SUMMARY AUDIT REPORT

Operation General Information

Name of Transportation Operation: PT CIPTA KRIDA BAHARI (CKB)

Name of Facility Owner: Iman Sjafei

Name of Facility Operator: Iman Sjafei

Name of Responsible Manager: Mohammad Nasrul Yusni

Address: Central Osowilangun Business Park Blok 7-K Jl. Tambak Osowilangun 81-D Surabaya

State/Province: East Java

Country: Indonesia

Telephone: (031) 98541000

E-Mail: m.nasrul@ckb.co.id

Operation Location Detail and Description

CKB cyanide transportation pre-operational scope of the supply chain, which covers the Port of Surabaya via commercial shipping vessel to the Port of Gorontalo, followed by storage at the designated interim storage facility and subsequent transportation to the mine site located in Gorontalo.

Name of Operation:	Signature of Lead Auditor & Technical Expert	Date:
CKB	Danny Tan	3 Oct 2025

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Auditor's Finding

This operation is

☑ in full compliance

☐ in substantial compliance *(see below)

☐ not in compliance

with the International Cyanide Management Code.

Auditor Information

Audit Company: Danny Tan

Lead Auditor: Danny Tan

Lead Auditor Email: dannytan163@yahoo.com.sg

Dates of Audit: 13 to 16 May 2025

Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Certification Auditors.

I attest that this Summary Audit Report for this pre-operational audit 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.

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Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1:

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with
- ☐ not in compliance with

Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

CKB conducted a comprehensive route assessment [dated 10 Apr 2025 and updated route assessment on 15 May 2025 under Sodium Cyanide Shipment/Transportation (WI-OPS-ILS- 06 dated 21 Nov 2023) verified with onsite sampled of route risk assessment along with for cyanide transportation route to Pani mine (as pre-operational scope of supply chain covers land transportation from Port of Gorontalo to mine site. The distance from the Port of Gorontalo to the Pani Mine is approximately 168 km.

The review of risk assessment enroute to Pani mine was conducted based on documented information and on-site verification. The selection of route was based on minimising potential accidents and releases or potential impacts of accidents, with due consideration given to the following:

a) Population density (Industrial and Housing Estate)
b) Infrastructure (roadway, rail, port) construction and condition (Railway track)
c) Pitch and grade (Highway up to bridge)
d) Prevalence and proximity

To mitigate identified transportation risks, PT CKB has a range of control measures. These include a structured fatigue management program, strict speed control policies, particularly in accident-prone and densely populated areas, the use of vehicle escorts for high-risk routes, mandatory pre-departure vehicle inspections, routine toolbox briefings to address journey-specific hazards, and ongoing driver training programs covering defensive driving, emergency response, and hazardous materials handling.

Procedure in place to reevaluate routes used for cyanide deliveries periodically, to get feedback on route conditions from the transporter's operators, as evident with WI-OPS-ILS-06 Rev.01_Sodium Cyanide Transportation and Form (Journey and Road Condition Evaluation)

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PT CKB documented the measures taken to address risks identified in its route risk assessments, as reflected in the Route Assessment and Documentation Reports dated 19 Mar and 15 May 2025.

Periodic evaluation is carried out every 6 months / if there are differences in the previous situation and conditions (re-route assessment, feedback to be gathered from the assigned driver as part of the journey report.

Inputs from communities, other stakeholders and applicable governmental agencies were gathered as necessary in the selection of routes and development of risk management measures as per the letter and Email Notification to the Related Government [11 Jul 2025]

As part of the overall risk assessment, provisions are in place to address special safety or security concerns that warrant the use of convoys, escorts, or other additional safety or security measures.

CKB do not contract entities to conduct land transportation.

Standard of Practice1.2:

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice1.2
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Based on review of work instructions – driver recruitment, driver selection, and associated qualification process, formally documented (Selection Criteria - Sodium Cyanide Shipment/Transportation (WI-OPS-002-CND dated 2 Jun 2023) were in place: reviewed training plan and matrix to be conducted for all personnel operating cyanide handling and transport equipment. CKB do not contract entities to conduct land transportation.

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Standard of Practice1.3:

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice1.3
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Based on an interview with site personnel, it was noted that procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide.

The above are also validated with the following documented information as reflected in Sodium Cyanide Shipment/Transportation (WI-OPS-002-CND dated 2 Jun 2023)

The reach stacker is used to ensure that the 20FT container's gross weight does not exceed the fleet capacity of 25 tons (25,000 kg) before loading onto the trailer. Once confirmed, the load weight is recorded in FRM-ILS-ILS-03 Rev. 00, Inspection of Container Payload before shipment.

CKB do not contract entities to conduct land transportation.

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Standard of Practice1.4:

Develop and implement a safety program for transport of cyanide.

