

Riskom International Pty Ltd

ABN 60 097 769 189

INTERNATIONAL CYANIDE MANAGEMENT CODE CYANIDE TRANSPORT OPERATIONS

Toll Mining Services

ICMC Transport Recertification Audit of the Toll Mining Services Australian Supply Chain –

Summary Audit Report

Submitted to:

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

10 April 2025

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SUMMARY AUDIT REPORT

OPERATION GENERAL INFORMATION

Name of Transport Operation **Toll Mining Services (Toll)**

Name of Facility Owner **Toll Resources**

Name of Facility Operator **Toll Mining Services**

Name of Responsible Manager **Jason Harwood**

Address **24 Young St, Gladstone**

State/Province **Queensland 4680,**

Country **Australia**

Telephone **+61 429 016 012**

Email jason.harwood@tollgroup.com

LOCATION DETAIL AND DESCRIPTION OF OPERATION

The Toll Supply Chain covers the delivery of cyanide through the use of various Toll divisions and subcontractors throughout Australia.

All road transporters operate under Toll's procedures for transport and emergency response and are required to have maintenance systems in place that meet Toll's standards.

Through its network, Toll provides road transport to customers in Queensland and Northern Territory and via rail to Tasmania, Victoria and Western Australia.

The supply chain includes transport of:

- solid cyanide within IBCs packed into freight containers
- solid cyanide in sparge containers
- liquid cyanide solution in Portable Tanks (ISO tanks)

from Orica Australia Limited's (Orica) Yarwun Production Facility to customer mines throughout Australia.

Orica is certified under the Code as transporters and have systems in place that meet Code requirements. Toll implements and maintains their client's systems and procedures where required and interacts with Orica's systems and personnel for their respective supply chains and particularly for cyanide unloading and emergency response.

Toll uses rail transport through operators Aurizon/Linfox and Pacific National from Mt Miller siding through transfer stations in Brisbane, Sydney and Adelaide to terminals in Melbourne and Kalgoorlie. All rail operations are monitored by Toll with due diligence inspections carried out at each site.

Audit Scope

The scope of this audit includes Toll's chain of transport of cyanide by road and rail from Orica's manufacturing facilities in Yarwun Queensland to customers within Australia.

The scope of the 2025 supply chain audit is set out below.

Road Transport

Toll Mining Services

- Toll Gladstone, Queensland (Qld)
- Toll Laverton, Victoria (Vic)
- Toll Burnie, Tasmania (Tas)
- Toll Adelaide, South Australia (SA)
- Toll Kalgoorlie, Western Australia (WA)

Subcontractors

- KJP Haulage, Qld
- Martin's Haulage, Qld
- Ballard Bulk Haulage, Qld
- Window Transport, Qld
- Team Global Express (TGE), Vic
- Team Global Express, Tas

Rail Transport – Operators

- Aurizon/Linfox
- Pacific National

Rail Transport – Rail Heads and Sidings

- Mount Miller Rail Head, Qld
- Acacia Ridge Freight Terminal, Qld
- Melbourne Freight Terminal, Vic
- Adelaide Freight Terminal, SA
- Kalgoorlie Freight Terminal, WA

Changes since 2022 report

- Martin's Haulage, Queensland commenced 2022
- Ballard Bulk Haulage, Queensland commenced 2025
- Window Transport, Queensland commenced 2025
- Team Global Express (TGE), Vic. Split from Toll in 2021. Previously Toll Laverton, Victoria
- Team Global Express, Tasmania. Split from Toll in 2021. Previously Toll Burnie, Tasmania

Auditor's Finding

This operation is:

- ☒ in full compliance
- ☐ in substantial compliance
- ☐ not in compliance

with the International Cyanide Management Code.

Audit Company

Riskom International Pty Ltd
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Lead Auditor

Ken Price
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Names and Signature of Other Auditor

Auditor 1	Name Ryan Brogden	Signature
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Date(s) of Audit

Inclusive of the period from 17 February 2025 to 12 March 2025

AUDITOR FINDING AND ATTESTATION

Name of Operation **Toll Resources Australian Transport Supply Chain**

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.

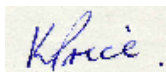
I attest that this Summary Audit Report accurately describes the findings of the certification audit.

