ICMI CYANIDE CODE
SUMMARY AUDIT REPORT
CERTIFICATION AUDIT

CYANIDE TRANSPORTATION
SUPPLY CHAIN #5 - TURKEY SUPPLY CHAIN

CYPLUS GMBH
RODENBACHER CHAUSSE 4
63457 HANAU-WOLFGANG
GERMANY

Submitted to:
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CyPlus, Transportation Route No. 5, Turkey

(Signature of Lead Auditor Dr. Steinweg)

Audit Date 21.-24.02.2012
Name of Cyanide Transportation Facility: CyPlus GmbH (Evonik Industries)
Name of Facility Owner: n/a
Name of Facility Operator: n/a
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Location detail and Description of operation:
The German company CyPlus GmbH is part of the Evonik Industries Group. CyPlus produces cyanide as a manufacturer in the German Wesseling plant. From Wesseling, Germany, the cyanide is distributed in different packaging variations using different supply chains. The customers / the gold mines can be found on different sites across the world. Accordingly, different supply chains are utilized. In this report, the supply chain no. 5 is covered, starting from Izmir port, Turkey, the port of entry.

Supply from the production site to the customers / mines
CyPlus's production site in Wesseling, Germany is ICMC-certified and registered since July 24, 2006 with no suspension since then. From Wesseling site the cyanide is shipped to gold-mines all over the world. The CyPlus company acts as a consignor for cyanide transportations. The scope of the CyPlus consignment is covering different supply chains. Table 1 shows the different supply chains, as they are actually listed at the http://www.cyanidecode.org - webpage.

Supply Chain No. 1 covers the portion from the production site, across the German overseas ports (Hamburg and Bremerhaven) to the respective ports of entry.

This report is focusing on the Supply Chain #5: Izmir port to the Tüprag Metal Mining Industry and Trade gold mine in Kişladağ mine site, located in Uşak Province, Turkey.

Description of supply chain #5
(detailed information about the involved companies / organizations see ch. 1.4)
Operating parties:
- Oversea vessel transport coming in across mediterranean sea: MSC (part of supply chain #1; see the respective report; not in scope of this report)
- Party No. 1 of Supply Chain #5: Port of Izmir (TCDD); Receiving the vessels, port operations
- Party No. 2 of Supply Chain #5: Limar Port and Ship Operators; subcontracted by Port of Izmir to perform portions of port operations just at the port site using port installations.
- Party No. 3 of Supply Chain #5: Anhan Nakliyat; transportation company, picking the containers from the Izmir port site installations and performing the transport to the Tüprag Metal Mining Industry and Trade.
gold mine in Kışladağ mine site, located in Uşak Province, Turkey; approx. 210 km eastern direction from İzmir port.

- Party No. 4 of Supply Chain #5: Meko Environmental Protection Services Ltd.; Emergency Response Service company (supporting party no. 3)

<table>
<thead>
<tr>
<th>Name of Mine, Production Facility or Transport Operation</th>
<th>Signatory Ownership Position</th>
<th>Name of Operating Company</th>
<th>Operation Address/Location</th>
<th>Certification Intention?</th>
<th>Additional Information or Comments</th>
<th>Date of Certification</th>
<th>Audit Documents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supply Chain #1 - Weselung Plant to International Port of Entry</td>
<td>Not Applicable</td>
<td>CyPlus GmbH</td>
<td>Rodenbacher, Chaussée 4, 63457 Hanau, Germany</td>
<td>Yes</td>
<td>Includes truck transport by several trucking companies from the production plant in Weselung, Germany, to the Container Terminal at Cologne-Hohr, Germany; rail transport to the Container Terminals at Bremenhaven or Hamburg, Germany, and ocean transport to the Ports of Deseada, Argentina, Santos, Brazil and Mazatlan, Mexico.</td>
<td>June 2, 2011</td>
<td>Summary Audit Report Captural Form</td>
</tr>
<tr>
<td>Supply Chain #2 - Argentinean Supply Chain</td>
<td>Not Applicable</td>
<td>CyPlus GmbH</td>
<td>Rodenbacher, Chaussée 4, 63457 Hanau, Germany</td>
<td>Yes</td>
<td>Transport of sodium cyanide within Argentina including its arrival at the port of Deseada and trucking to customer mine sites by Translogistica Orcz S.A.</td>
<td>July 1, 2011</td>
<td>Summary Audit Report Captural Form</td>
</tr>
<tr>
<td>Supply Chain #3 - Brazil Supply Chain</td>
<td>Not Applicable</td>
<td>CyPlus GmbH</td>
<td>Rodenbacher, Chaussée 4, 63457 Hanau, Germany</td>
<td>Yes</td>
<td>Transport within Brazil from the port of entry to customer mine sites.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supply Chain #4 - Mexican Supply Chain</td>
<td>Not Applicable</td>
<td>CyPlus GmbH</td>
<td>Rodenbacher, Chaussée 4, 63457 Hanau, Germany</td>
<td>Yes</td>
<td>Transport within Mexico from the port of entry to customer mine sites.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supply Chain #5 - Turkey Supply Chain</td>
<td>Not Applicable</td>
<td>CyPlus GmbH</td>
<td>Rodenbacher, Chaussée 4, 63457 Hanau, Germany</td>
<td>Yes</td>
<td>Transport within Turkey from the port of entry to customer mine sites.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 1: CyPlus’s supply chains, actually listed at www.cyanidecode.org – webpage.

