

SUMMARY AUDIT REPORT

for the July 2015
International Cyanide Management Code Certification Audit



Prepared for:

Societe Generale de Consignation et d'Entreprises Maritimes (SOGECO)

Submitted to:

International Cyanide Management Institute
1400 I Street, NW, Suite 550
Washington, DC 20005, USA

FINAL

15 December 2015



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SUMMARY AUDIT REPORT

Name of Transporter: Societe Generale de Consignation et d'Entreprises Maritimes

Name of Owner: Societe Generale de Consignation et d'Entreprises Maritimes

Name of Responsible Manager: Mr Layti Ndiaye, Director of Operations

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Location detail and description of operation:

Kinross Gold Corporation (Kinross) purchases cyanide from Cyanco Corporation (Cyanco), for the Tasiast Mauritania Ltd. SA gold mining operation (Tasiast), a Kinross mining operation in Mauritania. The cyanide is transported from Cyanco's production plant in Houston, Texas, via the Port of Houston to the Port of Nouakchott in Mauritania. Societe Generale de Consignation et d'Entreprises Maritimes (SOGECO) is responsible for transportation of the cyanide by road from the Port of Nouakchott to the Tasiast mine site.

The cyanide is shipped in sealed standard 20-foot steel intermodal shipping containers. Within each shipping container the solid cyanide is packaged in 1,000 kg 'bag-in-box' plywood intermediate bulk containers (IBC); 20 IBCs per shipping container. The cyanide briquettes in each IBC are packed in nylon supersacks enclosed in plastic (bag in bag). The total weight of each packed shipping container is approximately 24,000 kg.

The containers are unloaded onto the Port of Nouakchott wharf using shipboard cranes owned and operated by the Maersk Ocean shipping company. After the integrity of the containers and the shipping documentation is checked the Port of Nouakchott loads the containers onto awaiting SOGECO trucks. The road used by the cyanide convoy is the asphalt paved N-2 highway for the first 305 km to the Tasiast mine junction. From here the road is unpaved compacted gravel base for the final 50 km to the mine. The route is shown in Figure 1.

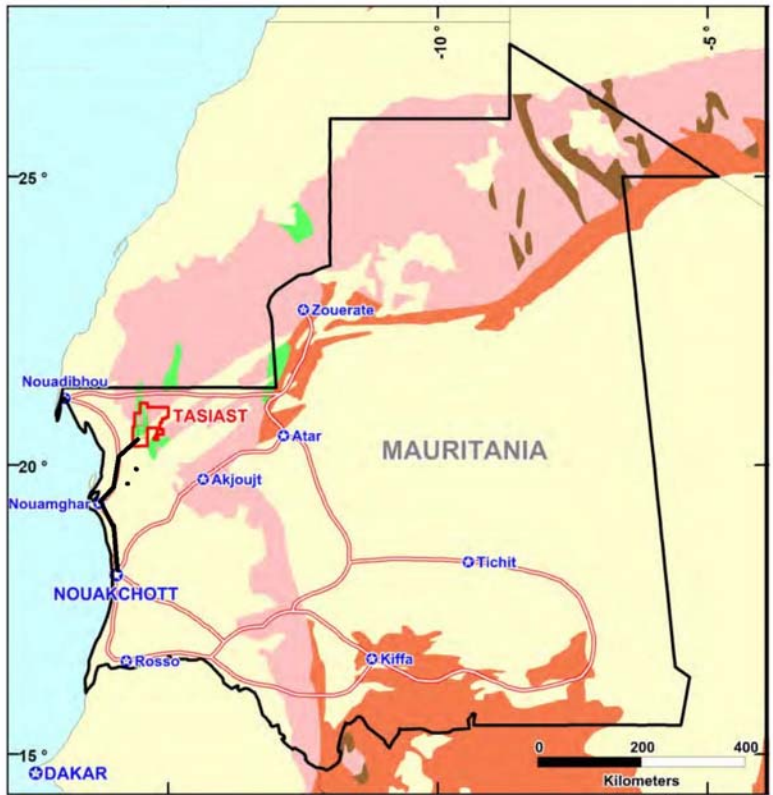


Figure 1: Cyanide transportation route between Port of Nouakchott to Tasiast Mine .

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Auditors' Finding

The operation is: ■ in full compliance
 in substantial compliance
 not in compliance

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Audit Team Leader and Technical Auditor: John Lambert
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Names and Signatures of Other Auditors

Date(s) of Audit: 21 July 2015 and 25 July 2015

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 Transportation Verification Protocol* and using standard and accepted practices for health, safety and environmental audits.

