APRIL 2025

INTERNATIONAL CYANIDE MANAGEMENT CODE

Australian Gold Reagents – European Supply Chain Summary Audit Report

Prepared for Harry Aung
Australian Gold Reagents
April 2025
Ref. W24017_06 I Revision 0

Submitted to:

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ENPOINT
Environmental Asset Management

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1 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	AGR European Supply Chain
Name of Facility Owner:	Not applicable
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2 SODIUM CYANIDE TRANSPORTATION

2.1 AGR Australia Ltd

AGR is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd (Coogee Chemicals). CSBP, a subsidiary of Wesfarmers Ltd is the major participant in the venture and acts as both plant operator and sales agent. Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

AGR in its capacity as the sales agent is the consigner and is responsible for the overall management of the cyanide transportation activities.

2.2 Kwinana Production Facility

AGRs cyanide production facility is located within CSBPs fertiliser and chemicals complex at Kwinana, approximately 40 km south of Perth, Western Australia. AGR produces two forms of cyanide namely solid and solution. Cyanide solution is produced as a 30% strength liquid and solid cyanide is >97% solid white briquette. Crimson dye is added by the manufacturer for both products.

AGRs production facility was recertified in full compliance with the Code on 28 August 2023.

2.3 Australian Supply Chain

AGRs Australian Supply Chain covers both road and rail transport from AGRs Kwinana production facility to end user mine sites in Australia and to the Port of Fremantle for export. The Australian Supply Chain includes the port and stevedore operations at Fremantle Port.

AGRs Australian Supply Chain was recertified in full compliance with the Code on 9 November 2022.

2.4 Ocean Freight Supply Chain

The scope of AGR's Ocean Freight supply chain includes the marine transportation of solid cyanide (in intermediate bulk containers (IBCs) within shipping containers) from the Fremantle Port, Western Australia, to various interstate and international Ports. The carriers used are the Mediterranean Shipping Company (Aust) Pty Ltd (MSC), Maersk Australia Pty Ltd (Maersk), and Ocean Network Express (ONE).

The carriers' roles within AGR's cyanide distribution network, or the Ocean Freight Supply Chain itself, are not part of the scope of this audit.

AGRs Ocean Freight Supply Chain was recertified in full compliance with Code on 6 July 2023.

2.5 European Supply Chain

The European Supply Chain changed during the audit period with the road transporter being contracted by the customer and no longer within AGRs scope as the consignor. To-Pet has remained ICMC certified but is no longer part of AGRs Supply Chain. AGRs completed their subcontractor management activities up until the change in contracting arrangements.

This supply chain includes the Ports of Izmir and Mersin in Türkiye.

2.6 Ports

The international sales and exports of cyanide, by AGR, take into consideration the ports and their extended infrastructure available to service the intended target area. AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from point of origin to destination. Each port is selected on the basis that it is the closest port to the customer and that it meets all reasonable industry standards for safety, security, and emergency response.

2.6.1 Port of Izmir

The Port of Izmir is one of the main Container Ports servicing Türkiye. AGR has ability to ship to Port of Izmir utilising the shipping company Maersk Line and MSC Shipping from Fremantle in Western Australia. The Port of Izmir is approximately 200km from the end user mine sites and the road transport routes from the Port to the end user mine sites are approved by the regulators.

2.6.2 Port of Mersin

The Port of Mersin (Turkish: Mersin Limanı), is a major seaport located on the south-eastern coast of Mediterranean Sea in Mersin, southern Türkiye. As one of the largest harbours in the country, it is Türkiye's main gateway to the Mediterranean Sea. It was constructed during the 1950s as a major government project.

2.7 Road Transport

Within the European Supply Chain, AGR no longer contracts the road transportation of cyanide to its customers. ICMC Certified Transporter To-Pet was used for a portion of the audit period to conduct road transport to AGRs customers. It has been included in this audit report on this basis.

2.8 Transit storage

Within the scope of this audit, transit storage is associated with port operations where containers of cyanide are removed from the vessels and may be temporarily stored and then placed on road vehicles for the next part of the journey. These transit storage depots are managed by the relevant port authorities and due consideration of relevant protocol requirements has been made through the due diligence process.

There is no interim storage outside of the Port operations included within this supply chain.

2.9 Auditors Finding and Attestation

AGR is:	☒ **in full compliance with**	**the International Cyanide Management Code**
	☐ in substantial compliance with	
	☐ not in compliance with	

No significant cyanide exposures or releases were noted to have occurred during AGRs recertification audit.

