



REPORT

International Cyanide Management Code

Bolloré Recertification Audit

Summary Audit Report, Ivory Coast Supply Chain

Submitted to:

International Cyanide Management Institute
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WASHINGTON, DC 20005
UNITED STATES OF AMERICA

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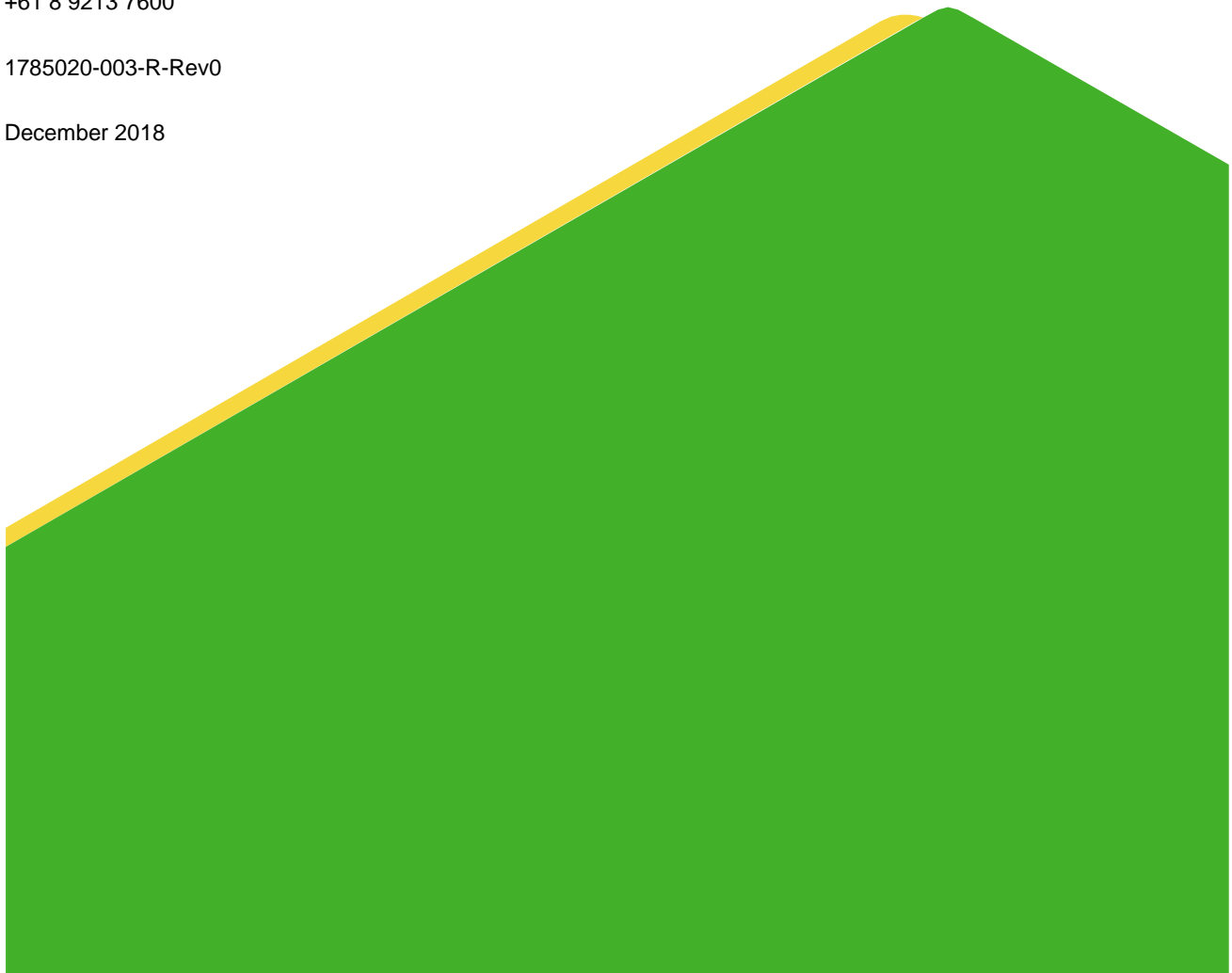
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APPENDICES

