

# 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

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## Operation Location Detail and Description

CKB cyanide transportation scope of the supply chain, which covers the Port of Surabaya by Commercial shipping vessel to Port of Gorontalo, storage at designated interim storage and thereafter transportation to the mine site located in Gorontalo.

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& Technical Expert  
*Danny Tan*

Date:  
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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: 2 to 6 Feb 2026

## **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.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.1

not in compliance with

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

CKB conducted a comprehensive route assessment for the transportation of sodium cyanide, initially dated 10 April 2025 and updated on 8 Jan 2026, under WI-OPS-ILS-06 Rev. 01\_Sodium Cyanide Transportation 13 Feb 2026). The assessment included on-site sampling of route risks for the land transportation of cyanide from the Port of Gorontalo to the Pani Mine, a distance of approximately 168 km.

The risk assessment for the Pani mine, supported by documented information and on-site verification, guided route selection to minimize the potential for accidents, releases, and their impacts. The following factors were considered:

- a) Population density (Industrial and Housing Estate)
- b) Infrastructure, including the construction and condition of roadways, railways, and ports
- c) Pitch and grade (Highway up to bridge)
- d) Prevalence and proximity

To mitigate the identified transportation risks, PT CKB has several control measures in place. These include a structured fatigue management program, strict speed-control policies in accident-prone and densely populated areas, vehicle escorts for high-risk routes, mandatory pre-departure vehicle inspections, routine toolbox briefings on journey-specific hazards, and ongoing driver training in defensive driving, emergency response, and hazardous-materials handling. A procedure is in place to periodically reevaluate routes used for cyanide deliveries and to obtain feedback on route conditions from the transporter's operators, as demonstrated by the following document. WI-OPS-ILS-06 Rev.01\_Sodium Cyanide Transportation and Form (Journey and Road Condition Evaluation)

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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. PT CKB documented actions taken to address risks identified in its route risk assessments, as detailed in the Route Assessment and Documentation Reports dated 15 May 2025 and 8 Jan 2026.

Inputs from communities, stakeholders, and governmental agencies were gathered as needed for route selection and risk management measures, as documented in the email notification and meeting minutes with local authorities on 5 Nov 2025.

As part of the overall risk assessment, provisions address special safety or security concerns that require convoys, escorts, or other measures, with police escort and one emergency vehicle based on records from the first transportation on 24 Nov 2025 and on 6 Dec 2025.

CKB engaged PT MISA for land transportation services. Due diligence was completed on 2 Mar 2026, and it was confirmed that procedures are in place to ensure the contractor complies with Transport 1.1.

## Standard of Practice 1.2:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.2

not in compliance with

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

Based on review of work instructions – driver recruitment, driver selection, and associated qualification process, formally documented (Selection Criteria - WI-OPS-ILS-06 Rev. 01\_Sodium Cyanide Transportation 13 Feb 2026) were in place.

Reviewed training plan and matrix to be conducted for all personnel operating cyanide handling and transport equipment.

CKB engaged PT MISA for land transportation services. Due diligence was completed on 2 Mar 2026, and it was confirmed that procedures are in place to ensure the contractor complies with Transport 1.2.

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## Standard of Practice 1.3:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.3

not in compliance with

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

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-ILS-06 Rev. 01\_Sodium Cyanide Transportation 13 Feb 2026)

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 engaged PT MISA for land transportation services. Due diligence was completed on 2 Mar 2026, and it was confirmed that procedures are in place to ensure the contractor complies with Transport 1.3.

## Standard of Practice 1.4:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.4

not in compliance with

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

Based on onsite observations, it was noted that placards 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 Rev. 01\_Sodium Cyanide Storage

13 Feb 2026 as reflected in the following documents:

1. WI-OPS-ILS-06 Rev. 01\_Sodium Cyanide Transportation  
13 Feb 2026– *Sodium Cyanide Storage*
2. WI-OPS-ILS-06 Rev. 01\_Sodium Cyanide Transportation  
13 Feb 2026 – *Pemeriksaan Muatan Kontainer Sebelum Dikirim* (Inspection of Container Payload Before Shipment)

Reviewed procedure in place for provision of (Sodium Cyanide Shipment/Transportation (WI-OPS-ILS-06 Rev. 01\_Sodium Cyanide Transportation 13 Feb 2026) 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 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-ILS-06 Rev. 01\_Sodium Cyanide Transportation 13 Feb 2026) - Drivers working hours and fatigue management with at least 6-8hours rest before driving.

