PT Trans Continent

Indonesia Supply Chain

International Cyanide Management Code

Transportation Recertification Audit

Summary Audit Report



10 September 2026

CYANIDE AUDIT SERVICES

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1. AUDIT DETAILS

1.1 Operation

Indonesia Supply Chain

1.2 Owner

PT Trans Continent

1.3 Operator

PT Trans Continent

1.4 Responsible Person

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1.7 Audit Dates

The audit was conducted from 11 to 12 May, 2026.

1.8 Description of Operations

PT Trans Continent (PTTC) Indonesia Supply Chain provides specialised logistics and transportation services for the distribution of solid sodium cyanide to gold mining operations in Indonesia. The supply chain comprises a combination of road and marine transportation activities. PTTC manages the land transportation segments using its own dedicated vehicles and trained drivers, while approved third-party shipping companies are used for the maritime transport portions of the routes.

The scope of this recertification covers the following three cyanide transportation supply chains:

- PT J Resources Bolaang Mongondow (JRBM) – Bakan Mine;
- PT Meares Soputan Mining (MSM) / PT Tambang Tondano Nusajaya (TTN); and
- PT Nusa Halmahera Minerals (NHM).

JRBM Supply Chain

For the JRBM supply chain, solid sodium cyanide is received at Terminal Petikemas Surabaya (TPS), Surabaya, and transported by PTTC-operated vehicles to Tanjung Perak Domestic Port. From Tanjung Perak, the cyanide containers are shipped to Bitung Port, North Sulawesi, aboard a commercial vessel operated by PT Tanto Intim Line. Following temporary storage within the designated dangerous goods area at Terminal Petikemas Bitung, PTTC assumes responsibility for the final transportation stage and delivers the cyanide by road to the JRBM Bakan mining operation in North Sulawesi.

MSM/TTN Supply Chain

The MSM/TTN supply chain follows a similar arrangement. PTTC transports cyanide containers from Terminal Petikemas Surabaya to Tanjung Perak Domestic Port using its own fleet and drivers. The containers are subsequently shipped by a PT Tanto Intim Line commercial cargo vessel to Bitung Port. After unloading and

storage in the designated dangerous goods area, PTTC undertakes the final road transport segment to the MSM and TTN mining operations located in North Sulawesi.

NHM Supply Chain

For the NHM supply chain, PTTC transports solid sodium cyanide from Terminal Petikemas Surabaya to Tanjung Perak Domestic Port. The containers are then shipped by commercial cargo vessel to Bitung Port, North Sulawesi. At Bitung Port, the containers are transferred to a Landing Craft Transport (LCT) vessel operated by either PT Karya Bahari Line and PT Christine Line for transport to Tanjung Barnabas Port in North Maluku.

PTTC's scope of responsibility for the NHM supply chain concludes at Tanjung Barnabas Port. The subsequent overland transportation of cyanide from Tanjung Barnabas Port to the Gosowong Mine is managed directly by PT Nusa Halmahera Minerals. Tanjung Barnabas Port and cyanide transport to the Gosowong Mine is therefore excluded from the scope of PTTC's Cyanide Code certification.

Since the previous audits, the only change to the supply chains have been the discontinuation of the use of Hacaca Logistics as a subcontractor for the road transportation segments between ports. These transport activities are now undertaken directly by PTTC using its own vehicles and drivers.

No other changes have been made to the transportation routes, logistics arrangements, or overall allocation of responsibilities within the three supply chains. Accordingly, the scope of this recertification remains substantially unchanged from that assessed during the previous certification cycle.

2. AUDITOR INFORMATION

2.1 Audit Company

Cyanide Audit Services
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2.2 Auditor

Lead Auditor and Technical Specialist – Rudi Seebach

2.3 Contact Details

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2.4 Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute (ICMI) and meet the applicable criteria established by the ICMI for Code Auditors.

I attest that this Audit Report accurately describes the findings of the recertification audit. I further attest that the audit was conducted in a professional manner in accordance with the International Cyanide Management Code's *Cyanide Transportation Verification Protocol (June 2021)* and using standard and accepted practices for health, safety and environmental audits.

PT Trans Continent Indonesia Supply Chain		10 September 2026
Operation	**Signature of Lead Auditor**	**Date**

3. AUDIT FINDING

The operation is:

- ☒ IN FULL COMPLIANCE
- ☐ IN SUBSTANTIAL COMPLIANCE
- ☐ NOT IN COMPLIANCE

With the International Cyanide Management Code.

