



SUMMARY AUDIT REPORT

International Cyanide Management Code

Australian Gold Reagents, Central and South American Supply Chain, Recertification Audit

Submitted to:

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

Darren Gould
Product Support and Logistics Specialist
Australian Gold Reagents

Email: darren.gould@agrcyanide.com

Submitted by:

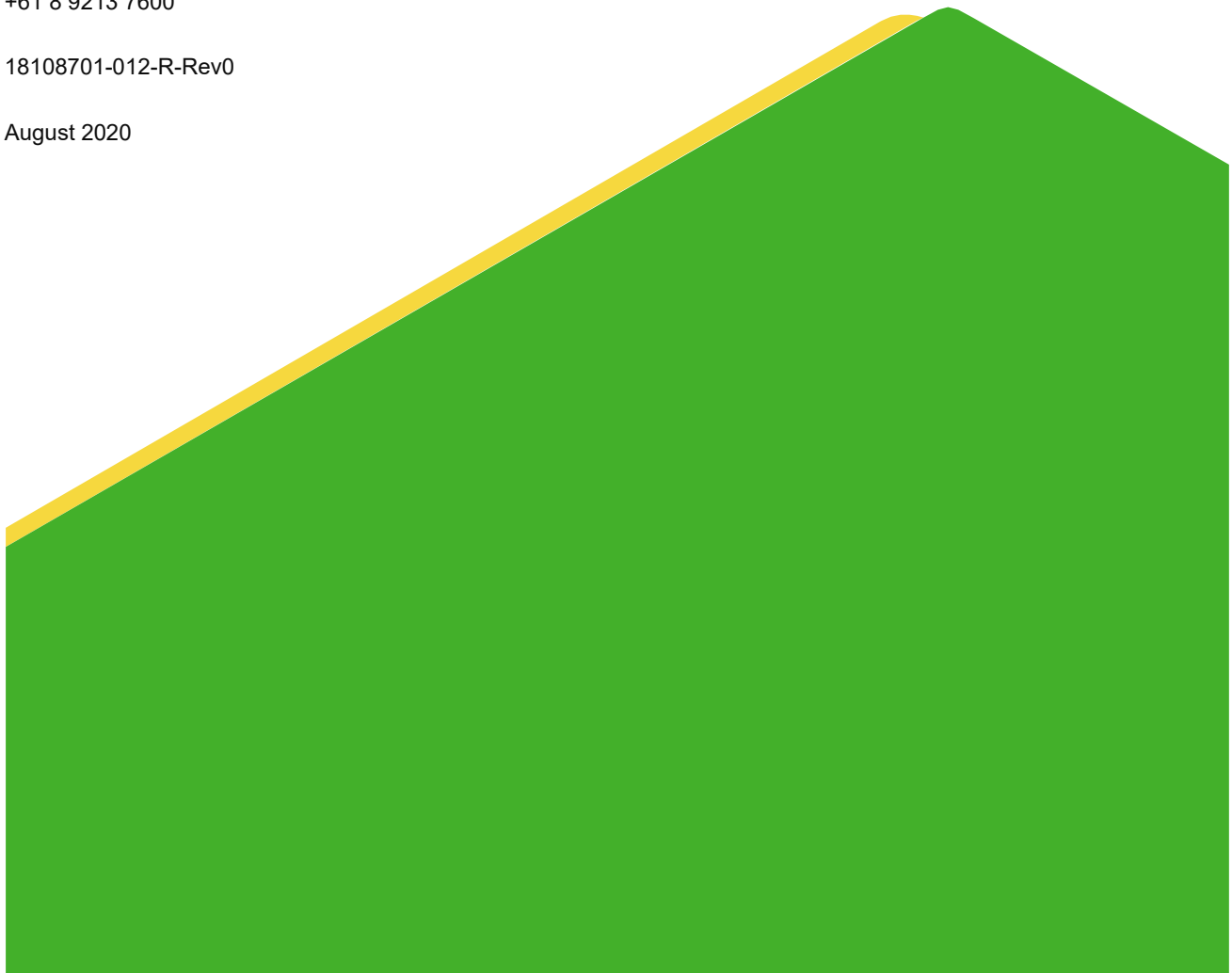
Golder Associates Pty Ltd

Level 3, 1 Havelock Street West Perth, Western Australia 6005 Australia

+61 8 9213 7600

18108701-012-R-Rev0

August 2020



Distribution List

1 copy – ICMI (+ electronic)

electronic copy – Australian Gold Reagents

electronic copy – Golder

Table of Contents

1.0 INTRODUCTION	1
1.1 Operational Information	1
2.0 CYANIDE TRANSPORTATION	1
2.1 Australian Gold Reagents Ltd	1
2.2 West Australian Supply Chain	1
2.3 Kwinana Production Facility	1
2.4 Ocean Freight Supply Chain	2
2.5 Central and South America Supply Chain	2
2.5.1 Ports	2
2.5.1.1 Port of Deseado, Argentina	2
2.5.1.2 Port of Coronel, Chile	3
2.5.1.3 Port of Santos, Brazil	3
2.5.1.4 Port of Punta Arenas, Chile	4
2.5.1.5 Port of San Antonio, Chile	4
2.5.1.6 Port of Rio Haina, Dominican Republic	5
2.5.1.7 Port of Callao, Peru	5
2.5.2 Road Transportation	5
2.5.2.1 Victor Mason Transportes Cruz del Sur, Argentina	5
2.5.2.2 Transportes Alvarez e Hijos SRL, Argentina	6
2.5.2.3 Transportes Niquini Ltd, Brazil	6
2.5.2.4 Marítima Dominicana, S.A.S, Dominican Republic	6
2.6 Transit Storage	6
2.7 Auditor's Findings and Attestation	6
2.8 Name and Signatures of Other Auditors	7
2.9 Dates of Audit	7
3.0 CONSIGNOR SUMMARY	8
3.1 Principle 1 – Transport	8
3.1.1 Transport Practice 1.1	8
3.1.2 Transport Practice 1.2	10
3.1.3 Transport Practice 1.3	11

3.1.4	Transport Practice 1.4.....	12
3.1.5	Transport Practice 1.5.....	13
3.1.6	Transport Practice 1.6.....	13
3.2	Principle 2 – Interim Storage.....	14
3.2.1	Transport Practice 2.1.....	14
3.3	Principle 3 – Emergency Response.....	16
3.3.1	Transport Practice 3.1.....	16
3.3.2	Transport Practice 3.2.....	17
3.3.3	Transport Practice 3.3.....	18
3.3.4	Transport Practice 3.4.....	19
3.3.5	Transport Practice 3.5.....	20
4.0	DUE DILIGENCE	21
4.1	Port of Deseado, Argentina.....	21
4.1.1	Summary of Port Operations	21
4.1.2	Transport Practice 1.1.....	22
4.1.3	Transport Practice 1.5.....	22
4.1.4	Transport Practice 1.6.....	22
4.1.5	Transport Practice 2.1.....	22
4.1.6	Auditor Conclusion	22
4.2	Port of Coronel, Chile.....	23
4.2.1	Summary of Port Operations	23
4.2.2	Transport Practice 1.1.....	23
4.2.3	Transport Practice 1.5.....	23
4.2.4	Transport Practice 1.6.....	24
4.2.5	Transport Practice 2.1.....	24
4.2.6	Auditor Conclusion	24
4.3	Port of Santos, Brazil	24
4.3.1	Summary of Port Operations	25
4.3.2	Transport Practice 1.1.....	25
4.3.3	Transport Practice 1.5.....	25
4.3.4	Transport Practice 1.6.....	26