APPENDIX A

Important Information

1.0 INTRODUCTION

1.1 Operational information

Name of Transportation Facility:	Bolloré Logistics – Ivory Coast Supply Chain
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Bolloré Logistics
Name of Responsible Manager:	Olivier Restoueix
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2.0 CYANIDE TRANSPORTATION

2.1 Bolloré Logistics

The Bolloré Group was founded in 1822 and the Group's principal activities include: transport and logistics (freight forwarding and stevedoring and railways); plastic films for capacitors and packaging; electric batteries, thin papers and energy distribution.

The African transportation arm of the Bolloré Group is managed by Bolloré Logistics (Bolloré), formerly Bolloré African Logistics; which has been established for more than 50 years in 55 countries including 45 in Africa and plays a key role in port activity, terrestrial transport and tailor-made logistics solutions.

2.2 Trans-shipping and interim storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Temporary storage in transit does occur at the Port of Abidjan while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port of Abidjan and taken to the Bolloré transport storage yard where they are stored on the truck overnight in preparation for convoy departure at 0500 hrs the following morning. At no stage is the cyanide removed from the trucks or containers prior to unloading at the customer mine site.

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2.3 Auditors Findings and Attestation

in full compliance with

Bolloré 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 Bolloré Ivory Coast Supply Chain recertification audit.

Audit Company: Golder Associates Pty Ltd

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

Email: mwoods@golder.com.au

2.4 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Transport Technical Specialist		12 December 2018

2.5 Dates of Audit

The ICMC Recertification Audit was conducted over two days between 22 and 23 May 2018 at Bolloré facilities in Abidjan, Ivory Coast.

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.

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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.

in full compliance with

Bolloré is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré has implemented a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases.

Bolloré identifies the preferred route, based on a high level analysis of the following key principles:

- The port to mine site route must follow authorised commercial routes used by the other dangerous goods transporters, including the transport of oil products, liquefied petroleum gas (LPG) and pesticides
- The route must avoid developed or urban zones including: schools, hospitals and any other zones with high population densities.

The route assessment process is conducted by a team of at least two (2) trained employees in consultation with the Quality, Health, Safety and Environment (Q-HSE) Department, who will provide a supporting role. The route assessment team travel the selected transport route(s) in order to physically assess and record the hazards and potential risks along the route(s).

Section 1.3 of the *Procedure* requires the road study to record specific details including the following aspects:

- Type road surface
- Condition of road surface
- Width of the road
- Demarcation lines visible
- Recommended speed limits
- Width and condition of shoulder of road
- Road crossings
- Rail crossings
- T-Junctions

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- Mountain passes
- Pitch and grade
- Sharp bends
- Emergency parking areas
- Villages
- Schools
- Hospitals
- Availability of the mobile phone network
- Check-points (Police, Customs and Local Authorities)
- Prevalence and proximity of water bodies and fog.

Bolloré has implemented a procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks.

The route assessment documents the hazards/threats identified and details the control measure for the hazards. Typically the routes are major arterial roads designated for heavy vehicle transport.

Bolloré does implement a process or procedure to periodically re-evaluate routes used for cyanide deliveries and also has a process for getting feedback on route condition from the transporters' operators.

The *Cyanide Transport Management Plan* also requires feedback on the state of the route in the event of changes upon completion of each road convoy and includes road condition details and any problems encountered along the transport route. A review of records from a recent trip noted that the appropriate form was complete and contained route observations.

The *Realisation et Utilisation d'un Road Survey* procedure notes that Road-Surveys will be reviewed and updated:

- *Before the resumption of operations at the following a shutdown of operations higher than in 3 months or consecutive to an unusual event (climate, policy,)*
- *As a result of significant changes on the route (road, environment...)*

As a result of a significant evolution of the operations carried out on the route (vehicles, cargo...)

