

# INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

## Cyanide Transportation Summary Audit Report

For the  
International Cyanide Management Code

Samsung C & T Corporation  
Southeast Asia Supply Chain

12 December 2025

Samsung C & T Corporation



12 December 2025

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Name of Supply Chain Operator

Lead Auditor Signature  
Page 1 / 15

Date

# Transportation Summary Audit Report

## Operation General Information

Name of Transport Operation : Samsung C & T Corporation Southeast Asia Supply Chain  
Name of Facility Owner : Samsung C & T Corporation  
Name of Facility Operator : Samsung C & T Corporation  
Name of Responsible Manager : TaeHun Ahn / Fine & Specialty Chemicals Group Leader  
HyoSub Kim / Fine & Specialty Chemicals Group  
Professional  
Address : 67, Sejong-daero, Jung-gu,  
State / Province : Seoul  
Country : Republic of Korea  
Telephone : 82-2-2145-2505  
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## Operation Location Detail and Description

The head office of Samsung C & T Corporation is located in Seoul, Korea. There are four business divisions in Samsung C & T Corporation as Trading & Investment Division, Engineering & Construction Division, Fashion Division and Resort Division. Related to supplying the sodium cyanide, the main jobs of Trading & Investment Division are making agreement with mining companies, receiving customer orders, review of customer orders and arrangement of shipping. Those were conducted by Fine & Specialty Chemicals Group in Trading & Investment Division of Samsung C & T Corporation.

Samsung C & T Corporation applied Southeast Asia Supply Chain as one of operation into ICMC signatory. In the Southeast Asia Supply Chain, the transportation of sodium cyanide from manufacture in Korea to Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia was included. Samsung C & T Corporation make supplying contracts with customers under CIF condition. According to the CIF condition, Samsung C & T Corporation is responsible for supplying sodium cyanide from manufacture in Korea to Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia.

The customs clearance and transportation from the ports to gold mining sites are controlled and implemented by customers. So the roadway transportation from Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia to gold mining sites is excluded in Southeast Asia Supply Chain.

The roadway transportation company, ports and shipping companies were included in Southeast Asia Supply Chain. The segments in Southeast Asia Supply Chain were as below.

- 1) Sodium cyanide manufacture : Tongsuh Petrochemical Corp., Ltd. Ulsan Plant in Korea
- 2) Roadway transportation from manufacture to Pusan New Port : By Bukwang Logistics Co., Ltd.
- 3) Marine transportation from Pusan New Port in Korea to Hai Phong Port in Vietnam,

Samsung C & T Corporation



12 December 2025

---

Name of Supply Chain Operator

Lead Auditor Signature

Date

Jakarta Port and Surabaya Port in Indonesia : By shipping companies SINOKOR, SM LINE and KMTC

## Auditor's Finding

This operation is

- X in full compliance
- in substantial compliance
- not in compliance

with the International Cyanide Management Code.

## Auditor Information

Audit Company : 3Points Co., Ltd.  
Lead Auditor : Mr. SangHo Ahn  
Lead Auditor E-mail : triplepoint@naver.com  
Dates of Audit : 08, 09 and 11 December 2025

## Auditor Attestation

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

I attest that this Summary Audit Report 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.

Samsung C & T Corporation



12 December 2025

-----  
Name of Operation

-----  
Lead Auditor Signature

-----  
Date

Samsung C & T Corporation



12 December 2025

-----  
Name of Supply Chain Operator

-----  
Lead Auditor Signature

-----  
Date

## Principles and Standards of Practice

### Principle 1 | TRANSPORT

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

#### Standard of Practice 1.1

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

**The operation is**  **X in full compliance with** **Standard of Practice 1.1**  
 in substantial compliance  
 not in compliance with

Samsung C & T Corporation have implemented hazardous chemical transportation procedure in which detail process for selection of sodium cyanide transportation routes and control methods were defined. According to the procedure, when they select the sodium cyanide transportation routes they shall consider safety, population density, infrastructure, pitch, grade, prevalence and proximity of water and fog, security and cost effectiveness. During November 2025, they evaluated the routes for such items as availability, security, transportation quantity and cost and then finally decided the transportation routes as below.