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.

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

Audit Team Leader and Transport Specialist

Kenneth Price



Signature of Lead Auditor

Date 4 April 2025

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

Basis for this Finding:

The Toll Mining Services (Toll) Supply Chain is in FULL COMPLIANCE with Standard of Practice 1.1 requiring Toll to select cyanide transport routes to minimise the potential for accidents and releases.

Toll transports cyanide originating from Orica Yarwun to various locations around Australia, either directly or via sub-contractors. This includes local transport, for example to Mount Miller Rail Siding, Gladstone Port and longer routes to the Northern Territory and other locations. Toll is engaged in road transport along various parts of the transport chain, for example including Laverton to Melbourne Port for export and delivery to customer sites around Australia from rail or ship.

Toll has a Cyanide Transport Management Plan (Plan) that cover the selection of transport routes to ensure the potential for accidents and cyanide release is minimised. Section 6 of the Plan requires consideration of the items including population density, infrastructure, pitch and grade, and water or fog.

Toll's subcontractor, Team Global Express (TGE) has developed their own JMP, called a Route Risk Assessment for Victoria and Tasmania. This process is consistent with the Toll process for developing a JMP. TGE also use Safe Driving Plans (SDP) that detail further information specific for each journey.

The SDP covers population density infrastructure (roadway, rail, port) construction and condition, pitch and grade, prevalence and proximity of water bodies and fog.

The remaining road transport sub-contractors audited (KJP Haulage, Window Transport, Martins Haulage) operate directly to the Toll Journey Management Plan (JMP), they do not select routes for delivery.

Toll uses rail operators to transport cyanide from the rail siding at Mt Miller (near the Yarwun manufacturing plant) to various rail terminals and transfer points in Brisbane, New South Wales, Victoria, South Australia and Western Australia. Toll has done due diligence assessments of the rail carriers (Pacific National and Aurizon/Linfox) and the rail heads and sidings in all States.

Toll details the process for conducting a route assessment, including risk assessment of the proposed route in the Plan and Conducting Route Assessments Procedure. Each route risk assessment and implemented controls are detailed in the JMP. This includes the assessment of hazards related to the cyanide load, vehicle, road, weather, time and related hazards. The JMP describes the controls to ensure the risk is minimised. Route Assessments are reviewed when there is a change, an on-road incident occurs or every three years.

Team Global Express manage their Safe Driving Plan (SDP) and Route Risk Assessment. This process aligns with the Toll process for developing the risk assessment and JMP to evaluate the risks on the transport routes and manage those risks.

Toll staff have daily meetings with Orica and relevant personnel to evaluate routes, reviewing the transport schedule, road conditions, weather and related factors. Decisions are made in this meeting regarding the journey schedule, planned weather and road impacts and related factors to ensure the transport risk is minimised

The risk assessment for route selection and determining measures taken to address the route risks is documented within the JMP for Toll and in the SDPs for TGE. The risk assessment is subdivided based on the main road sections to consider any different and local road conditions.

Direct stakeholder engagement has been initiated by Orica for governmental, community and other stakeholder engagement. This information informs the selection of routes and the information contained within the Toll JMP. This information is communicated from Orica to Toll for consideration of selecting routes. Toll has daily meetings with Orica personnel to discuss the transport logistics including route conditions and scheduled shipments.

The sub-contractors liaise directly with Toll for any information relevant to the stakeholders. This information informs the JMP development for Team Global Express (TGE). All other sub-contractors operate directly to the Toll JMP and related processes.

Operations in Australia do not require special safety or security controls such as convoys or escorts for the transport of cyanide generally.

Toll uses rail operators to transport cyanide from the rail siding at Mt Miller (near the Yarwun manufacturing plant) to various rail terminals and transfer points in Brisbane, New South Wales, Victoria, South Australia and Western Australia. Toll has done due diligence assessments of the rail carriers (Pacific National and Aurizon/Linfox) and the rail heads and sidings in all States.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Toll use only trained, qualified and licensed operators to operate its transport vehicles and other cyanide handling equipment. Drivers don't handle cyanide, all cyanide in closed containers.

