Whatton Consulting Limited

REPORT

Nika Logistics

ICMI CERTIFICATION SUMMARY REPORT

Submitted to:

International Cyanide Management Institute (ICMI)
1400 I Street, NW - Suite 550
Washington, DC 20005
UNITED STATES OF AMERICA

Submitted by:

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Summary Report

January 2026

Distribution List

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1.0 SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Name of Cyanide Transportation Facility: Nika Logistics – Czech Republic

Name of Facility Owner: Nika Logistics – Czech Republic

Name of Facility Operator: Nika Logistics – Czech Republic

Name of Responsible Manager: Michal Lunacek

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2.0 NIKA LOGISTICS OVERVIEW

This report focuses on transport of Cyanide by Nika Logistics from the Cy-Plus manufacturing facility in Wesseling, Germany to the Lučební závody Draslovka a.s. Kolín (Draslovka) manufacturing plant in Kolin (Czech Republic).

Nika will develop and use their own route risk assessments. Nika have also developed their own emergency plan which relies on the fact that national emergency responders are legally responsible for medical, fire and rescue and police intervention in the event of any incident involved with cyanide transport in Germany and the Czech Republic.

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

2.1 Nika Logistics

The following parties are involved in Nika Logistics' road transport of cyanide from the Cy-Plus manufacturing facility in Wesseling, Germany to the Lučební závody Draslovka a.s. Kolín (Draslovka) manufacturing plant in Kolin (Czech Republic).

1) Nika Logistics; Czech Republic

Nika Logistics a.s. (Nika) is a Czech transport and logistics company with many years of experience in the field of domestic and international transport and forwarding. They were founded in 1997 and now have around 400 employees and 275 vehicles. Nika provides ADR transport (all classes except Class 7), bulk transport and specialist transport services. Nika also has two logistics centres in Liberac and Pardubice.

Nika are part of the Šmídl Holding a.s. group.

The service portfolio includes warehousing and logistics, earthworks and bulk material transport.

Nika's vehicles meet the strictest environmental standards EURO 5 and 6. The average age of their vehicle fleet is two years, and they have satellite online monitoring of all vehicles. They also have ISO9001 and GMP+ certification.

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

Lučební závody Draslovka a.s. Kolín (Draslovka) has two ICMI certified supply chains (No 1 and 2) from its manufacturing plant. They are based at the Draslovka cyanide manufacturing facility in Kolin (Czech Republic) which is also an ICMI certified Cyanide producer. Draslovka currently provides Cyanide training for the Nika team and host mock drills that Nika attend. They will usually be the client for Nika's transportation between Wesseling and Kolin.

2.2 Transport Stages

Nika will enter into a contract (order) with Draslovka, or other party, to transport cyanide by road from the Cy-Plus manufacturing facility in Wesseling, Germany to the Lučební závody Draslovka a.s. Kolín (Draslovka) manufacturing plant in Kolin (Czech Republic). We note above that this remit may be expanded in the future. Depending on the order Nika will transport this under a direct contract whereby Nika will hold the responsibility for compliance with the ICMI code requirements.

Nika's code responsibilities (within the planned transport route) commence on collection and loading of the containers (goods) at Wesseling, Germany until delivery to Draslovka's Kolin site in the Czech Republic.

Nika considered different options for transport of solid cyanide between Wesseling, Germany until delivery to Draslovka's Kolin site in the Czech Republic all predominately on main carriage ways, and these were subject to route assessments by Nika.

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

3.0 SUMMARY AUDIT REPORT

Auditors Findings

Nika Logistics – Czech Republic

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

☐ in substantial compliance with

☐ not in compliance with

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

Audit Company: Whatton Consulting Limited

Audit Team Leader: Dale Haigh - Lead Auditor

Email: dalehaigh@whattonconsulting.com

Dates of Audit

The Certification Audit was undertaken over 2 days, between 17 to 18 September 2025.

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

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

Nika Logistik, Czech Republic		
Name of Facility	Signature of Lead Auditor	Date
Nika Logistics, Czech Republic		January 2026

4.0 PRINCIPLE 1 – TRANSPORT

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

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

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Nika implements processes and procedures to select transport routes that minimize the potential and potential impacts of accidents and/or releases. Nika has a documented procedure detailing how they select transport routes and have applied this to identify transport routes from CyPlus at Wesseling, Germany to Draslovka in the Czech Republic. The procedure states that it will use the criteria set by the cyanide code to consider specific concerns (population density, infrastructure condition, grade and proximity to water). Nika identified that there are no significant issues related to water bodies along the route, with high quality bridges on first class roads. This will continue to be assessed for any new routes.