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

4. TRANSPORT VERIFICATION PROTOCOL

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 minimise the potential for accidents and releases.

	☒ in full compliance with	
The operation is	☐ in substantial compliance with	Standard of Practice 1.1
	☐ not in compliance with	

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

The transporter has established procedures for selecting transport routes to minimise the likelihood of accidents and releases, and to reduce the potential consequences should such events occur.

The Route Assessment Procedure outlines the methodology for identifying and evaluating transport routes with the objective of reducing the potential for incidents. In determining the safest and most practical route, the procedure requires consideration of factors such as population density, the construction and condition of infrastructure including roadways, ports, carrier facilities, the pitch and grade of the route, and the prevalence and proximity of water bodies and fog.

PTTC has implemented a process for evaluating risks associated with its cyanide transportation routes and for applying controls to manage identified hazards. Route risk assessments are completed for all road transport segments used for cyanide shipments, and examples of these assessments were reviewed during the audit. Where higher-risk conditions are identified, PTTC implements additional mitigation measures to reduce the risks to an acceptable level. PTTC has established a process for the periodic review and reassessment of cyanide transport routes. In accordance with its Route Assessment Procedure, route evaluations are undertaken and updated on a regular basis, with the most recent route risk assessments dated 2025.

PTTC also reviews route selection and associated risk assessments whenever significant changes occur. Where changes arise during an active shipment, such as detours or road disruptions, an immediate assessment is undertaken by convoy personnel, including drivers, the Branch Manager and, where applicable, police escorts, to ensure that risks remain adequately controlled.

In addition, PTTC has established mechanisms for obtaining operational feedback on cyanide transport routes. Information gathered through these processes is used to review and, where necessary, revise route selection and associated risk assessments to address changing conditions. PTTC has also documented the controls implemented to address risks identified along selected transport routes. Route evaluation and selection are conducted through a structured risk assessment process. Identified mitigation measures are recorded within the risk assessment documentation.

Hazards, potential threats, control measures, are all captured in the route-specific risk assessments. This information is consolidated into a Driver's Brief, which is used during pre-departure toolbox meetings. PTTC engages with relevant stakeholders and, where necessary, village chiefs to inform them of the risks associated with cyanide transport and to obtain permission for access through their respective areas.

In addition, PTTC obtains permits from the Directorate General of Land Transportation, Ministry of Transportation, for the transport of cyanide. These permits are issued on a per-truck basis and specify the approved transportation route. PTTC has implemented additional security measures for the transport of cyanide. Shipments are conducted in convoy, with a police escort leading the convoy and the PTTC Branch Manager travelling at the rear in a support vehicle.

A PTTC rescue truck equipped with emergency response equipment accompanies the convoy to provide immediate support in the event of an incident. Additional controls include the use of sealed containers fitted with manufacturer seals to maintain product integrity and security throughout transit.

PTTC does not utilise road transport contractors, with all road transportation activities being undertaken using PTTC-operated vehicles and drivers. However, the PTTC Indonesia Supply Chain includes third-party marine carriers namely:

- PT Christine Line
- PT Karya Bahari Line
- PT Christine Line

As PTTC does not control the routes selected by these carriers, a due diligence review has been undertaken in accordance with the PTTC Due Diligence Procedure for each carrier involved in the supply chain to verify that they understand their responsibilities under the International Cyanide Management Code, are capable of fulfilling those responsibilities, and operate in accordance with the requirements of the Code.

Based on the outcomes of these due diligence reviews, PTTC concluded that the marine carriers engaged within the supply chain meet the applicable requirements of the Cyanide Code.

Standard of Practice 1.2

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.2, requiring that personnel operating cyanide handling and transport equipment are trained and competent to perform their duties with minimum risk to communities and the environment.

PTTC ensures that only trained, qualified, and appropriately licensed personnel are used to operate transport vehicles. Personnel involved in the transport of cyanide are trained to carry out their duties in a manner that minimises the risk of cyanide releases and exposure. This applies to all personnel operating transport equipment owned and operated by PTTC, which is limited to trucks used to transport pre-packaged cyanide sea containers. PTTC does not load or unload cyanide sea containers.

PTTC has developed and implemented a structured training programme for drivers and escort personnel. The programme defines the mandatory and recommended training requirements for all personnel involved in cyanide transport activities.