Bolloré does document the measures taken to address risks identified with the selected routes. The route assessment documents reviewed detailed the measures taken to address risks identified with the selected routes. Typically these relate to speed and use of escorts leading the convoy enabling road hazards to be communicated to the drivers.

Bolloré does seek input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.

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Copies of escort request letters; Forces Armées de Côte d'Ivoire (FACI), Centre Ivoirien Anti-Pollution (CIAPOL) and Secrétariat Permanent de la Commission pour l'Interdiction des Armes Chimiques en Côte d'Ivoire (SPCIAC-CI) have been retained, confirming that AL Ivory Coast has liaised with external escort agencies. The route survey sheets have details regarding health centres.

The community is indirectly consulted throughout these agencies, no direct consultation is undertaken as this may increase security risks and the company uses authorised commercial routes for the transportation of cyanide. Within the vicinity of the mine, community consultation has been conducted by the mine site.

Bolloré utilises road convoys as a means of managing the risks of the road conditions and responding to emergencies.

Bolloré's controls include the following:

- Only truck drivers and escort team members qualified and trained in cyanide emergency procedures will be implied in the transport and handling of cyanide
- Cyanide convoys of more than three (3) trucks utilise a minimum of two (2) escort vehicles, one in front of the convoy and one following the convoy (the escort in front of the convoy is responsible for regulating speed limits)
- The transport of cyanide is strictly prohibited during the night, the allowed convoy hours are from 05:00 in the morning to 18:30 in the evening. Authorised exceptions allow the convoy to depart at 04:30 in the morning to avoid traffic congestion
- The Chief of Escort ensures that required rest stops are respected and that convoys follow the required speed limits and correct travelling distances.
- During stops of short duration, the Chief of Escort shall ensure that stopped trucks do not present a risk and that the twist-locks and straps have been checked.
- All vehicles in the convoy have global positioning system (GPS) tracking. The GPS tracking system continuously transmits position and other data from the convoy throughout the trip. Data collected includes speed, position/movements and duration of pauses/stop overs.

In addition to Bolloré control measures the following organisations may accompany the convoys, including:

- Representative from Action Civilo-Militaire (ACM) engaged to escort the convoy.
- Representative from the Ivory Coast Antipollution (CIAPOL) in charge of the fight against pollution and elected by the sustainable development and healthiness, Department of the Environment
- Forces Republican of Ivory Coast (FRCI) engaged to ensure the safety and the fluidity of the convoy

The Permanent Secretariat of the Commission on the Prohibition of Chemical weapons (SPCIAC-CI), authority indicated for the management of the hazardous substances and technical assistance in the event of a discharge.

Bolloré has advised external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response.

The emergency response procedure outlines the role and responsibilities of the following outside responders in the event of an emergency:

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- Escort Assistant(s)
- Fire Service

Copies of survey sheets supplied to medical facilities detailing their capabilities along the route have been retained.

Bolloré does not subcontract the transport and handling of cyanide.

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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.

in full compliance with

Bolloré is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré 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.

Bolloré does only use trained, qualified and licensed operators for its transport vehicles. All drivers undertaking cyanide transport must have a government issued current driver's license with relevant category along with mandatory internal training.

A copy of the register demonstrating current drivers' licences within the required expiration dates was provided. The register possesses a trigger system to highlight licences that are approaching expiry (alerts range from one to two months prior to expiry). A review of drivers on-site found them to have current 'Road Tractor' licences. The Police also carry out checks of licenses along the route and drivers would be subject to fines or other penalties if not appropriately licensed.

Drivers and escorts also complete internal training developed and delivered by Bolloré including cyanide transport, emergency management and defensive driving.

All personnel operating cyanide transport equipment been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

Bolloré has developed and implemented training requirements for drivers and escort personnel with the following mandatory elements:

- Cyanide awareness (including use of masks and filters)
- First aid
- Use of fire extinguishers
- Hazardous materials (HAZMATS)
- Emergency exercises.