Short description of location detail and description of operation:

Anhan Nakliyat Transportation company (AN) are contracted as a cyanide transporter for CyPlus GmbH to transport solid cyanide by road from İzmir harbour to their depot and client gold mine Tüpraş Metal Mining Industry and Trade in Kışladağ mine site, located in Uşak Province, Turkey. AN’s main operations base is their "Gaziemir TIR Parkina" yard, approximately 20 mls from the İzmir harbour, within the greater Gaziemir industrial region (incl. airport İzmir Adnan Menderes). Cyanide is received at the port of İzmir by sea in containers, which hold approx. 20 one-ton boxes of solid cyanide. The containers are offloaded at the port by TCDD respectively Limar Port and Ship Operators and short-term stored at their facility. TCDD respectively Limar Port and Ship Operators are part of the ICMi audited supply chain of the cyanide producer and consignor bringing the cyanide in. For the purposes of Cyanide Code transportation compliance, AN’s Code responsibilities commence on collection of the containers from TCDD port site location. Containers are delivered from the Quay to the AN’s Container Depot where they are stacked and short-term stored. Control and monitoring of the containers is undertaken by TCDD who subscribe to the IMDG Code. AN’s Cyanide Code responsibilities commence once they take the containers from the TCDD storage area. AN clears the consignment and AN’s vehicles collect the containers with the documentation and manage them under a transport management plan process (jointly agreed between CyPlus and the mine). The containers of cyanide, in all cases, are then transported in escorted convoy to their "Gaziemir TIR Parkina" yard, approximately 20 mls from the İzmir harbour. From this place, the convoy starts the route to the mine. In near future a route alternative may be defined and notified: direct transport from İzmir port to the mine without touching the Gaziemir TIR Parkina site.

CyPlus, Transportation Route No. 5, Turkey

(Signature Lead Auditor Dr. Steinweg)

Audit Date 21.-24.02.2012
Involved parties in supply chain #5

1) CyPlus GmbH, Hanau, Germany
CyPlus is the signatory company which is in the role of the ICMI Code’s Consignor. The organization is not active in transporting cyanide but is contracting the full transport service by Evonik Services.

2) CyPlus GmbH, Wesseling, Germany
The CyPlus site at Wesseling is the production plant of sodium cyanide. Initial packaging is done there. The overall supply chain starts here.

3) Evonik Services GmbH, Hanau-Wolfgang, Germany
The technical procurement is purchasing transportation and logistic services from dedicated suppliers and is following strictly defined processes to evaluate appropriate suppliers who are able to perform cyanide shipment under controlled conditions.

4) TCDD – Port Operator in İzmir, Turkey, (TCDD Liman İşletmesi Müdürlüğü İzmir)
Government facility, subordinated to Turkish Ministry of Transport; operating all facilities of the İzmir port.

5) Limar Port and Ship Operators S.A.
In the 1990’s, due to insufficient investment, Istanbul’s ports were unable to meet the needs and demand of Turkish importers and exporters. Limar Port and Ship Operators S.A., was founded in 1996 with the objective of eliminating congestion in Istanbul, the most important destination for Turkey’s imports. With the dynamism of the private sector, Limar began providing port services to importers and exporters as well as scheduled container lines. By the end of 1998, it had achieved a job volume of 441 vessels. Limar signed a long-term agreement with the Ministry of Transport’s General Directorate of Railroads (TCDD) of –among others– İzmir port, to upgrade their existing equipment stock and thus to contribute to improvements in service quality at the port. As part of this agreement, a new mobile cranes went into service at the İzmir port.

