



Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

International Cyanide Management Code Recertification Audit

ICMC Transport Recertification Summary Audit Report

2026-08-20

2913478A



Document distribution

Anqing Shuguang Supply, Sales and Transportation Co., Ltd. International Cyanide Management Code Recertification Audit ICMC Transport Recertification Summary Audit Report

2026-08-20

2913478A

Prepared for

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

No. 18, Environmental Protection Intelligent Manufacturing Industrial Park, Daguan District, Anqing City, Anhui Province, China

Submitted to

International Cyanide Management Institute (ICMI)

1400 | Street, NW
Suite 550
WASHINGTON DC 20005
UNITED STATES OF AMERICA

Prepared by

WSP Engineering Technology (Beijing) Co., Ltd. Shanghai Branch
No. 643 Xinhua Road, Changning District, Shanghai 200052, China
T +86 21 8030 6000

Quality control	Name	Date	Signature
Prepared by:	Zoey Tang	09/06/2026	
Reviewed by:	Song Luo	09/06/2026	
Approved by:	Rudi Seebach	09/06/2026	

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Revisions

Rev	Date	Details
0	2026/06/09	Deliver first report
1	2026/08/20	Revised based on ICMI's comments

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Table of contents

1.	Introduction	5
1.1	Operational General Information	5
1.2	Operation Location Detail and Description	5
1.3	Transit Storage	7
2.	Auditor's Findings	8
2.1	Auditor Information	8
2.2	Auditor Attestation	9
3.	Principles and Transport Practices	10
3.1	Principles 1 Transport	10
3.1.1	Transport Practice 1.1	10
3.1.2	Transport Practice 1.2	12
3.1.3	Transport Practice 1.3	13
3.1.4	Transport Practice 1.4	15
3.1.5	Transport Practice 1.5	17
3.1.6	Transport Practice 1.6	18
3.2	Principle 2 Interim Storage	19
3.2.1	Transport Practice 2.1	19
3.3	Principle 3 Emergency Response	19
3.3.1	Transport Practice 3.1	19
3.3.2	Transport Practice 3.2	22
3.3.3	Transport Practice 3.3	24
3.3.4	Transport Practice 3.4	24
3.3.5	Transport Practice 3.5	25
4.	Important Information	27

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

1. Introduction

1.1 Operational General Information

Name of Transport Operation:	Anqing Shuguang Supply, Sales and Transportation Co., Ltd.
Name of Facility Owner:	Anqing Shuguang Supply, Sales and Transportation Co., Ltd.
Name of Facility Operator:	Anqing Shuguang Supply, Sales and Transportation Co., Ltd.
Name of Responsible Manager:	Guoyu Yu
Address:	No. 18, Environmental Protection Intelligent Manufacturing Industrial Park, Dagan District, Anqing City
State/Province:	Anhui
Country:	China
Telephone:	+86 556-5215220
Email:	gygs@sgchem.com

1.2 Operation Location Detail and Description

Anqing Shuguang Supply, Sales and Transportation Co., Ltd (hereinafter referred to as “Shuguang Transport”) was established in 1995 and is located at No. 18 Environmental Protection Intelligence Manufacturing Zone, Dagan District, Anqing City, which is approximately 150 km south of Hefei City-the capital of Anhui Province. Shuguang Transport is approved by Anqing City Bureau of Transport for road transportation and handling of dangerous goods. Shuguang employs approximately 80 people for the transport operation and has a fleet of 37 vehicles that are licensed and certified to transport dangerous goods.

The sodium cyanide product is manufactured and packaged by Anhui Anqing Shuguang Chemical Co., Ltd. (the production company). Solid cyanide is packaged in 50 kg metal drums, 1 tonne intermediate bulk containers or 1.1 tonne intermediate bulk containers and then into shipping containers. Liquid cyanide is packaged and transferred in tanker trucks. All packaging is undertaken by the production company.

Table 1 provides a summary of Shuguang Transport’s main routes for solid cyanide. Shuguang Transport uses 18 main transport routes to their clients within China.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Table 1.1 Summary of Main Transportation Routes