A review of on-site driver and escort personnel training records against the *Training Matrix* confirmed that personnel undertaking cyanide transport have completed the mandated training. Personnel interviewed confirmed the training system and could provide details of the controls to be followed during cyanide transport.

Bolloré does not subcontract the transport of cyanide.

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3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

Bolloré is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The operation only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide.

Bolloré operates transport equipment including:

- Trucks with 6x4 and 4x2 configurations
- Trailers equipped with twist-locks and dedicated to carry one 6 m (20 foot) container weighing approximately 24 tonnes
- Escort vehicles.

Each shipping container contains 20 one tonne boxes of cyanide. One container per truck is currently being transported (24 tonnes) which is within the design specifications of the prime movers and trailers being used.

A review of maintenance records for fleet vehicles that conducted cyanide transport during the period confirmed that preventative maintenance activities had been conducted in accordance with Bolloré procedures.

There are procedures to verify the adequacy of the equipment for the load it must bear.

Bolloré currently has 15 prime movers from their fleet dedicated to cyanide and upon completion of a transport mission each truck and trailer are required to pass through the maintenance workshop for assessment. The assessment corrects deficiencies identified during the convoy as well as allows scheduled services to be completed.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide.

As noted in previously, Bolloré maintains a fleet of prime movers and trailers to transport cyanide containers. One shipping container per truck is transported and the weight is within the configurations permitted by the Vehicle Specifications Records Providing Structural Weight Ratings (UNICAF). The UNICAF Vehicle Specifications Records identify the axle load limits for trucks and trailers. The escort commander completes a check including loads for each convoy.

A review of convoy documentation confirmed that Bolloré carried a single container per vehicle in accordance with their procedures.

Bolloré does not subcontract the transport and handling of cyanide.

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3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

Bolloré is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging.

Bolloré's involvement in maintaining the integrity of packaging is limited. Cyanide product is loaded and sealed by the producer and Bolloré has written procedures to check seals on all vessels and containers. The seals are substantial non-reusable locks, which are numbered. Seal numbers are recorded and cross checked at each point of the delivery chain through the delivery dockets.

Delivery dockets are also carried on all vehicles. These documents are carried for each leg of the journey and they require the carrier and customer to sign that all seals have been checked and are intact and the material grade is detailed on the seals.

Bolloré uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards. Vehicle placarding consists of the following:

- One emergency information panel (EIP) is placed on each of the long sides of the container, on diagonally opposite ends. This is done by cyanide manufactures
- One EIP is placed on the vehicle so that it is visible from the rear.
- One Class 6 dangerous goods class label is placed at the front of the vehicle.

The Bolloré pre-departure checks include checks on placarding for the presence of dangerous goods diamonds, EIPs and dangerous goods labels.

Loaded containers inspected during the site visit conformed to these requirements.

Bolloré implements a safety programme for cyanide transport that includes:

- Vehicle inspections prior to each departure are undertaken by the driver. This check sheet covers both the prime mover and trailer and includes vehicle roadworthiness, dangerous goods requirements, personal protective equipment (PPE), communication equipment, etc.
- Upon completion of each transport mission each truck and trailer are required to pass through the maintenance workshop for any servicing requirements. The assessment corrects deficiencies identified during the convoy as well as allows scheduled services to be completed. Maintenance scheduling and records are managed through a maintenance database *Maximo* (previously *Gespar* until 2017) and used to schedule maintenance activities. Maintenance is conducted by the workshop in Abidjan which is resourced with experienced maintenance personnel.