6) Loxx Holding GmbH, Gelsenkirchen, Germany
Loxx is the overall coordinator of transport services for CyPlus respectively Evonik Industries; Loxx contracts Anhan Nakliyat to perform the local Turkish transports starting from İzmir port to the mine; no operating activities during supply chain #5

7) Anhan Nakliyat İnşaat Turizm, Sanayi Ticaret Limited Sirketi, İzmir, Turkey
Transport company Anhan Nakliyat is operating the truck transport of cyanide containers between the İzmir port to the Tüpraş gold mine in Kışladağ mine site, located in Uşak Province, Turkey.
8) MSC Mediterranean Shipping Company S.A. Geneva, Italy

MSC is operating the ocean shipment to the port of Izmir. The MSC organization has implemented an international structured management system to regulate and to control the shipments of dangerous goods with high expertise, responsibility and experience. Acting during supply chain #1, so no operating activities during supply chain #5.

9) Meke Environmental Protection Services Ltd.; Istanbul, Turkey

Meke is a service supply organization providing, among others, services for marine pollutant protection (preventive and reactive) and risk preventing services / operations, e.g. escort service. Meke is contracted by CyPlus to run and update the Emergency Response Plan for the transporting company Anhan Nakliyat, derived from CyPlus's Emergency Response Plan. Meke also provides trainings for the Anhan Nakliyat persons, involved in transportation and transportation organisation.

The transporter as a consigner is CyPlus GmbH and the on-site transportation operation is performed by Anhan Nakliyat company.
Auditor’s Finding

This operation is

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

with the International Cyanide Management Code.

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

Audit Company ........................................... LULU Intelligent Organization
Audit Team Leader ................................. Dr. Benno Steinweg
Email ....................................................... Benno.Steinweg@googlemail.com
Names / Signatures of other auditors ...... n/a
Date of audit ................................. Feb 21 - 24, 2012

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

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Production Operations and using standard and accepted practices for health, safety and environmental audits.
PRINCIPLE 1 – OPERATIONS:

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

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

☒ in full compliance with
☐ in substantial compliance with ☐ not in compliance with

This operation is ☐ in substantial compliance with Transport Practice 1.1

Summarize the basis for this Finding:

CyPlus is not active in transport operating activities on site. This activity is subcontracted to Anhan Nakliyat Ltd. (AN). CyPlus runs a certified quality system, that contains the Emergency Response Plan Tüprag (ERPT), Rev. 0, Jan 31, 2011. Within this ERPT a process to select transport routes to reduce potential risks with respect to accidents and releases is included. This process takes into account the population density along the potential route, infrastructure installations (e.g. bridges, road foundations etc.), rivers, creeks, ponds, in general proximity to water. The total transportation route from Izmir port to the Tüprag mine is clearly defined. CyPlus does not contract this selecting process, but runs it in cooperation and in collaboration with the transporting company Anhan Nakliyat and the ERP consultant Meke. 2. The ERP defines the process for evaluation of the risks and the potential risks. Potential scenarios have to be taken in consideration; advice is given on how to react with respect to detected risks. The “Selection of Routes” process is clearly defined and carried out. During the road risk assessment and selection process input from communities, police, public agencies and further interested parties is required to have a full information for performing a risk assessment. This is also to cooperate with the authorities in a good atmosphere. The input is required according to ERP. CyPlus' ERP deals in detail with the involvement of external interested parties (mutual aid scheme). Further regulations are defined focusing on communication during routine operation and during emergency cases (alerting).

CyPlus as the transport company has subcontracted the local transport operation activities to the German Loxx company. On the other hand, under authorization of CyPlus, Loxx subcontracts the local activities to their partner company Anhan Nakliyat. Additionally the ERP consultant Meke is also subcontracted by CyPlus to support with emergency assessment, planning and assistance services, as well as trainings. All of the parties are required to fulfill CyPlus' quality and HSE requirements, controlled by service level agreements. This contracting scheme is clearly defined in CyPlus' ERP. One of the main outcome of this agreement is, that the transporter Anhan Nakliyat runs an own ERP, derived from CyPlus' ERP. The interaction of CyPlus' ERP and Anhan Nakliyat / Meke's ERP is clearly defined and followed.