Nika carry out their own assessments and record these. One overnight parking is required due to the length of the journey, and this is completed in a specific location and assessed by Nika. Nika staff confirmed that there is no difficult terrain present along the planned routes. Nika will also assess the route before setting off (to consider traffic and weather conditions via local web pages).

Ongoing monitoring of the routes produced by Nika will occur through use by the drivers. A driver from Nika Logistics was interviewed and confirmed that they were aware of and follow the selected transport routes and are aware of the identified hazards.

The transporter has a procedure to evaluate the risks of selected transport routes and has taken measures to manage these risks. Drivers are provided with the route risk assessment in advance of each trip and are tracked through the use of GPS. Nika have confirmed that they will review the selected route and options every six months.

In the event of any incidents or accidents on the road then the route may be subject to alteration. Nika has continual access to their own GPS system and local government transport networks that provide updates on road conditions and are reviewed prior to each trip. Any issues identified by the driver when travelling along the selected routes are also fed back to Nika.

The transporter documents the measures taken to address risks associated with the selected routes, using route risk assessments. The assessments are documented and were provided for review during the site inspection. The transporter documents the measures taken to address risks associated with the selected routes.

Route risk assessments for the road transport elements are completed by Nika directly. The assessment includes a physical assessment through driving and identification of risks for cyanide transportation. The assessments are documented, and these documents were provided for review during the site inspection.

The types of measures taken to manage the risks and documented in the route risk assessment include the following; routes taken to avoid built up areas and no stopping in built up areas that cannot be avoided, no stopping on bridges, be aware of potential foggy weather when travelling over or near water bodies, be aware of steep slope, and only stop in designated overnight parking area. The route risk assessment also noted that road routes are in good condition and accessible all year round, that traffic conditions will be assessed prior to commencement of the journey and that GPS and mobile phone signals are affective throughout the route.

The transporter seeks input from stakeholders with an interest in the selection of routes. The selected routes good quality main roads between Wesseling, Germany and Kolin in the Czech Republic. Nika identify issues through a review of community and stakeholder websites, and changes to routes are made or additional risk management measures applied and included in feedback to the drivers. Most of the changes experienced are short term (incident or road repairs) based on feedback from Nika.

Nika and Draslovka report that there are no special safety or security concerns currently (based on many past trips) in the Czeck Republic or Germany, but they confirmed that should any such issues arise then they would re-evaluate their plans and modify them accordingly.

Nika do not use any contractors to carry out cyanide transportation. All Nika drivers are provided with specific training including cyanide hazards, safe handling of cyanides, and the emergency plan. They are also provided with route risk assessments and carry driver packs containing the routes, emergency contacts and plan, ADR details and Material Safety Data Sheets (MSDS) for the cyanide transported.

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

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.2. Nika use only trained and qualified and licensed operators. Evidence including driving licences, ADR licences, valid tachograph card, cyanide training and emergency plan training was reviewed on site for several Nika drivers. Records are held on software in Nika's administration building. The records include scans of driver's licence, signed working agreement, Tachograph cards, ADR training certificates and cyanide training.

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

All personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures. Nika staff are involved in the following training modules and Nika holds records of these:

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

- Mock Drill s (performed by Draslovka)

A selection of Nika drivers and team members were interviewed about their knowledge of the procedures and practices involving operating cyanide handling and transport equipment and responses indicated that they were competent to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. Nika Logistics do not use sub-contractors.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 1.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The transport company only uses equipment designed and maintained to operate within the loads it will be handling. Equipment consists of road vehicles (tractor units, trailers and tautliners) that were purchased to a design specification appropriate for the cyanide transport task Nika Logistics provided government registration certificates for tractor units and trailers confirming the maximum load they could carry. Samples of these documents were reviewed and confirmed that tractor units were all capable of carrying loads of 44 tonnes and that trailers were capable of carrying between 39 tonnes and 44 tonnes (more than sufficient to carry the proposed cyanide loads). A container with 20 one tonne cyanide packages weighs just under 24 tonnes including packaging and container weight.