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- The Bolloré procedures provide that transport of cyanide is prohibited during the night, the allowed convoy hours are from 05:00 in the morning to 18:30 in the evening. Authorised exceptions allow the convoy to depart at 04:30 in the morning to avoid traffic congestion. The journey is approximately five (5) hours from the port to the mine site. The Chief of Escort ensures that required rest stops at every three (3) hours are respected throughout the transportation journey.
- Cyanide is stowed into the freight containers by the producer. Solid cyanide is packed into United Nations approved composite intermediate bulk containers (IBCs) that are stowed to minimise movement in transport. The securing systems appear to be as effective as reasonably practicable. Containers are secured using twist locks, which are designed and constructed to international transport standards. Twist locks are inspected prior to each departure and periodically during the journey.
- Bolloré procedures notes that the Chief of Escort will manage the convoy suitably in adverse conditions. This will include the convoy stopping and only continuing the journey after evaluation and assessment of the situation by the Chief of Escort.
- When the Chief of Escort considers that it is impossible to continue the approved route, the following options are to be taken into account:
 - If an alternate route exists, the Chief of Escort is required to validate the alternate route with the logistics person in charge of Transport and Lifting Management. Once the alternate route has been approved for use the convoy can continue with the journey
 - If there is no alternate route, the Chief of Escort must consult logistics person in charge of Transport and Lifting Management to consider the following two options:
 - The convoy returns to the base
 - If the convoy cannot return to the base, the Chief of Escort shall identify a safe and secure parking area to allow for temporary immobilisation of the convoy. The Chief of Escort then awaits further instruction from the logistics person in charge of Transport and Lifting Management (and of the mine).
- Bolloré has a *Zero Tolerance Drugs and Alcohol Policy*. The *Policy* advises that abuse of alcohol and drugs will be prevented by education of workers, refusing to admit personnel under the influence of alcohol or drugs onto the work site, ensuring that personnel dismissed for drug and alcohol abuse are not eligible to any of the company's sites.
- Records are maintained that the above activities have been conducted. Maintenance records, inspection and convoy records were samples through the audit period.

Bolloré does not subcontract the transport of cyanide.

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3.1.5 Transport Practice 1.5

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

in full compliance with

Bolloré 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 Bolloré Logistics.

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

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

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3.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

Bolloré is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré transport vehicles do have the means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

Each vehicle in the convoy (including the escort team) are equipped with walkie-talkies, cell phones and a Bolloré number pertaining to the fleet, which allows them to communicate for free. Prior to departure for each cyanide convoy, the material of communication is tested and batteries are charged and reloaded. The chargers are also carried with the convoys. The escort leader has with him a folder with all documents requested for the convoy (Transport Management Plan, Emergency Response Plan, contact from all authorities, contact details from all the health centres on the road, copies of all checklists and forms used during the convoy).

Although drivers have a cell phone, it is company policy not to communicate directly with drivers under normal operating conditions.

Communication with the mine and producer is undertaken by the main office.

The *Safety and Communication Pre-Departure Checklist* includes a check for mobile phone and two-way radio functions. GPS tracking is checked prior to and throughout voyages through the review of reports generated by the tracking system.

Communication blackout areas are checked during the road survey process and the Road Survey Report details the available mobile phone coverage and network along the entire transport route.

In addition, all vehicles in the convoy have global positioning system (GPS) tracking. Bolloré has procedures to track the progress of cyanide shipments. These include:

- Advising consignees when shipments leave the production facility and estimated time or date of arrival of the consignment.
- Use of satellite tracking, phone and UHF systems to monitor progress along the routes.

The GPS tracking system continuously transmits position and other data from the convoy throughout the trip. Data collected includes speed, position/movements and duration of pauses/stop overs.

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Bolloré has appropriate inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. Inventory controls are the primary method of preventing product loss during shipment.

These controls include the following:

- Consignments are identified and documented (individual IBCs are identified by number, and each freight container and each isotainer number is recorded).
- All containers are locked with seals and the seal numbers are recorded and checked by the consignee. Seals are also checked at transfer locations and on route.
- The shipments are weighed when leaving the production facility and again when arriving at the mine site.
- The identifying container numbers are transmitted to the consignee and are checked off by the representative (driver) and consignee at the point of delivery.