SN.	Destination	Distance	Product
1	Shanghai Port (Client's dangerous goods warehouse)	601 km	Solid
2	Jinjiang City, Fujiang Province	879 km	Solid
3	Shenyang City, Liaoning Province	1963 km	Solid
4	Nantong City, Jiangsu Province	576 km	Solid
5	Xuzhou City, Jiangsu Province	523 km	Solid
6	Shangyu City, Zhejiang Province	591 km	Solid
7	Ningbo City, Zhejiang Province	672 km	Solid
8	Shenzhen City, Guandong Province	1147 km	Solid
9	Dali City, Yunnan Province	2798 km	Solid
10	Erlianhaote City, Inner Mongolia Province (Commenced from 2024)	1984 km	Solid
11	Mianyang City, Sichuan Province (Commenced from 2025)	1410 km	Solid
12	Pengze City, Jiangxi Province (Commenced from 2024)	139 km	Liquid
13	Tongling City, Anhui Province (Commenced from 2024)	119 km	Liquid
14	Dexing City, Jiangxi Province (Commenced from 2024)	350 km	Liquid
15	Hangzhou City, Zhejiang Province (Commenced from 2023)	464 km	Solid
16	Xingyi City, Yuanan Province (Commenced from 2023)	2084 km	Solid
17	Jinan City, Shandong Province (Commenced from 2023)	819 km	Solid
18	Zamyn-Uud City, Mongolia (Commenced from 2024)	2004 km	Solid

Cyanide is loaded onto the trucks at the production facility and from there is transported directly to the client or port.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

1.3 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

2. Auditor's Findings

Shuguang Transport is ☒ in full compliance with **The International Cyanide Management Code**
☐ in substantial compliance with
☐ not in compliance with

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

2.1 Auditor Information

The audit was undertaken by Rudi Seebach (Lead Auditor and Technical Specialist), Song Luo (Auditor Trainee) and Zoey Tang (Auditor Trainee) of WSP Engineering Technology (Beijing) Co., Ltd., Shanghai Branch. Auditors' information is as below:

Audit Company: WSP Engineering Technology (Beijing) Co., Ltd. Shanghai Branch

Audit Team: Rudi Seebach – Lead Auditor and Transport Technical Specialist
Song Luo – Auditor Trainee
Zoey Tang – Auditor Trainee

Email: rudi@cyanideaudit.com.au
song.luo@wsp.com
zoey.tang@wsp.com

Names and Signatures of Auditors:

Names	Position	Signature	Date
Rudi Seebach	Lead Auditor and Transport Technical Specialist		09/06/2026
Song Luo	Auditor Trainee		09/06/2026
Zoey Tang	Auditor Trainee		09/06/2026

Dates of Audit: 11 to 12 March 2026

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

2.2 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 Cyanide Code 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.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

09/06/2026

Date

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

3. Principles and Transport Practices

3.1 Principles 1 | Transport

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

3.1.1 Transport Practice 1.1

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

The operation is ☒ in full compliance with **Transport Practice 1.1**
☐ in substantial compliance with
☐ not in compliance with

Summarize the basis for this finding/Deficiencies Identified:

Shuguang Transport has implemented a process for selecting transport routes that minimizes the potential for accidents and releases or the potential impacts of accidents and releases.

Shuguang Transport has developed and implemented a management system for transportation and there is a specific written procedure that details the process and parameters to be assessed while identifying, selecting and assessing potential transport routes.

The procedure does include the assessment of:

1. Ecological Environment: Living water resource, large lake, river, agro-ecological areas, nature reserves, culture heritage.
2. Population density: market towns, parks, schools, factories, stations, railways, ports and other public facilities
3. Road conditions: traffic flow, road conditions, slopes, sharp turns, bridges, tunnels, pitch and grade.
4. Natural conditions: fog, typhoons, heavy rain, ice, snow, sandstorm and natural disasters occurring areas.

In addition, the roads assessed by Shuguang Transport need to be approved by local police authorities for the transport dangerous goods.

Shuguang Transport has established a procedure for evaluating the risks associated with selected cyanide transport routes and implementing the controls necessary to manage these risks. The procedure requires safety and dispatch personnel to collect route data and identify hazards by physically driving the potential routes. Identified hazards are assessed using a scoring system that generates an overall risk rating.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

For new routes, the vice team leader conducts an individual assessment of the route prior to the first cyanide shipment. Cyanide Transportation Route Assessment Reports were provided for review and address all elements specified in the Procedure on Selection and Evaluation of Cyanide Transport Routes.

For existing routes, Shuguang Transport conducts an annual review and update of the route assessment based on drivers' ongoing collection of route data and hazard observations. Hazards are reassessed using the established scoring system to generate an updated risk rating. Cyanide Transportation Route Periodic Assessment Sheets for these routes were provided for review.

For all customer destinations, one primary and two alternative routes are identified. The primary route is selected on the basis of the highest overall score, with alternative routes available should the primary route become compromised (e.g., major construction, accidents).

Each assessment is reviewed and signed by the drivers, escorts, coordinators, and safety supervisors. Following this internal review, the route is approved by the general manager. Once the pre-assessment is finalised, approval from the local government is required before the route can be used.

Shuguang Transport has implemented a process to periodically re-evaluate all routes used for cyanide deliveries and to obtain ongoing feedback on route conditions from its operators. Route assessments are reviewed and updated annually, and the updated information is used to brief drivers on the routes and associated control measures.

