

# SUMMARY AUDIT REPORT

## Operation General Information

Name of Transportation Operation: PT. PENTAWIRA LOGISTICS INDONESIA [PLI]

Name of Facility Owner: ALIM ANDI PRASETIO

Name of Facility Operator: ALIM ANDI PRASETIO

Name of Responsible Manager: AKHMAD ALI FARHAN

Address: RUKO GOLDEN PALACE BLOK C-17, JL. HR MUHAMMAD NO. 373-383  
PRADAH KALIKENDAL, DUKUH PAKIS, SURABAYA

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Telephone: (031) 7381112, 7381115

E-Mail: [alim.prasetio@pentawiralogistics.com](mailto:alim.prasetio@pentawiralogistics.com)

## Operation Location Detail and Description

PT Pentawira Logistics Indonesia [PLI] is using cyanide transportation to PT BSI Mine as pre-operational scope of supply chain that covers land transportation from Surabaya Port to Banyuwangi.

PLI

*Danny Tan*

6 Mar 2025

Name of Operation:

Signature of Lead Auditor  
& Technical Expert

Date:

# SUMMARY AUDIT REPORT

## *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](mailto:dannytan163@yahoo.com.sg)

Dates of Audit: 9 to 12 Dec 2024

## 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 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.

PLI

*Danny Tan*

5 Mar 2025

Name of Operation

Signature of Lead Auditor

Date

PLI

*Danny Tan*

6 Mar 2025

Name of Operation:

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& Technical Expert

Date:

# SUMMARY AUDIT REPORT

## 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:*

Based on review of Cyanide Transportation Risk Assessment Procedure dated 13 Jan 2025, PLI has established process for selecting transport routes, with due consideration provided for critical factors, such as population density, infrastructure conditions, pitch/grade, and proximity to water bodies and potential fog. Evidence of comprehensive risk analysis and documentation as reflected in Job Risk Assessment dated 13 Jan 2025.

PLI provided clear documentation outlining how each factor is systematically evaluated and addressed, along with evidence of corrective actions for poor infrastructure and specific risk mitigation strategies for routes near water bodies or fog-prone areas based on the review of Job Risk Assessment dated 13Jan 2025.

PLI implemented a structured feedback mechanism and ensure that identified issues are addressed, with records of how feedback that influences route decision-making. PLI established additional safety measures, such as convoys and escorts, the process for identifying and justifying these routes is well- documented with a formal process to identify high-risk routes and documented decision-making process for implementing additional safety measures as reflected in Cyanide Transportation Risk Assessment Procedure dated 13 Jan 2025

PLI seeks input from stakeholders for the selected routes as part of formalize process for engaging with local communities, stakeholders, and government agencies and maintain documentation of consultations and responses.

PLI contracts entity [PLM] to conduct transport activities and based on review of procedure (Contractor Management dated 13 Jan 2025) contractors are made aware of and comply with applicable ICMI Code requirements including established contracts which explicitly require compliance with ICMI cyanide transport standards and ongoing compliance monitoring.

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6 Mar 2025

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## 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:

PLI established formal procedures - Selection, Training, and Risk Management for Cyanide Transport and Handling dated 13 Jan 2025 to ensure compliance with cyanide transportation and handling standards. Documented processes are in place to ensure that assigned drivers are trained, qualified, and licensed for operating transport vehicles with formal system for tracking and verifying operator qualifications.

Training for personnel handling cyanide and transport equipment is consistent based on structured program in place to minimize cyanide exposure risks, and training records are properly maintained.

PLI contracts entity [PLM] to conduct transport activities and based on review of procedure (Contractor Management dated 13 Jan 2025) contractors are made aware of and comply with applicable ICMI Code requirements including established contracts which explicitly require compliance with ICMI cyanide transport standards and ongoing compliance monitoring.

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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:*

PLI established documented procedures as outline in Equipment Suitability and Load Capacity Verification dated 13 Jan 2025. This procedure is to ensure equipment is designed and maintained for the loads it handles with a process to regularly verify equipment adequacy for specific loads and formal procedures to prevent overloading of vehicles, which creates safety risks. Procedures are also in place to prevent overloading, including monitoring weight limits and regular inspections.

PLI contracts entity [PLM] to conduct transport activities and based on review of procedure (Contractor Management dated 13 Jan 2025) contractors are made aware of and comply with applicable ICMI Code requirements including established contracts which explicitly require compliance with ICMI cyanide transport standards and ongoing compliance monitoring.

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6 Mar 2025

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## 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

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

Procedure for Packaging Integrity Maintenance for Cyanide Transport dated 13 Jan 2025 and Signage and Placard Protocols for Cyanide Transport dated 13 Jan 2025 are documented processes to ensure that cyanide packaging remains intact during transport, which poses risks to safety and compliance along with proper placards and signage to identify cyanide shipments as part of overall comprehensive safety program for cyanide transport.