Czech and German legal road requirements are set at 40T maximum weight limit, both of which can be increased to a weight limit of 44T with relevant permissions. Nika uses 20-foot containers for one tonne boxes which result in a total load just below 24 tonnes (20 tonnes of cyanide plus packaging) which are below the legal limits. Nika also carries loads using its Tautliner which has a technical limit of 39T but a legal limit of 36T, again sufficient to carry the 24 tonnes load of cyanide.

Containers are weighed at the Wesseling site before and after loading to ensure that the vehicle is below the legal limits and example Bill of Delivery documents which include weighbridge information, confirm that total weights are well below the legal maximum allowed and were within the truck and trailer weight limits.

Nika Logistics have provided evidence that the equipment used is registered by the government and that annual inspections are completed in accordance with government requirements.

For all cyanide transportation, cyanide is loaded into either sea containers or the Tautliner within sealed containers (IBCs) and the loads are then secured inside the container and inspected by Draslovka and the Nika drivers. Check lists from Nika have been reviewed. Cyanide containers are inspected before and after loading. Any issues identified and the cyanide will not be transported.

Service plans and records were observed for Nika's trucks and trailers which are held on a site database. The system flags up, required services and legal inspections in advance. Vehicles are maintained by main dealer suppliers although minor repairs are completed by Nika mechanics on site. In addition, each year vehicles

(trucks and trailers) are required to complete a legal inspection (Known as STK). Example STKs were observed at the Nika offices.

Procedures are in place to verify the adequacy of the equipment for the load it must bear. Nika confirmed that dispatchers on taking an order for transportation of cyanide check that the proposed transportation can handle the load required before accepting the order.

Examples of Nika's inspection check sheets were observed on site. A driver of cyanide was also interviewed and confirmed these checks are completed. Nika has procedures in place to prevent overloading of the transport vehicles used for transporting the cyanide and include the inspections. Nika do not currently use contractors.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Nika follows a system to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging and have significant experience in handling dangerous goods including cyanide. Nika staff are provided with training in Cyanides (including handling and emergency procedures).

Nika's route risk assessments ensure routes are selected to minimise damage to vehicles and transported cyanide. The routes are along good quality roads. Vehicles and trailers used by the road transporters are designed, maintained and inspected to carry the loads safely. Inspections carried out by Nika at the start of the journey and during transport ensure that the integrity of the producer's packaging is maintained.

Vehicles carrying cyanide are also tracked by Nika using a GPS system (Webdispecink). Monitoring is maintained and the drivers also carry mobiles and in the event of an issue the Dispatcher is informed. GPS reports can be produced showing current status, speed, route and stop locations with records held for at least three years.

Nika also carry an Emergency Plan which includes specific Cyanide Emergency elements. Nika have to call the National Emergency Services in the event of an incident. The carrying of the Safety and Emergency plan was confirmed through inspection of vehicles and interview with drivers.

Placards and signage are used to identify the shipment as cyanide and are as required by local regulations or international standards and were observed on site. Signage is placed on all shipping cyanide boxes, drums and on the outside of the shipping containers. Example check lists from Nika were observed and discussions with Nika staff confirmed that the presence of placards/signs is checked before transportation commences. The placards used on containers, include UN Numbers; and Hazchem classification.

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

Vehicle inspections which include tractor and trailer units are completed by Nika during loading and prior to shipping. Examples check lists were observed.
Nika has implemented a preventative maintenance program which includes both tractor and trailer units and was observed on site. Nika use software to track and flag maintenance records and requirements. Containers (where used) are inspected by Nika before each use. Maintenance of containers used for cyanide transport is carried out by Nika's client (Draslovka) who supply the cyanide and containers. Draslovka also inspect the container after loading and Nika also inspect the sealed container on commencement of the journey and at times during the journey and these are logged on Nika's inspection check list, examples of which were observed on site.

Limitations on operator driver hours are managed by Nika and are indicated in training and within employment contracts. Nika also manage this via dispatchers who monitor drivers and transportation. Tachograph systems also analyse driver hours.

Solid cyanide is loaded securely into the vehicles by CyPlus at Wesseling. The vehicles are designed to hold these loads in a secure manner and are inspected during loading by Nika drivers and recorded on check lists, which have been observed.

Civil unrest is unlikely in this region based on recent experience. If severe weather is encountered transport can be delayed. Nika have empowered drivers to make the decision to delay transport in the event of poor weather.

Nika has an alcohol and drug abuse prevention procedure and has confirmed that they carry out random testing. The prohibition of drugs and alcohol is discussed during cyanide training. Records are maintained by Nika.

Nika do not use any sub-contractors.