4.3.5	Transport Practice 2.1	26
4.3.6	Auditor Conclusion	26
4.4	Puerto Arenas, Chile	26
4.4.1	Summary of Port Operations	27
4.4.2	Transport Practice 1.1	27
4.4.3	Transport Practice 1.5	27
4.4.4	Transport Practice 1.6	28
4.4.5	Transport Practice 2.1	28
4.4.6	Auditor Conclusion	28
4.5	Port of San Antonio, Chile	28
4.5.1	Summary of Port Operations	29
4.5.2	Transport Practice 1.1	29
4.5.3	Transport Practice 1.5	29
4.5.4	Transport Practice 1.6	30
4.5.5	Transport Practice 2.1	30
4.5.6	Auditor Conclusion	31
4.6	Port of Rio Haina, Dominican Republic	31
4.6.1	Summary of Port Operations	31
4.6.2	Transport Practice 1.1	32
4.6.3	Transport Practice 1.5	32
4.6.4	Transport Practice 1.6	32
4.6.5	Transport Practice 2.1	33
4.6.6	Auditor Conclusion	33
4.7	Port of Callao, Peru	33
4.7.1	Summary of Port Operations	33
4.7.2	Transport Practice 1.1	34
4.7.3	Transport Practice 1.5	34
4.7.4	Transport Practice 1.6	35
4.7.5	Transport Practice 2.1	35
4.7.6	Auditor Conclusion	35
5.0	REFERENCES	35

6.0 IMPORTANT INFORMATION.....36

APPENDICES

APPENDIX A
Important Information

1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Central and South American Supply Chain
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Australian Gold Reagents Pty Ltd
Name of Responsible Manager:	Darren Gould, Product Support & Logistics Specialist
Address:	Kwinana Beach Road, Kwinana
State/Province:	Western Australia, 6966
Country:	Australia
Telephone:	+61 (8) 9411 8875
Email:	darren.gould@agrcyanide.com

2.0 CYANIDE TRANSPORTATION

2.1 Australian Gold Reagents Ltd

Australian Gold Reagents Ltd (AGR) is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd (Coogee Chemicals). CSBP, a subsidiary of Wesfarmers Ltd, is the major participant in the venture and acts as both plant operator and sales agent. Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

AGR, in its capacity as the sales agent, is the consigner and is responsible for the overall management of the cyanide transportation activities.

2.2 West Australian Supply Chain

AGR's West Australian supply chain is from the Kwinana production facility, using rail and road transport to end user mine sites in Western Australia; as well as road transport to Fremantle Port for export supply. For export product this supply chain is up to and includes the stevedore operation at Fremantle Port.


AGR's West Australian Supply Chain was re-certified as being in full compliance with the Code on 15 November 2019. The West Australian Supply Chain is not part of the scope of this audit.

2.3 Kwinana Production Facility

The AGR cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, some 40 km south of Perth within the state of Western Australia. AGR produces and transports two different forms of cyanide from the Kwinana production facility, namely solution and solids. Cyanide solution is produced as a 30% strength liquid and solid cyanide as a >97% strength white briquette.

The production facility was re-certified as being in full compliance with the Code on 3 August 2017 and the recertification audit was undertaken in March 2020 within the three-year audit period.

AGRC
 AGR Central and South American supply chain
 Name of Facility


 Signature of Lead Auditor

August 2020
 Date

2.4 Ocean Freight Supply Chain

The scope of AGR's Ocean Freight supply chain includes the marine transportation of solid cyanide (in intermediate bulk containers (IBCs) within shipping containers) from the Fremantle Port, Western Australia, to various interstate and international Ports. The carriers used are the Mediterranean Shipping Company (Aust) Pty Ltd (MSC), Maersk Australia Pty Ltd (Maersk) and Kawasaki Kisen Kaisha Ltd (K Line).

The carriers' roles within AGR's cyanide distribution network, or the Ocean Freight Supply Chain itself, are not part of the scope of this audit.

2.5 Central and South America Supply Chain

AGR's Central and South America supply chain covers the land-based transportation of AGR's solid cyanide from the ports in Argentina, Brazil, Chile, the Dominican Republic, and Peru to end point users. Within the Central and South America supply chain ICMC-certified road transportation companies are used and current operators include Victor Mason (Victor), Transportes Alvarez (Alvarez), Marítima Dominicana (Mardom), and Transportes Niquini (Niquini) are contracted to transport solid cyanide by road.

The Port of Rio Haina, and transporters Mardom were added to the supply chain later during the audit period the amendment is captured through this recertification audit. Alvarez is a new transporter and is yet to be used by AGR.

Zetramsa, Minería y Construcción and CITSSA Logistics were include in the previous supply chain certification but are no longer used by AGR and were not used by AGR during the audit period. The Port of Buenos Aires (Argentina) was not used during the audit period and is no longer used by AGR.

2.5.1 Ports


The international sales and exports of cyanide, by AGR, take into consideration the ports and their extended infrastructure available to service the intended target area. AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from point of origin to destination. Each port is selected on the basis that it is the closest port to the customer and that it meets all reasonable industry standards for safety, security, and emergency response.

2.5.1.1 Port of Deseado, Argentina

Puerto Deseado is the main Container Port servicing the Santa Cruz province; AGR has the ability to ship to Puerto Deseado utilising the shipping company Maersk Shipping for the shipment of product from Fremantle in Western Australia. There are no other container terminal ports in the Santa Cruz province, as such Puerto Deseado is the only port available to AGR for transport of their product.

The Port is administered by the Santa Cruz Port Executing Unit and is owned by the province of Santa Cruz. The Port is a public use port and is primarily a fishing port serviced by a wharf as opposed to a container terminal and its associated facilities. The Santa Cruz Port Executing Unit oversees the safe navigation of shipping in the local water. They also oversee, with the support of the vessels captain and crew, mining company safety personnel and transport company, the operation of all Port operations.

The sodium cyanide containers arrive on self-geared vessels at the port of Puerto Deseado. Self-geared vessels are equipped with ships derricks (cranes) for unloading and loading containers on the vessel. These derricks are operated by the vessel's crew.

-		
AGR Central and South American supply chain	Signature of Lead Auditor	August 2020
Name of Facility		Date

The vessel's crew utilising the derricks will only unload when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers. The port has no onshore laydown or storage areas for handling dangerous goods. Due to the sensitivities of the fishing industry, no dangerous goods are allowed to be stored or containers stacked on the wharf.

Customs clearance is processed before the arrival of the vessel to allow for the direct unloading of the vessel onto vehicles. Once loaded on the road transport vehicles, the containers are checked against the shipping manifest and customs clearance documents. On completion of the checks the containers are allowed to depart the port for the road transport to the mine site.

2.5.1.2 Port of Coronel, Chile

The Port of Puerto Coronel is a consortium of companies known as Compañía de Puerto Coronel SA., a company of the Ultramar Group. Puerto Coronel is a natural port in the BioBio Region south of Concepcion, in the south-centre of Chile. It is connected to the north and south of Chile by railroad and road (Route 5). Pino Hachado is the closest crossing to Argentina.

Puerto de Coronel is a multipurposed terminal with world class installations serving three business areas: Containers, General Cargo, and Bulk Cargo and accepts dangerous goods. Puerto Coronel is in the second urban and industrial centre of the country, south of Concepcion, 500 km south of the national Chile capital, Santiago. The Port container terminal opened in 2009.

The port has container handling equipment including 50 tonne gantry cranes (2 of), 50 tonne mobile cranes (2 of), 2 fixed 50 tonne cranes, and numerous forklifts, container handling chassis, and reach stackers. The Port allows the receipt and unloading of sodium cyanide containers directly to trucks that would take them to destination on land.

2.5.1.3 Port of Santos, Brazil

Santos Port is one of the main ports servicing Brazil; within the overall confines of the Port of Santos are many unloading terminals. AGR has the ability to ship to this port by utilising the Mediterranean Shipping Company for the shipment of product from Fremantle Western Australia and the shipping line's service through to Santos Port and the unloading terminal of Brasil Terminal Portuario (BTP). The terminal allows unloading of the shipments of containers and the subsequent road transport section to the customers' mines.

BTP is a joint venture between APM terminals and Terminal Investment Limited; both companies are leaders in the global market for handling of containers. Operations commenced in 2013. The BTP terminal is strategically located on the right bank of the port of Santos and is the closest terminal to the Anchieta Highway, one of the main highways in Brazil.

The port has container handling equipment including eight portainer cranes of 80 tonne capacity and 21 rubber-tyred gantry cranes of 50-tonne capacity. BTP has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking containers.

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

2.5.1.4 Port of Punta Arenas, Chile

The Port of Punta Arenas is located in Southern Chile, in the XII Region in the border of Magellan Straits.