Records of completed route assessments were provided for review, along with training records confirming that drivers received these briefings, including the requirement to provide feedback on route conditions. Drivers and escorts may also submit feedback through routine inspection records.

Seven new routes were introduced during auditing period (2023-2026). The annual route assessment documentation for this route was reviewed and confirmed that Shuguang Transport completed the assessment and review in accordance with its procedures.

Shuguang Transport documents the measures taken to address risks identified with the selected routes. The route assessment document details the measures taken to address risks of selected routes. This is then communicated verbally to drivers during briefing sessions, and attendance records are retained.

Copies of route assessment were reviewed and confirmed to contain details on the control measures such as:

- Posted speed limits must also be obeyed.
- Trucks must slow down when passing through villages and give way to pedestrians.
- When passing schools, the trucks must avoid the school start and finish time.
- The trucks must keep a distance of at least 150 metres away from the vehicles ahead.
- The trucks must not overtake on bridge.

The emergency contact information of hospital and environmental agency was also identified in the assessment report.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Shuguang Transport seeks input from applicable governmental agencies, communities and other stakeholders as necessary in the selection of routes and development of risk management measures. As noted, the approval of the local authority is required prior to the transport and are provided with a copy of the route assessment.

Each shipment requires a permit "Road Transportation Permission for Highly Toxic Chemicals" to be issued by the local authority which allows cyanide to be transported along the designated route for a specified timeframe. There is also a requirement that the local police must be notified if the shipment needs to be stopped overnight. The requirement for notifying local police has been specified on the online application system.

Shuguang Transport prepared a list of hospitals, environmental protection department and fire-fighting bureau for each route. Shuguang Transport has assessed its routes and concluded that no routes require additional control measures for special safety or security considerations.

Shuguang Transport has two drivers for each vehicle with the off-duty driver assuming the role of escort. The emergency response plan is carried in the cabin of the vehicle and contact is to be made with local police in the event of an incident. If an area is identified as a security concerns area, Shuguang Transport's system states that the local police are to be contacted to provide and escort through the area.

Shuguang does not contract other entities to conduct cyanide transportation.

3.1.2 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.

The operation is	☒ in full compliance with	Transport Practice 1.2
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Shuguang Transport only uses trained, qualified and licensed operators to operate its transport vehicles. Each employee has been established a personal file, including training records, examination records and certificates.

The Procedure for Training and Education details the minimum requirements, including government certification to operate specific vehicles and purpose. To operate a transport vehicle, the operators must have:

- Dangerous Chemical Transport Vehicle Driving Licence, issued by Anqing transportation authority.
- Dangerous Chemical Transport Vehicle Driving Training, organised by Anqing transportation authority.
- Annual Training organised by Shuguang Transport.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

- Three levels of entry training on safety laws, regulations, cyanide awareness, emergency response measures and protection, organised by Shuguang Transport.

Interviews and a review of training records and delivery records confirmed that drivers had received the designated training and held current driver’s licences. All personnel involved in operating cyanide transport equipment are trained to perform their duties in a way that minimises the potential for cyanide releases and worker exposure.

Once the container has been loaded, inspected, and sealed, Shuguang Transport assumes responsibility for the shipment. Their training program is designed to ensure drivers can manage the transport of cyanide safely and prevent any release or subsequent exposure.

Shuguang Transport maintains an annual training plan that delivers monthly modules covering key elements of their management system on a rotational basis. These sessions include instruction on driving risks, the transport of dangerous goods, and cyanide transportation route assessment and associated controls. Drivers do not load or unload containers. A review of training attendance records, training files, and driver interviews confirmed that the required training is being delivered.

Shuguang does not contract other entities to conduct cyanide transportation.

3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is	☒ in full compliance with	Transport Practice 1.3
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Hazardous chemicals transported by Shuguang Transport are subject to the required local government approvals. A Hazardous Chemicals Application Form is submitted to the Anchin Transportation Bureau, and each vehicle is authorised to travel on designated city routes. Load-bearing capacity and actual load weight are verified for every consignment to ensure compliance with route and vehicle limits.

All vehicles undergo an annual third-party Motor Vehicle Technical Inspection, which covers all safety-critical aspects of the truck and trailer combination. In addition, local government authorities conduct pre-trip inspections before each departure, supported by Shuguang Transport’s own mobile pre-departure checks.