- 1) From sodium cyanide manufacture Tongsoh Petrochemical Corp., Ltd. Ulsan Plant to Pusan New Port : Roadway transportation by truck and trailer
- 2) Pusan New Port in Korea to Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia Southeast Asia : Marine transportation by ship

They have subcontractor evaluation procedure in which detail evaluation items for sodium cyanide manufactures, roadway transporters and shipping companies were defined. Such items as ICMC signatory or environment and safety system certification, history of accident, compliance of target delivery, cost and cooperation etc. were evaluated for sodium cyanide manufactures, roadway transporters and shipping companies. According to the procedure, they evaluated and chose sodium cyanide manufacture, roadway transporter and shipping companies as below.

- 1) Sodium cyanide manufacture : Tongsoh Petrochemical Corp., Ltd. Ulsan Plant
- 2) Roadway transportation from cyanide manufacture to Pusan New Port in Korea : by Bukwang Logistics Co., Ltd.  
- Bukwang Logistics Co., Ltd. was recertified in full compliance under the Cyanide Code on 24 April 2025 and initially certified during April 2022
- 3) Marine transportation from Pusan New Port to Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia : by SINOKOR, SM LINE and KMTC

Samsung C & T Corporation decided the control methods for each segment in Southeast Asia Supply Chain as below.

- 1) Roadway transportation company in Korea (Bukwang Logistics Co., Ltd.)
  - (1) Periodic supplier evaluation by Samsung C & T Corporation
  - (2) Implementation and certification of ICMC by Bukwang Logistics Co., Ltd.
- 2) Pusan New Port in Korea
  - (1) Periodic route evaluation by Samsung C & T Corporation
  - (2) Periodic due diligence investigation by Samsung C & T Corporation
- 3) Marine transportation by shipping companies (SINOKOR, SM LINES and KMTC)
  - (1) Periodic route evaluation by Samsung C & T Corporation
  - (2) Periodic due diligence investigation by Samsung C & T Corporation

Samsung C & T Corporation



12 December 2025

---

Name of Supply Chain Operator

Lead Auditor Signature

Date

- 4) Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia Southeast Asia
- (1) Periodic route evaluation by Samsung C & T Corporation
  - (2) Periodic due diligence investigation by Samsung C & T Corporation

Samsung C & T Corporation have implemented hazard identification and risk assessment process in hazardous chemical transportation procedure in which hazard identification in sodium cyanide supply chain, risk assessment for identified hazards and high risk control were defined. According to the process, during November 2025, Samsung C & T Corporation have identified hazards and evaluated the risks in Southeast Asia Supply Chain. Below high risks were identified.

- 1) Release of sodium cyanide powder to road, land and surface water during roadway transportation by transporter.
- 2) Damage to sodium cyanide container and human exposure during loading and unloading works.
- 3) Release to sea water during marine transportation by shipping companies
- 4) Robbery during road transportation, storage in ports and marine transportation.

Samsung C & T Corporation Fine & Specialty Chemicals Group have implemented control measures for those high risk items as maintaining safety system and ICMC certification by roadway transporter, due diligence investigations, supplier evaluations, preparation and application of emergency response plan.

According to hazardous chemical transportation procedure, Samsung C & T Corporation should reevaluate the overall routes of Southeast Asia Supply Chain every year periodically. And if there are some changes related to routes, transporters, facilities and relevant legal requirements, they will reevaluate the routes non-periodically. As Samsung C & T Corporation completed the first evaluation for the routes of Southeast Asia Supply Chain during November 2025, they will reevaluate next year. The process for getting feedback on route condition from each segment in Southeast Asia Supply Chain was defined in hazardous chemical transportation procedure. According to the procedure, Samsung C & T Corporation have received and reviewed information related to cyanide transportation routes from sodium cyanide manufacture, roadway transporter, shipping companies, ports and relevant interested parties. Related to the Southeast Asia Supply Chain, there was no special issue related to safety and environment.

Samsung C & T Corporation documented the control measures to address the high risks in Southeast Asia Supply Chain. They prepared and implemented the control measures such as supplier evaluation, check the certification of ICMC by roadway transporter, due diligence investigation for ports and shipping companies. And they established and maintained emergency response plan for sodium cyanide release, human exposure and robbery. The communication channel with government body, safety agency, police, manufacture and transporters was defined in emergency response plan.