Sodium Cyanide Shipment/Transportation (WI-OPS-ILS-06 Rev. 01\_Sodium Cyanide Transportation 13 Feb 2026) procedures to prevent loads from shifting were verified on-site.

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 13 Feb 2026.

Drug abuse program in place as documented in Sodium Cyanide Shipment/Transportation (WI-OPS-ILS-06 Rev. 01\_Sodium Cyanide Transportation 13 Feb 2026).

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CKB engaged PT MISA for land transportation services. Due diligence was completed on 2 Mar 2026, and it was confirmed that procedures are in place to ensure the contractor complies with Transport 1.4.

## Standard of Practice 1.5:

*Follow international standards for transportation of cyanide by sea.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.5

not in compliance with

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

Sea Transportation (TPS to Gorontalo Domestic Seaport)

CKB engages PT Tanto Intim Line as a subcontracted commercial vessel operator to perform sea transportation from TPS to the Port of Gorontalo. A structured due diligence framework has been established to ensure that subcontracted carriers consistently comply with International Cyanide Management Code (ICMC) requirements and applicable safety obligations. This framework is governed by the following documented procedures and tools:

- WI-ILS-ILS-03 Rev. 00 – Sodium Cyanide Seafreight Handling
- FRM-ILS-ILS-06 Rev. 00 – Daftar Uji Tuntas untuk Transportasi Laut Sianida (Due Diligence Checklist for Sea Cyanide Sea Transport)

A formal due diligence assessment of PT Tanto Intim Line was conducted on 15 Oct 2025, focusing on key operational, safety, and compliance domains. The assessment covered the following areas:

1. Shipping Documentation and Declarations  
Verification of shipping records, including proper declaration of hazardous cargo in accordance with regulatory and ICMC requirements.
2. Emergency Response Preparedness  
Review of post-exercise emergency response reports to assess effectiveness, readiness, and continuous improvement of response capabilities.
3. Crew Competency and Training  
Validation of crew qualifications, certifications, and training records relevant to the handling and transportation of cyanide.

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4. Cargo Documentation and Traceability

Examination of loading manifests to ensure accurate documentation, traceability, and alignment with transport requirements.

5. Emergency Response Planning and Communication

Assessment of documented emergency response plans, including communication protocols and escalation procedures during incidents.

6. Loading and Stowage Practices

Evaluation of onboard loading and stowage arrangements for cyanide containers, ensuring compliance with safety standards and segregation requirements.

7. Emergency Equipment Readiness

Verification of the availability, condition, and maintenance records of cyanide-specific emergency response equipment onboard the vessel.

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## Standard of Practice 1.6:

*Track cyanide shipments to prevent losses during transport.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 1.6

not in compliance with

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

Communication is conducted via mobile phones and Walkie Talkies, as confirmed by onsite observations and functionality checks documented in the Sodium Cyanide Transportation Pre-Departure Checklist (FRM-OPS-08 Sodium Cyanide Transportation Pre-Departure Checklist).

CKB has implemented a system to track the progress of its cyanide shipments.

On-site route assessments and interviews with the transport manager confirmed that systems are in place for shipment tracking, loss prevention, and recording screenshots of vehicle-tracking livestreams. Communication and tracking during transportation are conducted using mobile phones, walkie-talkies, and GPS.

Verify that communication blackout areas along transport routes have been identified and special procedures implemented for the blackout areas. (WI-OPS-ILS-07 Rev. 00\_Blackout Areas Instruction 21 Nov 2025)

Based on the verification of the Cargo Manifest dated 7 Dec 2025 and supporting documentation, the transporter has implemented adequate inventory controls and a formalised chain-of-custody process. These measures provide reasonable assurance that sodium cyanide shipments are accurately tracked, safeguarded against loss, and transferred under controlled and documented conditions from the Port of Surabaya to CKB and subsequently to Pani Mine.

CKB engaged PT MISA for land transportation services. Due diligence was completed on 2 Mar 2026, and it was confirmed that procedures are in place to ensure the contractor complies with Transport 1.6.

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## Principle 2 | INTERIM STORAGE

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

#### Standard of Practice 2.1:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 2.1

not in compliance with

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

CKB had made provisions based on established procedure (Sodium Cyanide Storage – WI-OPS-ILS-05 Rev. 01\_Sodium Cyanide Storage 13 Feb 2026) 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 are 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) and due diligence conducted on 17 Feb 2026, 25 Feb 2026 and updated on 3 Mar 2026 and verified for actions taken.

