

SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.
2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.
3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.
4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

**International Cyanide Management Institute (ICMI)
888 16th Street, NW, Suite 303
Washington, DC 20006, USA**

5. The submittal must be accompanied with 1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and 2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.
6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.
7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.

SUMMARY AUDIT REPORT

Name of Cyanide Transportation Consignor: CyPlus GmbH _____
Name of Facility Owner: n.a. _____
Name of Facility Operator: n.a. _____
Name of Responsible Manager: Frank Harenburg (Vice President) _____
Address: Rodenbacher Chaussee 4, 63457 Hanau-Wolfgang _____
State/Province:- _____ Country: Germany _____
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frank.harenburg@cyplus.com

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Description of operation and of the Supply Chain #1 (Wesseling Plant to International Ports of Entry):

This audit of the cyanide supply chain #1 was ordered by the CyPlus GmbH company. Their headquarter is located at Hanau-Wolfgang in Germany. The production site of CyPlus is located in Wesseling/Germany. This site had been re-certified under the ICMC requirements in 2009. From Wesseling the cyanide is shipped to gold-mines all over the world.

The CyPlus company acts as a Consignor for cyanide transportations. The scope of the CyPlus consignment is covering different supply chains. This report is focussing on the Supply Chain #1: Wesseling Plant to International Ports of Entry. This includes truck and rail transport from production plant to port of departure, and ocean transport to ports of entry in various countries.

The specific scope of this audit was the transportation chain of solid sodium cyanide between the production site at Wesseling/Germany and the different ports worldwide (e.g. Santos/Brazil, Puerto Deseado/Argentina or Mazatlan/Mexico) from where the cyanide is transported to the goldmines. The transport within these different countries from port of entry to customer's mine site is not part of the scope.



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Based on this situation the transportation process is structured into the following elements:

- A) Generic Part 1: transportation between the CyPlus production site at Wesseling/Germany and the Container Terminal at Cologne-Niehl/Germany by road
- B) Generic Part 2: transportation between the Container Terminal at Cologne-Niehl/Germany and the Container Terminals at Bremerhaven/Germany or Hamburg/Germany by rail
- C) Specific Parts 1-x: shipment between the Container Terminals at Bremerhaven/Germany or Hamburg/Germany and the various ports of entry (e.g. Santos, Puerto Deseado or Mazatlan) by sea

The driving initiator of these activities is the CyPlus organization (a 100 % subsidiary of Evonik-Degussa GmbH) who is acting as a consignor. CyPlus corporation is the signatory company which is in the role of the ICM Code's Consignor. The organization is not active in transporting cyanide but is contracting the full transport service by Evonik Services. Each single transportation order is released by CyPlus and regulated by Evonik-Services GmbH. They appoint the forwarding company Leschaco (located in Bremen/Germany and Hamburg/Germany) as Lead Logistics Provider (LLP) for the entire Evonik group of companies. Leschaco puts the different ocean carriers (Mediterranean Shipping Company, Maersk or Hapag Lloyd) in charge to organize the complete transportation chain including the precarriage to the respective port of departure ("carrier's haulage"). At the end of this complex construction the single transportations are initiated by the consignor CyPlus in Hanau/Germany (headquarter) in close cooperation with their production facility in Wesseling/Germany. Evonik-Services GmbH, having the mandate of CyPlus for logistics services procurement and transportation safety, is responsible for negotiation of sea freight rates and the respective contraction of the ocean carriers and for the maintenance of the dangerous goods data in the IT system. The subcontractors acting in the precarriages mentioned under A) and B) (e.g. TFG Transfracht as a super operator for road and rail transportation or the terminal operating companies such as HHLA Container Terminals or Eurogate Terminals) are directly contracted by the respective ocean carrier. Representatives and managers of all these companies and organizations took part in the audit sequences which were constituted at the locations of operation. To verify the statements of the involved parties, complete consignments of sodium cyanide along the transportation chain from Wesseling to the various ports of entry were checked on the basis of documents, records and evidences.

The most important organizations which are involved in this Supply Chain #1 and their roles or functions are as follows:



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1) CyPlus GmbH, Hanau

CyPlus corporation is the signatory company which is in the role of the ICMI Code's Consignor. The organization is not active in transporting cyanide but is contracting the full transport service by Evonik Services.

2) CyPlus GmbH, Wesseling

The CyPlus site at Wesseling is the production plant of sodium cyanide. They pack the product into wooden IBC's and prepare them for shipping.