When Samsung C & T Corporation selected the transportation route of Southeast Asia Supply Chain and developed the control measures for high risks, they considered and reflected the comments from governmental agencies, communities and stakeholders such as Ulsan government office, Busan local government office, Korea Occupational Health and Safety Agency, local fire fighting agency, sodium cyanide manufacture Tongsoh Petrochemical Corp., Ltd. Ulsan Plant, roadway transporter Bukwang Logistics Co., Ltd., shipping companies, Good Morning Hospital and DongKang Medical Center.

During November 2025, Samsung C & T Corporation reviewed the overall route for Southeast Asia Supply Chain. According to the review results, they decide that convoys and escorts are unnecessary from sodium cyanide manufacture Tongsoh Petrochemical Corp., Ltd. Ulsan Plant in Korea to Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia as sodium cyanide production and roadway transportation by ICMC certified companies and implementation of Dangerous Goods Code

Samsung C & T Corporation



12 December 2025

---

Name of Supply Chain Operator

Lead Auditor Signature

Date

of the International Maritime Organization (herein after IMO DG code) by big shipping companies.

Samsung C & T Corporation do not contract any other entities to conduct activities required in Standard of Practice 1.1. Samsung C & T Corporation communicated the emergency response plan, their hazardous chemical transportation procedure and material safety data sheet to manufacture, roadway transporter, ports and shipping companies and requested awareness and implementation. As consigner Samsung C & T Corporation have used subcontractors registered as ICMC signatories and certification completed if possible. So they chose ICMC certified subcontractors such as sodium cyanide manufacture Tongsoh Petrochemical Corp., Ltd. Ulsan Plant and roadway transporter Bukwang Logistics Co., Ltd.

### **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.

**The operation is**                      **X in full compliance with**  
 in substantial compliance                      **Standard of Practice 1.2**  
 not in compliance with

According to subcontractor evaluation procedure prepared by Samsung C & T Corporation, they evaluated subcontractor during June 2025. During the subcontractor evaluation, they checked and confirmed that sodium cyanide transporter have used only trained, qualified and licensed drivers and operators. And also the transporter is ICMC signatory and certified. Samsung C & T Corporation have prepared and communicated hazardous chemical transportation procedure, material safety data sheet and emergency response plan to manufacture, transporter, ports and shipping companies to use for training, daily operation and emergency cases.

### **Standard of Practice 1.3**

Ensure that transport equipment is suitable for the cyanide shipment.

**The operation is**                      **X in full compliance with**  
 in substantial compliance                      **Standard of Practice 1.3**  
 not in compliance with

According to subcontractor evaluation procedure, Samsung C & T Corporation evaluated subcontractor during June 2025. During the subcontractor evaluation, they checked and confirmed that sodium cyanide transporter have used only equipment designed and maintained to operate within the designed capacity. During the due diligence investigation, they checked and confirmed that the ports and shipping companies have used suitable equipment. And also Samsung C & T Corporation confirmed that transporter, ports and shipping companies have preventive maintenance procedure to control the transport equipment and verify the adequacy of transport equipment. And container itself designated to prevent overloading.

### **Transport Practice 1.4**

Develop and implement a safety program for transport of cyanide.

**X in full compliance with**

Samsung C & T Corporation



12 December 2025

---

Name of Supply Chain Operator

Lead Auditor Signature

Date

**The operation is**       in substantial compliance  
                                  not in compliance with

**Standard of Practice 1.4**

As Samsung C & T Corporation is a trading company, they do not actually need the detail safety program for transportation of sodium cyanide. During the subcontractor evaluation and due diligence investigation, they checked and confirmed that sodium cyanide transporter, ports and shipping companies developed and implemented the safety program. As a consigner, they requested to transporter for the compliance of local regulation, international standards and safety program. If the transporter violate the local regulation and international standards, they are not able to be registered as approved subcontractor to Samsung C & T Corporation.

**Standard of Practice 1.5**

Follow international standards for transportation of cyanide by sea.