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

☒ **in full compliance with**

The operation 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 is not applicable as the transporter does not ship cyanide by air or by sea within this supply chain.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 1.6**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Transport Vehicles have the means to communicate with Nika head office, their client (Draslovka) and Emergency Responders and through them to the mining operation. Nika drivers carry mobile phones and driver's packs which have details of contact numbers in the event of an emergency. Check lists are used to confirm that the drivers carry phones and carry the driver's packs. Examples of checklists for Nika were observed.

All Nika vehicles are also fitted with the Webdispecink GPS system which allows for constant monitoring of cyanide transport. There are no black spots for the GPS or mobile phone system for the routes that Nika is currently involved with and the equipment is regularly tested (each day of use) to ensure that it functions correctly.

Communication system signal status is reviewed during the route risk assessments. There are systems and procedures in place to enable the progress of cyanide shipments. The system and procedures include post load inspection of the vehicles (by Nika drivers), active GPS tracking of transport during the route from pick up to delivery by Nika, and use of mobile phones to confirm arrival at Draslovka and for use in emergency.

Documents are also prepared at the start of the transportation by Nika's client, Draslovka including Bill of Delivery (from CyPlus), and CMR (International Goods Transport Consignment Note) and weighbridge documents. Shipping records indicate the amount of cyanide in transit and Materials Safety Data Sheets are available during transport.

Nika's client, Draslovka also advise the mine, ports and shippers when shipments leave the departure point (where relevant) and estimated time and date of arrival of the consignment.
The transporter uses inventory controls and chain of custody documentation (Bill of Delivery) to prevent the loss of cyanide during shipment.

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

Shipping documents are provided at the start of the transportation process and inspected at periods during the transportation. Nika do not use contractors.

5.0 PRINCIPLE 2 – INTRIM STORAGE

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

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

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 is not applicable as Nika does not undertake any interim storage of cyanide.

6.0 PRINCIPLE 3 – EMERGENCY RESPONSE

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

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.1**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Nika has a Manual (Principles of Safe Cyanide Transport) which includes their Emergency Response Plan which includes background on the nature of cyanide transported, the training required, response schemes and procedures, reporting of emergency events, significant cyanide incidents, corrective action in case of incidents, and the emergency contact list.

By law Nika have to carry an ADR (Dangerous Goods Transport) Emergency Plan in accordance with Section 1.10.3.2 of the European ADR Regulations (Directive 2008/68/EC).
This includes reference to Section 6.1 (Toxic Substances which includes cyanides). The requirements of this plan are not in conflict with the Emergency Response plan which Nika carry when they are transporting cyanide.

Nika's emergency plan is appropriate for the selected transportation route which states that transport includes road transport. The Emergency Response Plans states specifically that solid cyanide will be transported. The transport methods include road transport which is mentioned in the Emergency Plan. The plans consider all aspects of the transport infrastructure relevant to Nika's activities which involve transfer of solid cyanide from the CyPlus, Wesseling facility to the Draslovka site in the Czech Republic. Transport by road is subject to route risk assessments which assess the hazards on possible routes. The emergency response plans state the cyanide is transported in closed containers which are then secured and transported by road in vehicles designed to effectively carry the loads. The Emergency Plan includes descriptions of response actions as appropriate for anticipated emergency situations. We note that the response to emergency incidents in Germany and the Czech Republic is solely the responsibility of the national emergency services.

Each driver carries the emergency plan which states for any incident involving cyanide that the driver should ensure they are safe and it includes several actions including distance, location and use of RPE/PPE to help them. The driver should then contact the emergency response services who will take over management of any cyanide incident. The driver should then contact the Nika Dispatcher. The plans and instructions are appropriate for the potential release scenarios along the route. The Plan does identify the roles of outside responders and medical facilities.

The Nika emergency plan requires the calling of the national emergency numbers. In Germany and the Czech Republic emergency services (medical (rescue services), fire and police) would manage the situation at this point and the supply chain team and local communities would be advised of any actions directly from them.

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

The operation is

☒ **in full compliance with**

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

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The transporter provides initial and refresher emergency response training for appropriate personnel.

Nika provides initial cyanide and emergency response training in August 2025 and will carry out annual refresher training. Draslovka also provides training on cyanide including background on cyanide and mock drills to Nika staff. This training is to be refreshed each year, and this commitment is stated within Nika's manual. Interviews were conducted with a selection of Nika staff which demonstrated that personnel have a good understanding of what to do in the event of an emergency involving cyanide and their roles. ADR (Dangerous Goods transport) training is also completed by Nika drivers every 5 years and examples of ADR training cards were inspected for Nika drivers.