3) Evonik Degussa GmbH, Wesseling

The service organisation of Evonik Degussa at Wesseling site provides CyPlus with logistic and handling services such as control of trucks, preparing the transportation documents, loading or labelling of the containers.

4) Evonik Services GmbH, Hanau-Wolfgang

The technical procurement is purchasing transportation and logistic services from dedicated suppliers and is following strict defined processes to evaluate appropriate suppliers who are able to perform cyanide shipment under controlled conditions.

5) Lexzau, Scharbau GmbH & Co. KG (part of the Leschaco organization), Hamburg

Leschaco is the overall coordinator of transport services and has no operating activities.

6) TFG Transfracht Internationale Gesellschaft für kombinierten Güterverkehr mbH & Co. KG, Frankfurt

TFG is responsible for the inland transport (precarriage) between Wesseling production plant and the container terminal at Köln-Niehl by truck and the following rail transportation to the port terminals at Bremerhaven and Hamburg as well. TFG is selecting the trucking company (Spedition Frisch firm). Each single transport event in this field between Wesseling and the port terminals is running exclusively under the control of TFG.

7) Frisch Spedition und Transport GmbH & Co. KG, Cologne

Transport company Frisch is operating the truck transport of cyanide containers between the production plant at Wesseling, the interim facility at Talke and the inland container terminal at Köln-Niehl (Cologne-Niehl).

8) Alfred Talke GmbH & Co. KG, Hürth

Talke is providing a temporarily back-up loading and storage interim facility if necessary. The facilities had been audited by CyPlus and were object in this supply chain audit as well. Talke is well equipped.



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9) CTS Container-Terminal GmbH, Cologne

CTS is operating the inland container terminal at Köln(Cologne)-Niehl.

All above mentioned companies are generic involved in the supply chain #1 of cyanide to the international ports see generic parts 1 + 2 in the corresponding chapters 2.3 and 2.4). After arrival in the port terminals at Bremerhaven or Hamburg the specific parts of the transportation chain are following. With this report, the destinations at Santos, Puerto Deseado and Mazatlan are covered under this audit.

The organizations which are involved in the specific steps are:

10) Eurogate Container Terminal Hamburg GmbH

11) Eurogate Container Terminal Bremerhaven GmbH

Both Eurogate terminals are utilized by MSC to ship cyanide containers to Santos. They are organized as highly safe areas which are completely under control by the port police. The incoming containers are promptly transferred to the dedicated ocean vessels being booked.

12) MSC Mediterranean Shipping Company S.A. Geneva

MSC is operating the ocean shipment to the port of Santos. The MSC organization has implemented an international structured management system to regulate and to control the shipments of dangerous goods with high expertise, responsibility and experience.

13) NTB North Sea Terminal Bremerhaven GmbH & Co.

NTB terminal is utilized by Maersk to ship cyanide containers to Puerto Deseado. It is organized as a highly safe area which is completely under control by the port police. The incoming containers are promptly transferred to the dedicated ocean vessels being booked.

14) Maersk Deutschland A/S & Co. KG

Maersk is operating the ocean shipment to the port of Puerto Deseado. The Maersk organization has implemented an international structured management system to regulate and to control the shipments of dangerous goods with high expertise, responsibility and experience.

15) HHLA Container Terminal Burchardtkai GmbH

HHLA terminal is utilized by Hapag Lloyd to ship cyanide containers to Mazatlan. It is organized as a highly safe area which is completely under control by the port police. The incoming containers are promptly transferred to the dedicated ocean vessels being booked.



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16) Hapag Lloyd AG

Hapag Lloyd is operating the ocean shipment to the port of Mazatlan. The Hapag Lloyd organization has implemented an international structured management system to regulate and to control the shipments of dangerous goods with high expertise, responsibility and experience.

All relevant players and involved organizations had been inspected during the audit. Those assessments were covering visits at the locations (production site, interim storage area, inland terminal, Port terminals and administration offices of the ocean carriers as well), interviews with the involved partners and employees, inspections of IT systems and checks of documents.

