



November 2014

INTERNATIONAL CYANIDE MANAGEMENT CODE

Stellar Logistics Limited Transportation Certification Audit, Ghana, Summary Audit Report

Submitted to:

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

Stellar Logistics Limited
Stellar Group Head Office
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Accra Airport
GHANA, WEST AFRICA

REPORT

Report Number. 137648037-007-R-Rev0

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Table of Contents

| | |
|--|-----------|
| 1.0 INTRODUCTION..... | 1 |
| 1.1 Operational Information | 1 |
| 1.2 Stellar Logistics Limited | 1 |
| 1.3 Trans-shipping Depots or Interim Storage Sites | 1 |
| 1.4 Auditors Findings and Attestation | 2 |
| 1.5 Name and Signatures of Other Auditors: | 2 |
| 1.6 Dates of Audit | 2 |
| 2.0 CONSIGNOR SUMMARY..... | 3 |
| 2.1 Principle 1 – Transport..... | 3 |
| 2.1.1 Transport Practice 1.1 | 3 |
| 2.1.2 Transport Practice 1.2..... | 4 |
| 2.1.3 Transport Practice 1.3..... | 5 |
| 2.1.4 Transport Practice 1.4..... | 6 |
| 2.1.5 Transport Practice 1.5..... | 7 |
| 2.1.6 Transport Practice 1.6..... | 7 |
| 2.2 Principle 2 – Interim Storage..... | 8 |
| 2.2.1 Transport Practice 2.1 | 8 |
| 2.3 Principle 3 – Emergency Response..... | 9 |
| 2.3.1 Transport Practice 3.1 | 9 |
| 2.3.2 Transport Practice 3.2..... | 10 |
| 2.3.3 Transport Practice 3.3..... | 11 |
| 2.3.4 Transport Practice 3.4..... | 12 |
| 2.3.5 Transport Practice 3.5..... | 13 |
| 3.0 LIMITATIONS | 14 |

APPENDICES

APPENDIX A

Limitations



1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: Stellar Logistics Limited
Name of Facility Owner: Not Applicable
Name of Facility Operator: Stellar Logistics Limited
Name of Responsible Manager: Paul Harrison, Deputy General Manager
Address: Stellar Logistics Limited
Stellar Group Head Office
Millennium Heights Building
Liberation Link
State/Province: Accra Airport
Country: Ghana
Telephone: +233 (0) 31 2025356
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Email: paul.harrison@stellar-africa.com

1.2 Stellar Logistics Limited

Stellar is a division of the Stellar Group of Companies. Stellar is a wholly owned Ghanaian entity that was established in 2007 to provide freight forwarding and logistics services. The Company's head office is located in Accra, with branches in Takoradi, Accra, Tema, Ouagadougou, Burkina Faso and Lagos, Nigeria.

The Group of companies provides logistics, hospitality, travel, power, ship broking, and property maintenance and retail services. The logistics arm transports bulk dangerous goods and containerised products to the mining industry in Ghana.

Stella currently transports solid sodium cyanide manufactured by Orica, in 20' general purpose shipping containers or bulk sparge isotainers from the Port of Takoradi in Ghana or Orica Pty Ltd's Cyanide transfer facility (Tarkwa, Ghana) to end user destinations within Ghana by road.

1.3 Trans-shipping Depots or Interim Storage Sites

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

Storage in transit may occur at Stellar's Takoradi Depot in the event that receipt at the port is delayed. In this event, containers are not removed from the trailers and the vehicles are parked for a maximum of 24 hours.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



1.4 Auditors Findings and Attestation

in full compliance with

Stellar is: in substantial compliance with **Cyanide Management Code**

not in compliance with

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Edward Clerk, CEnvP (112), Exemplar Global (020778)

Email: eclerk@golder.com.au

1.5 Name and Signatures of Other Auditors:

| Name | Position | Signature | Date |
|--------------|---------------------------------------|--|------------------|
| Edward Clerk | Lead Auditor and Technical Specialist |  | 14 November 2014 |

1.6 Dates of Audit

The Certification Transport Audit of Stellar was undertaken over two days on 5 and 6 August 2014.

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 Pre-Operational Verification Protocol for Cyanide Transportation Operations* and using standard and accepted practices for health, safety and environmental audits.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

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

2.1.1 Transport Practice 1.1

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

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar has implemented a route assessment procedure to guide the selection and review of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. The *Procedure for Route Assessment* prompts the persons undertaking the route assessment to identify potential risks along the route. Hazards identified during the route assessment and selection process are risk assessed using the process detailed in the *Procedure for Route Assessment* and the *Hazard Identification and Risk Management* procedure. Following the conduct of any risk assessment, the procedure requires the *Emergency Response Plan for the Transportation of Sodium Cyanide* (ERP) and *Cyanide Transport Management Plan* (CTMP) to be reviewed for applicability with respect to any new risks identified or the implementation of risk controls or mitigation measures during the risk assessment process.