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SUMMARY AUDIT FINDINGS REPORT

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

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

■ **in full compliance with Transport Practice 1.1**

The operation is

in substantial compliance with
not in compliance with

Summarize the basis for this Findings/Deficiencies Identified:

SOGECO transports cyanide by road between the Port of Nouakchott to the Tasiast mine; a distance of approximately 355 km. Route options are limited to a few alternatives between the Port and the northern limits of Nouakchott, a distance of about 25 km. Beyond this the only route is the Nouadhibou Road (N-2) to the Tasiast road junction, a distance of 280 km and an unpaved gravel road running northeast to the mine site, a distance of approximately 50 km.

SOGECO used a risk assessment procedure to select the least hazardous route for the transport of cyanide. Of three viable routes between the Port of Nouakchott and the northern limits of Nouakchott the preferred route was selected as houses along the route are set back from the road, the route avoids a busy roundabout junction and a hospital and schools that are present on the alternates. Other considerations included low hanging electric cables that cross the roads in the City. The landscape is generally flat and desert, and outside of Nouakchott settlements are few and generally small and/or nomadic. Primary hazards include occasional wandering animals and pedestrians and, along the northern part of the route, blowing sand and dunes. Potholes are a potential hazard on the unpaved road to the Tasiast mine. There are no open water bodies along the route.

Hazards along the route are reassessed annually and documented on a road risk assessment form that is carried with each convoy. The form identifies traffic controls and hazards at marked distances along the route and actions required by the driver to minimize the hazard. The Convoy Supervisor also updates the form as necessary during each convoy to incorporate new or temporary hazards (animals, temporary settlements, potholes, sand drifts etc.) along the route.

Weather conditions are checked prior to a convoy departure. The convoy departure could be delayed if cross winds exceed about 60 km/hr or there is a risk of dust storm.

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To manage risk SOGECO has implemented a Cyanide Transport Management Plan that includes requirements for equipment specification and maintenance, employee training, and rules of the road for cyanide convoys. This Plan is supplemented by a number of Working Documents and instructions.

Convoys are restricted to daylight driving. The only exception permitted is when there is a late departure caused by unloading delays at the Port. In such occurrences the convoy will drive out of Nouakchott after dark to a temporary overnight rest stop to avoid having to park the convoy in a populated area over night. The Ministry of Environment Authorization limits the size of a convoy to 13 shipping containers. Speed restrictions are defined through populated areas, on bends, on unpaved road and during inclement weather. Each SOGECO vehicle is equipped with GPS, and truck location and speed are tracked by computer. The convoy is prohibited to drive during rain. The Plan also has requirements for periodic rest stops, vehicle checks and security measures during overnight stops.

SOGECO has met with government and community officials, gendarmerie and clinics in Nouakchott, and in the settlements of Belewakhe and Chami and discussed cyanide transport and emergency response. Various government departments, including Ministry of Mines and Energy, Ministry of Environment, Ministry of Internal Affairs and Mayor of Nouakchott are also involved with authorization for the transport of cyanide.

The cyanide is transported on convoys with gendarme security escort. Each convoy is accompanied by two escort vehicles. All vehicles are equipped with radio or walkie-talkie for communicating within the convoy and cell phones are used to communicate with the SOGECO logistics office. A satellite phone is also carried with the convoy in the event that the cellular network is not functioning. During overnight stops the convoy parks off the road in a remote unoccupied area. The area is taped-off and cyanide hazard signs are posted. The gendarmes are posted to ensure the trucks are secure during the night.

There is limited external emergency capability available in Nouakchott to provide assistance in the event of a medical emergency involving cyanide. At the north end of the route medical and emergency response assistance would be offered by the Tasiast mine. Although community clinics and hospitals have been made aware of the potential for a cyanide transport incident, SOGECO contracts a trained medic to accompany the cyanide escort in case of an emergency. The Civil Protection fire fighters that accompany the convoy are responsible for removing casualties from the scene and isolating the area. The Gendarme that accompany the convoy control vehicle traffic at the scene and contact local gendarme and community leaders to coordinate evacuation or other public control measures needed. SOGECO maintains

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an 80 tonne crane on standby during each convoy ready to respond to an emergency.