Section 13 of the Plan provides the requirement of training for Toll training for drivers transporting cyanide. A training needs analysis is conducted to identify all training required and the Gladstone Cyanide Driver Competency Requirements lists these requirements. All training is recorded in a training matrix and recorded in the Toll Learning Management System.

All Sub-contractors have training matrices that align with the Toll training needs analysis. Cyanide specific training is undertaken by Toll or Orica. Each sub-contractor has a system for recording and managing licences and training to ensure training is current and drivers are deemed competent.

Toll undertakes due diligence audits annually for verification of the implementation of contractor requirements as required.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

All vehicles in service within Australia operate under the National Heavy Vehicle Accreditation Scheme (NHVAS) for all jurisdictions except Western Australia where the Western Australia Heavy Vehicle Accreditation (WAHVA) applies. These government regulated schemes require vehicles to be designed, maintained and certified to operate to mass limits, thereby ensuring the equipment is designed and maintained to operate within the loads it will be handling and is suitable for cyanide transport. Both schemes also have certification for maintenance and fatigue to ensure the safe operation of vehicles on Australian roads.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 1.4 requiring an implemented safety program for transport of cyanide.

The Toll Cyanide Management Plan provides detail to ensure cyanide is transported in a manner that maintains the integrity of the Orica packaging, including prestart checks of vehicles and containers.

Toll and its subcontractors maintain dangerous goods licensing to comply with the jurisdictional regulatory requirements around Australia. Each jurisdiction in Australia has consistent regulations requiring an Australian Emergency Information Panel (EIP) to be attached to each side of the vehicle (or attached to the container or tank on both sides) and the rear of the vehicle. A dangerous goods diamond placard is required on the front of the vehicle.

All containers are placarded with Australian EIPs at Orica Yarwun and placards remain in place until delivered. The driver conducts pre-start checks of the vehicle to confirm the placards are in place and are readable prior to departure. Checks of placards conducted during route when driver stops for breaks

This is reflected in the procedures at TGE, other subcontractors and the rail carriers..

Toll and its subcontractors comply with the NHVAS and WAHVA requirements that includes mass management, fatigue management and maintenance management. This scheme has detailed requirements that ensure compliance with ongoing verification supported by quarterly audits and annual external audits conducted by an NHVR auditor.

Toll and its subcontractors implement a safety program for cyanide transport that includes:

- a) Vehicle inspections prior to each departure/shipment - including vehicle pre-starts prior to departure.
- b) A preventive maintenance program – As part of the NHVAS and WAHVA programs, Toll and its subcontractors have a preventative maintenance program. This requires scheduled maintenance of vehicles based on hours of operation, with detailed records of all inspection and maintenance activities conducted.
- c) Limitations on operator or drivers' hours – The NHVAS program for fatigue requires hours are managed for driver fatigue. This is managed with manual work diary (MWD) or electronic work diary (EWD).
- d) Procedures to prevent loads from shifting – all containers are secured to the vehicle with twist locks to prevent movement. Carriers comply with the load restraint requirements under NHVR.
- e) Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered – the Cyanide Management Plan and procedures detail the requirements for modification or suspension of transport due to severe weather or civil unrest. The JMP for each trip has further detail for altering the journey during transport.
- f) A drug abuse prevention program – Toll and its subcontractors have a drug and alcohol prevention program. Drivers are required to conduct alcohol tests prior to departure from Orica Yarwun and they are subject to random drug and alcohol tests.
- g) Retention of records documenting that the above activities have been conducted – All carriers have procedures for the retention of records for all documentation related to the transport of cyanide and compliance with transport requirements.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain does not involve transport by sea.

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

Basis for this Finding/Deficiencies Identified:

Toll is in full compliance with Transport Practice 1.6, tracking shipments to prevent losses during transport

Toll and its subcontractors have various means for drivers to communicate with the company, mining operation, cyanide producer or emergency services as appropriate.

All vehicles are fitted with GPS tracking systems for all routes. These monitor vehicle movements, incidents, G-force monitoring and reporting, driver actions, sleep monitoring and operations. This is supplemented with mobile phones, 2-way radios used for contacting base and mine and satellite phones where necessary.

The prestart checks for Toll and all subcontractors include communications checks of UHF radio, mobile phone and GPS tracking.