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.

☒ in full compliance with
☐ in substantial compliance with ☐ not in compliance with

This operation is ☐ in substantial compliance with Transport Practice 1.2

CyPlus, Transportation Route No. 5, Turkey

(Signature Lead Auditor Dr. Steinweg) 

Audit Date 21.-24.02.2012
Summarize the basis for this Finding:

CyPlus is not active in transport operating activities on site. This activity is subcontracted, as described in Transport Practice 1.1, to the Anhan Nakliyat transportation company. Nevertheless: the transport company Anhan Nakliyat uses only trained, qualified and licensed drivers to operate its trucks. This is basically required in CyPlus’ ERPT Rev. 0 and in the service level agreement between the parties CyPlus, Loxx, Anhan Nakliyat and Meke. The qualification requirements are focused on both, routine activities during normal operation and actions / behaviour during emergency cases / situations. Special training were available, too.

Operating personnel does not have to do handling activities with cyanide, but only transport activities and handling activities with originally closed containers. The trainings do focus on scenarios and potential incidents and accidents. Exercises are performed routinely, e.g. simulation of spills and the respective reaction on that. Basic trainings are required according to training matrix (knowledge about procedures, forms, processes etc.). These basics are replenished by further trainings with respect to spill handling, emergency reaction etc. The documentation shows the training history and the respective effectiveness checks of the trainings. This is completed by specific Turkish re-qualification documentation for truck drivers, that is mandatory. Special training were available, too.

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

- x in full compliance with
- □ in substantial compliance with
- □ not in compliance with

Summarize the basis for this Finding:

CyPlus as an organization does not transport loads on site at the Izmir region. But their subcontracted transporter Anhan Nakliyat (AN) does. The AN owned transport equipment is mostly brand new. Various maintenance scenarios are in place: (1) Checks in advance and after each transport, define in each individual transport folder (2) planned routine technical checks and small standard maintenance items and (3) routine expert maintenance activities, done by external garages, dedicated to truck-brand, mostly certified by the respective truck OEMs. The trucks and the respective tools, technical equipment and attachments are obviously maintained to operate within the loads they are handling.

Anhan Nakliyat runs procedures to require a verification of each single weight-amount to be transported. Nevertheless: they use only new, heavy load platform lorries, that are (far more as) sufficient for the load they must bear.

AN uses exclusively their own owned trucks for the respersentational transport route No. 5. No ferry, barge or other means of transportation is in use. When using a TEU (20 foot equivalent unit) the maximum load is defined. No unloading / re-loading etc. activities are done by Anhan Nakliyat. So the container – once loaded by CyPlus in Germany – will not be opened and thus the load amount will not be changed. The use of heavy load trucks safeguards, that no overload will occur.

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

- x in full compliance with
- □ in substantial compliance with
- □ not in compliance with

CyPlus, Transportation Route No. 5, Turkey

(Signature: Lead Auditor Dr. Steinweg)  
Audit Date 21.-24.02.2012
Summarize the basis for this Finding:

The container is sealed by CyPlus in Germany and only opened at the mine, thus internal damage cannot be identified en route #5. A Container Interchange Report is completed and jointly signed by the shippers representatives and the cyanide transporter's representatives to agree on any damage that may be sighted on the container at the port. The Vehicle Trip Checklist is completed at the mine, on delivery of the container and a section reports on container seals, labelling and general container condition. This checklist is counter signed by the mine representative. Turkish transport regulations with respect to marking and placarding according is followed. A pre-trip checklist is completed for the truck and trailer before the vehicle is loaded with the cyanide containers. The Fleet Preventative Maintenance (PM) policy states that preventative maintenance is performed on each vehicle. PM tasks are clearly identified and followed. These tasks are identified in the scheduled maintenance system of truck OEM's manual.

The Vehicle Operators Handbook specifies the maximum hours of duty for the drivers. The Vehicle Operators Manual includes a section on drug and alcohol policy. The policy includes specific statements on drug and alcohol usage, testing, alcohol and drug dependence, use of drugs and alcohol on the company premises or whilst driving and the consequences of positive test results. The policy also covers random testing and searches. The policy and company recognizes alcohol and drug dependence as a treatable condition and will provide appropriate support and assistance within the bounds of the policy.