The Emergency Response Plan identifies the key roles and responsibilities in the event of an emergency for Nika Drivers and Emergency Responders (police, firefighters, medical team). As emergency measures are the responsibility of the National Emergency services in Germany and the Czech Republic, the main actions for Nika drivers are to make themselves safe and contact the emergency services and then the Nika Dispatcher to inform others.

Nika hold a list of all emergency response equipment that should be available during transport or along the transportation route in their manual. Equipment is inspected prior to each trip using check list. Expiry dates of equipment are held in Nika's Maintenance system and are flagged in advance of the expiry dates occurring. Emergency equipment included coveralls, protective gloves, protective glasses, cartridge-based respirator with ABEK filters, covers, explosion proof (EX) approved flash lights, wheel chock and plastic sheet.

Example check lists were observed which are used at the start of each trip to confirm that the equipment is available. The transporter has the necessary emergency response and health and safety equipment, including personal protective equipment. Drivers inspect their emergency equipment each day. Nika does not sub-contract its activities.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 3.3**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

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

Nika has a Manual which includes an Emergency Plan. Details of the notification requirements in the event of an incident are detailed here. This includes the requirement to contact external emergency responders immediately using main national emergency numbers. The Emergency Plans detail the contact numbers which are the relevant national emergency numbers for emergency response providers. All contact details are reviewed at least annually as stated in the Emergency Response Plan.

The internal reporting procedure is stated within the emergency plan and requires the driver to contact the Nika dispatcher (after the emergency services have been contacted) and the dispatcher will contact the customer and others as required by the nature of the incident.

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

Systems are in place to ensure that internal and external emergency contact information and reporting procedures are kept current. The National emergency number (in Germany and the Czech Republic) is 112 and it is unlikely that this number will change and if it does there is likely to be widespread notification in advance of the change. The Emergency plan is also reviewed annually, and this includes a review of the emergency contact numbers. Drivers are also provided with the emergency transport contact sheet with current contact numbers just prior to each trip. These were observed at Nika during the interview with staff and drivers.

The transporter has a procedure (emergency plan within manual) for notifying ICMI of any significant incidents. Details of the communication requirements in the event of an emergency are presented in the emergency plan. Interviews with Nika staff confirmed that they are aware of the communication requirements in the events of an incident. There have been no cyanide related emergencies in 2025.

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

☒ **in full compliance with**

The operation is ☐ in substantial compliance with **Transport Practice 3.4**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

There are procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

Details of the remediation requirements are detailed within Nika's Emergency Plan which states that the responsibility for remediation of any cyanide releases rests solely with the emergency services (located in Germany and the Czech Republic).

The plan also identifies external responders who would provide support in the event of an incident.

The procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. Nika's emergency response plan states specifically that "The *use of chemicals such as sodium hypoiodite, ferrous sulphate and hydrogen peroxide to treat Cyanide once it has entered surface water is prohibited*". It was confirmed in interviews that training provided to Nika staff reinforces the requirement that such chemicals cannot be used to treat the cyanide.

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

The operation is

☒ **in full compliance with**

☐ in substantial compliance with **Transport Practice 3.5**

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

There are provisions for periodically reviewing and evaluating the adequacy of the Emergency Plan. Every year the Nika Emergency Plan is reviewed as stated within the Emergency Plan.
There are provisions for periodically conducting mock emergency drills and they have been and will continue to be implemented. Nika's manual states that Nika employees must annually participate in Draslovka's mock drills. If Draslovka do not go ahead with these drills for any reason, Nika will carry out mock drills on their own.

According to Nika staff, the mock drills will include both cyanide release and exposure. The last mock drill was provided to Nika staff by Draslovka on 28/11/2025 and was attended by Nika staff. This mock drill included a release of solid cyanide following a vehicle accident and potential for cyanide exposure (inhalation and skin contact) following the release. This was confirmed in the information provided on the mock drill by Draslovka and Nika.

There is a procedure to evaluate the performance of the emergency response plan after its implementation. Nika will review their emergency plan annually as stated in their plan. There have been no cyanide related emergencies since in 2025.

Signature Page

Whatton Consulting Limited

Dale Haigh
Lead Auditor

Date: January 2026

Whatton Consulting Limited