Based on onsite verification on 5 Feb 2026 at CY Berlian, Gorontalo Domestic Seaport, it was observed that the transporter has established and implemented structured controls for the interim storage, handling, and safeguarding of sodium cyanide. Hazard communication measures were effectively implemented, with clear warning signage displayed across the storage area. These signs indicate the presence of cyanide, restricted activities such as no smoking, eating, or drinking, and mandatory personal protective equipment requirements. Interim storage requirements have been formalised within contractual and procedural controls, ensuring safety and security obligations are clearly defined and enforceable. Verification against WI-OPS-ILS-05 dated 13 Feb 2026 confirmed that documented

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procedures are in place and communicated to relevant personnel, including port operators and outsourced security or handling staff. Training and awareness initiatives have supported consistent implementation. Cyanide containers were stored with a minimum separation distance of about 10 metres and stacked up to three tiers, reducing cross-contamination risk and allowing safe access. Cyanide was also segregated from incompatible substances such as acids, oxidisers, and explosives, using designated storage zones and physical barriers. Layers of protection include physical barriers, perimeter controls, container locking mechanisms such as valve lockouts, and continuous monitoring through CCTV systems. Deployed security personnel further strengthen the control environment, providing deterrence and response capability against unauthorised access or interference. Cyanide containers were stored in covered, sealed conditions to prevent contact with water. Container Yard 2 is elevated by about 0.5 metres above the surrounding boundary road, reducing the risk of water ingress or flooding. Adequate ventilation was also observed, supporting the prevention of hydrogen cyanide gas accumulation. Spill containment and emergency preparedness measures were in place, with CKB responsible for providing and maintaining spill response equipment.

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## Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice 3.1:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.1

not in compliance with

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

CKB has established a formal Emergency Response Procedure for Sodium Cyanide Handling (WI-HSE-HSE-32 Rev. 01\_Sodium Cyanide Handling Emergency Response Plan 13 Feb 26), which addresses potential cyanide release scenarios across both interim storage and land transportation operations. The procedure is risk-based, with incident scenarios identified through formal risk assessments, including events such as accidental sodium cyanide exposure/poisoning and spills into waterways. The Emergency Response Plan (ERP) adopts a structured incident classification approach; whereby defined incident types are aligned to corresponding response protocols. These include both basic incident response actions and specific emergency response guidelines, taking into account the physical and chemical characteristics of cyanide (e.g. solid form, solution, and potential hydrogen cyanide gas release) under different incident conditions. The ERP further incorporates key transport infrastructure and operational response requirements, ensuring readiness and coordination across the logistics chain. These include:

1. Availability and use of appropriate Personal Protective Equipment (PPE)
2. Deployment of recovery vehicles for containment and removal of hazardous materials
3. Establishment of evacuation zones based on incident severity and exposure risk
4. Defined protocols for communication with external emergency responders
5. Clearly assigned roles and responsibilities, including integrated response coordination with local communities, medical facilities, local authorities, and fire services
6. Accessibility of Material Safety Data Sheet (MSDS) for Sodium Cyanide to support hazard identification and treatment measures
7. Implementation of the ICMI notification process for reporting and escalation of cyanide-related incidents

In addition, the ERP explicitly identifies and integrates external stakeholders with designated emergency response roles, including emergency services and community-level responders, as documented in WI-HSE-32 Rev.01 – Sodium Cyanide Handling Emergency Response Plan.

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Standard of Practice 3.2:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.2

not in compliance with

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

CKB has established a formal Emergency Response Procedure for Sodium Cyanide Handling (WI-HSE-HSE-32 Rev. 01 Sodium Cyanide Handling Emergency Response Plan 13 Feb 26), which defines both the Emergency Response Plan (ERP) and operational response procedures for incidents arising from interim storage and transportation activities. Based on interviews with site personnel, it was evidenced that ERP awareness training has been conducted for personnel involved in cyanide handling operations. The training framework covers key operational elements, including:

- Clearly defined roles and responsibilities during ERP activation
- Identification and use of designated emergency response equipment for both interim storage and transportation scenarios
- Proper selection and application of Personal Protective Equipment (PPE)

The ERP further establishes specific cyanide emergency response duties assigned to both internal personnel and external responders. These responsibilities include:

- Execution of initial containment actions to control leakage or spillage
- Timely notification and coordination with local authorities
- Implementation of measures to minimise risks to human health and the environment
- In support of operational readiness, a preventive maintenance regime has been implemented to ensure the continued functionality and availability of emergency response equipment. Maintenance records are retained alongside documented listings of required emergency response resources for transportation-related incidents, supporting auditability and control effectiveness.