All transport routes have been checked for communication blackout areas along transport routes. MT Data has the capability to switch from GSM to satellite where blackout spots encountered.

Toll and its subcontractors implement inventory controls through chain of custody documentation to prevent loss of cyanide during shipment. Vehicles have dangerous goods shipping documentation held by the driver during transport. Inventory controls and chain of custody documents are carried in the vehicles with container numbers, seal numbers recorded. Containers are sealed at Yarwun and seals checked on route and at rail terminals. Seals broken by mine on delivery.

Documents are part of dangerous goods shipping documents which record container number, quantity of cyanide and other dangerous goods information.

Safety Data Sheets for cyanide are kept in driver's folder in the vehicle cabin.

PRINCIPLE 2 – INTERIM STORAGE

Design, construct and operate cyanide trans-shipping depots and 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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 2.1 requiring cyanide to be stored in a manner that minimises the potential for accidental releases.

All cyanide containers are marked with EIPs clearly indicating cyanide.

There is signage on all sites to prohibit smoking, open flames, eating and drinking confined to office/mess areas. Personal protective equipment (PPE) not needed for cyanide as containers sealed closed and drivers not exposed at the storage areas.

Locked gates at both entry and exit to all the depots inspected, most are locked after each vehicle entry or exit. Security cameras on sites and these are monitored.

There are locks on outlets for any isotainer or container with cyanide. Driver does not hold key, held at pickup and delivery point.

At all locations, cyanide is separated from incompatible materials such as acids, strong oxidizers and explosives by locating it away from all other exposures to prevent mixing.

Sealed containers of cyanide are kept on vehicle in locked sealed freight container. No other dangerous goods or foodstuffs near the transit area.

Containers stored in sealed freight containers. on corner posts, above concrete base. Water drains to stormwater drains which may be covered with purpose-built mats.

Cyanide is stored in sealed containers in the open air, with adequate ventilation to prevent build-up of hydrogen cyanide gas and cyanide dust.

Containers of cyanide are sealed and not opened until delivered to mine.

TGE has systems in place to contain any spilled cyanide materials and minimize the extent of a release. There is no credible chance of spillage at the Altona site: container is placed on truck at the wharf and any movement in the yard at Altona is with a reach stacker at low level. Storage location at TGE is away from potential interaction that may affect the containment.

Toll uses rail operators to transport cyanide from the rail siding at Mt Miller (near the Yarwun manufacturing plant) to various rail terminals and transfer points in Brisbane, New South Wales, Victoria, South Australia and Western Australia. Toll has done due diligence assessments of the rail carriers (Pacific National and Aurizon/Linfox) and the rail heads and sidings in all States. The only siding that includes cyanide storage is Kalgoorlie and Toll's inspections include a review of the storage facility, which has secure, dedicated, bunded storage facilities for cyanide storage.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 3.1 requiring a detailed emergency response plan for potential cyanide releases.

Orica has a generic Emergency Response Plan Guide which has been adapted by Toll and TGE to specifically apply to their national transport operations and includes:

- management of the physical and chemical form of the cyanide
- the method of transport (truck or rail) or storage
- all aspects of the transport infrastructure (e.g., condition of the road, railway, port)
- the design of the transport vehicle (e.g., single or double walled, top or bottom unloading) or storage facility
- descriptions of response actions, as appropriate for the anticipated emergency situation and
- the roles of outside responders, medical facilities or communities in emergency response procedures

Toll has a comprehensive Emergency Response Plan based on Orica's emergency response guidance document. Toll supplements the Orica emergency response guide with transport Emergency Procedure Guides. Their emergency response information for cyanide is based on Orica's emergency response guidance document. Toll's emergency response guide includes descriptions of response actions, as appropriate for the anticipated emergency situation.

Orica's complementary ERG:

- identifies the roles of external responders, medical services or communities in emergency response procedures; and
- advises responders or other stakeholders of their roles.

Toll's Emergency Response Plan is supplemented with regular emergency response drills which also involve Orica.