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Auditor's Finding

This operation (Supply Chain #1) is

- in full compliance
- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

* For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company: DQS GmbH; August-Schanz-Str. 21; D-60433 Frankfurt/Main____
 Audit Team Leader: Dr. Klinken, Heinz Theo E-mail: okt.klinken@t-online.de
 Names and Signatures of Other Auditors: not applicable_____

 Date(s) of Audit: Nov, 17th – 19th, 2010; Jan 3rd – 5th, 2011 and Mar 25th – 27th, 2011 (documentation assessment)_____

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

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Quality Distribution Inc.
 Name of Facility



Signature of Lead Auditor

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A) Road Transportation:

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

Transport Practice 1.1: *Select cyanide transport routes to minimize the potential for accidents and releases.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The CyPlus organization (by means of the technical procurement of Evonik Services GmbH) is purchasing transportation and logistic services from dedicated suppliers. Especially the department "Category Transportation Safety" is following strict defined processes to evaluate appropriate suppliers who are able to perform cyanide shipment under controlled conditions. In this certain case of Supply Chain #1 the carriers such as MSC, Maersk and Hapag Lloyd are contracted by CyPlus as main suppliers. These ocean carriers are purchasing TFG as a subcontractor to transform the shipment to the German ports (Bremerhaven, Hamburg) as a carrier's haulage in compliance with the code.

The distance between the production plant of CyPlus at Wesseling and the CTS terminal at Cologne-Niehl is about 20 miles. The route runs through the greater area of Cologne city and is in a very good condition (paved highways, organized and controlled traffic system according to standard of well developed countries with corresponding infrastructure). The trucks are equipped with navigation system and digital control system. The routes are selected under the focus to avoid population density; they consider infrastructure, pitch and grade and the prevalence and proximity of water bodies and fog as well. In case of construction alternative routes will be calculated to manage the corresponding risks. As part of TFG's quality management system an extensive documentation has been established. In addition, appropriate procedures, working instructions or significant manuals are in place. In this specific case, infrastructural risks and problems which are caused by bad road conditions etc. are very rare. The designated route between the CyPlus manufacturing facility (certified to ICMC standards) and the CTS terminal follows the highway system in Germany. The local routes between the site and the terminal are approved for hazardous materials transportation. The drivers are mandatory trained for the transport of packaged dangerous goods, long-time experienced and they know the specific road conditions as well. Each transportation is supervised by satellite tracking system. Because of this additional safety and security measures, convoys or escorts, which both is fully unusual in Europe, are not needed. TFG is cooperating with the ICE (International Chemistry Environment) in Europe, which is supported by the CEFIC organization (European Chemical Industry Council).



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If emergency action needs to be taken by drivers when leaks, spills or fire occur during transport, the instruction given in the "Transport Emergency Card" (ADR "Instructions in writing") must be followed immediately. In this special case, the external responders such as the plant at Wesseling, the medical organization of Evonik-Degussa at Wesseling site, local fire-brigades (municipal fire-brigade of Wesseling) or the local hospitals are well informed about the handling and transportation of cyanide and the about potential risks of cyanide. TFG is coordinating and contracting external trucking companies. In this specific case, the road transportation from Wesseling to Cologne-Niehl is operated by Frisch company. TFG has elaborated a profile of requirements for subcontractors (dated on Jan 01st, 2009). This profile needs to be signed by TFG and subcontractor's company and is part of the contract.

In addition, the consignor CyPlus has implemented a Standard Operating Procedure (SOP) "Supervision – Internal Audits" to ensure that the procedures of the established system to manage cyanide shipments (as mentioned above) are reviewed at regular intervals.

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.

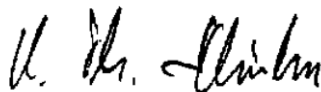
The operation is in full compliance with
 in substantial compliance with Transport Practice 1.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The TFG company only employs people who have a commercial driver license to operate its transport vehicles according to the law of Germany. The personnel are qualified and trained in an appropriate manner to fulfil the internal TFG and CyPlus safety requirements. To transport cyanide the drivers need to have a valid mandatory training certificate for the transport of packaged dangerous goods according to ADR. All drivers performing the corresponding Cyanide transportations between CyPlus manufacturing facility and the terminal are listed at TFG/Frisch. Their status of qualification and training scope is documented. For training reasons, charts or explanations of the Material Safety Data Sheets have been used. These statements are true for all contractors which are involved in the transportation process.

Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

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



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Summarize the basis for this Finding/Deficiencies Identified:

For packaging and transportation of cyanide standardized equipment is in use. This covers the packaging of the cyanide in wooden boxes as well as the overseas containers where those boxes are transported in. All the freight containers come from ocean carriers and they are specified especially for the use to transport packaged dangerous goods, such as sodium cyanide. Containers, chassis and trucks as well have to fulfil the requirements of the European legislation for handling and transporting cyanide. A transportation unit covers one overseas container that is packed with 20 IBC's containing 1.000 kg cyanide each. The gross weight is about 21.100 kg in accordance to the bill of lading. With respect on the electronic data base to select the equipment overloading is ruled out. To control the subcontractors like Frisch company TFG performs checks and audits in a regular manner.

Transport Practice 1.4: *Develop and implement a safety program for transport of cyanide.*

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

Summarize the basis for this Finding/Deficiencies Identified:

The freight containers which are used for the transportation of solid cyanide are usually in property of the ocean carriers. The wooden boxes which are used to pack the solid cyanide (together with PE inlining bags) are specified. Technical data and dimensions are well defined. They are classified and licensed for hazardous goods transportation according to UN registration. The drivers are to follow the established delivery procedures described in the requirements for transportation of dangerous goods to ensure the integrity of producer's packaging. The freight containers are sealed after loading; the seals are registered on the transportation documents. Due to this fact the drivers will not come into contact with the wooden boxes nor with the product. Vehicle inspections prior to each departure are performed according to the Evonik and TFG procedures for dangerous goods transportation. The depending trucks are checked first when entering the Wesseling site and second before and after the loading process. The preventive maintenance program is well established and documented. The technical equipment (trucks etc.) undergoes different types of inspection (annual inspection) according to German law. The consumption of drugs or alcohol is strictly forbidden in accordance to the law and to the contracts with TFG. Records retention is ensured by software tools, electronic files or by paperwork in defined binders. These statements are true for all contractors which are involved in the transportation process.



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Transport Practice 1.5: *Follow international standards for transportation of cyanide by sea and air.*

The operation is in full compliance with
 in substantial compliance with Transport Practice 1.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The shipments of cyanide by sea are transported in compliance with the IMDG Code.

Transport Practice 1.6: *Track cyanide shipments to prevent losses during transport.*

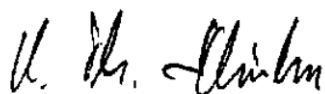
The operation is in full compliance with
 in substantial compliance with Transport Practice 1.6
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified: (Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice is mentioned in this report.)

All trucks / transporters are equipped with a satellite communication system. All drivers have cell phones and the relevant phone numbers are all available in different documents. In cases of breakdown of the satellite system drivers use their cell phones. There are different tools in place to control the inventory and the amount of cyanide during transportation. After finishing the loading process, the containers are to be sealed; the seal no. is documented on the transportation documents. The bill of lading indicates the amount of cyanide in transit with respect to the controlled weight of each 1.000 kg-box which are checked at the production facility. Material Safety Data Sheets are available and in place. These statements are true for all contractors which are involved in the transportation process.

2. INTERIM STORAGE: *Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.*

Transport Practice 2.1: *Store cyanide in a manner that minimizes the potential for accidental releases.*



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

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

In some few cases the cyanide boxes are stored temporarily in an interim warehouse at Cologne-Hürth (at the company Alfred Talke Logistic Services). The warehouse has the permit of the local authorities to store dangerous goods such as solid cyanide. It is one of the first warehouses in Germany to be certified according to packaging and warehouse regulations by SQAS (Safety and Quality Assessment System under control of CEFIC). The required warning signs were in place. Visitors and auditors as well need to wear personal protection equipment. One section of the warehouse has a specific permission to store cyanide. This section within the fenced area of the Talke facilities is locked and supervised by cameras. A gatekeeper is present on 24/7. This section is under roof; contact of the packed cyanide with water or other chemical materials is impossible. The Talke company has implemented an appropriate system to manage cases of emergency in close cooperation and with support of the CyPlus organization.

In cases of cyanide spill a corresponding information chain (internal and external communication to CyPlus) is organized and trained. The Talke employees are well informed about the risks in handling of cyanide; they are practicing emergency simulations with cyanide periodically. Spill equipment is in place.

3. EMERGENCY RESPONSE: *Protect communities and the environment through the development of emergency response strategies and capabilities*

Transport Practice 3.1: *Prepare detailed emergency response plans for potential cyanide releases.*

The operation is in full compliance with
 in substantial compliance with Transport Practice 3.1
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

There are several emergency response plans in place for potential cyanide releases. These instructions declare that the drivers have immediately to contact local authorities and advising the nature of the emergency and the material involved. The most important supporting organizations are CEFIC (European Chemical Industry Council) and the German Chemical Industry Association (VCI).