**The operation is**      **X in full compliance with**  
                                  in substantial compliance  
                                  not in compliance with

**Standard of Practice 1.5**

As Samsung C & T Corporation is trading company, they do not actually perform the transportation of cyanide by sea. They evaluated shipping companies according to subcontractor evaluation procedure. They have evaluated for items as compliance with IMO DG Code, legal requirements and international standards, accident cases during marine transportation, compliance of target delivery and cost of transportation. Considering the evaluation results, they selected SINOKOR, SM LINE and KMTC as shipping companies for sodium cyanide transportation from Pusan New Port in Korea to Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia Southeast Asia. Samsung C & T Corporation completed the due diligence investigation during November 2025 for the shipping companies. According to the due diligence investigation, Samsung C & T Corporation confirmed that shipping companies were comply with IMO DG Code.

**Standard of Practice 1.6**

Track cyanide shipments to prevent losses during transport.

**The operation is**      **X in full compliance with**  
                                  in substantial compliance  
                                  not in compliance with

**Standard of Practice 1.6**

Samsung C & T Corporation is trading company, so they do not actually perform the transportation of cyanide. During the subcontractor evaluation, they checked and confirmed that the sodium cyanide transportation vehicles have pager, mobile phone and communication channel sheet in which telephone numbers of transportation company, the manufacture and emergency responders defined. And also during the subcontractor evaluation, they checked and confirmed that the transporter have tested periodically the communication equipment. Samsung C & T Corporation checked the overall routes of Southeast Asia Supply Chain and found no blackout area. And they requested to transporter and shipping companies to identify blackout area and procedure to control the blackout area. Until now they have not received any identified blackout area from transporter and shipping companies. Samsung C & T Corporation have procedure to track the progress of cyanide shipments. And if needed, they tracked the progress of cyanide shipments by contact with sodium cyanide manufacture

Samsung C & T Corporation



12 December 2025

-----  
Name of Supply Chain Operator

Lead Auditor Signature

Date

Tongsuh Petrochemical Corp., Ltd. Ulsan Plant, transporter Bukwang Logistics Co., Ltd. and communication with shipping companies. And also during the subcontractor evaluation, they checked and evaluated the tracking of cyanide shipments by transporter.

When Samsung C & T Corporation receive purchasing orders from customers as gold mining companies, they review the target delivery and quantity and input the orders in computer network system. They requested to sodium cyanide manufacture Tongsuh Petrochemical Corp., Ltd. Ulsan Plant to dispatch the amount of sodium cyanide and nominate the shipping companies. The individual customer order including target delivery and amount, dispatched date and quantity of sodium cyanide from manufacture to shipping companies were registered in computer network system of Samsung C & T Corporation. And also the progress of marine transportation by shipping companies can be checked for individual customer orders by communication with shipping companies. So the inventory control and custody documentation were properly implemented to prevent loss of sodium cyanide during transportation. According to the subcontractor evaluation results, the roadway transporter Bukwang Logistics Co., Ltd. and shipping companies controlled the Material Safety Data Sheet properly.

Samsung C & T Corporation



12 December 2025

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Name of Supply Chain Operator

Lead Auditor Signature

Date

## 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.

**The operation is**  **X in full compliance with** **Standard of Practice 2.1**  
 in substantial compliance  
 not in compliance with

Samsung C & T Corporation checked over all routes of South America Supply Chain and identified interim storage areas as below.

- 1) Pusan New Port in Korea
- 2) Hai Phong Port in Vietnam
- 3) Jakarta Port and Surabaya Port in Indonesia

Pusan New Port in Korea, Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia are controlled by national port agencies. Samsung C & T Corporation completed due diligence investigations for ports and national port agencies during November 2025. The due diligence investigation activities are operation check, site visit and interview with employees for those ports and national port agencies. They confirmed that the interim storage areas were controlled properly in compliance with legal requirements and ICMC code requirements. They issued some minor findings during due diligence investigation, they requested corrective actions and confirmed the corrective action results from ports and national port agencies. And also they informed their hazardous chemical transportation procedure, material safety data sheet and emergency response plan to employees in ports and national port agencies.