Transport Practice 1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

The operation is

- **in full compliance with Transport Practice 1.2** in substantial compliance with
- not in compliance with

Summarize the basis for this Findings/Deficiencies Identified:

SOGECO Group only uses trained, qualified and licensed drivers and crane operators. In Mauritania drivers are required to hold a Class C driver's license, appropriate for the heavy tractor/trailer goods vehicle driven. Most of the drivers gained their training and experience in the military. All personnel that participate in the cyanide convoys, including the contract medic, and gendarme and government personnel that accompany the cyanide convoys complete cyanide awareness training. Refresher training is provided by the HSEQ Manager and is based on training materials provided by Cyanco. This training includes the use of respirators.

In March 2015 Cyanco also provided a 3-day emergency response and cyanide awareness training program for all personnel involved with the transport of cyanide. This training was also attended by the Civil Protection fire fighters, the contract medic, and gendarme and government personnel that accompany the cyanide convoys. This training included a table top emergency response scenario and classroom exercises and discussion. As part of the training personnel were trained in the use of Self Contained Breathing Apparatus (SCBA), although in the event of an emergency only the Civil Protection fire fighters would use the equipment as first responders.

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

The operation is

- **in full compliance with Transport Practice 1.3** in substantial compliance with
- not in compliance with

Summarize the basis for this Findings/Deficiencies Identified:

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The handling and loading of cyanide containers at the Port of Nouakchott is undertaken by Port personnel using a Terex stacker maintained by the Port. SOGECO's responsibility for the cyanide shipment starts after the container is accepted by SOGECO and loaded by the Port onto the tractor/trailer.

SOGECO owns and maintains a large fleet of tractor/trailers for its transportation business. Of these SOGECO have selected 15 tractor/trailers (13 for use on the convoy and two kept on standby) for use for cyanide transport. The tractors are manufactured by Mercedes and are rated at 340 to 410 horse power. The flat bed trailers are 3 axles units manufactured by Sodexim, and are rated to carry loads of 50T or 60T, depending on the trailer. SOGECO also maintains an 80T capacity Grove mobile crane on standby during cyanide convoys ready to respond to a transport emergency. Procedures limit the cyanide transport to only one container per tractor/trailer. As the gross weight of each loaded shipping container is approximately 24,000 kg, the maximum load carried is well within the safe operating load for the trailers.

SOGECO conducts vehicle maintenance in house, and employs 14 mechanics/painters at their maintenance works yard. The vehicles are maintained on a preventative maintenance program recommended by Mercedes. Maintenance is scheduled and tracked using the Maximo preventative maintenance system software. As part of standard maintenance operating practice each vehicle is subject to a documented inspection every time it leaves the shop. Inspections of trailers are conducted monthly and include air brakes, tires, suspension, locks and chassis. Replacement parts for the tractors are Mercedes or compatible CE standard parts.

In addition to the preventative inspection and maintenance program, documented vehicle inspections are also undertaken immediately prior to a convoy by the HSEQ Manager together with a mechanic from the maintenance department. Drivers are required to check their vehicles and the security of their loads prior to departure and at each rest stop. Checks are also undertaken by the Convoy Supervisor during a convoy.

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

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

Summarize the basis for this Findings/Deficiencies Identified:

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SOGECO ensures that the cyanide is transported in a manner that maintains the integrity of the packaging. Cyanide is received as solid briquettes packed in plywood 1,000 kg IBCs. These are packed and transported in 20 foot long shipping containers; 20 IBC boxes per container. Within each IBC, the briquettes are packed in nylon supersacks enclosed in plastic (bag in bag) to protect against moisture. Each container is received sealed from Cyanco, and the structural integrity of the container and integrity of the seal is checked when the container is unloaded at Port of Nouakchott prior being accepted by SOGECO and loaded onto a trailer. Although an uncommon occurrence, damaged containers not accepted by SOGECO are isolated by the Port and remain on the wharf awaiting a safe resolution between the supplier (Cyanco) and the purchaser (Tasiast).

The shipping containers are sealed by Cyanco and the seal is not broken until the shipment reaches the mine site. The content of shipping each container is clearly identified on each side by "Poison" and UN 1689 placards and Marine Pollutant placards. European (ADR) Hazard Identification Number 66 (highly toxic substance) and UN1689 number (cyanide) placards are placed on the front of the tractor and back of the trailer, and a Toxic 6.1 placard with toxic written in English and Arabic on the back of the trailer as required by local regulations or international regulations.