AGR has the ability to ship to this port by utilising the Maersk Shipping Line and/or Mediterranean Shipping Line and/or any other shipping company approved by AGR through their International Cyanide Management Institute (ICMI)-accredited Ocean Freight Supply Chain certification for the shipment of product from Fremantle Western Australia and the shipping line’s service through to Punta Arenas. The Port allows unloading of the shipments of containers and the subsequent road transport section crossing the Chile/Argentine border to mine sites in Southern Argentina.

The Port of Punta Arenas is operated by Empresa Portuaria Austral, which is a Chilean Government Enterprise. The Mardones Terminal has three berthing areas with a total of 336 m length, a draft of 14 m, which primarily receives container vessels and fishing ships.

Containers of cyanide are unloaded from incoming self-geared vessels for direct discharge onto trucks which then immediately leave the port.

2.5.1.5 Port of San Antonio, Chile

San Antonio is Chile’s largest port and the busiest port on South America’s west coast. Located on the shores of central Chile, it is nearest the country’s capital, Santiago. Puerto San Antonio covers 495 hectares, including 353 hectares of water and 142 hectares of land. Maximum depth of its waters is 23 m in the access channel and nine (9) metres in the container terminal. Puerto San Antonio has excellent access to roads and rail to Santiago, southern Chile, and Argentina. It is connected to Santiago by the Freeway of the Sun, a high-speed highway.

Inner Puerto San Antonio contains four terminals including the Terminal Multioperado, which contains four wharves for handling solid and liquid bulks, containerised cargo, and loose cargo. Approximately twenty companies and 14 shipping agencies use this terminal. It offers over 200 reefer connections for containerised cargo, direct rail access, and six hectares of storage areas.

San Terminal Antonio International (STI) operates the South Molo Terminal, which specialises in handling containerised cargo. STI is 50% owned by the SAAM group. The terminal contains 31 hectares of paved storage for containerised and bulk cargoes and 11.000 m² of warehouses with 800 reefer connections. The terminal offers rail and road access and 24-hour security services.

DP World operates the Puerto Central Terminal (PCE) who bought the facility from Puertos y Logística S.A, or Pulogsa, in 2019. The terminal has two finger piers with six docking sites, 148,000 m² of warehouses, and more than 330,000 m² of paved yards for storage.

The vessels operated by MSC who handle AGR’s shipping requirements to Chile call both container terminals and utilise the services of both stevedoring companies STI and DP World for their unloading and stevedoring requirements. Both STI and DP World has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking containers.

AGR Central and South American supply chain
 Name of Facility


 Signature of Lead Auditor

August 2020
 Date

2.5.1.6 Port of Rio Haina, Dominican Republic

The Haina Port is one of the main Container Ports servicing the Dominican Republic; AGR has the ability to ship to Haina Port utilising the Mediterranean Shipping Company for the shipment of product from Fremantle in Western Australia. The alternative Port in the Dominican Republic is the Caucedo Port, this Port was not considered suitable as the road transport from the Port to the end user gold mine is longer and the route goes through the city area of Santo Domingo.

The Autoridad Portuaria Dominicana (Dominican Port Authority) oversees the operation of all Port operations in the Dominican Republic including the safe navigation of shipping in the Dominican Republic's water. Haina Port has one container terminal: Haina International Terminal (HIT).

Three Gantry cranes for loading and unloading containers on vessels. Each has a maximum lifting capacity of 48 metric tonnes. AGR containers are between 25 and 26 metric tonnes, therefore well within the operating limits of the cranes. Numerous reach stackers are available and are designed to handle the maximum weight for forty-foot containers of 44 metric tonnes; therefore, their capacity exceeds the required capacity to lift containers shipped by AGR.

The containers are accepted and stacked on the port in the designated space allocated by the HIT Terminal Planner. The containers can then be allocated and will then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork.

2.5.1.7 Port of Callao, Peru

The Port of Callao is Peru's main commercial seaport; AGR has the ability to ship to the Port of Callao utilising the Mediterranean Shipping Company (MSC), Maersk Shipping or Hamburg Sud (HSud) for the shipment of product from Fremantle in Western Australia. The Port of Callao is about 12 km from the capital city of Lima which is the location of the customer warehouse site.

Peru's National Port Authority (Spanish) (APN) governs all ports in Peru, including the Port of Callao. The Port of Callao has two container terminals; The North Pier (Muelle Norte), operated by APM and the South Pier (Muelle Sur), operated by DP World. Containers of cyanide are taken from the vessels and transported by terminal trucks to a designated dangerous goods area within the respective terminals. Containers of dangerous goods within these areas are segregated according to international DG segregation requirements.

The Port of Callao's South Pier container yard is equipped with six post-Panamax gantry cranes, 21 rubber tyred gantry cranes, 30 chassis and trailers, two reach stackers, and two empty container handlers. The terminal gate has six incoming lanes and four outgoing lanes for containers.

The Port of Callao's North Pier container yard is equipped with 12 electric Rubber-Tired Gantry (RTG) cranes and four Super Post-Panamax ship-to-shore (STS) cranes. The quay cranes can reach 23 containers wide and lift up to 100 tonnes.

2.5.2 Road Transportation

2.5.2.1 Victor Mason Transportes Cruz del Sur, Argentina

Victor Mason Transportes Cruz del Sur (Cruz del Sur) is an International Cyanide Management Code (ICMC)-certified transporter based in Argentina. AGR use Cruz del Sur to collect cyanide from ports and deliver directly to mine sites without secondary storage facilities. Cruz del Sur was originally certified in 2010 and was recertified on 10 March 2020.

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

2.5.2.2 Transportes Alvarez e Hijos SRL, Argentina

Transportes Alvarez e Hijos SRL (Alvarez) are an ICMC pre-operationally certified transporter based in Argentina. Alvarez were pre-operationally certified in November 2018 and are yet to complete their certification audit. AGR has not used Alavarez for the transport of cyanide.

2.5.2.3 Transportes Niquini Ltd, Brazil

Transportes Niquini (Niquini) is an ICMC-certified transporter based in Brazil. AGR use Niquini to collect cyanide from ports and deliver directly to mine sites without secondary storage facilities. Niquini was originally certified in 2009 and recertified on 13 June 2017. AGR has confirmation that Niquini has completed its recertification audit assessment in March 2020 and reports submitted to the IMCI for completeness review.

2.5.2.4 Marítima Dominicana, S.A.S, Dominican Republic

AGR added Maritima Dominicana (Mardom) to the Central and South American supply chain in January 2020 with transport operations commencing in February 2020. AGR uses Mardom for the transport of cyanide product from the Port of Haina to customers in the Dominican Republic. Mardom are an ICMC-certified transporter that were originally certified in January 2013 and recertified on 12 June 2019.

2.6 Transit Storage

The operation at CSBP is a manufacturing facility and the storage of solid and liquid cyanide prior to dispatch is covered under the Cyanide Production Verification Protocol.

Within the scope of this audit, transit storage is associated with port operations where containers of cyanide are removed from the vessels, temporarily stored, and then placed on road vehicles for the next part of the journey. These transit storage depots are managed by the relevant port authorities and due consideration of relevant protocol requirements has been made through the due diligence process.

There is no interim storage undertaken during road transport to the end user.

2.7 Auditor’s Findings and Attestation

in full compliance with

AGR is: in substantial compliance with

**The International
Cyanide Management Code**

not in compliance with


No significant cyanide exposures or releases were noted to have occurred during the previous three-year audit cycle.

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Mike Woods, Exemplar Global (113792)


Email: mwoods@golder.com.au

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

2.8 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		10 August 2020


2.9 Dates of Audit

The ICMC Recertification Audit was conducted over period 24-30 June 2020.

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 *Cyanide Transportation Verification Protocol for the International Cyanide Management Code* and using standard and accepted practices for health, safety, and environmental audits.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

3.0 CONSIGNOR SUMMARY

3.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

3.1.1 Transport Practice 1.1

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

AGR is in full compliance with **Transport Practice 1.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

AGR

AGR, through the use of ICMC-certified road carriers, has a process for the selection of transport routes that minimise the potential for accidents and releases or the potential impacts of accidents and releases.

AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

Selection is a three-stage process and, broadly, involves:

- 1) Identification of potential suitable carriers in the country of desired operation. It is generally not possible to call for tenders in the countries in which AGR operates and as such, AGR carry out due diligence of existing ICMI certified carriers or other approved dangerous goods transporters.
- 2) Following the identification of potential international carriers, AGR completes an assessment of whether the carriers satisfy AGR's minimum requirements for the transport of cyanide.
- 3) Prior to acceptance of the preferred international carrier, an overall risk assessment of the carrier is conducted. The outcome of the risk assessment is the generation of an overall risk rating for the international carrier, as either a Low, Medium or High risk carrier. The risk rating is used to determine the frequency and scope of ongoing audits and other reviews

The process outlined above is used to verify that:

- Suitable transport equipment that is fit for the purpose of transporting cyanide.
- A preventative maintenance programme in place for its transport equipment, and it can provide evidence to indicate that this preventative maintenance programme is adhered to.
- Complied with and continues to comply with, all statutory and legal requirements of the Relevant Country(s) in which they operate or through which they transport.

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

- Policies and procedures in place in relation to: emergency response, fatigue management, driver training and performance management; and drugs and alcohol, and can demonstrate adherence to them.
- A sound reputation and there is no evidence to suggest that the carrier is not in a sound financial position.

AGR implements a procedure to evaluate the risks of selected cyanide transport routes and takes the measures necessary to manage these risks.

A route review, from the port to the mine site(s), is undertaken as part of the international carrier risk assessment. This process involves representatives of both AGR and the international carrier driving the proposed route(s) and documenting the risks. Recommendations are then made as to route changes, additional safety controls or security considerations where necessary.

AGR requires subsequent route surveys on a routine basis according to the carrier's overall risk rating.

AGR conducts triennial due diligence assessments on ports used in the Supply Chain to identify potential risks.

Ports

The international sales and exports of cyanide by AGR take into consideration the ports and their extended infrastructure available to service the intended target area. The destination port is selected on the basis that it is the closest port to the customer and that it meets reasonable industry standards for safety, security, and emergency response.

The requirement to seek input from communities, other stakeholders, and applicable governmental agencies as necessary is not relevant to the port component of this Supply Chain.

Due diligence assessments of the ports used in the supply chain were completed by AGR (within their three-year cycle) and reviewed by Golder. Golder's assessments concluded that AGR's due diligence assessments have reasonably evaluated these facilities. The due diligence assessment did not identify additional management measures needed for the ports.

Road Transportation


AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

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.

AGR 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:

AGR is in FULL COMPLIANCE with Transport Practice 1.2 requiring personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

AGR

AGR, through the use of ICMC-certified road carriers, has a process in place for the use of only trained, qualified, and licensed operators in operating transport vehicles during the transportation of its cyanide.

AGR has undertaken audits of its supply chain carriers, and has monitoring systems in place to assess transporter's ongoing compliance with ICMI and AGR cyanide handling and transportation requirements.

AGR does subcontract the transport and handling of cyanide and has established procedures to ensure subcontractors meet the requirements of Transport Practice 1.2.

AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

Ports

AGR does not operate transport vehicles or equipment at port facilities used in its supply chain, operation is undertaken by the managing Port Authority or stevedoring service provider at the port.


The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with international and local regulations. Ports selected in the Supply Chain are located in International Maritime Organisation (IMO) member countries; member nations must ensure that ports comply with the requirements of the IMO Dangerous Goods (DG) Code 2018.

AGR conducts triennial due diligence assessments of port facilities used in the supply chain.

Road Transportation

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR Central and South American supply chain  August 2020
 Name of Facility Signature of Lead Auditor Date

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

AGR 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:

AGR is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

AGR

AGR does not directly operate transport vehicles, though through the use of ICMC-certified road carriers has a process in place requiring that only equipment designed and maintained to operate within the loads it will be handling is used.

AGR has monitoring systems in place to evaluate the transporter's compliance with the Code and AGR's requirements.

AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.

AGR's International Carrier Selection and Performance Management procedure provides the process for the selection of a new carrier, and once selected, their ongoing performance management.

Ports

Ports used by AGR have equipment operation and maintenance capabilities and procedures that are not dependent on AGR. The ability of the port facilities to operate safely, and their capability to handle dangerous goods is assessed during the due diligence process.


AGR conducts triennial due diligence assessments for ports used in its Supply Chain.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with AGR's requirements and relevant regulations.

Road Transportation

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.

-		August 2020
Name of Facility	Signature of Lead Auditor	Date

- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

AGR 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:

AGR is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

AGR

AGR has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. AGR's cyanide is packaged at its ICMC-certified production facility in Kwinana Western Australia, in accordance with the packaging and labelling requirements required by the political jurisdictions through which the load will pass. Individual IBCs are loaded into sea containers and which are sealed prior to departure from the facility.

The production facility was last fully recertified against the Code on 3 August 2017 and AGR has conducted the recertification audit assessment in March 2020.

AGR, through the use of ICMC-certified road carriers, has a process to ensure that cyanide is transported in a manner that maintains the integrity of the packaging. AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure International Carrier Selection and Performance Management.


Road Transportation

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

AGR Central and South American supply chain  August 2020
 Name of Facility Signature of Lead Auditor Date

3.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

in full compliance with

AGR is

in substantial compliance with

Transport Practice 1.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to AGR.

AGR does not and does not intend to transport consignments of cyanide by sea or air within the scope of this audit.

3.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

AGR is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

AGR

AGR, through the use of ICMC-certified road carriers, has a process in place to track cyanide shipments and prevent losses during transport. AGR has undertaken audits of the carriers to verify that tracking capabilities and suitable arrangements for response are in place.

Road Transportation

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

3.2 Principle 2 – Interim Storage

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

3.2.1 Transport Practice 2.1

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

in full compliance with

AGR is

in substantial compliance with

Transport Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AGR 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.

AGR

AGR does not operate trans-shipping or interim storage facilities within its Supply Chain, but circumstances may arise where trans-shipping of cyanide product is required. This involves unloading the cargo at a terminal facility, temporary set down and loading onto another vehicle for the continuation of the delivery.

AGR has no control over when and where this happens, but via the due diligence process has satisfied itself that the transshipment of product occurs in accordance with relevant legislation and complies with standards for the carriage of dangerous goods.

Within the scope of this audit, a trans-shipping depot and interim storage site is associated with the Port of Santos, Port of Rio Haina, and Port of San Antonio where containers of cyanide are removed from the vessels, temporarily stored and then placed on road vehicles for the next part of the journey. The transit storage depot is managed by the relevant port authority and due consideration of relevant protocol requirements has been made through the due diligence process.

For the ports of Punta Arenas, Puerto Coronel, Puerto Deseado, and Callao the normal operation is for the containers of cyanide to be unloaded from the vessels and loaded directly onto road transport trailers supplied by an ICMC-certified transporters for immediate transport from the Port.

Ports

Port of Santos

There is a dedicated dangerous goods storage area within the port has full CCTV coverage by the terminal operators in addition to monitoring cameras operated by the Customs Authorities. There is a dedicated fenced cyanide laydown area with bitumen surface at the port that has Emergency Information Panels indicate that cyanide is stored in the area.

Cyanide product remains in the IBC containers that were packed at the production facility. The IBCs remain within the locked and sealed shipping containers until they arrive at the destination mine. The cyanide packaging has a sealed plastic liner that stops the contact of product with moisture or humidity. Containers are stored on the port in open air allowing adequate ventilation.

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

The Port and BTP Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide.

Port of San Antonio

Both STI and DP World has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking containers.

Sodium cyanide is managed in accordance with the Stevedores policy and procedures. There is a dedicated fenced cyanide laydown area with bitumen surface at the port that has Emergency Information Panels indicate that cyanide is stored in the area.

Cyanide product remains in the IBC containers that were packed at the production facility. The IBCs remain within the locked and sealed shipping containers until they arrive at the destination mine. The cyanide packaging has a sealed plastic liner which stops the contact of product with moisture or humidity. Containers are stored on the port in open air allowing adequate ventilation.

The Stevedores Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide.