Samsung C & T Corporation



12 December 2025

---

Name of Supply Chain Operator

Lead Auditor Signature

Date

### 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.

**The operation is**                      **X in full compliance with**  
 in substantial compliance                      **Standard of Practice 3.1**  
 not in compliance with

Samsung C & T Corporation have maintained emergency response plan considering the possible emergency cases as sodium cyanide release to road, land, surface water and sea water, human exposure, robbery during transportation and interim storage. The emergency response plan considered the solid sodium cyanide packaged in polyethylene inner film, polypropylene woven bag and box and transported in container, transportation method, interim storage areas, infrastructure as road condition, ports and marine transportation. In the emergency response plan, they defined what they should do, communication channel and relevant external responders such as sodium cyanide manufacture, transporter, shipping company, mining customers, safety agency, police and hospitals. Detail emergency response plan considering roadway transportation was prepared by ICMC certified transporter Bukwang Logistics Co., Ltd. and checked by Samsung C & T Corporation. Samsung C & T Corporation checked that shipping companies issued commitment to comply with IMO DG Code in which the emergency response plan required. For interim storage areas such as ports, they informed the emergency response plan and MSDS of sodium cyanide in which handling and treatment for released sodium cyanide defined.

#### Standard of Practice 3.2

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

**The operation is**                      **X in full compliance with**  
 in substantial compliance                      **Standard of Practice 3.2**  
 not in compliance with

Samsung C & T Corporation have maintained training procedure in which the preparation of annual training plan, initial and refresher training for emergency response related to sodium cyanide export were defined. According to the training procedure, they have prepared and implemented annual training plan as initial training for new employees and refresher training for existing employee every year. The team leader and professional participated the emergency response training by sodium cyanide manufacture. And team leader implemented the training for their team members for the emergency response plan and MSDS. During the emergency response training, the communication channel, duties of relevant external agency and main activities of Fine & Specialty Chemicals Group were introduced and training records were maintained.

Samsung C & T Corporation



12 December 2025

---

Name of Supply Chain Operator

Lead Auditor Signature

Date

In the emergency response plan prepared by Samsung C & T Corporation, the roles and responsibilities of team leader, team member, other relevant team and external agency were defined. And also in their emergency response plan and MSDS, the emergency response equipment such as shovel, sawdust, glove, mask etc. were defined.

The roadway transporter Bukwang Logistics Co., Ltd. have trained their employee and vehicle operators as annual training program. Samsung C & T Corporation checked the implementation of

emergency response training by roadway transporter during supplier evaluations. And also shipping companies have implemented training for their employees to comply with IMO DG Code. For interim storage areas, they informed their emergency response plan and MSDS of sodium cyanide in which handling and treatment for released sodium cyanide defined.

### **Standard of Practice 3.3**

Develop procedures for internal and external emergency notification and reporting.

**The operation is**                      **X in full compliance with**  
 in substantial compliance                      **Standard of Practice 3.3**  
 not in compliance with

Samsung C & T Corporation have maintained emergency response procedure. According to the procedure, they shall prepare and maintain emergency response plan in which detail response processes and current contact information shall be identified and the emergency response plan shall be checked every year and contact information updated as needed.

Since 2012, Samsung C & T Corporation prepared, maintained and updated emergency response plan appropriate to sodium cyanide export business and over all emergency situations possibly expected in Southeast Asia Supply Chain. During November 2025, the emergency response plan was reviewed and updated according to emergency response procedure. Internal and external notification was prepared and updated during November 2025 including the current contact information of sodium cyanide manufacture, roadway transporter, shipping companies, safety agency, fire fighting agency, government offices and hospitals.

During April 2023, they updated their emergency response procedure including notification of ICMI of any significant cyanide incidents to comply with ICMC requirement. And according to due diligence investigations for ports and shipping companies, Samsung C & T Corporation confirmed that ports and shipping companies have procedures or manuals in which reporting any significant incidents to exporters as Samsung C & T Corporation and relevant interested parties. So Samsung C & T Corporation can report any significant incidents during handling in ports and marine transportation to ICMI. There was no cyanide incident related to cyanide exporting business since 2012 when Samsung C & T Corporation started the sodium cyanide export business.