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice1.4
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Based on onsite observations, it was noted that placards will be used to identify the shipment as cyanide, as required by local regulations, including international standards. The rework process for ensuring the integrity of the producer's packaging is outlined in WI-OPS-ILS-05 (dated Nov 2023), as reflected in the following documents:

1. WI-OPS-ILS-05 Rev.01 – *Sodium Cyanide Storage*
2. FRM-ILS-ILS-03 Rev.00 – *Pemeriksaan Muatan Kontainer Sebelum Dikirim* (Inspection of Container Payload Before Shipment)

Reviewed procedure in place for provision of (Sodium Cyanide Shipment/Transportation (WI-OPS-002-CND dated 2 Jun 2023)
covering topics such as coupling and decoupling procedure refresher, safety on the road, fatigue control, speeding, pre-trip inspection checklist response actions in the event of road accidents and Personal Protective Equipment and validated with an onsite interview held with personnel on site. Vehicle maintenance records for both vehicle and trailer from January to September 23.

PT CKB has an established preventive maintenance system for its transport equipment, which operates independently without reliance on contractors. This system is supported by a maintenance program already in place, prepared for future cyanide transportation. PT CKB is responsible for inspecting and maintaining sea containers, as evidenced by inspection reports and approval protocols used to assess the condition of the containers after each inspection.

Limitations on operators or drivers' hours as reflected Sodium Cyanide Shipment/Transportation (WI-OPS-002-CND dated 2 Jun 2023) - Drivers working hours and fatigue management plan dated DDMMYYYY with at least 6-8hours rest before driving.

Sodium Cyanide Shipment/Transportation (WI-OPS-002-CND dated 2 June 2023) procedures to prevent loads from shifting were verified on-site.

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PT CKB has established procedures that allow for the modification or suspension of transportation activities when necessary, particularly under adverse conditions such as heavy rain, dust, fog, poor lighting, or any situation where visibility is reduced to less than 10 meters. These procedures include measures such as reducing speed, maintaining communication between convoy vehicles, and making joint decisions on whether to proceed or halt the journey. These protocols are documented in the Sodium Cyanide Transportation procedure dated 10 July 2025.

Drug abuse program in place as documented in Sodium Cyanide Shipment/Transportation (WI-OPS-002-CND dated 2 Jun 2023).

CKB do not contract entities to conduct land transportation.

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Standard of Practice1.5:

Follow international standards for transportation of cyanide by sea.

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice1.5
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Sea Transportation (TPS to Gorontalo domestic seaport)

CKB subcontracts PT Tanto Intim Line commercial vessel for sea transportation from TPS to the Port of Gorontalo. CKB had an overarching due diligence procedure to ensure that subcontractors continue to comply with ICMC requirements, as follows, and to address the key aspects:

1. WI-ILS-ILS-03 Rev. 00_Sodium Cyanide Seafreight Handling
2. FRM-ILS-ILS-06 Rev. 00_Daftar Uji Tuntas untuk Transportasi Laut Sianida (Due Diligence Checklist for Sea Cyanide Sea Trans)

Key aspects:
1. Shipping records – declaration
2. Emergency response post-exercise report
3. Competency records for the ship crew
4. Loading manifest
5. Emergency response plan and communications
6. Loading and stowage onboard for cyanide containers
7. List of cyanide response emergency equipment and maintenance records

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Standard of Practice1.6:

Track cyanide shipments to prevent losses during transport.

The operation is ☑ in full compliance with Standard of Practice1.6

☐ in substantial compliance with

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Means of communication is through mobile phones and Walkie Talkie, as verified by onsite observation and functionality checks, as reflected in Sodium Cyanide Transportation Pre-Departure Checklist (FRM-OPS-001-CND)

After evaluating the above reviews, CKB has a system in place to track the progress of its cyanide shipments.

On-site route assessment and interviews with the transport manager revealed that the system is in place to ensure the tracking of cyanide shipments and loss prevention, as well as to capture screenshot records of car tracking streaming systems for livestreaming of vehicles.

Verify communication blackout areas along transport routes have been identified and special procedures implemented for the blackout areas. (WI-OPS-oo4-CND dated 5 Oct 23)

CKB do not contract entities to conduct land transportation.

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Principle 2 | INTERIM STORAGE

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

Standard of Practice2.1:

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice2.1
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB had made provisions based on established procedure (Sodium Cyanide Storage – WI-OPS-001-CND dated 2 Jun 2023) that warning signs are visible in both Indonesia and English language at the entrance of future open space Warehouse to alert personnel the presence of cyanide; that smoking, open flames, eating and drinking are not allowed and what personal protective equipment are needed to be worn. The cyanide storage open yard must be dry and not waterlogged. The installation of concrete blocks as a pedestal for containers serves as an alternative to preventing waterlogging during rainy days, thereby increasing the safety of containers containing Sodium Cyanide. - The required stack height of the filled containers is two tiers. - Water drainage in the open yard area shall be self-collected in the waste control.