Training requirements are documented in the Training Matrix, and training records verified that the required training had been completed. In addition, all drivers are required to hold the appropriate driver's licence issued by the local Police Agency.

PTTC does not utilise road transport contractors, with all road transportation activities being undertaken using PTTC-operated vehicles and drivers. However, the PTTC Indonesia Supply Chain includes third-party marine carriers namely:

- PT Christine Line
- PT Karya Bahari Line
- PT Christine Line

The Supply Chain also includes the following port facilities:

- Terminal Petikemas Surabaya
- Tanjung Perak Domestic Port
- Bitung Port

Due diligence reviews have been undertaken in accordance with the PTTC Due Diligence Procedure for each marine carrier and port involved in the supply chain to verify that they understand their responsibilities under the International Cyanide Management Code, are capable of fulfilling those responsibilities, and operate in accordance with the requirements of the Code.

Based on the outcomes of these due diligence reviews, PTTC concluded that the marine carriers and port operations engaged within the supply chain meet the applicable requirements of the Cyanide Code including training in the International Maritime Dangerous Goods (IMDG) Code requirements.

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

PTTC ensures that only equipment designed and maintained to operate within its intended load limits is used for cyanide transport activities. PTTC maintains a Vehicle Register that documents the design specifications of all trucks and trailers used to transport cyanide.

The Vehicle Management Procedure defines the maintenance and servicing requirements for all vehicles and trailers used by PTTC. Under this procedure, the Transport Supervisor is responsible for maintaining a schedule of manufacturer-recommended servicing and ensuring that all vehicles and trailers are serviced accordingly.

Vehicle servicing is monitored through the Regular Truck Service Report, which identifies upcoming service due dates. Records of both scheduled and unscheduled maintenance activities are retained. Vehicle load-bearing testing is conducted every six months by the Directorate General of Land Transportation. Records of recent load-bearing tests were reviewed during the audit.

PTTC also requires drivers to complete a pre-start checklist before each trip to verify that vehicles and equipment are in a safe operating condition and to identify any maintenance requirements. The Vehicle Management Procedure requires truck drivers to complete a Pre-Start Checklist before using any vehicle. The checklist confirms that vehicles are in a safe operating condition and identifies any maintenance requirements.

The Pre-Start Checklist includes verification of the rated load capacity of the truck and trailer and a comparison with the planned load weight. This process ensures that transport vehicles are not overloaded during cyanide transport operations.

PTTC does not utilise road transport contractors, with all road transportation activities being undertaken using PTTC-operated vehicles and drivers. However, the PTTC Indonesia Supply Chain includes third-party marine carriers namely:

- PT Christine Line
- PT Karya Bahari Line
- PT Christine Line

The Supply Chain also includes the following port facilities:

- Terminal Petikemas Surabaya

- Tanjung Perak Domestic Port
- Bitung Port

Due diligence reviews have been undertaken in accordance with the PTTC Due Diligence Procedure for each marine carrier and port involved in the supply chain to verify that they understand their responsibilities under the International Cyanide Management Code, are capable of fulfilling those responsibilities, and operate in accordance with the requirements of the Code.

Based on the outcomes of these due diligence reviews, PTTC concluded that the marine carriers and port operations engaged within the supply chain meet the applicable requirements of the Cyanide Code, including the requirement to use transport equipment that is suitable for the safe transport of cyanide.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.4 requiring the operation to develop and implement a safety programme for transport of cyanide.

PTTC has established procedures to ensure cyanide is transported in a manner that preserves the integrity of the producer's packaging. Cyanide is packed in IBCs, which are placed inside shipping containers. These containers are padlocked upon dispatch remain secured until delivery to the client.

The Road Transport Procedure defines the controls and actions required for the safe transport of cyanide by road. It includes the requirement for completion of a Cyanide Pre-Delivery Checklist by the driver prior to dispatch that includes checks to ensure that the integrity of the cargo is maintained.

The operation uses placards or other signage to identify cyanide shipments in accordance with applicable local regulations and international standards. The Road Transport Procedure defines the controls and actions required for the safe transport of cyanide by road. It includes the requirement for completion of a Cyanide Pre-Delivery Checklist by the driver prior to dispatch that includes checks to ensure that the required placards and other signage is in place.