Shuguang Transport uses only equipment designed and maintained to operate within the loads it is required to handle. The company maintains detailed records for each vehicle combination (prime mover and trailer), including registration details, load-bearing capacity, and manufacturer-specified maximum load limits verified through the vehicle certification process. Each vehicle has an individual file containing shop instructions, certificates, and maintenance records.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.		2026-06-09
Name of Operation	Signature of Lead Auditor	Date

The maximum load-bearing capacity of the trucks is 34,700 kg. Load weights are incorporated into the lift plan to ensure no exceedance of allowable limits. Pre-departure Vehicle Inspection Records include:

- Vehicle number
- Mechanical parameters (brakes, tyres, lights, alarms, steering, transmission, chassis, fire extinguishers, antistatic devices, signage, power cut-off, battery, Beidou system, wipers, etc.)
- Latest Emergency Response Plan
- Emergency response equipment (MSDS, antidotes, chemical protective suits, full-face masks, driver physical condition checks)
- Driver and escort signatures

Three-Party Inspection Records include:

- Packaging and labels
- Seal serial numbers
- Actual loading versus maximum loading capacity
- Vehicle certificates and licence
- Driver certificates and licence
- Road Transportation Permissions for Highly Toxic Chemicals
- Road Transport Bill of Dangerous Goods
- Inspector signature

The management team conducts random vehicle inspections after the drivers' pre-departure checks to verify consistency. Special Vehicle Inspections and Comprehensive Inspections are also conducted to assess mechanical parameters and emergency response equipment.

Vehicles transporting dangerous goods undergo Level II maintenance by a licensed third party and an annual functional verification. A quality warranty certificate is issued for each vehicle. Before departure, two rounds of inspection are completed by the driver, escort, safety department, and the producer's security personnel.

Shuguang Transport has established procedures to verify the adequacy of the equipment for the load it must bear. Management Rule of Overloading Prevention, Shift Prevention, Loading and Unloading includes compliance with annual inspection process for vehicle certification for the transport of dangerous goods issued by the local government. Part of the inspection process is to confirm vehicles are meeting manufacturer's specifications for load bearing.

Inspection records denote the load bearing capacity and actual load. A review of Delivery Receipts confirmed shipments are within the load capacity of the vehicles. Procedures are in place to ensure transport vehicles are not overloaded when handling cyanide. The maximum load-bearing capacity of the trucks is 34,700 kg, and planned load weights are incorporated into the lift plan to ensure this limit is not exceeded.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Pre-departure inspections compare the vehicle's certified design capacity with the actual load, and inspection records document both the allowable load and the load being carried. A review of Delivery Receipts confirmed that all cyanide shipments were within the approved load capacity of the vehicles.

Shuguang does not contract other entities to conduct cyanide transportation.

3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is	☒ in full compliance with	Transport Practice 1.4
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Shuguang Transport has procedures in place to ensure cyanide is transported in a manner that maintains the integrity of the producer's packaging.

Anhui Anqing Shuguang Chemical Company Co., Ltd. is responsible for packaging and labelling the cyanide product. Packaging is undertaken in several configurations:

- Solid cyanide is placed into plastic bags and then into locked, sealed metal barrels. These are secured within a shipping container or lockable vehicle hold.
- Solid cyanide is placed into plastic bags and then into wooden crates, which are nailed and strapped to form an intermediate bulk container (IBC). These are then loaded and locked inside a shipping container.
- Solid cyanide is placed into plastic bags and then into metal-framed timber IBCs, which are subsequently locked inside a shipping container.

Once the product has been packed and sealed in the bulk container, responsibility transfers to the transporter. Procedures require regular checks of packaging integrity during transport, with any damage or spillage to be reported immediately. Single-use seals are applied to container doors and these are checked periodically throughout the journey. Unique seal serial numbers are recorded on inspection sheets, and Delivery Receipts confirm seals were intact at the point of delivery.

The maintenance and management of the bulk shipping containers are the responsibility of Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

The containers are manufactured by nationally designated and qualified manufacturers. In accordance with applicable legal and regulatory requirements, each container is inspected annually by a nationally accredited inspection body. Containers that pass the inspection are issued a Metal Atmospheric Pressure Tank Inspection Report for Road Transportation of Liquid Dangerous Goods, which is valid for one year. The Company only uses containers with valid inspection certification for transportation activities.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Prior to each trip, drivers inspect the validity of the tank inspection certificate, emergency shut-off valves, manhole gaskets, tank condition, safety markings and labels, pipelines, overall appearance, and loading/discharge valves. The inspection results are accurately documented in the Cyanide Transport Vehicle Pre-Trip Safety Inspection Checklist.

In addition, the Company's safety management personnel conduct monthly inspections of transport containers to verify their integrity and fitness for service. Inspection records are maintained in the container management files. An independent file is established for each transport container, including the manufacturer's certificate of conformity, factory inspection records, quality inspection certificates, product quality certificates, and detailed inspection records required by national regulations.

The bulk shipping containers used for transportation are manufactured by qualified specialist suppliers and are provided with certificates of conformity. As part of routine operations, drivers and escorts inspect the containers prior to each trip, with particular attention given to locking mechanisms, seals, and the connection between the container and the vehicle. The inspection findings are recorded in the Cyanide Transport Vehicle Pre-Trip Safety Inspection Checklist, and the Company's Safety Department conducts monthly inspections of the containers to verify their continued integrity and suitability for service.