Port of Rio Haina

There is a dedicated fenced cyanide laydown area with bitumen surface at the port that has Emergency Information Panels indicate that cyanide is stored in the area. Rio Haina Port Authority and Customs surveillance cameras on HIT Wharf are monitored and independent from HIT Terminal cameras.

Cyanide product remains in the IBC containers that were packed at the production facility. The IBCs remain within the locked and sealed shipping containers until they arrive at the destination mine. The cyanide packaging has a sealed plastic liner which stops the contact of product with moisture or humidity.

Containers are stored on the port in open air allowing adequate ventilation. The Port and HIT Emergency Response processes includes neutralising agent processes for managing a potential spill of sodium cyanide.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

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.

AGR is in full compliance with **Transport Practice 3.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

AGR

AGR, through the use of ICMC-certified road carriers addresses the requirements to prepare detailed emergency response plans for potential cyanide releases.

AGR does not physically transport cyanide within the scope of this Supply Chain. AGR’s procedure International Carrier Selection and Performance Management details the characteristics that carriers must demonstrate in order for them to carry AGR’s product. AGR’s approach is to use ICMC-certified carriers.

Ports

AGR conducts triennial due diligence assessments on port facilities used in the Supply Chain, emergency response capabilities are assessed during this process.

The due diligence assessments found that the ports used by AGR are performing dangerous goods handling duties in accordance with international and local regulations. Ports selected in the Supply Chain are located in IMO member countries, member nations must ensure that ports comply with the requirements of the IMO DG Code.


The port due diligence reviews assess emergency response capabilities, identify emergency response plans and outline additional information specific to the emergency response infrastructure and resources located at each port.

Road Transportation

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR’s transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR’s transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR’s transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR Central and South American supply chain
 Name of Facility


 Signature of Lead Auditor

August 2020
 Date

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

3.3.2 Transport Practice 3.2

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

in full compliance with

AGR is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

AGR

AGR through the use of ICMC-certified road carriers does provide emergency response training of appropriate personnel. AGR does not physically transport cyanide within the scope of this Supply Chain. AGR's procedure *International Carrier Selection and Performance Management* details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.

Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the carriers.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving cyanide.

AGR has undertaken an audit of each of the carriers in the Supply Chain to satisfy themselves that the carriers are meeting AGR's requirements for the handling and transportation of cyanide, as provided in the procedure *International Carrier Selection and Performance Management*.

Ports

AGR conducts triennial due diligence assessments on port facilities used in the Supply Chain, emergency response capabilities are assessed during this process.

The due diligence assessments found that the ports used by AGR have appropriate emergency response capabilities to deal with potentially dangerous goods releases.

Individual port due diligences identify the emergency response plans and outline additional information specific to the emergency response infrastructure and resources located at each port.

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

Road Transportation

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

AGR is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

AGR

AGR, through the use of ICMC-certified road **carriers** addresses the requirements to develop procedures for internal and external emergency notification and reporting.

AGR does not physically transport cyanide within the scope of this Supply Chain. AGR's procedure International Carrier Selection and Performance Management details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.


Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the carriers.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving cyanide

Road Transport

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.

AGR Central and South American supply chain  August 2020
 Name of Facility Signature of Lead Auditor Date

- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

3.3.4 Transport Practice 3.4

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

AGR is in full compliance with **Transport Practice 3.4**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AGR 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.

AGR

AGR, through the use of ICMC-certified road carriers addresses the requirements to develop 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.

AGR does not physically transport cyanide within the scope of this audit. AGR's procedure *International Carrier Selection and Performance Management* details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.


Whilst AGR's product is being transported, emergency response is governed by the certified transporter's drivers. AGR conducts due diligence assessments and Cyanide Delivery Audits to verify that the shipments occur in accordance with relevant legislation and standards for the carriage of dangerous goods. The due diligences and audits have found that there were no issues of concern in regards to the management and handling of cyanide product by any of the carriers.

AGR retains a technical and advisory role in an emergency and may provide resources and personnel (depending on where an incident takes place) to assist emergency services in the response to an incident involving cyanide.

Road Transporters

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR Central and South American supply chain  August 2020
 Name of Facility Signature of Lead Auditor Date

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

3.3.5 Transport Practice 3.5

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

in full compliance with

AGR is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AGR is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

AGR

AGR, through the use of ICMC-certified road carriers addresses the requirements for provisions for periodically reviewing and evaluating the adequacy of emergency response documentation.

AGR does not physically transport cyanide within the scope of this audit. AGR's procedure *International Carrier Selection and Performance Management* details the characteristics that carriers must demonstrate in order for them to carry AGR's product. AGR's approach is to use ICMC-certified carriers.

Ports

AGR conducts triennial due diligence assessments on port facilities used in the Supply Chain; emergency response capabilities are assessed during this process.

The due diligence assessments found that the ports used by AGR have appropriate emergency response capabilities to deal with potential dangerous goods releases.

Individual port due diligences identify the emergency response plans and outline additional information specific to the emergency response infrastructure and resources located at each port.

Road Transport

AGR utilises ICMC-certified transporters for road transportation elements of its supply chain.

- Niquini, AGR's transporter based in Brazil was recertified on 13 June 2017 and has undertaken the recertification audit in March 2020.
- Cruz Del Sur, AGR's transporter based in Argentina, was recertified on 10 March 2020.
- Mardom, AGR's transporter based in the Dominican Republic, was recertified on 12 June 2019.

AGR has not used the following transporters at the time of this certification audit but they are included in the supply chain.

- Alvarez, a transporter based in Argentina, was pre-operationally certified in November 2018. AGR is monitoring their compliance status.

AGR Central and South American supply chain



August 2020

Name of Facility

Signature of Lead Auditor

Date

4.0 DUE DILIGENCE

4.1 Port of Deseado, Argentina

The Port of Deseado in Argentina is utilised as part of AGR's Central and South American Supply Chain. The due diligence of the port dated 20 December 2019 was prepared by AGR's Martin Maloney, Product Support and Logistics AGR and Lee Baker, Global Supply Chain Manager.

The due diligence reports were reviewed by Mike Woods of Golder during July 2020, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.1.1 Summary of Port Operations


Puerto Deseado is the main Container Port servicing the Santa Cruz province; AGR has the ability to ship to Puerto Deseado utilising the shipping company Maersk Shipping for the shipment of product from Fremantle in Western Australia. There are no other container terminal ports in the Santa Cruz province; as such, Puerto Deseado is the only port available to AGR for transport of their product.

The Port is administered by the Santa Cruz Port Executing Unit and is owned by the province of Santa Cruz. The Port is a public use port and is primarily a fishing port serviced by a wharf as opposed to a container terminal and its associated facilities. The Santa Cruz Port Executing Unit oversees the safe navigation of shipping in the local water. They also oversee, with the support of the vessels captain and crew, mining company safety personnel and transport company, the operation of all Port operations.

The sodium cyanide containers arrive on self-geared vessels at the port of Puerto Deseado. Self-geared vessels are equipped with ships derricks (cranes) for unloading and loading containers on the vessel. These derricks are operated by the vessel's crew.

The vessel's crew utilising the derricks will only unload when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers. The port has no onshore laydown or storage areas for handling dangerous goods. Due to the sensitivities of the fishing industry no dangerous goods are allowed to be stored or containers stacked on the wharf.

Customs clearance is processed before the arrival of the vessel to allow for the direct unloading of the vessel onto vehicles. Once loaded on the road transport vehicles, the containers are checked against the shipping manifest and customs clearance documents. On completion of the checks, the containers are allowed to depart the port for the road transport to the mine site.

: <u>AGR Central and South American supply chain</u> Name of Facility	 Signature of Lead Auditor	<u>August 2020</u> Date
---	--	----------------------------

4.1.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from Fremantle Port to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

Puerto Deseado has been chosen as the preferred port in Argentina as it is one of the country's main container ports and has all the standards and equipment expected of an international port. In addition, the location of Puerto Deseado means that the road transport to the mine is of the shortest route and is able to avoid the main centres and busier pathways of the cities.

4.1.3 Transport Practice 1.5

The due diligence notes that all goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide. This adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain.