The controls in place would allow any loss of product to be promptly detected. The controls placed on empty containers on the return journey are the same as full ones.

Shipping records indicating the amount of cyanide in transit and Safety Data Sheets are available during transport. A review of delivery documentation together with pre-departure security checks confirmed that the amount of cyanide on each vehicle is recorded.

There is a copy of the emergency response plan with the SDS booklet held within the cabin of each vehicle.

Bolloré does not subcontract the transport and handling of cyanide.

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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

Bolloré is

in substantial compliance with

Transport Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 that requires transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to Bolloré.

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

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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.

in full compliance with

Bolloré is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré has developed emergency response documents for potential cyanide emergencies in the Ivory Coast supply chain.

These documents comprise of the *Plan of Emergency Intervention – Transport of Sodium Cyanide - Emergency Response Plan (ERP)* and the *Cyanide Transport Management Plan*.

The ERP provides information on

- Purpose
- Scope
- Objective
- General Information:
 - Sign and symptoms of cyanide poisoning
 - First aid instructions
 - Emergency communication numbers and a list of health care centres
 - Actions to be taken for inhalation or ingestion
 - Actions to be taken for contact with skin or eyes
 - Procedure for neutralising cyanide briquettes
 - Procedure for cleaning Personal Protective Equipment (PPE) and associated equipment
- General Instructions in the Event of an Incident During the Transportation of Cyanide:
 - Securing the scene of the incident
 - Response actions to the five (5) plausible emergency scenarios identified
- Notification and reporting.

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The *ERP* is specific to the transportation of cyanide by Bolloré and covers the transport risks via emergency scenarios based on the route assessment process. The *ERP* reflects the specific emergency response actions required for potential scenarios identified during the risk and route assessment processes.

The *General Instructions* (in the event of an incident during the transportation of cyanide) section of the *ERP* details the five (5) plausible emergency scenarios:

- Incident without discharge
- Incident without discharge but injuries
- Incident without discharge but impact on integrity of container
- Incident with discharge to ground with injuries
- Incident with discharge to waterway.

The *ERP* does consider both the physical and chemical form of cyanide and is based on transport of solid sodium cyanide. The *ERP* also includes the SDS, which provides information on the physical and chemical form of cyanide and the associate hazards and response actions.

The consideration of transport infrastructure has also been undertaken by Bolloré through route risk assessments and route assessments. Route assessments detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route. The *ERP* has been developed specifically for road transportation with trucks with a single container on each truck. There is no storage of cyanide.

The plans do include descriptions of response actions, as appropriate for the anticipated emergency situation. The *General Instructions* (in the event of an incident during the transportation of cyanide) section of the *ERP* details the five (5) plausible emergency scenarios identified. Actions are provided for the drivers, escorts and third parties that may be involved depending on the circumstances.

The *ERP* details both internal and external (outside responders) responsibilities in the event of an emergency. Section 2 outlines the role and responsibilities of the following outside responders in the event of an emergency:

- Escort Assistant(s)
- Fire Service.

3.3.2 Transport Practice 3.2

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

in full compliance with

Bolloré Logistics is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré does provide emergency response training of personnel to fulfil the duties outlined in the ERPs. Drivers are trained in the response actions to take in the event of an incident and a review of training records for drivers involved in cyanide transport confirmed that training had been provided.

In addition to training on the ERP, mock emergency drills with debriefs are held periodically as part of the training and evaluation process. A review of on-site driver and escort personnel training records against the *Training Matrix* confirmed that Bolloré had trained personnel to provide emergency response capabilities during cyanide transportation.

All drivers and escort team personnel are taken through emergency response drills on how to handle cyanide road accidents and spills. During the site inspection, discussions with Bolloré drivers and escorts confirmed that they have completed the training.

The ERP does identify the specific emergency response duties and responsibilities of personnel for response in the event of an incident.