Audit Company: Enpoint

Audit Team Leader: Mike Woods, Exemplar Global (113792)

Email: mikewoods@enpoint.com.au

2.10 Name and Signatures of Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		9 April 2025

2.11 Dates of Audit

The Audit Team was undertaken by Mike Woods of Enpoint, an ICMI pre-certified Lead Auditor and Technical Specialist. The field component of the audit was completed on 24 January 2025.

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

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

3 TRANSPORTATION VERIFICATION PROTOCOL

PRINCIPAL 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.

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

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

AGR, through the use of an ICMC-certified road carrier, has a process for the selection of transport routes that minimise the potential for accidents and releases or the potential impacts of accidents and releases. AGR subcontracted road transportation for a portion of the audit period and AGR has undertaken an assessment of the carrier in the supply chain to satisfy themselves that the selected carrier was meeting AGR's requirements for the handling and transportation of cyanide. The *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

Selection is a three-stage process and, broadly, involves:

1. Identification of potential suitable carriers in the country of desired operation. It is generally not possible to call for tenders in the countries in which AGR operates and as such, AGR carry out due diligence of existing ICMI certified carriers or other approved dangerous goods transporters.
2. Following the identification of potential international carriers, AGR completes an assessment of whether the carriers satisfy AGR's minimum requirements for the transport of cyanide.
3. Prior to acceptance of the preferred international carrier, an overall risk assessment of the carrier is conducted. The outcome of the risk assessment is the generation of an overall risk rating for the international carrier, as either a Low, Medium, or High risk carrier. The risk rating is used to determine the frequency and scope of ongoing audits and other reviews.

The process outlined above is used to verify that:

- Suitable transport equipment that is fit for the purpose of transporting cyanide.
- A preventative maintenance programme in place for its transport equipment, and it can provide evidence to indicate that this preventative maintenance system is adhered to.
- Complied with and continues to comply with, all statutory and legal requirements of the relevant country(s) in which they operate or through which they transport.
- Policies and procedures in place in relation to emergency response, fatigue management, driver training and performance management; and drugs and alcohol and can demonstrate adherence to them.

- Sound reputation and there is no evidence to suggest that the carrier is not in a sound financial position.

Ports

The international sales and exports of cyanide by AGR take into consideration the ports and their extended infrastructure available to service the intended target area. The destination port is selected on the basis that it is the closest port to the customer and that it meets reasonable industry standards for safety, security and emergency response.

AGR conducts triennial due diligence assessments on ports used in the supply chain to identify potential risks. The due diligence assessments of the ports used in the supply chain were completed by AGR (within their three-year cycle) and reviewed by Enpoint.

Enpoint's assessments concluded that the due diligence assessments of the ports within the supply chain completed by AGR have reasonably evaluated these facilities. The due diligence assessments concluded that no additional management measures were needed for the ports. The due diligence assessment reviews are presented in Section 4.

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certifications were maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023.

Transport Practice 1.2

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

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

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

AGR, through the use of an ICMC-certified road carrier, has a process in place for the use of only trained, qualified and licensed operators in operating transport vehicles during the transportation of its cyanide.

AGR has undertaken audits of its supply chain carrier and has monitoring systems in place to assess transporter's ongoing compliance with ICMI and AGR cyanide handling and transportation requirements.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.2.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of the

carrier in the supply chain to satisfy themselves that the carrier was meeting AGR's requirements and held regular meetings with the contractor.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

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

AGR does not directly operate transport vehicles. By using an ICMC-certified road carrier, AGR has a process in place requiring that only equipment designed and maintained to operate within the loads it will be handling is used.

AGR has monitoring systems in place to evaluate the transporter's compliance with the Code and AGR's requirements.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.3.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of the carrier in the supply chain to satisfy themselves that the carrier was meeting AGR's requirements and held regular meetings with the contractor.

AGR no longer subcontracts the road transport of cyanide within this supply chain.

Ports

Ports used by AGR have equipment operation and maintenance capabilities and procedures that are not dependent on AGR. The ability of the port facilities to operate safely, and their capability to handle dangerous goods is assessed during the due diligence process.

AGR conducts triennial due diligence assessments for ports used in its Supply Chain.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with AGR's requirements and relevant regulations.

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certification was maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023. The road transport of cyanide is no longer included within this supply chain.

Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

AGR is in FULL COMPLIANCE with Transport Practice 1.4 requiring the development and implementation a safety program for transport of cyanide.