Drivers are required to stop and rest every four hours for a minimum of 20 minutes, during which they conduct an inspection of the vehicle and load. Loading and unloading of cyanide are not the responsibility of the transporter.

Placards and signage used to identify the shipment as cyanide meet local and international standards. Diamonds placed at front and rear of the vehicle identify load as cyanide and the containers also have labelling that identifies the contents of the container. An inspection of the vehicles confirmed that placarding is used.

Shuguang Transport has implemented a safety programme for cyanide transport that includes:

a. Vehicle inspections prior to each departure/shipment?

Vehicle inspections are conducted prior to each departure by the driver and escorts. These inspections cover mechanical roadworthiness as well as specific critical items. The Vehicle Coordinator verifies the inspection results.

Following loading, the driver, escorts, security personnel, and warehouse or production staff conduct a further inspection before each departure or shipment, as well as at designated stops throughout the journey.

b. A preventative maintenance program?

Return Vehicle Inspection will be conducted after the vehicles returned from transportation to check the maintenance requirement. Maintenance records indicate routine basic maintenance is regularly performed. In addition to the internal preventative maintenance plan there is a 90-day third party maintenance and annual function verification with certificate for government compliance purposes.

c. Limitations on operator or drivers' hours?

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Daily driving limits are applied based on distance travelled, with the frequency and duration of rest breaks increasing for longer journeys. Each vehicle is staffed with two drivers to allow for appropriate rest periods and shift rotation. Vehicles must be parked between 00:00 and 06:00.

Driving times are monitored via the Beidou Navigation system on site, which provides real-time tracking and 24-hour alerts if drivers do not comply with rest requirements or mobile phone restrictions. In practice, for the current routes, actual driving hours are well below the prescribed limits.

d. Procedures to prevent loads from shifting?

Solid cyanide product is packaged by the manufacturer into metal drums or IBCs which are in turn loaded into sea container. The sea containers are sealed and secured to vehicles by twist locks.

e. Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered?

Documented procedures provide the measures for modifying or suspending if conditions such as severe weather or civil unrest are encountered. The procedure outlines the actions to take and who must be contacted.

f. A drug abuse prevention program?

Provisions on control and management during cyanide transportation, which specifies that drivers and escorts involved in cyanide transport must not take alcohol or drugs that could affect safe driving, including hypnotic drugs affecting the nervous system, nausea and vomiting drugs, allergy drugs, analgesic drugs, stimulants, anti-hypertensive drugs and epilepsy drugs. The drivers are observed by the coordinator to assess fitness for duty.

g. Retention of records documenting that the above activities have been conducted?

Records are maintained that the above activities have been conducted.

Shuguang does not contract other entities to conduct cyanide transportation.

3.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea.

☒ in full compliance with

The operation is

☐ in substantial compliance with

Transport Practice 1.5

☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Shuguang Transport does not intend to transport consignments of cyanide by sea within the scope of this audit.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

3.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is ☒ in full compliance with **Transport Practice 1.6**
☐ in substantial compliance with
☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Shuguang Transport vehicles have the means to communicate with the transport company, the mining operation, the cyanide producer and emergency responders.

A range of communication systems is available, and the management system defines the communication methods. All vehicles carry the emergency response plan, which includes phone numbers for hospitals, external emergency responders on the transport route, as well as internal emergency contacts.

The primary means of communication between vehicles and the office is via mobile phone. The Beidou navigation system is used to track the progress of the transportation throughout the journey. There is also an emergency button in each driver's cab, which is connected to the Beidou navigation System. In the event of any emergency, the driver can press the button directly, and the employee in the control room of the Beidou navigation System will contact to initiate emergency response.

The **second driver** will contact the transport coordinator in the event of an emergency, and the coordinator will handle communication with the client (mine) and supplier/producer. There is a 24-hour manned contact centre that the drivers can contact to initiate emergency response. The contact details for the local police and fire authority are also available for the drivers.

Shuguang Transport periodically tests communication equipment to ensure it is functioning properly. Mobile (cell) phones are checked daily, and the Beidou tracking system is randomly tested across a selection of trucks to confirm it is operational. All mobile phone numbers are recorded in a contact register.

Shuguang Transport has assessed blackspots along its transport routes. There is good mobile coverage along current transport routes without blackouts according to interviews with personnel. Shuguang Transport has assessed blackspots along its transport routes. There is good mobile coverage along current transport routes without blackouts according to interviews with personnel.

Shuguang Transport has systems and procedures to track the progress of cyanide shipments. There are Beidou Navigation tracking systems installed on the vehicles, the Beidou system is linked to the province government tracking system and Shuguang Transport has its own tracking system that provides information on the vehicles performance including speed and fuel consumption.