AGR's solid cyanide is packaged in 1,000 kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20 foot general purpose shipping containers which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the International Convention for the Safety of Life at Sea (SOLAS) 74, Chapter VII, regulation 5 and the International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78, Annex III, regulation 4.

4.1.4 Transport Practice 1.6

Maersk Shipping utilises their in-house tracking system to monitor the progress of all containers from the loading port through the various transshipment ports until the final destination port. The vessel's Captain carries a Dangerous Goods manifest (including stowage plan) and Packing Certificates for each of the hazardous cargo transport units which is updated at each port visited.


4.1.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

4.1.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

4.2 Port of Coronel, Chile

The Port of Coronel in Chile is utilised as part of AGR's Central and South American Supply Chain. The due diligence of the port dated 12 February 2019 was prepared for AGR by Patricia Fuster and Cristina Couto. The due diligence was provided for Golder review by Darren Gould of AGR.

The due diligence reports were reviewed by Mike Woods of Golder during July 2020, who meets the ICM1 requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.2.1 Summary of Port Operations

The Port of Puerto Coronel is a consortium of companies known as Compañía de Puerto Coronel SA., a company of the Ultramar Group. Puerto Coronel is a natural port in the BioBio Region south of Concepcion, in the south-centre of Chile. It is connected to the north and south of Chile by railroad and road (Route 5). Pino Hachado is the closest crossing to Argentina.

Puerto de Coronel is a multipurposed terminal with world class installations serving three business areas: Containers, General Cargo, and Bulk Cargo and accepts dangerous goods. Puerto Coronel is in the second urban and industrial centre of the country, south of Concepcion, 500 km south of the national Chile capital, Santiago. The Port container terminal opened in 2009.

The port has container handling equipment including 50 tonne gantry cranes (2 of), 50 tonne mobile cranes (2 of), 2 fixed 50 tonne cranes, and numerous forklifts, container handling chassis, and reach stackers. The Port allows the receipt and unloading of sodium cyanide containers directly to trucks that would take them to destination on land.


4.2.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from Fremantle Port to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port, which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The Port of Coronel has been selected on the basis it provides and has all the standards and equipment expected of an international port and provides an alternative option for import of product into Argentina.

4.2.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

-		August 2020
Name of Facility	Signature of Lead Auditor	Date

AGR's solid cyanide is packaged in 1,000kg Intermediate Bulk Containers (IBC). For distribution in Australia and Internationally, the IBCs are packed in 20-foot general purpose shipping containers, which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.2.4 Transport Practice 1.6

Importer of the sodium cyanide is to ensure the road transport provider has the road transport equipment present at the Port when the vessel docks or is ready to unload the containers. Customs clearance is processed before the arrival of the vessel to allow for the direct unloading of the vessel onto vehicles that are provided by ICMC-certified transporters.

Once loaded on the road transport vehicles the containers are checked against the shipping manifest and customs clearance documents, on completion of the checks the containers can depart the Port for the road transport to the mine site.

4.2.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

4.2.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the rail operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.3 Port of Santos, Brazil


The Port of Santos in Brazil is utilised as part of AGR's Central and South American Supply Chain. The due diligence of the port dated August 2018 was conducted by AGR's Ed Beard Export Technical Manger.

The due diligence reports were reviewed by Mike Woods of Golder during July 2020, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

4.3.1 Summary of Port Operations

Santos Port is one of the main ports servicing Brazil; within the overall confines of the Port of Santos are many unloading terminals. AGR has the ability to ship to this port by utilising the Mediterranean Shipping Company for the shipment of product from Fremantle Western Australia and the shipping line's service through to Santos Port and the unloading terminal of Brasil Terminal Portuario (BTP). The terminal allows unloading of the shipments of containers and the subsequent road transport section to the customers mines.

BTP is a joint venture between APM terminals and Terminal Investment Limited both companies are leaders in the global market for handling of containers. Operations commenced in 2013. The BTP terminal is strategically located on the right bank of the port of Santos and is the closest terminal to the Anchieta Highway, one of the main highways in Brazil.

The port has container handling equipment including 8 portainer cranes of 80 tonne capacity and 21 rubber-tyred gantry cranes of 50 tonne capacity. BTP has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking containers.

4.3.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from Fremantle Port to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

Santos and BTP has been chosen as the preferred port in Brazil as it is the country's main container terminal and has all of the standards and equipment expected of a major international port. In addition, the location of Santos and BTP means that the road transport to the mine is best placed for access to the mines.

4.3.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000 kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20-foot general purpose shipping containers, which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

4.3.4 Transport Practice 1.6

The Terminal has a state-of-the art surveillance system ensuring the security of goods at all times including video cameras installed at strategic locations in the terminal which are monitored 24/7. BTP uses software that on receipt of the Bill of Lading/pre-receipt advice (PRA) information provides BTP knowledge of the shipment contents prior to the vessel arriving ensuring planning for unloading and storage can occur.

The containers are accepted and stacked on the port in the designated space allocated by the BTP Terminal Planner. Once the consignment is cleared through customs and a release certificate is issued for each container. BTP has a strict security process managing the transporter's vehicle entering the Terminal to collect a designated container. The transport company makes an appointment with BTP to collect containers from the port. Without this appointment the trucks cannot enter onto the port.

The containers can then be allocated and then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork. All through this process the containers are referenced by their individual numbers which are associated with the Bill of Lading and tracked through the online system.

Sodium Cyanide movements in Brazil are also monitored and permitted by the Brazilian military once all customs clearances are done and transport permits obtained the onward transport of the product is allowed.

4.3.5 Transport Practice 2.1

The storage, as well as control and planning of container loading and unloading, is conducted through a sophisticated logistic planning system. BTP has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking containers.

Sodium cyanide is managed in accordance with BTP policy and procedures and the cyanide laydown area currently used is segregated with a security fence and the laydown area is only used for cyanide. Emergency Information Panels indicate the cyanide laydown area. The due diligence provides that the laydown area is on bitumen surface and proven appropriate for large container forklifts and trucks. There were no signs of damage or cracks upon inspection.


4.3.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.4 Puerto Arenas, Chile

The Puerto Arena in Chile is utilised as part of AGR's Central and South American Supply Chain. The due diligence of the port dated 5 June 2020 was conducted by AGR's Darren Gould, Product Support & Logistics Specialist.

The due diligence reports were reviewed by Mike Woods of Golder during July 2020, who meets the ICMI requirements for Transport Technical Specialist.

-		
AGR Central and South American supply chain	Signature of Lead Auditor	August 2020
Name of Facility		Date

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.4.1 Summary of Port Operations

The Port of Punta Arenas is located in Southern Chile, in the XII Region in the border of Magellan Straits.

AGR has the ability to ship to this port by utilising the Maersk Shipping Line and/or Mediterranean Shipping Line and/or any other shipping company approved by AGR through their ICMI Accredited Ocean Freight Supply Chain certification for the shipment of product from Fremantle Western Australia and the shipping line's service through to Punta Arenas. The Port allows unloading of the shipments of containers and the subsequent road transport section crossing the Chile/Argentine border to mine sites in Southern Argentina.

The Port of Punta Arenas is operated by Empresa Portuaria Austral which is a Chilean Government Enterprise. The Mardones Terminal has three berthing areas with a total of 336 m length, a draft of 14 m, which primarily receives container vessels and fishing ships. Containers of cyanide are unloaded from incoming self-geared vessels for direct discharge onto trucks which then immediately leave the port.

4.4.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from Fremantle Port to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port, which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The Port of Puerto Arenas is selected on basis that the container terminal and suitable standards facilities for the import of containers and proximity for road transport to the mine.

4.4.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000 kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20-foot general purpose shipping containers, which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

When the vessel arrives at the port the Maersk or MSC operations staff give copies of the emergency information together with the Dangerous Goods manifest to the ship's Captain. This documentation is then provided to the Punta Arenas port authorities upon arrival.

Maersk and MSC also comply with storage requirements, the container booking and tracking system manages the stowage and separation positions of all dangerous goods containers on their vessels to ensure compliance with international regulations.