The transporter implements a safety program for cyanide transport as follow:

- Drivers are required to conduct pre-departure vehicle inspections.
- A preventive maintenance program is implemented to ensure vehicles remain fit for service.
- Driver hours are managed in accordance with the Transportation Procedure, which limits driving to a maximum of 12 hours per day and requires drivers to take a break every four hours. Driver hours are tracked using Maxfleet Pro, a GPS-enabled vehicle tracking system.
- Loads are secured in accordance with standard operating procedures. Containers are secured using twist locks, which are inspected prior to transport in accordance with the Cyanide Pre-delivery Checklist to verify that the load is properly secured.
- External factors, such as severe weather and civil unrest, are assessed by PTTC Branch Managers. Relevant information is communicated to convoys and individual vehicles as required. Where these conditions present an increased risk, transportation routes may be modified or deliveries suspended until it is safe to proceed.
- The PTTC Drug and Alcohol Policy prohibit the use of prohibited substances while at work. Prior to the commencement of each convoy, all drivers undergo alcohol testing to verify they are fit for duty before transport operations begin.
- Records demonstrating the implementation of these requirements are retained.

PTTC does not utilise road transport contractors, with all road transportation activities being undertaken using PTTC-operated vehicles and drivers. However, the PTTC Indonesia Supply Chain includes third-party marine carriers namely:

- PT Christine Line
- PT Karya Bahari Line
- PT Christine Line

Due diligence reviews have been undertaken in accordance with the PTTC Due Diligence Procedure for each marine carrier involved in the supply chain to verify that they understand their responsibilities under the International Cyanide Management Code, are capable of fulfilling those responsibilities, and operate in accordance with the requirements of the Code.

Based on the outcomes of these due diligence reviews, PTTC concluded that the marine carriers engaged within the supply chain meet the applicable requirements of the Cyanide Code, including the requirement to develop and implement a safety program for transport of cyanide.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is	☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 1.5

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea.

The PTTC Indonesia Supply Chain includes third-party marine carriers namely:

- PT Christine Line
- PT Karya Bahari Line
- PT Christine Line

Due diligence reviews have been undertaken in accordance with the PTTC Due Diligence Procedure for each marine carrier involved in the supply chain to verify that they understand their responsibilities under the International Cyanide Management Code, are capable of fulfilling those responsibilities, and operate in accordance with the requirements of the Code.

Based on these due diligence reviews, PTTC concluded that the marine carriers in the supply chain meet the applicable requirements for transporting cyanide by sea in compliance with the International Maritime Organization's (IMO) Dangerous Goods (DG) Code as follow:

- PTTC requires shipping declarations and dangerous goods certificates for cyanide cargo, confirming that shipments are packaged in accordance with Part 4 of the IMO DG Code and the applicable packaging instructions and provisions.
- PTTC verifies that containers are correctly marked and placarded during transport, including the Class 6 label, Marine Pollutant mark and UN No. 1689.
- The due diligence process includes verification that cyanide containers display the required Class 6 label, Marine Pollutant mark and UN No. 1689 in accordance with IMDG Code requirements.
- PTTC has a system for checking the placarding and integrity of containers during transport to verify compliance with IMDG Code requirements.
- Shipping declarations and dangerous goods certificates are required for all cyanide cargo prior to shipment.
- Container Packing Certificates are obtained and retained from the shipper in accordance with Section 5.4.2 of the IMDG Code.

- Ships carrying cyanide maintain a manifest or stowage plan identifying the presence and location of cyanide in accordance with Section 5.4.3.1 of the IMDG Code.
- The due diligence questionnaire confirms that vessels maintain an emergency response plan on board, stored separately from the cyanide, in accordance with SOLAS requirements and Section 5.4.3.2 of the IMDG Code.

The due diligence questionnaires confirms that vessels implement standardised stowage procedures for Category B dangerous goods, inspect stowage areas following unloading, separate cyanide from acids, and inspect cargo transport units for damage, leakage or sifting before loading, consistent with the stowage and segregation requirements of Part 7 of the IMDG Code.

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is	☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 1.6

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

Transport vehicles are equipped with communication systems that allow direct contact with PTTC, the mine site, the cyanide manufacturer, and emergency response personnel as described in the Transportation Procedure.

The convoy uses the following communication tools:

- Hands free mobile phones — carried by all drivers, subcontractors, escort units, police, and the emergency response team.
- Two-way radios — installed in all trucks, escort vehicles, and emergency response units.