The position the vehicles is tracked in real time and the transport coordinator also makes daily contact with the escorts. Shuguang Transport has implemented inventory controls to prevent the loss of cyanide during

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

shipment. Solid cyanide vehicle dispatch records list provide a register of cyanide delivered, the amount and client, scheduled and actual delivery. This register is based on the completed delivery sheets.

Each vehicle carries a delivery confirmation docket that includes date of vehicle, cargo, weight, unique seal number, signature of receiver (on arrival), sales and coordinator (on dispatch). Seals are applied to the ISO container or shipping container with unique serial numbers.

Shuguang Transport has procedures for Beidou GPS tracking and checking of physical security (seals) on the route to provide inventory control. Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets are available during transport.

A review of delivery documentation together with pre-departure security checks confirmed that the amount of cyanide on each vehicle is recorded. There is a copy of the emergency response plan with the MSDS booklet held within the cabin of each vehicle.

Shuguang does not contract other entities to conduct cyanide transportation.

3.2 Principle 2 | Interim Storage

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

3.2.1 Transport Practice 2.1

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

The operation is	☒ in full compliance with	Transport Practice 2.1
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.

3.3 Principle 3 | Emergency Response

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

3.3.1 Transport Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

The operation is

☒ in full compliance with

☐ in substantial compliance with

☐ not in compliance with

Transport Practice 3.1

Summarise the basis for this Finding/Deficiencies Identified:

The transporter has an Emergency Response Plan (ERP).

Emergency Response Plan for Solid Cyanide Transportation, includes the following information:

- Introduction
- Hazard and Risk Analysis
- Emergency Organization and Responsibility
- Emergency Protection System
- Accident Prevention and Reporting
- On-site Treatment Measures for Accidental Cyanide Spill
- Emergency Termination
- Accident Communication
- Emergency Support
- Emergency Security
- Emergency Response Capacity Assessment
- Emergency Mock Drills and update
- Rewards and Accountability
- Attachments (Emergency command system diagram, accident report flow chart, accident emergency treatment communicate information)

The ERP specifies the actions required by the Shuguang Transport personnel and external emergency responders in the event that an emergency occurs. A copy of the ERP is kept in each vehicle that is used to transport cyanide.

The Emergency Response Plans (ERPs) are appropriate for the transportation route, physical and chemical form of the cyanide, method of transportation (Vehicle transportation), transport infrastructure and Shuguang Transport does not have an interim storage facility.

Disposal Plan for Solid Cyanide Transportation Accidents includes details on the actions to be taken in the event of:

- Vehicle breakdown or traffic accident;
- Spill on parking lots;
- Spill in mountainous areas;

Anqing Shuguang Supply, Sales and Transportation Co., Ltd. Name of Operation	Signature of Lead Auditor	2026-06-09 Date
---	--	--

- Spill to river;
- Spill on the highways, road, freight station, bridge, port, tunnel and storage areas;
- Extreme weather accident;
- Riot and thievery incidents;
- Soil remediation process;
- Cyanide poisoning medical treatment;
- Fire disaster.

The ERPs detail the emergency numbers for Police, Fire Authority and Ambulance. The ERPs also include contact details for the hospitals along the route. The ERP response actions are based on the scenarios developed from the hazards identified through the route assessment process.

The requirement was verified through discussion with the EHS Manager and review of the ERP area of application and document review.

The Disposal Plan for Solid Cyanide Transportation Accidents does include descriptions of response action for the anticipated emergency situations. The ERP contains response actions for:

- Vehicle breakdown or traffic accident;
- Spill on parking lots;
- Spill in mountainous areas;
- Spill to river;
- Spill on the highways, road, freight station, bridge, port, tunnel and storage areas;
- Extreme weather accident;
- Riot and thievery incidents;
- Soil remediation process;
- Cyanide poisoning medical treatment.
- Fire disasters

The Disposal Plan for Solid Cyanide Transportation Accidents details the response for to a solid release and details the actions for of the driver and escort at the scene and the emergency response team depending, on the scale of the incident.

The Emergency Response Plan for Solid Cyanide Transportation does identify the roles of outside responders including Transport Police, Transportation Administration Authority, Fire Authority, Safety Supervision and Management Authority, Environmental Authority, and medical services. In the event of an incident the driver's first duty is to contact emergency services. The roles of the emergency services are detailed as follows:

- Transport Police are responsible for keeping the public away from the incident scene and traffic control.
- Transportation Administration Authorities are responsible for rescue.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

- The Fire Authority is responsible for rescue, clearing the scene and cleaning up spills. The Shuguang emergency response team would work with the Fire Authority in cleaning up cyanide.
- Safety Supervision and Management Authority is responsible for coordinate rescue, supervise the implementation of emergency rescue measures, participate in accident investigation and handling.
- Environmental Authority is responsible for control the accident site, prevent pollution from expanding, track the dynamic situation of pollution, and put forward suggestions for environmental restoration.
- Local hospitals and ambulance are responsible for treating cyanide exposure at the scene and in hospital.