Descriptions of the specific emergency response duties and responsibilities for both internal and external responders are detailed within section 2 of the *ERP* for all response scenarios. These personnel include:

- Chief of Escort
- Escort Assistant(s)
- Truck driver(s)
- Assistant driver(s)
- Fire Service.

Bolloré maintains a list of all its emergency response equipment that should be available during the transport route. The quantity and condition of the equipment is checked as part of the *Safety and Communication Pre-Departure Checklist* and *First Aid Box Checklist*.

Bolloré do have procedures to check emergency response equipment. Equipment is inspected as part of the pre-departure checks and records are retained showing that checks of emergency equipment are being undertaken correctly prior to convoy departure.

Records are retained showing that checks of emergency equipment are being undertaken correctly prior to convoy departure. A visual inspection was also made of the equipment to verify that it was present and in serviceable condition.

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A review of on-site driver and escort personnel training records against the *Training Matrix* confirmed that Bolloré has trained its personnel in emergency response procedures for cyanide transportation.

All drivers and escort team personnel are taken through emergency response drills on how to handle cyanide road accidents and spills. Personnel interviewed could describe the key actions to be taken and what their role was in an emergency.

Bolloré does not subcontract the transport of cyanide.

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Date

3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

Bolloré is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré has procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

Section 5.3 of the emergency plan details the emergency communication protocol and includes details for the internal contacts (safety and management personnel), the police, fire service, authorities' person on the convoy (CIAPOL and FACI) and the mine customer and who is responsible for contact. The list of hospitals and their contact details are also included in Section 5.3.

Bolloré has provisions to ensure that internal and external emergency notification and reporting procedures are kept current. The emergency response plan has been updated on four occasions since initial development in 2014 and the revision process includes checks on emergency contacts.

Bolloré

Name of Facility



Signature of Lead Auditor

12 December 2018

Date

3.3.4 Transport Practice 3.4

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

in full compliance with

Bolloré is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré 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.

Bolloré has procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

The *ERP* includes descriptions of the response actions for an anticipated emergency situation. The *ERP* includes the following sections covering clean-up and decontamination:

- Procedure for neutralising cyanide briquettes
- Procedure for cleaning Personal Protective Equipment (PPE) and associated equipment.

The *Instruction in the Event of an Incident – Cyanide Transport Procedure* contains further detailed information regarding spill response requirements and states that in the event of a spill absorbent material and sodium hypochlorite are used to absorb and neutralise the spill. The absorbent material is then collected with a shovel and placed in suitable plastic bags. All bags containing the neutralised product shall be transferred to the mine site for appropriate treatment and disposal.

Bolloré prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

The *Cyanide Transport Management Plan* states:

“In the event of discharge in a water current or a river, it is necessary to avoid any use of neutralizing! No chemical product (hypochlorite of sodium, ferrous sulfate and hydrogen peroxide) can be used there in these cases.”

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12 December 2018

Date

3.3.5 Transport Practice 3.5

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

in full compliance with

Bolloré Logistics is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The ERP contains provisions for periodically reviewing and evaluating the plan’s adequacy and they are being implemented. The emergency response plan has been updated on four occasions since initial development in 2014.

Several transport-related mock exercises were held during the audit period and one non-cyanide related vehicle incident was presented as evidence of implementing and evaluating the emergency response plan. The mock drills presented cover both the release and recovery of cyanide product and potential exposure.

There is a process to evaluate the ERPs performance after its implementation and revise it as needed. The operation has conducted several drills with documented debriefs. The outcomes of the reviews have not triggered a revision of the plan but actions have been developed.

Bolloré

Name of Facility



Signature of Lead Auditor

12 December 2018

Date

4.0 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 Associates has under the contract between it and its client.

Bolloré

Name of Facility



Signature of Lead Auditor

12 December 2018

Date

Signature Page

Golder Associates Pty Ltd



Mike Woods
ICMC Lead Auditor and ICMC Transportation Expert

MCW/EWC/hn

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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



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