Each truck carries an Emergency Contact List that includes the contact details for the client, the PTTC Control Centre, police, fire departments, ambulance services, and hospitals relevant to each location along the applicable transport route.

Before each convoy departs, all communication devices are tested, and the results are recorded on the Pre-Delivery Checklist.

PTTC has assessed communication coverage along its transport routes. Cellular network availability is evaluated during initial route assessments, and blackout zones are documented in the Route Risk Assessments and further communicated during drivers briefs. Drivers are instructed to rely on two-way radios when travelling through these areas and to report when entering and exiting blackout zones.

The PTTC Cargo Tracking Procedure describes how cargo movements are monitored. During sea transport, tracking is conducted through a combination of phone calls, emails, faxes, and chain-of-custody documentation. Various documents used by suppliers, shippers, subcontractors, and PTTC record container numbers, cargo details, and shipment information. On the road cargo is tracked through a GPS system. A Daily Report is prepared summarising cargo location, vessel details, and prevailing weather conditions.

PTTC implements inventory control measures and chain-of-custody documentation procedures to minimise the risk of cyanide loss during transport listed in the Cargo tracking procedure. Chain of custody records list cyanide received, delivered, the amount and client, scheduled and actual delivery. Seals are applied to the shipping container with unique serial numbers. PTTC has GPS tracking and checking of physical security (seals) on the route to provide inventory control.

Shipping documentation, including records of cyanide quantities being transported and the relevant Safety Data Sheets (SDS), accompanies the cargo throughout the entire transportation process. SDSs were present in the

transport vehicles reviewed during the audit sampling process. An Indonesian-language version of the SDS was kept in each truck and had been explained to drivers as part of cyanide handling and awareness training to support correct application and understanding.

PTTC does not utilise road transport contractors, with all road transportation activities being undertaken using PTTC-operated vehicles and drivers. However, the PTTC Indonesia Supply Chain includes third-party marine carriers namely:

- PT Christine Line
- PT Karya Bahari Line
- PT Christine Line

Due diligence reviews have been undertaken in accordance with the PTTC Due Diligence Procedure for each marine carrier involved in the supply chain to verify that they understand their responsibilities under the International Cyanide Management Code, are capable of fulfilling those responsibilities, and operate in accordance with the requirements of the Code.

Based on the outcomes of these due diligence reviews, PTTC concluded that the marine carriers engaged within the supply chain meet the applicable requirements of the Cyanide Code, including the means to track cyanide shipments to prevent losses during transport.

Principle 2 – Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Standard of Practice 2.1

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 2.1 that requires transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

PTTC does not own or operate any interim storage facilities. Interim storage is provided within the ports that form part of the PTTC supply chain and is operated by the respective Port Authority at each location. The PTTC supply chain includes the following port facilities:

- Terminal Petikemas Surabaya
- Tanjung Perak Domestic Port
- Bitung Port

Due diligence reviews have been undertaken in accordance with the PTTC Due Diligence Procedure for each port involved in the supply chain to verify that they understand their responsibilities under the International Cyanide Management Code, are capable of fulfilling those responsibilities, and operate in accordance with the requirements of the Code.

Based on the outcomes of these due diligence reviews, PTTC concluded that the port facilities engaged within the supply chain meet the applicable requirements of the Cyanide Code, including the requirement to display warning signs advising workers that cyanide is present, that smoking, open flames, eating and drinking are prohibited, and specifying the personal protective equipment that must be worn.

PTTC Due diligence reviews confirm that cyanide is stored inside locked containers within a fenced compound, secured with perimeter fencing and guards stationed at entry and exit points.

PTTC Due diligence reviews confirm that cyanide is kept separate from incompatible substances. All cyanide is packaged by a Code-certified manufacturer in IBCs and placed inside locked shipping containers.

No other materials are stored inside the containers or within the compound. Containers are positioned in an open yard with adequate spacing from buildings and other containers, allowing natural ventilation to minimise the risk of hydrogen cyanide accumulation.

PTTC Due diligence reviews confirm that cyanide containers are stored outdoors in designated DG storage areas operated by applicable Port Authority. The IBC packaging and enclosed container storage provide strong protection from weather exposure and ensure effective secondary containment.