Team Global Express has an Emergency Response Plan that is a copy of the Toll Emergency Response Plan. TGE supplements the Toll/Orica Emergency Response Plan with a copy of the transport route and a one-page emergency response guide (TERP) given to driver for each load to supplement the more comprehensive Emergency Response Plan. TGE must meet Toll's training, qualification and licensing requirements before transporting cyanide and this includes training in emergency response procedures and drills.

Toll and TGE supplement the Orica emergency response guide with specific emergency response actions for various situations, and interaction with and contacting external responders, medical services and mining communities in emergency response procedures throughout all Australian states.

The other sub-contractors all operate to the Toll Emergency Response Plan

The rail operators have Emergency Response Plans which are monitored through Toll's due diligence assessments. The emergency response is based on Orica's Emergency Response Plan and state level response plans.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 3.2 requiring xxx designate appropriate response personnel and committed resources for emergency response.

Orica ensures that appropriate response personnel are designated, and necessary resources committed for emergency response.

Toll and Orica provide initial and refresher emergency response training to appropriate personnel.

There are descriptions of emergency response duties and responsibilities of personnel in Orica's emergency response guidebook and Toll has prepared guidance for drivers in the form of Emergency Procedure Guide for transport. Toll has no additional responsibilities for emergency response beyond their vehicle recovery

Orica has an online cyanide awareness program and drivers have completed it. Training records are kept.

Orica's emergency response guidebook includes responsibilities for cyanide specific support functions applicable to the transport contractor, Orica management and technical personnel and emergency response equipment. Orica and Toll manage these responsibilities for emergency response.

Toll provides vehicles and drivers, to collect and deliver containers of cyanide. The drivers have minimal duties or responsibilities in emergency response.

Toll provides drivers with a personal emergency response safety bag containing PPE such as masks, filters, overalls. Toll have contracts with ISS for non-cyanide emergency assistance such as lighting, vehicle recovery.

Toll maintains a list of the items and Toll and Orica periodically check the contents when reviewing vehicles prior to a shipment.

Monitoring the performance of the emergency response is through biannual and annual emergency response drills.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 3.3 requiring procedures for internal and external emergency notification and reporting.

Details

Orica ensures that procedures for internal and external emergency notification and reporting are developed and implemented.

Toll have a simple procedure on their Emergency Procedure Guide to notify Orica in an emergency. Orica's emergency response guidebook includes responsibilities for cyanide specific support functions applicable to the transport contractor, Orica management and technical personnel and emergency response equipment.

Toll's TERP includes local procedures and current contact information for notifying appropriate entities such as the customer, regulatory agencies, external response providers, medical facilities and potentially affected communities of an emergency.

Toll's emergency response plan requires 6-monthly table top drills, and quarterly checks that include notification and reporting procedures are current.

Toll have a simple procedure to notify Orica and ICMI of any cyanide incident. It has been put into effect when needed.

Orica have a procedure for notifying ICMI of incidents and all appear to have been reported.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 3.4 requiring procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Details

Orica ensures that procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals have been developed and implemented.

Toll and its subcontractors have no role in recovery, remediation or neutralisation other than vehicle recovery. They refer to Orica's emergency response service line.

Orica's emergency response guide includes guidance on remediation, recovery, neutralization, or decontamination and management and/or disposal of spill clean-up debris, with specific procedures applicable to cyanide neutralization.

Orica's emergency response guide specifically prohibits the use of chemicals such as ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

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

Basis for this Finding/Deficiencies Identified:

The Toll Supply Chain is in FULL COMPLIANCE with Standard of Practice 3.5 requiring periodical evaluation of response procedures and capabilities and revising them as needed.

Toll's Emergency Response Plan has provision for drills which include subcontractors at various intervals:

- Desktop drills biannually
- Practical exercises biennially.

The latest drill was November 2024; Orica and Toll worked through a vehicle rollover and spillage scenario and subsequently reviewed the various actions.

Prior to the above, there was a drill on 26 June 2024 with several earlier in the year at Kalgoorlie, Helidon and Tasmania,

Orica ensures that response procedures and capabilities are periodically evaluated and revised as needed.

Orica's Emergency response Guide states in Section 4 that it shall be reviewed, as a minimum, on a biennial basis and following incidents where the Guide is utilised. The revision history in the document indicates that Orica is adhering to this policy.