CKB has developed and implemented structured training programmes, including Emergency and Critical Response Training for Cyanide and Other Hazards. Training materials were reviewed and found to be relevant and operationally applicable. Evidence of implementation was sampled through records such as the HCN Gas Detector Usage Training – PT CKB (dated 19 May 2025) and formulated procedures for the administration of oxygen as per the available equipment. CKB engaged PT MISA for land transportation services. Due diligence was completed on 2 Mar 2026, and it was confirmed that procedures are in place to ensure the contractor complies with Transport 3.2, including participation in the cyanide spill exercise and drill at Pani Mine Adsorption, desorption, and recovery plant [ADR Plan] of 100kg on 29 Jan 2026.

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## Standard of Practice 3.3:

*Develop procedures for internal and external emergency notification and reporting.*

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.3

not in compliance with

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

The Sodium Cyanide Handling Emergency Response Plan (WI-HSE-HSE-32 Rev. 01\_Sodium Cyanide Handling Emergency Response Plan 13 Feb 26) establishes a structured framework for emergency notification and escalation in the event of transportation-related incidents. The procedure clearly defines both internal and external communication protocols, ensuring a timely and coordinated response in the event of a cyanide-related emergency.

The ERP includes comprehensive contact information for emergency notifications, covering relevant internal personnel, emergency responders, local authorities, and supporting agencies. These contact lists are actively maintained and form an integral part of the incident response framework.

It was observed that the procedure is operationalised through regular toolbox meetings conducted prior to land transportation activities, during which:

- Emergency contact lists are reviewed and updated
- Communication protocols are reinforced
- Personnel awareness of escalation procedures is validated

Documented records confirm that emergency response contact information is maintained for both yard (interim storage) and transportation operations. Interviews with onsite personnel further corroborated that the ERP requirements, including the use of updated contact lists, are actively implemented in practice.

In addition, a management escalation flowchart has been established to govern notification to the International Cyanide Management Institute (ICMI) in the event of significant cyanide incidents. This flowchart defines thresholds, reporting lines, and escalation timelines in alignment with ICMC requirements.

Based on onsite interviews and verification activities, it was confirmed that no significant cyanide incidents have occurred to date that would trigger formal notification to ICMI.

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## Standard of Practice 3.4:

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.4

not in compliance with

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

The Sodium Cyanide Handling Emergency Response Procedure (WI-HSE-HSE-32 Rev. 01\_Sodium Cyanide Handling Emergency Response Plan 13 Feb 26) provides a detailed spill contingency plan. In the event of a spill, external resources will be mobilised to recover or neutralise the spill, remove or neutralise any solutions or solids, and decontaminate affected soils or media.

The procedure also prohibits the use of sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide released into surface waters or during handling and transportation.

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

in full compliance with

The operation is  in substantial compliance with Standard of Practice 3.5

not in compliance with

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

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 With update emergency drill that conducted in 2026, 29 Jan

- FRM-HSE-HSE-46 Rev. 00\_Emergency Drill Scenario - Site Pani 2026 Rev1
- FRM-HSE-HSE-012 Rev01 Cyanide Emergency Drill Evaluation

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which provides a comprehensive framework for these exercises. A defined procedure is in place for evaluating the Plan's performance post-implementation, with FRM-HSE-HSE-012 Rev01 Cyanide Emergency Drill Evaluation demonstrating a proactive approach to ensuring the Plan remains practical, effective, and up to date.

Based on the review of the Emergency Drill Report dated 29 January 2026 and supporting documentation, it was observed that the organisation conducted a simulated cyanide spill exercise at the Pani Mine Adsorption, Desorption and Recovery (ADR) Plant, involving an estimated release of 100 kg of sodium cyanide.

The drill scenario was designed to reflect a credible operational risk, whereby a cyanide container was dropped during forklift unloading, resulting in packaging failure and subsequent spillage within the ADR unloading area. This scenario is considered realistic and aligned with material handling risks associated with cyanide transportation and on-site operations.

It was evidenced that upon discovery of the spill, personnel executed initial response actions in accordance with the established Emergency Response Plan (ERP). These actions included the cessation of operations, the isolation of the affected area, the activation of the emergency response team, the deployment of trained personnel equipped with appropriate Personal Protective Equipment (PPE), and the implementation of spill containment measures. The response also incorporated internal communication protocols and readiness to escalate to external responders when required, demonstrating a structured and coordinated approach.

Further review confirmed that a post-drill action plan dated 26 March 2026 has been developed, outlining defined roles and responsibilities, a clear timeline for recovery and decontamination activities, and the use of appropriate spill containment and decontamination equipment. The plan also includes provisions for inspection, verification prior to resumption of operations, and documentation of lessons learned to support continuous improvement.

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