A documented safety program is in place to minimize the potential for accidents and records are maintained to document implementation of the program. As discussed in Transport Practice 1.3 documented inspections are conducted on cyanide transport vehicles immediately prior to departure of the convoy and all vehicles are maintained through a preventative maintenance program that is tracked using the Maximo preventative maintenance software. Written procedures are in place that prohibit drivers from driving more than 2 hrs continuously without a break and that restrict driving to daylight hours except under circumstances of a late departure and a need for the convoy to clear the populated area of Nouakchott before stopping overnight. Procedures require loads to be checked by drivers and the Convoy Supervisor prior to departure of the convoy and during driver rest stops to ensure that the load is secure.

Generally weather conditions are suitable for cyanide transport year round; nevertheless, weather conditions are tracked prior to each departure. During inclement conditions such as high wind, a dust storm or precipitation, the convoy departure would be delayed or the convoy would be halted at a convenient off-road location until conditions improve. Procedures are in place to address critical security conditions that creates a potential danger to members of the convoy or integrity of the cargo.

Because Mauritania has strict cultural and regulatory requirements that forbid the use of alcohol and drugs, SOGECO does not have a formal drug and alcohol

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prevention program. Nevertheless, the driver awareness training program includes instruction of the effects of alcohol on driving ability. The alertness of drivers is assessed at the beginning of each shift, especially during Ramadan, to check that drivers are fit to drive.

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

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

Not Applicable. SOGECO does not transport cyanide by sea or air.

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

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

Summarize the basis for this Findings/Deficiencies Identified:

A number of trucks are equipped with radios. For those trucks without a radio, drivers are provided with walkie-talkie radios. The radios are used for communication within the convoy as the signals are not able to reach back to base. For communicating with base each driver is equipped with a cell phone with a free SOGECO account number. A satellite phone is also carried by the Convoy Supervisor in the event that there is no coverage on the GSM cell phone network. All communication equipment is tested and batteries charged prior to convoy departure. Chargers are also carried with the convoy in the event that they are needed. All SOGECO vehicles are equipped with GPS. The location and speed of each vehicle is tracked via a satellite /computer tracking system that is managed by the Logistics Department.

Administrative, communication and electronic systems are in place to track the progress of cyanide shipments. Prior to the marine delivery of a cyanide shipment to Nouakchott, Cyanco provides SOGECO and the Tasiast mine a copy of the Bill of Lading that itemizes each cyanide shipping container in the consignment and providing information on the container number, contents and weight, and the seal number. SOGECO generates a Delivery Slip containing this information which is carried with the convoy to Tasiast. On delivery of the consignment to Tasiast each

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container number and its seal number and integrity is checked. The SOGECO Delivery Slip is then signed and stamped by Tasiast as confirmation of product delivery. A government customs officer travels with the convoy to assure that the container seals are not tampered with on route.

The Convoy Commander is required to communicate with the logistics base at least every 2 hrs to report on progress of the convoy and potential issues encountered on route. Communications are recorded on Form DT.HSE.574. As discussed above the convoy location and speed is also tracked on the GPS tracking system.

The SOGECO Delivery Slip carried on the convoy by the Convoy Supervisor details the quantity of cyanide being transported. Manuals, documents and forms carried with each convoy include a Materials Safety Data Sheet (MSDS) for cyanide and instructions and precautions to follow in the event of a cyanide incident.

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

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

Not applicable. SOGECO does not operate a trans-shipping depot or interim storage facility.

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

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

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

Summarize the basis for this Findings/Deficiencies Identified:

SOGECO has an emergency response plan (ERP) entitled *MAN.HSE.02 – Plan D’Intervention D’Urgence – Transport De Cyanure*. The ERP was last updated in April 2015. The Plan is supplemented by a number of instructions and working documents

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that include updated internal and external emergency contact lists, equipment checklists, and procedures for responding to emergency situations involving cyanide. The ERP was developed specifically for the transport by road of cyanide in briquette form, packed 1,000 kg 'bag-in-box' plywood intermediate bulk containers (IBC) in 20 foot sealed shipping containers, one container per truck, between the Port of Nouakchott and the Tasiast Mine. Although the ERP is specific to SOGECO's transport by road, SOGECO would also provide emergency response assistance at the Port and at the Tasiast mine if requested if an emergency occurred during the container transfer operation.