Stellar has implemented processes and a procedure to periodically re-evaluate routes used for cyanide deliveries. The *Procedure for Route Assessment* details that route assessments will be reviewed when there is a change to the route; e.g. permanent road alteration, or at a minimum, annually.

Stellar has a process for providing feedback on route conditions during the journey and after each convoy. The *Driver Journey Plan* details planning process during the delivery. Upon returning from the delivery, the plan is signed and given to the Operations Superintendent, any issues the driver had on the journey are detailed on this plan. Any issues identified are reviewed and they are detailed on the *Convoy Leaders Route Advice Adjustment Form* and communicated during the toolbox meeting prior to the next departure.

Stellar has documented measures taken to address risks identified with the selected routes within the CTMP and route assessments.

Stellar seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. Stellar has identified Suppliers, Government Ministries and Departments, Medical Providers, mine site customers and local communities as stakeholders.

Stellar utilise road convoys and escorts to address safety concerns during transport. Stellar has a *Convoy Management* Procedure that details the requirements of transport in convoys. It states that *all deliveries of cyanide are to be transported in a convoy situation at all time.*

The ERP identifies the police, fire service and medical services as external responders and Stellar has advised these external responders and medical facilities of their roles during an emergency response.

Stellar does not subcontract any of its cyanide transport operations within the scope of this audit.

Stellar Logistics Limited
Name of Facility



Signature of Lead Auditor

14 November 2014
Date



2.1.2 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

Stellar is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Stellar 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.

Stellar only uses trained and competent operators to drive its trucks. All drivers are checked to ensure they have the correct licence before being employed. There is no requirement in Ghana for drivers to be licensed for dangerous goods transport.

Drivers, as well as being licenced to drive, are required to be trained in the following, as specified in *Minimum Training Requirements* procedure:

- Site Induction
- Cyanide Awareness
- Emergency Response Training
- First Level Response to Cyanide Emergencies
- First Aid
- Convoy Management Procedure
- Risk Assessment (Route Assessment)
- PPE Use and Storage
- Safe Guidelines for Transportation of Dangerous Goods

Stellar does not subcontract any of its cyanide transport operations within the scope of this audit.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. The CTMP details that prime movers and trailers utilised are rated for the load to be carried in accordance with current Ghanaian regulatory (Ghana National Road Transport Commission and ECOWAS (Economic Community Of West African States) protocols) requirements, subject to a preventative maintenance program and pre-utilisation inspection. The *Emergency Plan for the Transportation of Sodium Cyanide* states that Stella is licensed to carry bulk dangerous goods and all equipment used to carry dangerous goods is authorised to do so by the Ghana Driver and Vehicle Licensing Authority (DVLA) and Environmental Protection Agency (EPA).

The equipment selected by Stella conforms to the required regulations.

A General Vehicle Pre-Start Checklist is completed daily for all equipment by the QHSE Department. Any defects identified are noted and converted to work orders by the Maintenance Department. Each truck is also checked on return from each trip and goes to workshop for refuelling.

Stellar has implemented a *Fleet Maintenance Plan* procedure. This procedure details that preventive maintenance (PM) inspection and services will follow the recommended intervals (within 500 km or seven days) by the manufacture guidelines. The scheduled maintenance includes checks on the adequacy structural components. Stellar have also implemented a vehicle defect system to manage repairs and defects that identified during the vehicle inspection procedures.

Stellar has procedures in place to prevent overloading of vehicles. The CTMP states that the convoy make up is planned to ensure that loads to be carried are within the allocated vehicle configuration rated capacity. Stellar does not subcontract any of its cyanide transport operations within the scope of this audit.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar has a *Container Collection Procedure* to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. This procedure requires Stellar to check container seal integrity. The *Convoy Log Sheet* also records information including seal numbers.

Placards are used to identify the shipment as cyanide, as required by international standards. Stellar's management plan details that vehicles transporting sodium cyanide will be placarded in accordance with the Australian Dangerous Goods (ADG) Code. The plan also includes an example of an emergency information panel (EIP) that is attached to the containers, and Hazchem signs that must be placed on vehicles used in the transportation of sodium cyanide. It was confirmed that all containers are labelled and trucks are placarded on front and sides. The pre-departure checklist includes the requirement to check that EIPs are placed on containers and Hazchem placards (including UN hazard warning and marine pollutant diamonds) are placed on vehicle.