### **Standard of Practice 3.4**

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

**The operation is**                      **X in full compliance with**  
 in substantial compliance                      **Standard of Practice 3.4**  
 not in compliance with

Samsung C & T Corporation prepared the emergency response plan appropriate to overall emergency

Samsung C & T Corporation



12 December 2025

-----  
Name of Supply Chain Operator

Lead Auditor Signature

Date

cases possibly expected in Southeast Asia Supply Chain. In the emergency response plan, the remediation as recovery and protect for released sodium cyanide, decontamination of soil and water, control and disposal of wastes were defined. And also the prohibit of the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat sodium cyanide that has been released into surface water was defined. The emergency response plan and MSDS were informed to roadway transporter Bukwang Logistics Co., Ltd., shipping companies as SINOKOR, SM LINE and KMTC, ports as Pusan New Port in Korea, Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia.

**Standard of Practice 3.5**

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

<b>The operation is</b>	<input checked="" type="checkbox"/> <b>X in full compliance with</b>	<b>Standard of Practice 3.5</b>
	<input type="checkbox"/> in substantial compliance	
	<input type="checkbox"/> not in compliance with	

Samsung C & T Corporation established and maintained emergency response procedure. According to the procedure, the emergency response plan shall be checked every year and contact information updated as needed. And they shall check, evaluate and revise the emergency response plan as needed following actual incident and mock emergency drill.

During November 2025, Samsung C & T Corporation reviewed the emergency response plan, checked the adequacy and updated contact information.

According to the emergency response procedure, they shall do the mock emergency drill once per year. The mock emergency drill was implemented in their office during November 2025. The mock emergency drill simulated cyanide exposure of employee and release to land and surface water during transportation.

After the mock drill during November 2025, they evaluated overall process and confirmed that emergency response procedure and plan were adequate, equipment defined in emergency response plan was appropriate and employee in Samsung C & T Corporation were properly trained.

According to the emergency response procedure, Samsung C & T Corporation evaluated the performance of emergency response plan and updated contact information after the mock drill during November 2025.

Samsung C & T Corporation



12 December 2025

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Name of Supply Chain Operator

Lead Auditor Signature

Date

## **Summary Report of Due Diligence Investigations**

### **1. Background of due diligence investigation**

#### **1) Inability as consigner for ports and shipping companies lead to ICMC implementation and certification**

The Southeast Asia Supply Chain includes sodium cyanide manufacture, roadway transporter, ports and shipping companies as below.

- (1) Roadway transportation from sodium cyanide manufacture to Pusan New Port in Korea by Bukwang Logistics Co., Ltd.
- (2) Marine transportation from Pusan New Port in Korea to Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia by SINOKOR, SM LINE and KMTC

As consigner Samsung C & T Corporation control the overall Southeast Asia Supply Chain and will choose ICMC certified subcontractors or lead the ICMC implementation and certification to sodium cyanide manufacture, roadway transporter, ports and shipping companies. So they successfully have chosen ICMC certified subcontractors as Tongsoh Petrochemical Co., Ltd. Ulsan Plant and Bukwang Logistics Co., Ltd. However they can't choose the ICMC certified national port control agencies and shipping companies. And also they can't lead ports and shipping companies to ICMC implementation and certification due to their inability to affect their operating practices.

So Samsung C & T Corporation planned and implemented due diligence investigation for ports and shipping companies as required by ICMC.

#### **2) Scope of due diligence investigation**

Pusan New Port in Korea, shipping companies and Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia were included in Southeast Asia Supply Chain. So the due diligence investigations were implemented for Pusan New Port in Korea, shipping companies as SINOKOR, SM LINE, KMTC and Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia. The due diligence investigation was focused to the loading, unloading and storage activities in ports and marine transportation by shipping companies. The shipping companies' activities can be checked during the due diligence investigation of ports. So the due diligence investigation for Pusan New Port and shipping companies were implemented at the same time. And the results of due diligence investigations for Pusan New Port and shipping companies were recorded in combined report.

### **2. Progress of due diligence investigation**

#### **1) Development of checklist**

Samsung C & T Corporation reviewed the ICMC requirements, IMO DG Code, Southeast Asia

Samsung C & T Corporation



12 December 2025

---

Name of Supply Chain Operator

Lead Auditor Signature

Date

Supply Chain, property of sodium cyanide and information from Tongsuh Petrochemical Co., Ltd. Ulsan Plant. They have developed checklist for due diligence investigation applicable to the control of sodium cyanide storage and transportation.

- 2) Nomination of investigation team leader and member  
Considering the work experience and knowledge of ICMC, Fine & Specialty Chemicals Group leader nominated team leader and member for due diligence investigation.
  