The ERP considers all aspects of the road transport infrastructure to effectively respond to potential incidents located in a remote desert area which is characteristic of the majority of the transport route. In addition to being trained to handle dry cyanide spills, the convoy escort team also includes two Civil Protection fire fighters, experienced in the use of SCBA to respond to situations involving actual/potential HCN gas generation. A contract medic, trained in cyanide poisoning and the application of cyanide antidote (hydroxocobalamin) also accompanies the convoy to provide fast response in an area remote from medical services. Six of the convoy trucks carry 200 L tanks of water available for decontamination of casualties and/or equipment. Although, not critical in the first response to a cyanide incident, SOGECO retains an 80 T capacity mobile crane on standby during convoys ready to respond if lifting equipment is required.

The ERP does not provide details on the design of transport vehicles operated by SOGECO. However, vehicle specifications indicate that the 50T load capacity of the trailers used is more than adequate to safely transport a full cyanide shipping container having a maximum gross weight of 24T. SOGECO prohibits the loading of more than one container per trailer.

The ERP considers four potential cyanide transport incidents:

- A vehicle accident but the container remains intact on the trailer;
- A vehicle accident in which the trailer has tipped over but container remains intact and no spillage observed;
- A vehicle accident in which the trailer has tipped over and spillage of cyanide has occurred, and
- A vehicle accident in which the trailer has tipped over and spillage of cyanide has contact with precipitation or water channel.

The plan includes procedures for neutralizing cyanide residue using sodium hypochlorite. The plan prohibits the use of neutralizing chemicals in the vicinity of a water body.

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Because of limited resources in Mauritania the roles of outside responders in the event of an emergency is limited and SOGECO has assembled the resources and capability within the escort team to respond to all foreseeable types of cyanide transport incident. In addition to SOGECO's trained drivers and health and safety professionals the convoy escort team also includes the capability of two Civil Protection fire fighters, and a contract medic. Two gendarmes also accompany the convoy. The Civil Protection fire fighters will provide first response to secure the scene and retrieve casualties. The medic is trained in cyanide first aid. The role of the gendarmes is traffic control and notifying any necessary external responders or local community personnel as needed. The role of local community responders would generally be limited to evacuation and control of public. The assistance of local fire department and ambulance services may be available for incidents in and proximate to Nouakchott. The Plan also indicates that resources at the Tasiast Mine would be available to support SOGECO if an incident occurred in the vicinity of the mine. SOGECO has also arranged that the Tasiast mine would accept cyanide waste generated during incident cleanup/remediation activities. Hospitals have been notified of the potential for cyanide incidents and casualties would be taken therefore after initial first aid treatment by the contract medic. The ERP includes a list of hospital contact information.

Transport Practice 3.2: Designate appropriate response personnel and commit necessary resource, for emergency response.

The operation is

- **in full compliance with Transport Practice 3.2**
in substantial compliance with
not in compliance with

Summarize the basis for this Findings/Deficiencies Identified:

All personnel involved in the handling and transport of cyanide complete cyanide awareness training and emergency response training. This training was initially provided in 2013 by the Civil Protection fire fighters and since that time the HSEQ Manager has provided cyanide awareness refresher training. This training is based on Cyanco cyanide awareness training course materials and includes practical exercises in respirator training and emergency response. Drivers are also trained in fire-fighting, dangerous goods and general first aid.

In March 2015 Cyanco provided a three day cyanide awareness and emergency response training course for all SOGECO employees involved with cyanide transportation. The course was also attended by the Civil Protection fire fighters, contract medic, gendarme and government officials who also accompany the cyanide

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convoys. This course included SCBA training and an emergency response table top exercise.

The ERP provides descriptions of the roles and responsibilities in the event of an emergency. The Civil Protection fire fighters would undertake the first responder role to secure and enter the scene, assess the situation, and retrieve possible casualties. The gendarmes are responsible for controlling traffic and communicating as required with local communities. The drivers are responsible to move upwind away from the scene and assist as requested. The Convoy Supervisor is responsible for overseeing the implementation of the ERP, calling the emergency numbers, coordinating the clean-up and decontamination activities. The medic is responsible for first aid response and patient decontamination.

SOGECO has the necessary equipment and supplies available to response to all foreseeable transport emergencies. Emergency response equipment is inspected and checked prior to the departure of a convoy. The equipment is otherwise stored in a dedicated room in the logistics compound. Procedures and checklists are used to ensure all emergency response equipment and supplies are functioning and available if needed during the convoy. The emergency medical kit is maintained and retained by the Contract Medic. The kit included a CyanoKit (hydroxocobalamin), with expiry date August 2016. The Contract Medic indicated that the Cyanokit is stored in a refrigerated chest during a convoy and in a refrigerator at the hospital when not on convoy.