Stellar has implemented a safety programme for cyanide transport that includes the following:

- Vehicle inspections by the QHSE Department prior to departure and then again by the driver and Convoy Supervisor when vehicles have been loaded. Any defects are noted and rectified appropriately. Each truck is also checked on return to the yard.
- Stellar has implemented a *Fleet Maintenance Plan*. This procedure details that preventive maintenance inspection and services will follow the recommended intervals by the manufacture guidelines.
- Procedures to control driver fatigue that include limits to worker hours and cross checking driver times through the GPS system.
- Procedures to prevent loads from shifting, including the use of specifically designed container twist locks. These locks are checked periodically at the start and throughout a delivery.
- Procedures to suspend operations for inclement weather or problems on the route.
- A *Drug and Alcohol Policy* that details the organisation's awareness programme and notes the circumstances that testing may be carried out.

Records are retained for the above activities.

Stellar does not subcontract any of its cyanide transport operations within the scope of this audit.

Stellar Logistics Limited
Name of Facility



Signature of Lead Auditor

14 November 2014
Date



2.1.5 Transport Practice 1.5

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

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 1.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar does not transport consignments of cyanide by sea or air within the scope of this audit.

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar's vehicles have means to communicate with the Stellar Depot, the mining operation, the cyanide producer and emergency responders.

All drivers are equipped with mobile phones and mobile phone charging capacity is provided in each vehicle. Additionally, vehicles are fitted with a two-way radio system and GPS tracking. All communications systems are to be checked prior to the convoy leaving as per the *Pre-Departure Vehicle Checklist*.

Emergency contact numbers are provided in the *Procedure for Contact Details*, which is carried in each vehicle. The procedure states that numbers are reviewed during each route assessment review.

No communication black out zones have been identified on routes to current end user destinations within Ghana and surrounding areas. Drivers' use double SIM phones so while areas may have limited reception, no area has no reception from all carriers. The QHSE Manager stated that black spots are identified during the route survey.

Communication equipment is tested to ensure it functions properly either periodically or through continuous means. A GPS tracking system has been installed in all dedicated cyanide transport vehicles. This system is tested through continuous use.

Stellar has implemented systems and procedures to track the process of cyanide as described in the *Chain of Custody – Cyanide* procedure. Stellar utilises a GPS Mapping/Tracking system to determine vehicle locations. The system can detail the vehicle identification, local time, status (i.e. end drive, parked, drive), current location, course and speed.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



The *Driver Journey Plan* also details the departure and delivery points and rest points in between. All deliveries travel in convoy including with an Escort vehicle.

Safety Data Sheets are available during transport. The *Pre-Departure Vehicle Checklist* ensures they are in every vehicle prior to departure.

Stellar has implemented inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. After the initial inspection, a waybill is created by Stellar for each container. The waybill (duplicate and original) accompanies the Driver during the delivery. The waybills include a description of the goods, including container details and weights. This system is used as proof of delivery to customer mines.

Stellar does not subcontract any of its cyanide transport operations within the scope of this audit.

2.2 Principle 2 – Interim Storage

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

2.2.1 Transport Practice 2.1

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

in full compliance with

Stellar 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 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to Stellar.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit may occur at Stellar’s Takoradi Depot in the event that receipt at the port is delayed. In this event containers will not be removed from the trailers and the vehicles will only be parked for a maximum of 24 hours. The escort vehicle would also remain with the cyanide load and additional security is employed for the night. CCTV is also present in Takoradi Depot yard.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



2.3 Principle 3 – Emergency Response

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

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar has developed an *Emergency Response Plan for the Transportation of Sodium Cyanide* (ERP). The ERP is specific to the design of the vehicles and transportation routes used by Stellar. It details “Incident Types” and it includes emergency scenarios for truck transportation. It considers both the physical and chemical form of cyanide along with the method of transport. The consideration of transport infrastructure has also been undertaken by Stellar through *Route Risk Assessments*. *Route Risk Assessments* detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route.

The ERP includes a description of the response actions for an anticipated emergency situation. Part C of the ERP details clean up and containment steps:

- General clean up requirements
- General Clean Up Requirements
- Neutralization Procedures
 - Dry Solid Sodium Cyanide Spill
 - Sodium Cyanide Spill To Water
- Fire Hazards And Response
- Environmental Monitoring

The ERP identifies the roles of outside responders and medical facilities in the event of an emergency as well as the responsibilities of external responders and key personnel.