3.3.2 Transport Practice 3.2

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

The operation is	☒ in full compliance with	Transport Practice 3.2
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

Shuguang Transport does provide initial and refresher emergency response training of appropriate personnel. Training is provided on a monthly basis and topics include:

- Driver briefing on cyanide transport controls
- Regulations on dangerous chemical transport
- Safety management system
- Duties and operations procedures
- Specification dangerous chemicals and personal protective equipment.
- Seasonal driving risks
- Firefighting knowledges
- Medical rescue knowledges (poisoning, chemical burnt, wound, heatstroke)
- Vehicles maintenance

A review of driver training files and the annual training plan confirmed that drivers received training in emergency response. Interviews with drivers confirmed that they have been trained in the emergency response procedures and were aware of the hazards posed by cyanide.

In addition to the transport company resources, the Shuguang Emergency Response Team that are part of parent company and production facility are available to assist. The production facility (Anhui Anqing Shuguang Chemical Co., Ltd.) is certified under the Code.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Shuguang Transport does provide descriptions of the specific emergency response duties and responsibilities of personnel. The duties of the two drivers includes:

- Calling the emergency services
- Clearing the public from the scene
- Contacting Shuguang Transport's control centre
- Administering first aid
- Assisting emergency services
- Responding, containing and cleaning up small scale spills (Level III incidents)

The Emergency Response Team (ERT) is deployed and will be on site to support emergency services in the event of an incident. The plan clearly outlines the responsibilities of the ERT, with government authorities also involved as required.

The Emergency Contact Centre is responsible for notifying the Managing Director, who assumes overall responsibility for liaising with government and other stakeholders.

There is a list of emergency response equipment that should be available during transport. The Emergency Response Equipment List in the ERP (within emergency rescue truck) includes: Wiring board (100m), warning sign belt (100m), submersible pump (with conduit), amyl nitrite nasal inhalation , sodium thiosulfate, goggles, arm-long plastic glove, anti-poison mask, shovel, adsorption pad, chemical protective cloth, plastic cloth, reflective vest, etc.

Equipment prepared in solid cyanide vehicle includes amyl nitrite nasal inhalation , arm-long plastic glove, goggles, anti-poison masks, adsorption pad, sodium thiosulfate, fire extinguishers, shovel, chemical protective cloth, plastic cloth, reflective vest, etc.

Driver's training on the administration and use of amyl nitrite nasal inhalation is organized and delivered by the Company's Occupational Health Management Personnel. The training programme includes mandatory pre-job training for all new employees prior to assignment to their duties, as well as annual refresher training for personnel during their employment.

A copy of the Cyanide Transport Accident and Response and Disposal Plan is kept in each vehicle that is used to transport cyanide. Shuguang Transport does have available the necessary emergency response and health and safety equipment, including personal protective equipment during transport.

There are procedures to inspect emergency response equipment to assure its availability when required. The inspections are completed during the pre-departure inspection and there is a checklist that details each item of emergency response equipment that is signed by the driver and safety supervisor. A review of completed checklists and interviews confirmed that procedures were in place and being followed.

There are procedures to inspect emergency response equipment and assure its availability when required. Shuguang Transport provides initial and periodic refresher training in emergency response procedures including implementation of the emergency response plan.

Shuguang Transport drivers attend training specifically for emergency response annually with the course run twice to capture the workforce as well as Zhenghua designated drivers. A review of driver training files

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

confirmed that drivers attended the training and that the training was conducted annually. In addition to the transport drivers, the emergency response team employed by Anhui Shuguang Chemical Co who are certified under the Code are available to attend to incidents.

Shuguang does not contract other entities to conduct cyanide transportation.

3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is	☒ in full compliance with	Transport Practice 3.3
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

There are procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities in case of an emergency. The contact information is provided within the ERPs and includes contact information for emergency services and hospitals along the route.

The drivers are responsible for contacting Shuguang control centre who will contact the Managing Director. The managing director is responsible for liaising with the government and other stakeholders including the mine and supplier. This escalation process together with contact details is provided in the ERPs. Personnel interviewed described the escalation process provided in the ERPs and contact numbers are updated during the annual route assessment process.

Systems and procedures are in place to ensure that internal and external emergency notification and reporting procedures are kept current. The ERPs are reviewed on annual basis and personnel interviewed confirmed that the contact details are checked as part of the review and updated as needed.