- 3) Scheduling of due diligence investigation  
Samsung C & T Corporation planned the due diligence investigation during November 2025 for Pusan New Port in Korea, shipping companies as SINOKOR, SM LINE, KMTC and ports as Hai Phong Port in Vietnam, Jakarta Port and Surabaya Port in Indonesia.
  
- 4) Implementation of due diligence investigation  
Samsung C & T Corporation implemented due diligence investigations as planned during November 2025. They use the checklist and record the investigation results in checklist. After the investigation, they issued the completed checklist to national port agencies and shipping companies and requested corrective actions for some minor nonconformities. Samsung C & T Corporation Materials Group checked the action results and confirmed that corrective actions were completed for some minor nonconformities.

### 3. Results of due diligence investigation

Samsung C & T Corporation have developed and used the checklist and recorded the investigation results in checklist.

- 1) Pusan New Port in Korea including shipping companies SINOKOR, SM LINE and KMTC
  - (1) Due diligence investigation results  
Investigation Area : Storage, loading, unloading and marine transportation in Pusan New Port in Korea including shipping companies' activities  
Investigation Item : Storage area control, responsible personnel, emergency plan, mock drill, equipment control, training and marine transportation  
Investigation Date : 14 November 2025
  - (2) Conclusion  
According to the due diligence investigation results, Samsung C & T Corporation concluded that the control of the sodium cyanide by Pusan New Port and shipping companies comply with ICMC, IMDG code and national legal requirements.
  
- 2) Hai Phong Port in Vietnam
  - (1) Due diligence investigation results  
Investigation Area : Storage, loading, unloading in Hai Phong Port in Vietnam  
Investigation Item : Storage area control, responsible personnel, emergency plan, mock drill, equipment control and training  
Investigation Date : 17 November 2025
  - (2) Conclusion  
According to the due diligence investigation results, Samsung C & T Corporation concluded that the control of the sodium cyanide by Hai Phong Port comply with ICMC, IMDG code and national legal requirements.

Samsung C & T Corporation



12 December 2025

---

Name of Supply Chain Operator

Lead Auditor Signature

Date

- 3) Jakarta Port in Indonesia
  - (1) Due diligence investigation results
    - Investigation Area : Storage, loading, unloading in Jakarta Port in Indonesia
    - Investigation Item : Storage area control, responsible personnel, emergency plan, mock drill, equipment control and training
    - Investigation Date : 19 November 2025
  - (2) Conclusion
    - According to the due diligence investigation results, Samsung C & T Corporation concluded that the control of the sodium cyanide by Jakarta Port comply with ICMC, IMDG code and national legal requirements.
- 4) Surabaya Port in Indonesia
  - (1) Due diligence investigation results
    - Investigation Area : Storage, loading, unloading in Surabaya Port in Indonesia
    - Investigation Item : Storage area control, responsible personnel, emergency plan, mock drill, equipment control and training
    - Investigation Date : 20 November 2025
  - (2) Conclusion
    - According to the due diligence investigation results, Samsung C & T Corporation concluded that the control of the sodium cyanide by Surabaya Port comply with ICMC, IMDG code and national legal requirements.

#### 4. Review of the due diligence investigation results by ICMC audit team

During the ICMC certification audit during Dec. 2025 for Southeast Asia Supply Chain of Samsung C&T Corporation, the auditor Mr. SangHo Ahn reviewed the due diligence investigation process and results implemented by Samsung C & T Corporation.

The due diligence investigations included the control storage yards in ports and marine transportation.

Samsung C & T Corporation implemented the due diligence investigations comprehensively as below.

- Study and develop checklist applicable to sodium cyanide storage in ports and marine transportation.
- Nominated competent personnel as due diligence investigation team leader and member.
- Implement due diligence investigation with checklists and record the results.
- Issue corrective actions for minor nonconformities identified during due diligence investigation.
- Checked corrective action results

The audit team finally concluded that the due diligence investigations for Southeast Asia Supply Chain implemented by Samsung C & T Corporation were comply with ICMC requirements.

Samsung C & T Corporation



12 December 2025

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Name of Supply Chain Operator

Lead Auditor Signature

Date