Standard operating procedures are available, covering the topics modifying the transport, caused by unexpected incidents, preventing load from shifting during all handling activities etc. Records of evidences demonstrating the operation of the safety program are archived according to general standard operating procedure.

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

This section is not applicable as no modes of air or sea transport are used during supply chain no. 5.

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

- [x] in full compliance with
- [ ] in substantial compliance with
- [ ] not in compliance with

Summarize the basis for this Finding:

Communication with and among Anhan Nakliyat vehicles in the cyanide convoy is undertaken using mobile phones, short-wave radio, and satellite phones. All communication equipment is tested prior to convoy departure. The drivers at the time driving do not use the communications equipment. The accompanying safety officer in each truck communicates with the convoy leader and support vehicles. Convoy managers have all the appropriate telephone numbers to communicate with Anhan Nakliyat head office and appropriate emergency responders and emergency services on the convoy route. An actual telephone 1st is part of the equipment documentation on each vehicle being part of the convoy. The Anhan Nakliyat head office in cooperation with emergency service provider Meke manages all associated communications with the mine and the cyanide producer. Anhan Nakliyat transports and delivers sealed containers. A full and defined package of documents is part of the convoy management, also on the road. All communication equipment is tested prior to convoy departure.
The Road Assessment SOP requires to find out potentially blackout area with respect to functionality of communication equipment. The availability of technical equipment and spare parts are objects to be checked routinely in advance of the begin each convoy order to the mine. GPS tracking is implemented for all convoys.

Anhan Nakliyat receives, transports and delivers sealed containers, originally packed by CyPlus in Germany. A waybill accompanies the convoy which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, MSDS, packing list, bill of lading, customs declarations, and producer invoice.

Drivers have shipping documentation including the Bill of Lading with them at all times during a shipment. Information regarding the type of material transported, the type of container, the number of packages, and the weight of the shipment is consistently entered onto the Bill of Lading by the shipper. Drivers also have the sodium cyanide MSDS and Emergency Response Guides with them during deliveries.

**PRINCIPLE 2 – INTERIM STORAGE**

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

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

- ☒ in full compliance with

This operation is

- ☐ in substantial compliance with
- ☐ not in compliance with

**Summarize the basis for this Finding:**

In terms of Cyanide Code definitions, CyPlus' subcontracted supply chain partners (transporter Anhan Nakliyat, Port of Izmir, Limar port and ship operator) do not need and thus do not have interim storage facilities. CyPlus itself as an organization does not transport loads on site at the Izmir region. Storage in a warehouse does not occur during the whole transportation chain no. 5.

**Due diligence audit at Port site,** investigating Port's quality system and respective operations.

The only activities, that might be seen close to the definition of interim storage, can occur at the Izmir port, run by TCDD (General Directorate of Turkish state railways). The regular port process with respect to the needs of CyPlus’s supply chain No. 5 was investigated, covering all the respective requirements of the Code.

Finally, also at the port site, no interim storage facilities and operations in terms of Cyanide Code definitions do occur.

Nevertheless, during the investigations at the port site, a due diligence audit covering the TCDD port was performed, taken also in consideration the operating activities of Limar Port Operations company (daughter company of TCDD to run the physical activities on site). This was done, following a cyanide container from the vessel to the interim transfer place. The process was followed along the chain of activities. Documents were checked. To verify the statements of the involved parties, a complete consignment of sodium cyanide along the transportation route from the vessel to the interim transfer place at the port site was checked on the basis of documents, records and evidences. During the due diligence audit the port management could demonstrate, that all the respective requirements of the Code are covered and fulfilled.
In addition, CyPlus as responsible transporter has performed a due diligence audit at Izmir port, focusing the handling of cyanide containers. The respective report is available. Measures management is comprehensible.

Even when there are no interim storage facilities and operations in terms of Cyanide Code definitions the Transport Practice 2.1 topics were discussed with the TCDD and Limar Port and Ship Operators S.A. management.

National and international labeling provisions are maintained. Smoking, open flames, eating and drinking at the port is regulated by the quality system of the port site. Derived from that system, dedicated areas are defined where those special activities are allowed and also special areas, where those are restricted. Requirements covering personal protective equipment is clearly defined and regulated in the TCDD advising system.

The whole port area is protected by a fence and additionally supported by a technical and organizational based access control system. Access to the site is controlled at different control points / entry points. Only authorized persons / equipment are allowed to entry. Gate guard service is part of the TCDD organization. Sufficient security and access measures are in place.