Security is ensured through a security post managed by outsourced security services, as observed during on-site visits at the existing warehouse storing hazardous goods. Access control for visitors is in place and monitored for entrance to the warehouse.

Due diligence procedures are in place for Surabaya Domestic Seaport – CY Berlian and Gorontalo Domestic Seaport – CY Berlian as reflected in WI-OPS-ILS-05 Rev.01_Sodium Cyanide Storage and corresponding FRM-ILS-ILS-05 Rev. 00_Daftar Uji Tuntas untuk Penyimpanan Sementara Sianida (Due Diligence Checklist for Cyanide Interim Storage)

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Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice3.1:

Prepare detailed emergency response plans for potential cyanide releases.

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice3.1
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB had a procedure in place for the Emergency Response Procedure (Sodium Cyanide Handling Emergency Response Plan WI-HSE-32, dated 21 Nov 2023), which addressed potential cyanide releases for both interim storage and land transportation. Management of the following identified incidents leading to potential cyanide release was derived from risk assessment: Respective classifications of incidents (such as accidental sodium cyanide poisoning and spill to waterway) correspond with the incident response structure for basic incident and specific emergency response guide, taking into account the physical and chemical form of cyanide during accidental release. Requirements of transport infrastructure are considered as part of the overall ERP:

- Personnel Protective Equipment
- Recovery vehicle
- Evacuation zones
- Communications with external responders
- Respective roles and integrated response with local communities, medical facilities, local authorities and the fire department
- MSDS – Sodium Cyanide
- ICMI Notification Process

The ERP plan has identified external entities having designated roles in emergency response, such as emergency responders, medical services or communities, as outlined in WI-HSE-HSE-32 Rev.01_Sodium Cyanide Handling Emergency Response Plan.

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Standard of Practice3.2:

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice3.2
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

CKB had a procedure in place (Sodium Cyanide Handling Emergency Response Plan – WI-OPS-003-CND dated 21 Nov 2023), Response Procedure and Emergency Response Plan and based on an interview with site personnel, including ERP awareness training for personnel involved in interim storage and transportation operations covering the following:

- Specific roles and responsibilities during activation of ERP
- Interim storage and transportation of designated emergency response equipment
- Personal Protective Equipment (PPE)

This includes specific cyanide emergency response duties and responsibilities assigned to its personnel and outside responders during responses to emergency incidents, such as leaks or spills.

- To carry out initial action to contain the leakage
- To alert local authorities
- To minimise the risk to people and the environment

A maintenance regime was established to ensure the functionality of the emergency response equipment. Records are maintained for this regime, along with a list of emergency responses required for ERP in transportation operations.

Training plans are in place for (Emergency and Critical Response Training for Cyanide and Other Hazards), and appropriate materials were reviewed to ascertain the relevancy and application as sampled with HCN Gas Detector Usage Training - PT CKB - 19 May 2025.

CKB do not contract entities to conduct land transportation.

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Standard of Practice3.3:

Develop procedures for internal and external emergency notification and reporting.

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice3.3
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Sodium Cyanide Handling Emergency Response Plan (WI-OPS-003-CND, dated 21 Nov 2023) outlines contact information for emergency notifications during transportation incidents. The implemented ERP procedure includes both internal and external notification protocols as part of the incident response framework. This procedure is reviewed during toolbox meetings before land transportation, with contact lists updated accordingly.

Records are maintained that include emergency response contacts for both yard and transportation operations. On-site interviews with personnel confirmed that the ERP and associated contact lists are actively followed.

A management flowchart is in place to notify ICMI in the event of significant cyanide incidents. Based on interviews with onsite personnel, it was verified that no significant cyanide incidents have occurred to date that required ICMI notification.

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Standard of Practice3.4:

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

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice3.4
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Sodium Cyanide Handling Emergency Response Plan (WI-OPS-003-CND, dated 21 Nov 2023) outlines a comprehensive spill contingency plan for accidental spillage. In the event of a spill, an external resource will be mobilised to provide necessary responses, including procedures for the recovery or neutralisation of solutions or solids, as well as the decontamination of soils or other affected media. The procedure also explicitly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate, and hydrogen peroxide for treating cyanide released into surface waters or during handling and transportation.

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Standard of Practice3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is
- ☑ in full compliance with
- ☐ in substantial compliance with Standard of Practice3.5
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Provisions for regular review and evaluation of the Plan's adequacy are well-established and actively implemented, supported by tools such as the Training Matrix and FRM-HSE-HSE-47 Rev. 00 MoM Cyanide Emergency Drill 2025. Periodic mock emergency drills are conducted based on the FRM-HSE-HSE-46 Emergency Drill Scenario 2025, providing a comprehensive framework for these exercises. A defined procedure is in place for evaluating the Plan's performance post-implementation, with FRM-HSE-HSE-47 demonstrating a proactive approach to ensuring the Plan remains practical, effective and up to date.

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