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The VCI has initiated all over Germany a system called TUIS (Transportation-Emergency-Information-and-Response-System). This emergency response system is available 24 hours on 365 days per year. Police, authorities, physical doctors or municipal fire-brigades are on duty as well. The drivers have information sheets and safety instructions onboard (with telephone numbers, name of contact persons etc.). All these documents support the driver to react in an appropriate manner in case of emergency. Due to the fact that the road distances between production plant, terminal and (in some cases) the external warehouse are very short the emergency response plan needs no specific regulations for different transportation routes. The design of the equipment is considered in the ERP's. The TUIS organization is well informed about this. The storage facility has its own emergency response planning. Response actions are defined considering the different anticipated emergency situations. The role of outside responders, medical facilities or communities are covered with respect to the virtual TUIS organization, being the national scheme of the European ICE system in Germany. The emergency hotline is published in different instructions and procedures. TUIS is essential for the success of the emergency response activities. TUIS has multilingual communication capabilities, is operational 24 hours at seven days per week and could record all communication related to an emergency event. The Evonik Degussa fire brigade is member of the TUIS organization and therefore will be contacted directly in case of any emergencies involving cyanides in Germany.

Transport 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 Transport Practice 3.2
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The transporter provides emergency response training on different levels. Knowledge and capability of the management is assured by training courses and practical exercises. In fact, all drivers hired by TFG and dealing with dangerous goods, have to pass the mandatory training for the transport of packaged dangerous goods according to the ADR and have to maintain the certificate, which has to be renewed every five years. This training covers emergency response activities. The descriptions of the specific emergency response duties are stated in the "Instruction in Writing" (transport emergency cards) in section 5.4.3 of the ADR regulations. All cyanide transportation trucks are equipped with a spill kit to respond to emergencies. All trucks are equipped with fire extinguisher, ladder or spill response material. Completeness is controlled in accordance to the daily driver vehicle inspection report or when entering the Wesseling site to assure its availability. These statements are true for all contractors which are involved in the transportation process.



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Transport Practice 3.3: *Develop procedures for internal and external emergency notification and reporting.*

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

Summarize the basis for this Finding/Deficiencies Identified:

There are different procedures and emergency response plans in place to regulate those cases. The internal procedures of TFG, Talke and CyPlus define the emergency response activities. These procedures refer among others to TUIS and CEFIC. Internal and external emergency notification as well as reporting procedures are included in the TUIS process. Internal emergency response plans are kept current by periodical checks

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
 in substantial compliance with Transport Practice 3.4

Summarize the basis for this Finding/Deficiencies Identified:

All remediation activities are done by external contractors but initiated and controlled by the local authorities. The remediation procedures for cyanide release are communicated to the external contractors that undertake the remediation activity. TUIS, Evonik and the contracted companies make sure that the right and correct steps and activities are done and that the authorities are involved. This includes that the response companies do not use any sodium hypochlorite, ferrous sulphate and hydrogen peroxide.

Transport 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 Transport Practice 3.5

Summarize the basis for this Finding/Deficiencies Identified:

The emergency response plans and the corresponding procedures are reviewed and evaluated periodically. Mock emergency drills are conducted all over the involved companies. Outdoor field tests are performed to train emergency response in specific cases (e.g. damage assessment etc.). Even the TUIS processes are trained and drilled periodically.



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B) Rail Transportation

After delivering the container by truck to the Cologne-Niehl terminal and checking the corresponding documents the container is lifted from the chassis onto the railroad car. It is not allowed to keep cyanide containers overnight. To handle leakages or spills in a safe manner a specific containment to rescue damaged containers is provided. The emergency response plan is available to the terminal operators.

The railway shipment to Bremerhaven or Hamburg terminal is provided by TFG Transfracht. The route of the train is following an elaborated schedule with dedicated passages and defined times. It is possible to monitor the exact route of the train when passing specific checkpoints. In cases of emergency the train conductor has to inform the next control room in charge; they will release the emergency response plan. In cooperation with police, fire-brigade and TUIS the emergency response plan should run according to schedule.

The information and response scheme in case of rail accidents with dangerous goods is determined per flowchart and is running through TUIS before informing the Evonik headquarter. All involved parties are trained well in a regular manner. The final destination of the rail transport (without any stopover) are the container terminals at Bremerhaven or Hamburg, respectively. The different terminal operating companies are dedicated terminals for the utilized shipping lines (MSC, Maersk, Hapag Lloyd). The container terminals at the ports of Bremerhaven and Hamburg are operating a full implemented management system.