Cyanide containers are not separated from other materials during the short time of intermediate stopover. The location of the containers are well known. So in case of emergency a focused reaction with respect to a cyanide container is possible in any time. Due to the short time of intermediate stopover (no intermediate storage activity) no further separation is required.

During the short time of intermediate stopover at the port site the placement of the container is at the regular outside non-roofed area. The foundation / the ground structure is concrete base. Provisions are made, that spillage or firefighting spill water can be collected to prevent inflow to the sea. Only undamaged containers are stored in this main area. In case of damage or other suspect situations a special area is designed, that is separately fenced and with additional preventive and protective technical and organizational measures / equipment.

Sufficient volume to handle spillage is available. The requirement to fulfill preventive spill handling for all the other potentially handled goods leads to sufficient volume of back-up capacity to contain any spilled materials and minimize the extent of a release.

**PRINCIPLE 3 – EMERGENCY RESPONSE**

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

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

- [ ] in full compliance with

This operation is
- [ ] in substantial compliance with
- [ ] not in compliance with

**Summarize the basis for this Finding:**

CyPlus is not active in transport operating activities on site. This activity is subcontracted to the transport company Anhan Nakliyat. Anhan Nakliyat has implemented an Emergency Response Plan, following CyPlus’ Emergency Response Plan. This plan has been agreed with the cyanide manufacturer and the mine. This is a detailed document includes, among other information, the emergency response team organization chart, emergency phone directory, communication channels guidelines, emergency scenarios, and instructions to
attend specific and general emergency scenarios. The Emergency Response Plan includes an attachment describing the route in detail, with the assessment matrices which were used to develop emergency scenarios, the respective preventive and mitigation measures, and emergency response actions. The plan has a detailed explanation of the sodium cyanide characteristics and toxicity based on the MSDS. The emergency scenarios, the general emergency response instruction, and the scenario-specific instructions consider the solid state of the cyanide and its incompatibility with water and other substances. The Emergency Response Plan provides information regarding the packaging and transportation characteristics of the product, the container, and the transportation unit. All emergency scenarios developed are related to ground transportation and include: crash with another vehicle, vehicle rollover in steep slope or curve, rollover with spill, rollover with hurt persons, and rollover with the product reaching a water body, among others. The plan includes the emergency scenarios developed from the route assessment. It also identifies the areas where the different scenarios are most likely to take place. All the scenarios are in relation with accidents of trucks hauling a platform trailer carrying a 20 ft container, which is the only transportation modality used by Anhan Nakliyat on CyPlus’ route No. 5. The description of the route is available in detail in the ERP.

The plan ERP considers all aspects of the transport infrastructure. Special attention is given to the road assessment, where the specific conditions of the route and the respective installations are focused (e.g., bridges over water etc.). The plan considers the design of the transport vehicle. Container trailers are specified with minimum load requirements and special adaption points to fix the different container bottom designs.

The plan includes descriptions of response actions, as appropriate for the anticipated emergency situation. Trainings are done, covering the given scenarios. The plan also shows the respective emergency procedure, phone numbers and persons / functions to be involved in case of emergency / spill etc. as well as addresses of different functions (police, hospital, mayors of different communities along the route etc.). All of the above referenced response actions are actively accompanied by the emergency response service company Meke (contracted by CyPlus).

The plan identifies the roles of outside responders, medical facilities and communities in emergency response processes / cases. The alerting system in case of emergency is described and defined.

**Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response**

☐ in full compliance with

☐ in substantial compliance with Transport Practice 3.2

☐ not in compliance with

*Summarize the basis for this Finding:*

The transporter provides emergency response training for the appropriate personnel. The training matrix requires different kinds of training. Driver’s training on how to act and react as well as information on the product Cyanide etc. is performed. Those training are held by different parties. The scheduling is following the training concept, defined in ERP.

Descriptions of the specific emergency response duties and responsibilities of personnel are defined in detail. The master definition is given in CyPlus’ ERP and – derived from that also in the “Emergency Response service agreement”. The interaction of CyPlus’ ERP and Anhan Nakliyat / Meke’s ERP is clearly defined and followed. The contracted transporter company on site (Anhan Nakliyat) is included in this service agreement. Finally all active functions and persons in case of emergency are listed and their tasks and obligations are laid down in CyPlus’ ERP. The respective documentation is under control of CyPlus’ quality and HSE system. Under this regulation the control of the above mentioned docs is executed and thus it is safeguarded that each involved party always holds the actual version of the documentation.