These procedures spelt out the requirements vehicle inspections, preventive maintenance, operator/driver(s) hour limitations, load-shifting prevention, and protocols to suspend transport under in the event of encountering adverse conditions during cyanide transportation including established related retention of records.

PLI contracts entity [PLM] to conduct transport activities and based on review of procedure (Contractor Management dated 13 Jan 2025) contractors are made aware of and comply with applicable ICMI Code requirements including established contracts which explicitly require compliance with ICMI cyanide transport standards and ongoing compliance monitoring

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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:*

No sea transportation conducted within this scope of pre-operational audit.

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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:*

PLI established the following overarching documented procedures; Cyanide Transport Safety Program dated 13 Jan 2025 and Cyanide Transport Communication and Tracking dated 13 Jan 2025 to ensure that transport vehicles are equipped with communication systems to stay in contact with emergency responders and relevant parties such as police and Environmental Protection Agency. Procedures are in place to periodically test communication equipment, such as GPS, radios, or mobile phones, which could lead to communication failures in emergency situations and related identified communication blackout areas along transport routes.

PLI possess a formal system to track the progress of cyanide shipments in real-time to track and monitor of detected delays or cyanide incident issues. There are formal inventory controls and chain of custody documentation in place to prevent the loss of cyanide during transport. Shipping records and Material Safety Data Sheets (MSDS) are also made available during cyanide transportation.

PLI contracts entity [PLM] to conduct transport activities and based on review of procedure (Contractor Management dated 13 Jan 2025) contractors are made aware of and comply with applicable ICMI Code requirements including established contracts which explicitly require compliance with ICMI cyanide transport standards and ongoing compliance monitoring.

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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:*

PLI formulated relevant procedures for handling, storing, and securing cyanide within a shared facility as reflected in Cyanide Management at Interim Storage Site dated 13 Jan 2025 with the following key aspects:

- posting warning signs to alert workers about cyanide
- security measures to prevent unauthorized access
- protocols to separate cyanide from incompatible materials
- measures to minimize cyanide's contact with water
- systems for containing cyanide spills.
- mandatory separation distance based on local regulatory requirements for example minimum separation distance of 30metres apart

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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:*

PLI formulated Emergency Response Plan (ERP) for Cyanide Transportation dated 13 Jan 2025 which outlines the following key considerations:

- planning for specific transportation routes and conditions and interim storage for cyanide
- detailed response actions for various emergency scenarios such as spills, accidents, or exposure
- identified coordination with external entities, such as emergency responders and medical services with defined roles during cyanide transportation emergency

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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:*

The following two procedures; Emergency Response Plan (ERP) for Cyanide Transportation dated 13 Jan 2025 and Selection, Training, and Risk Management for Cyanide Transport and Handling dated 13 Jan 2025 spelt out formalized procedures for emergency preparedness and documented emergency response training for relevant personnel. ERP training sessions are conducted on both occasions; 12 Dec 2024 and 15 Jan 2025.

Emergency Response Plan (ERP) for Cyanide Transportation dated 13 Jan 2025 consists of formal inspection procedures to ensure the availability and functionality of emergency equipment when needed. The roles and responsibilities of external contractors, if involved in emergency response, are clearly defined.

PLI contracts entity [PLM] to conduct transport activities and based on review of procedure (Contractor Management dated 13 Jan 2025) contractors are made aware of and comply with applicable ICMI Code requirements including established contracts which explicitly require compliance with ICMI cyanide transport standards and ongoing compliance monitoring

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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:*

PLI established Emergency Response Plan (ERP) for Cyanide Transportation dated 13 Jan 2025 which outlines procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency depicting contacts such as fire department, police, EMS and poison control and Environmental Protection Agency. This procedure has the provisions systems to ensure that internal and external emergency notification and reporting procedures are kept current including notifying ICMI of any significant cyanide incidents.

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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 Emergency Response Plan (ERP) for Cyanide Transportation, dated 13 Jan 2025, outlines procedures for neutralizing cyanide solutions or solids, decontaminating soils and other affected materials, and management or disposal of debris from spill clean-up.

Emergency Response Plan (ERP) for Cyanide Transportation dated 13 Jan 2025 indicated the strict prohibition of the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

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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:*

Validated mock drill simulating a cyanide spill during transport potentially affecting the surrounding area, including nearby populations and water sources conducted on 12 Dec 2024, to evaluate the ERP response plans (Emergency Response Plan for Cyanide Transportation, dated 13 Jan 2025). The post exercise report identified areas for improvement such as emergency coordination, public awareness, environmental protection, and medical support. The mooted follow-up action plan includes improving spill detection, enhancing public communication, expanding containment measures and conducting targeted training exercises to enhance preparedness.

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6 Mar 2025

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