In addition to formal training and refresher training as discussed above, all convoy personnel attend a tool box meetings prior to departure of a convoy, in which topics, including convoy driving procedures, cyanide, PPE, health and safety and incident response, are reviewed and discussed.

As discussed above emergency response equipment is inspected prior to each convoy to ensure that it is in good working order and the inventory for the convoy is complete. Checks include ensuring batteries for radios, megaphone and phones are charged prior to departure; the SCBA equipment is charged and operational, fire-extinguishers are charged, and the 200 L water tanks on the trailers are filled. Inspection records for each convoy are maintained.

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

The operation is

- **in full compliance with Transport Practice 3.3**
- in substantial compliance with
- not in compliance with

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Summarize the basis for this Findings/Deficiencies Identified:

The responsibilities for external notifications are documented in the ERP. The Convoy Supervisor is responsible for calling the HSEQ Manager in the event of an accident and the HSEQ Manger contacts SOGECO management, local authorities and Tasiast Mine as appropriate for the type of emergency. The convoys are escorted by police and Civil Protection fire fighters who would notify external responders for additional assistance, if necessary.

SOGECO has a written procedure for management of change of documents. This procedure is part of SOGECO's ISO 9000 quality management system that has been rolled out in preparation for ISO 9001 certification of its transportation operation in September 2015. SOGECO have a full time quality assistant dedicated to document control and management of the quality system. At minimum documents are reviewed annually and updated as required. Where copies of documentation are provided to outside agencies a record of the email distribution is retained.

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

The operation is

- **in full compliance with Transport Practice 3.4**
in substantial compliance with
not in compliance with

Summarize the basis for this Findings/Deficiencies Identified:

Because of the arid conditions between Nouakchott and the mine the potential for a cyanide spill near open water is extremely remote as the average annual rainfall in the region is less that 140mm. However, infrequent precipitation events may occur during the rainy season in October which could result in ephemeral steam flow or surface water ponding.

The ERP addresses the use of neutralization chemicals for decontamination of soils and equipment. The instruction details the preparation and use of sodium hypochlorite solution and its application. The instruction also prohibits the use of chemical products (sodium hypochlorite and ferrous sulphate) where there is surface water. Cyanide waste resulting from cleanup and decontamination of a spill will be placed in sealed plastic bags and containers and transported to the Tasiast mine site for disposal.

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

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- **in full compliance with Transport Practice 3.5**
in substantial compliance with
not in compliance with

The operation is

Summarize the basis for this Findings/Deficiencies Identified:

SOGECO conducts periodic emergency response exercises that simulate potential transport related emergency events. In January 2015 a one day theory and one day practical training program was conducted to familiarize the escort team and drivers with the use of emergency response equipment, safety materials and materials for decontamination and clean-up. The practical program involved simulating four emergency response scenarios: an accident in which a shipping container opened and two IBC boxes fell out; an accident in which a motorcyclist was seriously injured but the cyanide container was undamaged and remained on the trailer; an accident in which a shipping container overturned and opened, damaging IBC boxes and exposing the bulk bags; and an accident in which a shipping container was damaged; releasing cyanide and exposing to persons to cyanide poisoning.

In March 2015 a table top exercise, facilitated by Cyanco, was conducted that involved all of the drivers and escort team including gendarmes, Civil Protection fire fighters, a Ministry of Environment representative and the Contract Medic. The table top scenario involved a dropped container during loading of a SOGECO truck/trailer at the Port of Nouakchott and spillage of dry cyanide on the wharf. Based on the observations from the exercise a number of recommendations were made to improve emergency response procedures including the recommendation to conduct a functional mock drill. At the time of the field component of the verification audit all recommendations except the functional mock drill had been implemented.

SOGECO conducted a functional mock drill in September 2015. The scenario involved a collision of a truck with a cyanide truck that resulted cyanide spillage, the highway being partially blocked and two members of the public exposed to cyanide. The mock drill was scheduled during a return of a convoy after a cyanide delivery to Tasiast to make the exercise as real as possible. In addition to convoy drivers, two Civil Protection fire-fighters, the contract medic, two gendarmes, a Ministry of Environment inspector and a Minister of Mines and Energy representative also participated in the drill. Based on lessons learned a corrective action plan was developed to address observed deficiencies areas for improvement. A recommendation was also made to conduct four mock drills in 2016.

In keeping with SOGECO's document management system and as stated in the ERP, the ERP is reviewed annually and as needed to address gaps or deficiencies.

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