AGR has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. AGR's cyanide is packaged at its ICMC certified production facility in Kwinana Western Australia, in accordance with the packaging and labelling requirements required by the political jurisdictions through which the load will pass. Individual IBCs are loaded into sea containers which are sealed prior to departure from the facility. The containers are not opened until they reach their destination at the mine.

The production facility was last fully recertified against the Code on 28 August 2023.

AGR, through the use of ICMC-certified road carriers, has a process to ensure that cyanide is transported in a manner that maintains the integrity of the packaging.

AGR's *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of the carrier in the supply chain to satisfy themselves that the carrier was meeting AGR's requirements and held regular meetings with the contractor.

AGR no longer subcontracts the road transport of cyanide within this supply chain.

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certification was maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023. The road transport of cyanide is no longer included within this supply chain.

Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

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

AGR is in FULL COMPLIANCE with Transport Practice 1.5 requiring international standards for transportation of cyanide by sea.

AGR does not transport cyanide by sea within the scope of this supply chain.

Transport Practice 1.6

Track cyanide shipments to prevent loss during transport.

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

AGR is in FULL COMPLIANCE with Transport Practice 1.6 requiring tracking of cyanide shipments to prevent loss during transport.

AGR, through the use of an ICMC-certified road carrier for a portion of the audit period implemented a process to ensure that cyanide is transported in a manner that maintains the integrity of the packaging. AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.6.

The *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of the carriers in the supply chain to satisfy themselves that the carriers was meeting AGR's requirements and held regular meetings with the contractor.

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certification was maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023. The road transport of cyanide is no longer included within this supply chain.

PRINCIPAL 2 – INTERIM STORAGE

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

Transport Practice 2.1

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

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

AGR is in FULL COMPLIANCE with Transport Practice 2.1 requiring the design, construction and operate cyanide interim storage sites to prevent releases and exposures.

Within the scope of this audit, transit storage may occur within port operations where containers of cyanide are removed from the vessels and may be temporarily stored and then placed on road vehicles for the next part of the journey. Under normal operating conditions containers are loaded directly onto road transporter vehicles.

AGR does not operate trans-shipping or interim storage facilities within its supply chain..

PRINCIPAL 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.

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

AGR is in FULL COMPLIANCE with Transport Practice 3.1 requiring preparation of detailed emergency response plans for potential cyanide releases.

AGR, through the use of an ICMC-certified road carrier for a portion of the audit period addressed the requirements to prepare detailed emergency response plans for potential cyanide releases.

AGR does not physically transport cyanide within the scope of this Supply Chain. The *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of the carrier in the supply chain to satisfy themselves that the carrier was meeting AGR's requirements and held regular meetings with the contractors.

AGR monitor shipments and has plans and capability to provide technical support and assistance to responders and subcontractors.

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certification was maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023.

Ports

AGR have considered emergency response arrangements at Port Facilities used in the supply chain and concluded that suitable capabilities to respond are available at the selected ports. The port due diligence reviews provide a summary of AGRs assessments.

The Ports selected for use in the supply chain are located in an IMO member country and member nations must ensure that the ports comply with the requirements of the IMO Dangerous Goods Code.

Transport Practice 3.2

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

AGR is:	☒ **in full compliance with**	**Transport Practice 3.2**

☐ in substantial compliance with

☐ not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 3.2 requiring the designation of appropriate response personnel and commit necessary resources for emergency response.

AGR, through the use of an ICMC-certified road carrier addressed the requirements to designate appropriate response personnel and commit necessary resources for emergency response.

AGR does not physically transport cyanide within the scope of this Supply Chain. The *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of the carrier in the supply chain to satisfy themselves that the carriers are meeting AGR's requirements and held regular meetings with the contractors.

AGR monitor shipments and has plans and capability to provide technical support and assistance to responders and subcontractors. General response to emergencies is also covered in AGR's online learning modules completed periodically by transport drivers.

AGR subcontracted the transport and handling of cyanide and has established procedures to ensure the subcontractor meet the requirements of Transport Practice 3.2.

The *AGR Customer and Supply Chain Operating Standards and Procedure* provides the process for the selection of a new carrier, and once selected, their ongoing performance management. AGR has implemented the monitoring systems detailed within their procedures to evaluate the suppliers ongoing compliance with the Code and AGR's requirements. AGR has undertaken an audit of the carrier in the supply chain to satisfy themselves that the carrier was meeting AGR's requirements and held regular meetings with the contractor.

The road transport of cyanide is no longer undertaken within this supply chain.