The operation has a procedure for notifying ICMI of any significant cyanide incident, which is detailed in *Emergency Response Plan for Solid Cyanide Transportation*. In case of relevant accidents, the deputy commander of the company's emergency headquarters shall contact the ICMI contact person of the company, who will report the relevant information of ICMI accidents.

3.3.4 Transport Practice 3.4

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

The operation is	☒ in full compliance with	Transport Practice 3.4
	☐ in substantial compliance with	
	☐ not in compliance with	

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Summarise the basis for this Finding/Deficiencies Identified:

There are procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. The ERPs detail the actions to be taken in the event of solid cyanide spill. The ERP provides that cyanide is to be collected and placed back into container or tanker and taken back to the production facility for disposal.

The ERPs describe neutralisation techniques using sodium thiosulfate for spills onto soils or ground. It provides the amount of sodium thiosulfate per metric tonne of spilt cyanide. All neutralised soil is to be excavated and taken back to the production facility for disposal.

The ERP 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. Section 6.4.7 of the Emergency Response Plan for Solid Cyanide Transportation states “In the emergency process, sodium hypochlorite, ferrous sulfate and hydrogen peroxide are strictly prohibited to treat the water and soil contaminated by the leakage of solid sodium cyanide”.

3.3.5 Transport Practice 3.5

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

The operation is	☒ in full compliance with	Transport Practice 3.5
	☐ in substantial compliance with	
	☐ not in compliance with	

Summarise the basis for this Finding/Deficiencies Identified:

There are provisions for periodically reviewing and evaluating the Plan’s adequacy and they are being implemented. The ERPs have been updated in 2025 and mock drills have been undertaken as planned over the three years period. The mock drill process includes a debrief process and review of what went well and opportunities to improve response.

Section 12.3 of Emergency Response Plan for Solid Cyanide Transportation requires annual review of the ERP, if any, for the applicable state and local laws, internal and/or external contact numbers, roles and responsibilities of the emergency response team, and any issues identified during the mock drills that requires updates for the ERP. The latest version of the ERPs reviewed at the time of the site visit was dated 30 June 2025.

There are provisions for periodically conducting mock emergency drills and they are implemented. The operation does conduct emergency response drills annually for both liquid and solid cyanide related scenarios for both worker exposure and environmental release. A review of mock drill reports and interviews confirmed that mock drills have been completed in accordance with commitments.

There is a procedure to evaluate the ERP’s performance after its implementation and revise if necessary. The ERP details that the plan will be updated after an incident or if there is a change in process or

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

equipment. Following the annual mock drill, a review of the ERP is undertaken and updated as required. There have been no incidents involving cyanide transport during the audit period.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

4. Important Information

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in **Appendix A** of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Appendix A – Important Information Relating to this Report

Anqing Shuguang Supply, Sales and Transportation Co., Ltd.

Name of Operation



Signature of Lead Auditor

2026-06-09

Date

Appendix A Important Information

The document ("Report") to which this page is attached and which this page forms a part of, has been issued by WSP Engineering Technology (Beijing) Co. Ltd. Shanghai Branch ("WSP") subject to the important limitations and other qualifications set out below.

This Report constitutes or is part of services ("Services") provided by WSP to its client ("Client") under and subject to a contract between WSP and its Client ("Contract"). The contents of this page are not intended to and do not alter WSP's obligations (including any limits on those obligations) to its Client under the Contract.

This Report is provided for use solely by WSP's Client and persons acting on the Client's behalf, such as its professional advisers. WSP is responsible only to its Client for this Report. WSP has no responsibility to any other person who relies or makes decisions based upon this Report or who makes any other use of this Report. WSP accepts no responsibility for any loss or damage suffered by any person other than its Client as a result of any reliance upon any part of this Report, decisions made based upon this Report or any other use of it.

This Report has been prepared in the context of the circumstances and purposes referred to in, or derived from, the Contract and WSP accepts no responsibility for use of the Report, in whole or in part, in any other context or circumstance or for any other purpose.

The scope of WSP's Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by WSP in regards to it.

At any location relevant to the Services conditions may exist which were not detected by WSP, in particular due to the specific scope of the investigation WSP has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

WSP accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. WSP has assumed that such information is correct unless otherwise stated and no responsibility is accepted by WSP for incomplete or inaccurate data supplied by its Client or any other person for whom WSP is not responsible. WSP has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to WSP.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed WSP to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by WSP or otherwise made available to WSP. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to WSP when the Services were performed and this Report was prepared. WSP has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

Where permitted by the Contract, WSP may have retained subconsultants affiliated with WSP to provide some or all of the Services. However, it is WSP which remains solely responsible for the Services and there is no legal recourse against any of WSP's affiliated companies or the employees, officers or directors of any of them.

By date, or revision, the Report supersedes any prior report or other document issued by WSP dealing with any matter that is in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to WSP for clarification.

wsp

