member for due diligence investigation as below.

- Team Leader : Mr. Whan-Joe Yuk (Senior Manager / Fine Chemicals Team)  
Mr. Se-Hyun Jeong (Assistant Manager / Fine Chemicals Team)
- Team Member : Mr. Hyun-Soo Kim (Assistant Manager / Fine Chemicals Team)  
Mr. Ki-Nam Park (Assistant Manager / Fine Chemicals Team)

- 3) Scheduling of due diligence investigation

The UNID Global Corporation Fine Chemicals Team planned the due diligence investigation

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 13 / 16

07 December 2018



during February 2017 year for Busan New Port in Korea, shipping company SAFMARINE Ltd., Dakar Port in Senegal and Abidjan Port in Côte d'Ivoire during November 2018 year.

4) Implementation of due diligence investigation

The UNID Global Corporation Fine Chemicals Team implemented due diligence investigation as planned during February 2017 year and November 2018 year. They use the checklist and record the investigation results in checklist. After the investigation, they issued the completed checklist to national port agencies and shipping company and requested corrective actions for some nonconformities. The UNID Global Corporation Fine Chemicals Team checked the action results from shipping company and confirmed that corrective actions were completed for nonconformity.

3. *Results of due diligence investigation*

The UNID Global Corporation Fine Chemicals Team have developed and used the checklist and recorded the investigation results in checklist.

1) Busan New Port in Korea

(1) Activities

- Control of storage yard in Busan New Port by national port control agency

(2) Due diligence investigation date

- 06 Feb. 2017 Year

(3) Due diligence investigation team

- Team Leader : Se Hyun Jeong Assistant Manager/Fine Chemicals Team
- Team Member : Hyun-Soo Kim Jeong Clerk/Fine Chemicals Team

(4) Due diligence investigation results

The due diligence investigation team have not found any nonconformity during the due diligence investigation for the control of storage yard in Busan New Port. So they did not issue any corrective action request. Instead they informed the MSDS of sodium cyanide to the manager of Busan New Port

(5) Conclusion

According to the due diligence investigation results, the UNID Global Corporation Fine Chemicals Team concluded that the control of sodium cyanide storage yard in Busan New Port comply with ICMC and national legal requirements.

2) Marine transportation by SAFMARINE Ltd.

(1) Activities

- Marine transportation by SAFMARINE Ltd.

(2) Due diligence investigation date

- 19 Nov. 2018 Year

(3) Due diligence investigation team

- Team Leader : Whan-Joe Yuk Senior Manager/Fine Chemicals Team
- Team Member : Hyun-Soo kim Jeong Assistant Manager/Fine Chemicals Team

(4) Due diligence investigation results and corrective action request

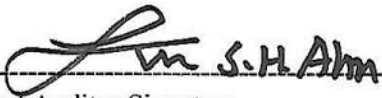
The investigation team issued the checklist to SAFMARINE Ltd. and requested corrective actions for some minor nonconformities identified during due diligence investigation. And also the investigation team confirmed the corrective action results taken by SAFMARINE. And also investigation team informed the MSDS of sodium cyanide to the assistant manager of SAFMARINE Ltd.

(5) Conclusion

According to the due diligence investigation results, the UNID Global Corporation Fine

UNID Global Corporation

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Name of Supply Chain Operator

  
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Lead Auditor Signature  
Page 14 / 16

07 December 2018

Chemicals Team concluded that the marine transportation by SAFMARINE Ltd. comply with ICMC and national legal requirements.

3) Dakar Port in Senegal

(1) Activities

- Control of storage yard in Dakar Port by national port control agency

(2) Due diligence investigation date

- 19 Nov. 2018 Year

(3) Due diligence investigation team

- Team Leader : Whan-Joe Yuk Senior Manager/Fine Chemicals Team
- Team Member : Hyun-Soo kim Jeong Assistant Manager/Fine Chemicals Team

(4) Due diligence investigation results

The due diligence investigation team have not found any nonconformity during the due diligence investigation for the control of storage yard in Dakar Port. So they did not issue any corrective action request. Instead they informed the MSDS of sodium cyanide to the manager of Dakar Port

(5) Conclusion

According to the due diligence investigation results, the UNID Global Corporation Fine Chemicals Team concluded that the control the sodium cyanide storage yard in Dakar Port comply with ICMC and national legal requirements.

4) Abidjan Port in Côte d'Ivoire

(1) Activities

- Control of storage yard in Abidjan Port by national port control agency

(2) Due diligence investigation date

- 20 Nov. 2018 Year

(3) Due diligence investigation team

- Team Leader : Whan-Joe Yuk Senior Manager/Fine Chemicals Team
- Team Member : Hyun-Soo kim Jeong Assistant Manager/Fine Chemicals Team

(4) Due diligence investigation results

The due diligence investigation team have not found any nonconformity during the due diligence investigation for the control of storage yard in Abidjan Port. So they did not issue any corrective action request. Instead they informed the MSDS of sodium cyanide to the manager of Abidjan Port

(5) Conclusion

According to the due diligence investigation results, the UNID Global Corporation Fine Chemicals Team concluded that the control the sodium cyanide storage yard in Abidjan Port comply with ICMC and national legal requirements.

4. Review of the due diligence investigation results by ICMC audit team

During the ICMC certification audit November 2018 year for West Africa Supply Chain of UNID Global Corporation, the auditor Mr. Sang-Ho Ahn reviewed the due Diligence investigation process and results implemented by UNID Global Corporation Fine Chemicals Team. The due diligence investigations included the control storage yards in ports and marine transportation.

The UNID Global Corporation Fine Chemicals Team implemented the due diligence investigations comprehensively for ports and marine transportation as below.

- Study and develop checklist applicable to sodium cyanide storage in ports and marine transportation.
- Nominated competent personnel as due diligence investigation team leader and member.

UNID Global Corporation

Name of Supply Chain Operator



Lead Auditor Signature

Page 15 / 16


07 December 2018

- Implement due diligence investigation with checklists and record the results.
- Issue corrective action request for nonconformity identified during due diligence investigation.
- Checked corrective action result

The audit team finally concluded that the due diligence investigations for West Africa Supply Chain implemented by UNID Global Corporation Fine Chemicals Team were comply with ICMC requirements.

UNID Global Corporation

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Name of Supply Chain Operator

  
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Lead Auditor Signature  
Page 16 / 16

07 December 2018