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certification was maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023.

Ports

AGR have considered emergency response arrangements at Port Facilities used in the supply chain and concluded that suitable capabilities to respond are available at the selected ports. The port due diligence reviews provide a summary of AGRs assessments.

Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

AGR is: ☒ **in full compliance with** **Transport Practice 3.3**

☐ in substantial compliance with

☐ not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 3.3 requiring development of procedures for internal and external emergency notification and reporting.

AGRs Transport Management Plan, Section 14 details the definition of a notifiable incident and the process for reporting. The Transport Management Plan was reviewed and updated in January 2025 and includes the definitions of a significant incident and the references the ICMI notification requirements.

AGR subcontracted the road transport of cyanide for a portion of the audit period to an ICMC fully certified transporter.

No significant incidents occurred during the audit period.

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certification was maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023.

Transport Practice 3.4

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

☒ **in full compliance with**

AGR is: ☐ in substantial compliance with **Transport Practice 3.4**

☐ not in compliance with

AGR is in FULL COMPLIANCE with Transport Practice 3.4 requiring the development of procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

AGR, through the use of an ICMC-certified road carrier for a portion of the audit period addressed the requirement to develop procedures for remediation. AGR does not physically transport cyanide and whilst AGR's product is being transported, emergency response is governed by the certified transporter.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving its cyanide product. AGRs Transport Management Plan provides details on:

- Handling hazards and pre-cautions
- Containment
- Neutralisation and Spill Recovery
- Reporting and investigation

AGRs Transport Management Plan does prohibit the use of Chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. In

addition, AGRs approach of using ICMC certified carriers means that those transporters also have procedures that prohibit the use of these chemicals.

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certification was maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023.

Transport Practice 3.5

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

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

AGR is in FULL COMPLIANCE with Transport Practice 3.5 requiring the periodic evaluation of response procedures and capabilities and revise them as needed.

AGR, through the use of an ICMC-certified road carrier addressed the requirements to periodically evaluate response processes. AGR does not physically transport cyanide within the scope of this supply chain and road transportation is no longer included within the supply chain. AGR completed an audit of the road transporter subcontractor in 2023 which included evaluation of emergency response processes.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving its cyanide product. AGRs Transport Management Plan details the procedures to follow in the event of an emergency. The Transport Management Plan was reviewed and updated in January 2025

Road Transport

AGR utilised ICMC certified transporter for road transportation elements of its supply chain for a portion of the audit period and the certification was maintained in full compliance. To-Pet was recertified as fully compliant with the Code on 6 Mar 2023.

Ports

AGR have considered emergency response arrangements at Port Facilities used in the supply chain and concluded that suitable capabilities to respond are available at the selected ports. AGRs complete due diligence assessments on a 3 yearly basis. The port due diligence reviews provide a summary of AGRs assessments.

4 DUE DILIGENCE

4.1 Port of Izmir, Türkiye

The port of Izmir in Türkiye is utilised as part of AGR's European Supply Chain. The due diligence of the port dated November 2024 was prepared by Harry Aung (AGR Supply Chain Lead) and involved a desktop update of the previous due diligence assessment prepared in 2021.

The due diligence report was reviewed by Mike Woods of Enpoint during January 2025, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1

4.1.1 Summary of Port Operations

The Port of Izmir is one of the main Container Ports servicing Türkiye. AGR has ability to ship to Port of Izmir utilising the shipping company Maersk Line and MSC Shipping from Fremantle in Western Australia. The Port of Izmir is approximately 200km from the end user mine sites and the road transport routes from the Port to the end user mine sites are approved by the regulators.

The port is situated at the east end of Izmir Bay and ships enter from the Aegean Sea via the Izmir Korfezi (inlet). It is the third largest port in Türkiye with a natural harbour. The container terminal is located in the new port area of Alsanak. The container terminal has 7 berths and a total quay length of 1050 m. The terminal covers an area of 152.000 sqm. and the holding capacity is 7074 TEU (twenty foot equivalent unit). Container operations at the quays are carried out by 5 gantry cranes of 40 tons capacity. The operations at the container yard are carried out by rubber-tired transtainers and reach stackers of 40 tons capacity, together with containers forklifts of up to 42 tons capacity. There is a hazardous cargo warehouse available at the Port.

The port has electronic and physical security systems installed, biometric identification cards are used to control entry to, and exit from, the port. Under normal operating conditions the cyanide containers are loaded directly onto transport vehicles and driven out of the Port to customer mine sites.