There is a list of all emergency response equipment, that has to be available during transport and along the transportation route. Meke, the emergency response service company (contracted by CyPlus) is made
responsible to have the right and full list and to take care, that the defined equipment and materials are available in full and in full function. The emergency response kit includes all items, as required by the Code and the referenced regulation as well as Turkish legal requirements.

The transport vehicle operators receive initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan. Anhan Nakliyat has set up a system of initial and refresher trainings, taking into account the individual persons training and experience history.

CyPlus as the transport company has subcontracted the local transport operation activities to the German Loxx company. On the other hand, under authorization of CyPlus, Loxx subcontracts the local transport activities to their partner company Anhan Nakliyat. Additionally the ERP consultant Meke is also subcontracted by CyPlus to support with emergency assessment, planning and assistance services, as well as trainings. All of the parties are required to fulfill CyPlus' quality and HSE requirements, controlled by service level agreements. This contracting scheme is clearly defined in CyPlus' ERP. One of the main outcome of this agreement is, that the transporter Anhan Nakliyat runs an own ERP, derived from CyPlus' ERP. A service Level Agreement among CyPlus and Meke Group gives further support into the overall emergency response system. The interaction of CyPlus' ERP and Anhan Nakliyat / Meke's ERP is clearly defined and followed.

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

- [x] in full compliance with

This operation is
- [ ] in substantial compliance with
- [ ] not in compliance with

**Summarize the basis for this Finding:**

The CyPlus' ERP includes a communication process description, that safeguards the full information of all interested and acting parties in case of emergency. This includes -among other aspects- listings of the members of the internal response team members (including the manufacturer CyPlus, Meke, Tüprag mine and Anhan Nakliyat), and that of external emergency responders (police, firefighters, hospitals, authorities, etc.). The emergency notification and reporting procedures are also included within the Emergency Response Plan. The respective documentation is under control of CyPlus' quality and HSE system. Under this regulation the control of the above mentioned docs is executed and thus it is safeguarded that each involved party always holds the actual version of the documentation. This is checked during internal audits.

**Transport Practice 3.4:** Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals

- [x] in full compliance with

This operation is
- [ ] in substantial compliance with
- [ ] not in compliance with

**Summarize the basis for this Finding:**

Descriptions of the specific emergency response duties and responsibilities of personnel are defined in detail. The master definition on how to react is given in CyPlus' ERP and -derived from that- also in the "Emergency Response service agreement". The measurements and actions by and during spill are defined and advised in detail. The methods to be used to decontaminate the environment/spillage are described, e.g: prevention of spoll entry into waterways, sewers, basements, or confined areas.

It is also established that chemicals should not be added to water bodies to control the pH or to neutralize

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(Signature Lead Auditor Dr. Steinweg)
cyanide. Additionally, it includes instructions for assessing the impact on surface water bodies and to prevent the population to be poisoned by contaminated water. These instructions are part of the emergency response instructions to cyanide spills with contact to water and water bodies.

The procedure prohibits the use of sodium hypochlorite and hydrogen peroxide to treat cyanide that has been released into surface water.

**Transport Practice 3.5:** Periodically evaluate response procedures and capabilities and revise them as needed

- [ ] in full compliance with
- [ ] in substantial compliance with
- [x] not in compliance with

**Summarize the basis for this Finding:**

There are the necessary provisions for periodically (min. once per year or driven by events) reviewing and evaluating CyPlus’ ERP. In conjunction with a potential adjustment or change all other corresponding response procedures and requirements must be adjusted (e.g. Meke’s procedures coming out of CyPlus’ ERPT or Anhan Nakliyat’s instructions within their quality and HSE system). Examples of change requests coming from events were inspected. In case of any event, the entry in the order folder would—if necessary—drive a change in the ERP-plans of the different parties.

Provisions for periodically conducting mock emergency are made. The respective drills are defined in CyPlus’ ERP. The training concept intends to involve all relevant parties. It’s intended and scheduled to have mock drills minimum once per year.

The revision system of the CyPlus’ ERP is defined. It’s required to do revision once per or event driven. Revisions or recommendations are to be implemented as appropriate. It is also planned to have a routine management review respectively a performance evaluation of the plan itself.