PTTC Due diligence reviews confirm that systems and procedures are established to manage and contain spills equivalent to the volume of the largest single cyanide drum within the DG yard. Emergency response procedures for the Ports were also confirmed as part of the assessment.

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	☒ in full compliance with ☐ in substantial compliance with ☐ not in compliance with	Standard of Practice 3.1

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

The PTTC Indonesian Supply Chain has established an Emergency Response Plan (ERP) to address any incident involving cyanide during transport. This plan satisfies the requirements of Transport Practice 3.1, which calls for detailed procedures to manage potential cyanide releases.

The ERP is appropriate for:

a) The transportation route

The ERP is appropriate for the transportation route. It draws on the route evaluation and risk assessment methodology outlined in Transport Practice 1.1, which provides detailed information on the characteristics of each route and the hazards associated with them.

b) The physical and chemical form of the cyanide

The ERP is appropriate for the physical and chemical form of the cyanide. It addresses the physical and chemical hazards of solid sodium cyanide and specifies the controls required to manage these risks.

c) The method of transport

The ERP is appropriate for the method of transport. It has been developed for road transport by truck, and outlines actions to be taken in the event of an emergency involving solid sodium cyanide handled by PTTC or its subcontractors. It identifies the most credible emergency scenarios, including:

- Sodium cyanide spill in an interim storage area or during transport
- Sodium cyanide spill inside a freight container
- Sodium cyanide spill in wet conditions inside a storage area
- Sodium cyanide spill in wet conditions during transport
- Fire occurring near cyanide

The plan also includes the presence of police escorts and deployment of PTTC's Emergency Response Team, which accompanies convoys to ensure rapid intervention if needed.

d) The transport infrastructure

The ERP is appropriate for the transport infrastructure. It incorporates all relevant elements of the transport infrastructure, based on the route evaluation and risk assessment.

e) The design of the transport vehicle or interim storage facility

The ERP is appropriate for the design of the transport vehicle. It accounts for the design and configuration of the transport vehicles, having been developed specifically for the movement of solid cyanide using trucks and trailers with a 45-tonne capacity, fitted with twist-lock systems.

The ERP includes descriptions of response actions appropriate for the anticipated emergency situations. Clean-up and emergency response responsibilities lie with PTTC. The plan specifies the following response actions: alert control; clear the area of all unprotected personnel; stop the leak, if this can be done without risk; bund, contain and isolate the spill; and prevent loss to waterways.

Spilled material is to be absorbed with dry earth or sand, or neutralised with ferrous sulphate. Ferrous sulphate is used to neutralise cyanide as part of the treatment process. The ERP includes clear, structured response actions appropriate for the anticipated emergency scenarios involving solid sodium cyanide.

The ERP defines the responsibilities of external responders. It specifies the emergency roles of organisations such as fire department, local police, medical services, external chemist, environmental authority, supplier. External responders having specified roles been notified of their roles.

Standard of Practice 3.2

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.2 requiring that they designate appropriate response personnel and commit necessary resources for an emergency response.

PTTC delivers emergency response training to relevant personnel involved in cyanide transport operations. A training programme has been developed and implemented for drivers and escort staff, with requirements documented in the Emergency Response Plan (ERP). The programme is further reinforced through scheduled mock emergency drills, which provide practical training opportunities in incident response.

Training provided by PTTC includes both initial induction and annual cyanide courses covering cyanide awareness and emergency response procedures. The training programme applies to all personnel involved in cyanide transport activities and is recorded in the ERP, Training Matrix, and Training Register, which also include details such as trainee names, training dates, and refresher intervals.

Emergency response training records are maintained to demonstrate that personnel with emergency response responsibilities have been trained and are competent to respond to cyanide transportation emergencies. Training records include the name of the trainer, the training subject, the names of attendees, and the date of the training.

The Emergency Response Team Responsibilities and Duties Procedure define the specific emergency response duties and responsibilities of personnel. It states that the Emergency Response Team comprises trained PTTC personnel who escort cyanide convoys while they are under PTTC's control. The team is responsible for providing the initial ("first-strike") emergency response in the event of an incident.

PTTC maintains responsibility for emergency preparedness across all transport convoys, including the provision of appropriate emergency response equipment and personal protective equipment (PPE). Equipment lists and PPE requirements are documented within the Emergency Response Equipment Inspection, Maintenance and Verification Procedure and verified through inspection checklists that confirm availability and functionality.