The consignments are discharged from the vessel straight onto trucks for delivery to the mine site(s)

4.4.4 Transport Practice 1.6

MSC and Maersk utilises their in-house tracking system to monitor the progress of all shipments from the initial port of loading, through the various transshipment ports, until the final destination port is reached. The Punta Arenas port authorities receive the vessels manifest which includes the containers for unloading and handling by them. Storage of containers does not occur at the port, as all containers are loaded directly from the ship onto the road transport vehicles. The trucks exit the port once loaded – these trucks are owned and tracked by Cruz del Sur who are an ICMC-certified transporter.

4.4.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

4.4.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.5 Port of San Antonio, Chile


The Port of San Antonio in Chile is utilised as part of AGR's Central and South American Supply Chain. The due diligence of the port dated June 2020 was conducted by AGR's Lee Baker, Global Supply Chain Manager.

The due diligence reports were reviewed by Mike Woods of Golder during July 2020, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

4.5.1 Summary of Port Operations

San Antonio is Chile's largest port and the busiest port on South America's west coast. Located on the shores of central Chile, it is nearest the country's capital, Santiago. Puerto San Antonio covers 495 hectares, including 353 hectares of water and 142 hectares of land. Maximum depth of its waters is 23 m in the access channel and nine (9) metres in the container terminal. Puerto San Antonio has excellent access to roads and rail to Santiago, southern Chile, and Argentina. It is connected to Santiago by the Freeway of the Sun, a high-speed highway.

Inner Puerto San Antonio contains four terminals including the Terminal Multioperado, which contains four wharves for handling solid and liquid bulks, containerised cargo, and loose cargo. Approximately twenty companies and 14 shipping agencies use this terminal. It offers over 200 reefer connections for containerised cargo, direct rail access, and six hectares of storage areas.

San Terminal Antonio International (STI) operates the South Molo Terminal, which specialises in handling containerised cargo. STI is 50% owned by the SAAM group. The terminal contains 31 hectares of paved storage for containerised and bulk cargoes and 11,000 m² of warehouses with 800 reefer connections. The terminal offers rail and road access and 24-hour security services.

DP World operates the Puerto Central Terminal (PCE) who bought the facility from Puertos y Logística S.A, or Pulogsa, in 2019. The terminal has two finger piers with six docking sites, 148,000 m² of warehouses and more than 330,000 m² of paved yards for storage.

The vessels operated by MSC who handle AGR's shipping requirements to Chile call both container terminals and utilise the services of both stevedoring companies STI and DP World for their unloading and stevedoring requirements. Both STI and DP World has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking containers

4.5.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from Fremantle Port to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port, which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

San Antonio port has been chosen as the preferred port in the region as it is the country's main container terminal and has all the standards and equipment expected of a major international port. In addition, the location of San Antonio means that the road transport to the mine is best placed for access to the relevant mines.

4.5.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000 kg Intermediate Bulk Containers (IBC). For distribution in Australia and Internationally, the IBCs are packed in 20 foot general purpose shipping containers, which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

–

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

The vessel's Captain carries a Dangerous Goods manifest (including stowage plan) and Packing Certificates for each of the hazardous cargo transport units, which is updated at each port visited. Either DP world or STI is provided a list of all containers that require lifting on or off the vessel. This list filters the cargo and details each of the hazardous cargoes handling and stowage requirements.

4.5.4 Transport Practice 1.6

The Terminal has a state-of-the art surveillance system ensuring the security of goods at all times including video cameras installed at strategic locations in the terminal which are monitored 24/7. The implementation of strict internal controls and a state-of-the art surveillance system contribute to the optimisation of operations and cargo security.

Both STI and DP World uses an electronic system that on receipt of the Bill of Lading/PRA information provides them knowledge of the shipment contents prior to the vessel arriving ensuring planning for unloading and storage can occur. The containers are accepted and stacked on the port in the designated space allocated by the Terminal Planner.

Once the consignment is cleared through customs and a release certificate is issued for each container. Both stevedores have a strict security process managing the transporter's vehicle entering the Terminal to collect a designated container. The transport company makes an appointment with either DP world or STI to collect containers from the respective terminal. Without this appointment allows the trucks cannot enter onto the terminal.


The containers can then be allocated and then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork. All through this process the containers are referenced by their individual numbers which are associated with the Bill of Lading and tracked through the online system.

4.5.5 Transport Practice 2.1

The short-term storage, as well as control and planning of container loading and unloading, is conducted through a sophisticated logistic planning system. Both STI and DP World has designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. They have an electronic system to manage segregation requirements for the product to ensure different dangerous goods are kept apart when stacking container.

Sodium cyanide is managed in accordance with the Stevedores policy and procedures and the cyanide laydown area currently used is segregated with a security fence and the laydown area is only used for cyanide.

Emergency Information Panels indicate the cyanide laydown area. Product remains in shipping containers ready for loading onto trucks for transport. Containers are stored on the port in open air allowing adequate ventilation.

-		
AGR Central and South American supply chain	Signature of Lead Auditor	August 2020
Name of Facility	Signature of Lead Auditor	Date

4.5.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.6 Port of Rio Haina, Dominican Republic

The Port of Rio Haina in the Dominican Republic is utilised as part of AGR's Central and South American Supply Chain. The due diligence of the port dated 14 October 2019 was conducted by AGR's Lee Baker, Global Supply Chain Manager and Peter Cooper, Export Manager.

The due diligence reports were reviewed by Mike Woods of Golder during July 2020, who meets the ICMI requirements for Transport Technical Specialist.

The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.6.1 Summary of Port Operations


The Haina Port is one of the main Container Ports servicing the Dominican Republic; AGR has the ability to ship to Haina Port utilising the Mediterranean Shipping Company for the shipment of product from Fremantle in Western Australia. The alternative Port in the Dominican Republic is the Caucedo Port; this Port was not considered suitable as the road transport from the Port to the end user gold mine is longer and the route goes through the city area of Santo Domingo.

The Autoridad Portuaria Dominicana (Dominican Port Authority) oversees the operation of all Port operations in the Dominican Republic including the safe navigation of shipping in the Dominican Republic's water. Haina Port has one container terminal: Haina International Terminal (HIT).

Three Gantry cranes for loading and unloading containers on vessels. Each has a maximum lifting capacity of 48 metric tonnes. AGR containers are between 25 and 26 metric tonnes, therefore well within the operating limits of the cranes. Numerous reach stackers are available and are designed to handle the maximum weight for forty-foot containers of 44 metric tonnes; therefore, their capacity exceeds the required capacity to lift containers shipped by AGR.

The containers are accepted and stacked on the port in the designated space allocated by the HIT Terminal Planner. The containers can then be allocated will then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

4.6.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from Fremantle Port to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port, which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The Haina Port is one of the main Container Ports servicing the Dominican Republic; AGR has the ability to ship to Haina Port utilising the Mediterranean Shipping Company for the shipment of product from Fremantle in Western Australia. The alternative Port in the Dominican Republic is the Caucedo Port; this Port is not selected as the road transport from the Port to the end user gold mine is longer and the route goes through the city area of Santo Domingo.

AGR contracts its shipping with MSC Shipping to the Dominican Republic Port of Haina. This is the preferred Port for dangerous goods container consignments for the Barrick Pueblo Viejo gold mine. The notification party on the shipping documents is MarDom, a significant shipping and clearing agent, distribution warehousing and transporter. The MarDom operations are nearby the HIT termina. The Haina Port is about 90 km from the end user mine site. The road route from the Port to the end user mine site is approved by the regulator.

4.6.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000 kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20-foot general purpose shipping containers, which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.


Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.6.4 Transport Practice 1.6

Once a consignment has been shipped from Fremantle Australia, the final documents are couriered as well as scanned and sent via email to MarDom. MarDom will then apply for the end users Import Permit and start the customs clearance.

HIT have software which on receipt of the Bill of Lading/PRA information providing HIT knowledge of the shipment contents prior to the vessel arriving ensuring planning for unloading and storage can occur. The transport company makes an appointment with HIT to collect containers from the port. Without this appointment the trucks cannot enter onto the port.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

The containers are accepted and stacked on the port in the designated space allocated by the HIT Terminal Planner. The containers can then be allocated will then be lifted from the stack by reach stacker and placed on the transport company truck according to the associated paperwork. All through this process the containers are referenced by their individual numbers which are associated with the Bill of Lading and tracked through the online system.