4.1.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Izmir has been chosen as the preferred port in Türkiye as it is one of the country's main container ports and has the standards and equipment expected of a major international port.

4.1.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.1.4 Transport Practice 1.6

The shipping line's manifest which includes the DG cargo containers information is sent to the port and terminals before the entry of DG cargo. This information helps the movement of the container is arranged in a safe way in the port and terminal.

The Port of Izmir receives the vessels manifest which includes the containers for unloading and handling by the Port. This information is then captured in the port's container terminal software program. This program then assists with the movement of the container from arrival to handover to transport company and the eventual return of the empty container.

Once the clearing and Port formalities are complete the consignment is collected by the Port by the road transport company. The trucks have GPS tracking devices which are monitored by the transporter until the convoy arrives at the mine site. At the mine site the delivery notes are signed by the mine site personnel acknowledging receipt of the shipment.

4.1.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers. There is a designated dangerous goods cargo area and warehouse in the event of a delay or incident.

4.1.6 Transport Practice 3.1

The AGR due diligence notes that the Port of Izmir maintains an Emergency Response process for managing potential spills and the ICMC transport contractor that collects the cyanide from the port has emergency response plans, personnel and equipment.

4.1.7 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.2 Port of Mersin

The port of Mers is utilised as part of AGR's European Supply Chain. The due diligence of the port dated November 2024 was prepared by Harry Aung (AGR Supply Chain Lead) and involved a desktop update of the previous due diligence assessment prepared in 2021.

The due diligence report was reviewed by Mike Woods of Enpoint during January 2025, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1
- Transport Practice 3.1

4.2.1 Summary of Port Operations

The Port of Mersin (Turkish: Mersin Limanı), is a major seaport located on the south-eastern coast of Mediterranean Sea in Mersin, southern Türkiye. As one of the largest harbours in the country, it is Türkiye's main gateway to the Mediterranean Sea. It was constructed during the 1950s as a major government project. It is the country's second largest port after Ambarli, near Istanbul. Owned by the Turkish State Railways (TCDD), its operating right was transferred on May 11, 2007 to PSA – Akfen consortium for a period of 36 years.

The port has 21 berths with a length of 3450 m servicing containers, general cargo, dry bulk, roll-on/roll-off cargoes, live animals, containers, petroleum products, passengers, local trade, and the free zone. The Port of Mersin can accommodate 30 vessels simultaneously. The Port of Mersin handles an annual average of 30 million tons of cargo.

There are 11 ship-to-shore gantry cranes and 38 rubber-tyre gantry cranes and 5 mobile habour cranes for transferring cargo together with a large fleet of supporting equipment.

The Port of Mersin provides a network structure that enables wireless data communication and security over a total of 110 hectares of port and extension areas. This allows for 24/7 monitoring the port and extension areas with over 400 CCTV cameras. Access to the port is controlled through the use of biometric identification cards, enabling entrance only to authorized personnel. Hand and vehicle terminals are located within the port area for real time data capture. The port holds certification under the International Ship and Port Facility Security) ISPS Code (Certificate 0933093).

4.2.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from the port of Fremantle to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The port of Mersin has been chosen as the preferred port in Türkiye as it is one of the country's main container ports and has the standards and equipment expected of a major international port providing alternative option to the Port of Ismir.

4.2.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch operations at the Kwinana production facility load 20 IBCs per container. The product plus the container weight is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.2.4 Transport Practice 1.6

The shipping line's manifest which includes the DG cargo containers information is sent to the port and terminals before the entry of DG cargo. This information helps the movement of the container is arranged in a safe way in the port and terminal.

The Port of Mersin receives the vessels manifest which includes the containers for unloading and handling by the Port. This information is then captured in the port's container terminal software program. This program then assists with the movement of the container from arrival to handover to transport company and the eventual return of the empty container.

Once the clearing and Port formalities are complete the consignment is collected by the Port by the road transport company. The trucks have GPS tracking devices which are monitored by the transporter until the convoy arrives at the mine site. At the mine site the delivery notes are signed by the mine site personnel acknowledging receipt of the shipment.

4.2.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers. There is a designated dangerous goods cargo area and warehouse in the event of a delay or incident.

4.2.6 Transport Practice 3.1

The AGR due diligence notes that the Port of Mersin maintains an Emergency Response process for managing potential spills and the ICMC transport contractor that collects the cyanide from the port has emergency response plans, personnel and equipment.

4.2.7 Auditor conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.