The container terminals at Bremerhaven and Hamburg are operating in compliance with the ISPS-Code security regulations (International Ships and Port Security Code). Among others, the following security measures and proceedings are obligatory:


- Access control of terminal personnel (ID card, turnstiles)
- Control of the access points that are secured with fences, cameras, motion sensors
- Permanent monitoring of the terminal
- Monitoring staff has to check persons and inspect luggage and vehicles
- Staff members always wear personal protection equipment (safety helmet, safety jacket and safety shoes)
- All movements to and on the terminal without announcement are generally forbidden
- No access to the terminal, including the buildings
- Checking ship's personnel for identity and corresponding vessel.

C) Sea Transportation

a) The sea passage from Bremerhaven or Hamburg to Santos/Brazil is operated by the ocean carrier MSC. For this reason MSC has to fulfil different requirements which are based on international or maritime regulations to determine aspects such as the technical equipment of ships, the pollution of the sea or the packaging and stowing of dangerous goods. For example:

- ISPS Code (International Ships and Port Security Code)
- SOLAS (International Convention for the Safety of Life at Sea)
- MARPOL (International Convention for the Prevention of Pollution from Ships)
- IMDG Code (International Maritime Dangerous Goods Code)
- ISM Code (International Safety Management Code).

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The management of all these requirements are based on data control and operational control. In certain cases MSC is obtaining specific documents of compliance, e.g. to state that MSC has implemented a safety management system that complies with the requirements of the ISM code, issued under the provisions of the SOLAS convention (by RINA Registro Italiano Navale). Nevertheless, and in accordance to the remarks of the MSC management, the port of Santos is supposed to be in very good condition and well equipped to handle the containers with sodium cyanide.

The further transportation of this freight is not part of this audit.

b) The sea passage from Bremerhaven to Puerto Deseado is operated by the ocean carrier Maersk. For this reason Maersk has to fulfil different requirements which are based on international or maritime regulations to determine aspects such as the technical equipment of ships, the pollution of the sea or the packaging and stowing of dangerous goods. For example:

- ISPS Code (International Ships and Port Security Code)
- SOLAS (International Convention for the Safety of Life at Sea)
- MARPOL (International Convention for the Prevention of Pollution from Ships)
- IMDG Code (International Maritime Dangerous Goods Code)
- ISM Code (International Safety Management Code)

Maersk operates a container booking and tracking system (Global Customer Service System, GCSS). This is also the management tool for handling the dangerous goods cargo to control the stowage position of the hazardous goods containers. All of Maersk's vessels are registered by Lloyd's Register Group which provides classification and certification of ships. In the same manner Lloyd's inspects and approves important components and equipment of the vessels. Nevertheless, and in accordance to the remarks of the Maersk management, the port of Puerto Deseado is supposed to be in very good condition and well equipped to handle the containers with sodium cyanide.

The further transportation of this freight is not part of this audit.

c) The sea passage from Hamburg to Mazatlan/Mexico is operated by the ocean carrier Hapag Lloyd. For this reason Hapag Lloyd has to fulfil different requirements which are based on international or maritime regulations to determine aspects such as the technical equipment of ships, the pollution of the sea or the packaging and stowing of dangerous goods. For example:

- ISPS Code (International Ships and Port Security Code)
- SOLAS (International Convention for the Safety of Life at Sea)
- MARPOL (International Convention for the Prevention of Pollution from Ships)
- IMDG Code (International Maritime Dangerous Goods Code)
- ISM Code (International Safety Management Code)



CyPlus GmbH
Name of Consignor

Signature of Lead Auditor

Apr 10th, 2011
Date

SUMMARY AUDIT REPORT

Hapag Lloyd operates a container booking and tracking system (FIS, Freight Information System). This is also the management tool for handling the dangerous goods cargo to control the stowage position of the hazardous goods containers. FIS is running worldwide at all Hapag Lloyd offices and agencies as a unique system to control the processes; deviations are impossible, user authorization is defined. Nevertheless, and in accordance to the remarks of the Hapag Lloyd management, the port of Mazatlan is supposed to be in very good condition and well equipped to handle the containers with sodium cyanide. The further transportation of this freight is not part of this audit.

CyPlus GmbH
Name of Consignor

Signature of Lead Auditor

Apr 10th, 2011
Date