PTTC does not utilise road transport contractors, with all road transportation activities being undertaken using PTTC-operated vehicles and drivers. However, the PTTC Indonesia Supply Chain includes third-party marine carriers namely:

- PT Christine Line
- PT Karya Bahari Line
- PT Christine Line

The Supply Chain also includes the following port facilities:

- Terminal Petikemas Surabaya
- Tanjung Perak Domestic Port
- Bitung Port

Due diligence reviews have been undertaken in accordance with the PTTC Due Diligence Procedure for each marine carrier and port involved in the supply chain to verify that they understand their responsibilities under the International Cyanide Management Code, are capable of fulfilling those responsibilities, and operate in accordance with the requirements of the Code.

Based on the outcomes of these due diligence reviews, PTTC concluded that the marine carriers and port operations engaged within the supply chain meet the applicable requirements of the Cyanide Code, including the requirement to designate appropriate response personnel and commit necessary resources for emergency response.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

PTTC has established an Emergency Contact List to ensure timely notification of relevant parties in the event of an emergency, including the shipper, consignee/receiver, external response organisations, potentially affected communities and medical facilities.

In addition, ERP, which is kept in all company vehicles, provides readily accessible emergency contact details and step-by-step guidance on required actions and notification procedures during an incident. Internal and external emergency contact numbers are also consolidated within the ERP.

PTTC has implemented the Periodic Review, Update and Verification of Emergency Response Contact Information Procedure to ensure emergency response contact information is maintained current and reliable. The procedure establishes a systematic process for periodically reviewing and updating emergency response contact directories, verifying the accuracy and availability of contact details, testing communication channels (including telephone, email and messaging), and documenting the results of each review together with any required corrective actions.

The ICMI Cyanide Incident Reporting Procedure establishes the process for notifying the ICMI of significant cyanide-related incidents in accordance with the requirements of the International Cyanide Management Code and the incident definitions published by the International Cyanide Management Institute (June 2021). Interviews with personnel confirmed that no incidents meeting the ICMI reporting criteria occurred during the audit period. Consequently, no notifications to the ICMI were required.

Standard of Practice 3.4

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

PTTC has established procedures for the remediation of cyanide spills, including the recovery or neutralisation of cyanide solutions and solids, decontamination of contaminated soil and other affected media, and the management and disposal of spill response waste.

The ERP provides guidance on cyanide spill response and remediation, including spill neutralisation, monitoring of affected areas following an incident, and criteria for determining when contaminated soil excavation is required. The procedure defines requirements for the excavation, handling and disposal of contaminated soil at a licensed B3 treatment or disposal facility, including the retention of disposal certificates.

It also requires verification of clean-up effectiveness before site reinstatement using clean, uncontaminated backfill from an approved source. The ERP is supported by a Remediation Sign-off – Contaminated Soil Incident Checklist to verify that remediation has been completed and documented.

The ERP also includes decontamination measures. These requirements are supported by emergency response training, annual mock drills incorporating spill response and remediation activities.

The ERP includes a clear restriction against the use of neutralising agents such as ferrous sulphate when cyanide is present in wet conditions or has entered natural surface water bodies.

Standard of Practice 3.5

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

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

Summarise the basis for this Finding/ Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.5 requiring the operation to periodically evaluate response procedures and capabilities and revise them as needed.

The ERP includes provisions for the periodic review and assessment of its adequacy. The Health, Safety, Environment and Community (HSEC) schedule outlines specific review requirements throughout the year, including an annual ERP review.

The ERP's document control section records publication dates, authorship, and revision numbers to maintain version traceability. Updates are made following any incident that activates the ERP, after significant operational changes, and after completion of mock drills.

Findings and recommendations from incident investigations are also incorporated into subsequent revisions of the plan. The document control section of the ERP shows regular revisions and updates within the audit period.

Provisions for emergency mock drills are included within the ERP, and these exercises are conducted on an annual basis to simulate response scenarios and test assigned roles and responsibilities. The drills simulate transport-related cyanide exposure and release incidents.

Emergency response drills are evaluated to determine whether response procedures are adequate, response equipment is appropriate, and personnel are properly trained. Documented evaluations are retained and used to identify opportunities for improvement and implement any necessary changes to emergency response procedures, equipment, or training.

The ERP requires post-incident evaluation and revision. During the audit period there had been no cyanide-related transport emergencies involving PTTC.

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