4.6.5 Transport Practice 2.1

Software programs (NAVIS) control container placement and movement; these software packages identify each individual container placement area in designated stacks. The input information for the placement of containers comes from the vessel's manifest. It is this program that allows container terminals to allocate dangerous goods storage areas, placement containers to ensure segregation requirements are met.

The cyanide laydown area currently used is segregated with a security fence and the laydown area is only used for cyanide. Emergency Information Panels indicate the cyanide laydown area. HIT policies dictate smoking, open flames and eating and drinking areas. Rio Haina Port Authority and Customs surveillance cameras on HIT Wharf are monitored and independent from HIT Terminal cameras.

4.6.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

4.7 Port of Callao, Peru

The Port of Callao in the Peru is utilised as part of AGR's Central and South American Supply Chain. The due diligence of the port dated 23 August 2018 was conducted by AGR's Ed Beard, Export Technical Manager.

The due diligence reports were reviewed by Mike Woods of Golder during July 2020, who meets the ICMI requirements for Transport Technical Specialist.


The following Code items were addressed within the due diligence report and a summary is provided below:

- Summary of Port operations
- Transport Practice 1.1
- Transport Practice 1.5
- Transport Practice 1.6
- Transport Practice 2.1.

4.7.1 Summary of Port Operations

The Port of Callao is Peru's main commercial seaport; AGR has the ability to ship to the Port of Callao utilising the Mediterranean Shipping Company (MSC), Maersk Shipping or Hamburg Sud (HSud) for the shipment of product from Fremantle in Western Australia. The Port of Callao is about 12 km from the capital city of Lima which is the location of the customer warehouse site.

AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

Peru's National Port Authority (Spanish) (APN) governs all ports in Peru, including the Port of Callao. The Port of Callao has two container terminals; The North Pier (Muelle Norte), operated by APM and the South Pier (Muelle Sur), operated by DP World. Containers of cyanide are taken from the vessels and transported by terminal trucks to a designated dangerous goods area within the respective terminals. Containers of dangerous goods within these areas are segregated according to international DG segregation requirements.

The Port of Callao's South Pier container yard is equipped with six post-Panamax gantry cranes, 21 rubber-tyred gantry cranes, 30 chassis and trailers, two reach stackers, and two empty container handlers. The terminal gate has six incoming lanes and four outgoing lanes for containers.

The Port of Callao's North Pier container yard is equipped with 12 electric Rubber-Tired Gantry (RTG) cranes and four Super Post-Panamax ship-to-shore (STS) cranes. The quay cranes can reach 23 containers wide and lift up to 100 tonnes.

4.7.2 Transport Practice 1.1

AGR only operates in export markets that are serviced by major international shipping companies with the ability to offer scheduled container services from Fremantle Port to the destination port for the country or continent. These shipping companies also provide the correct manifest documentation to the destination port, which provides them with a list of the cargo types and in the case of sodium cyanide and any other hazardous cargo the number and reference of the containers.

The Port of Callao has been chosen as the preferred port in Peru as it is the country's main container terminal and has all the standards and equipment expected of a major international port. In addition, the location of Callao means that the road transport to the customer warehouse is of the shortest distance and is able to avoid the main centre and busier pathways of the city.

Terminal operators have designated container handling equipment and planned laydown area for dangerous goods as well as general cargo. Terminal operators also do not mix different dangerous goods when stacking containers. The stevedoring activity is to remove the shipping containers from the vessel and place the shipping containers on the trucks for immediate removal from the port area. The vehicles will be from the selected transport company providing the road transport from the Port or the Licsa Inland Clearance Depot to the customer warehouse.

4.7.3 Transport Practice 1.5

Adherence to the IMDG Code commences at AGR's certified production facility and is carried right through the supply chain. All goods are packaged, labelled, and placarded as per International Maritime Dangerous Goods (IMDG) Code requirements for cyanide.

AGR's solid cyanide is packaged in 1,000 kg Intermediate Bulk Containers (IBC). For distribution in Australia and internationally, the IBCs are packed in 20-foot general purpose shipping containers, which are the closed cargo transport units as referred to by the IMO DG Code (also referred to as shipping containers or just containers).

For AGR's shipments, despatch can only load 20 IBCs per container, product, packaging plus container is within the requirements of the shipping line and hence the Port equipment. All documentation for the delivery of the goods to the port details each container's total gross weight.

: <u>AGR Central and South American supply chain</u> Name of Facility	 Signature of Lead Auditor	<u>August 2020</u> Date
---	--	----------------------------

Documentation that accompanies the cyanide throughout transportation by sea and delivery at ports includes a Dangerous Goods manifest, packing certificates and a Multimodal Dangerous Goods Form, which meets requirement nine of the SOLAS 74, Chapter VII, regulation 5 and MARPOL 73/78, Annex III, regulation 4.

4.7.4 Transport Practice 1.6

The stevedoring company receive the vessels manifest which includes the containers for unloading and handling by them. This information is then captured in the container terminal software program. This program then assists with the location where each container from the vessel is to be placed for storage or in the case of all dangerous goods, the containers have to be directly discharged onto trucks for immediate departure from the port area.

The stevedoring companies are fully aware when sodium cyanide containers are to arrive at the Port. The shipping company MSC, Maersk or HSud hand them a full manifest of containers on the vessel and the manifest of the containers that are to be handled off and on the vessel. These manifests will specify dangerous goods and the product, class, and quantities. This information allows the stevedores to understand and identify the containers to be handled.

4.7.5 Transport Practice 2.1

There is no interim storage at the port, cyanide product is unloaded when the sodium cyanide containers can be lifted off the vessel and placed directly onto road transport trailers.

4.7.6 Auditor Conclusion

The due diligence reviews were found to be sufficiently detailed to evaluate the port operations within the constraints of access and limited influence, and additional management measures by the consigner were not considered necessary.

5.0 REFERENCES

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Deseado, Argentina, 20 December 2019

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Coronel, Argentina, 12 February 2019

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Santos, Brazil, August 2018

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Punta Arenas, Chile, 5 Jun 2020

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of San Antonio, Chile, June 2019

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Rio Haina, Dominican Republic, 14 October 2019

Australian Gold Reagents (AGR), Due Diligence Assessment, Port of Callao, Peru, 23 August 2018

<https://www.cyanidecode.org/signatory-company-categories/transportes-alvarez-e-hijos-srl-argentina>

<https://www.cyanidecode.org/signatory-company/maritima-dominicana>

<https://www.cyanidecode.org/signatory-company/transportes-niquini-ltda>

<https://www.cyanidecode.org/signatory-company/v%C3%ADctor-masson-transportes-cruz-del-sur-sa>

AGR Central and South American supply chain

Name of Facility



Signature of Lead Auditor

August 2020

Date

6.0 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 has under the contract between it and its client.

-
AGR Central and South American supply chain
Name of Facility


Signature of Lead Auditor

August 2020
Date

Signature Page

Golder Associates Pty Ltd



Mike Woods

ICMC Lead Auditor and ICMC Transportation Expert

MCW/EWC/ds

A.B.N. 64 006 107 857

Golder and the G logo are trademarks of Golder Associates Corporation

[https://golderassociates.sharepoint.com/sites/32745g/deliverables/012 central and south american sc-sar/18108701-012-r-rev0 sar agr central and south american sc.docx](https://golderassociates.sharepoint.com/sites/32745g/deliverables/012%20central%20and%20south%20american%20sc-sar/18108701-012-r-rev0%20sar%20agr%20central%20and%20south%20american%20sc.docx)

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 Golder Associates Pty Ltd ("Golder") subject to the important limitations and other qualifications set out below.

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

This Report is provided for use solely by Golder's Client and persons acting on the Client's behalf, such as its professional advisers. Golder is responsible only to its Client for this Report. Golder 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. Golder 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 Golder 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 Golder'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 Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder 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.

Golder 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. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder 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 Golder or otherwise made available to Golder. 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 Golder when the Services were performed and this Report was prepared. Golder 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, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder'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 Golder dealing with any matter that is addressed 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 Golder for clarification



golder.com