Emergency contact numbers for internal and external entities are provided in Appendix A of the ERP.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



2.3.2 Transport Practice 3.2

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

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar provides emergency response training of appropriate personnel. Stellar has developed and implemented a training scheme for its Drivers and Convoy Supervisors. All drivers, as well as being licenced to drive, are required to be trained in the following, as specified in *Minimum Training Requirements* procedure:

- Specific Site Inductions
- Emergency Product Awareness
- Response Requirements
- First Aid
- Convoy Procedures.

The emergency response training is detailed in the ERP under *ERP Training Required*. All drivers are trained in accordance with *Minimum Training Requirements* procedure:

Descriptions of the specific emergency response duties and responsibilities for internal personnel and external entities are included for:

- Driver
- Convoy leader
- ERT
- External Responders.

Descriptions of the specific emergency response duties and responsibilities for internal personnel and external entities are detailed in the ERP. These personnel/entities include:

- Convoy Supervisor
- Primary and Secondary Incident Coordinators at SLL base
- Escort Driver, Truck Driver and Truck Driver's mate
- Client (ORICA)

Stellar Logistics Limited
Name of Facility



Signature of Lead Auditor

14 November 2014
Date



STELLAR LOGISTICS LIMITED CERTIFICATION AUDIT SUMMARY AUDIT REPORT

- Mine Site
- Local Police Service
- Local Ambulance Service
- Local Fire Service
- Environmental Protection Agency
- Water Resources Commission
- West African Rescue Association.

Stellar maintains a list of all of 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 *Pre-Departure Vehicle Checklist* and the *Convoy Emergency Response Equipment Checklist*.

Stellar provides emergency response training of appropriate personnel.

Emergency response training is part of the minimum training requirements for cyanide drivers.

Interviews and inspections of the checklists by the Auditor indicate that the equipment inspections are occurring as stipulated.

Stellar does not subcontract any of its cyanide transport operations within the scope of this audit.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

The ERP contains procedures and current contact information for notifying outside response providers, and medical facilities of an emergency. The ERP contains an emergency contact flow chart and emergency contact details for internal and external entities, including Stellar personnel, Emergency Response Team Members, Regulatory Authorities, Fire Services, Police Services and medical providers. Additionally, the *Procedure for Contact Details* SOP is kept in the vehicles with the ERP and also contains contact numbers for emergency services.

Systems are in place to ensure that internal and external emergency notification and reporting procedures are kept current. The ERP, including contacts, is reviewed at least annually and the *Procedure for Contact Details* is updated with every route review.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



2.3.4 Transport Practice 3.4

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

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Stellar 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.

Stellar has a procedure 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. This is covered in the ERP.

The ERP includes a description of the response actions for an anticipated emergency situation, including clean up and decontamination and covers Dry Sodium Cyanide Spill and Sodium Cyanide Spill to Water.

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

Under the section of sodium cyanide spill to water the ERP states:

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

Stellar Logistics Limited
Name of Facility



Signature of Lead Auditor

14 November 2014
Date



2.3.5 Transport Practice 3.5

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

in full compliance with

Stellar is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

There provisions for periodically reviewing and evaluating the adequacy of the ERP. Section 4.0 of the ERP states that:

SLL's (Stella's) QHSE Manager and deputy (if applicable) are the nominated persons responsible for updating this plan when the following happens:

- *Contact numbers change*
- *After an incident and the resulting investigation and evaluation deems it necessary*
- *Following exercises and mockdrills*
- *Updated at least annually.*

The ERP has provisions for periodically conducting mock emergency drills and they are being implemented. Evidence was provided in the form of drill reports indicating that both desktop and mock drill exercises are being undertaken by Stellar.

Stella advised that the next mock drill is scheduled for December 2014.

Stellar Logistics Limited
Name of Facility



Signature of Lead Auditor

14 November 2014
Date



3.0 LIMITATIONS

Your attention is drawn to the document – “Limitations”, which is included as Appendix A to this report. This document is intended to assist you in ensuring that your expectations of this report are realistic, and that you understand the inherent limitations of a report of this nature. If you are uncertain as to whether this report is appropriate for any particular purpose please discuss this issue with us.

Stellar Logistics Limited
Name of Facility


Signature of Lead Auditor

14 November 2014
Date



Report Signature Page

GOLDER ASSOCIATES PTY LTD

Edward Clerk
Associate, ICMC Lead Auditor and ICMC Transportation Expert

BJL/EWC/hsl

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APPENDIX A

Limitations



LIMITATIONS

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