



August 2016

INTERNATIONAL CYANIDE MANAGEMENT CODE

Transport Terrassement Minier, Republic of Guinea, Transportation Recertification Audit, Summary Audit Report

Submitted to:

International Cyanide Management Institute
(ICMI)
888 16th Street, NW-Suite 303
WASHINGTON DC 20006
UNITED STATES OF AMERICA

Transport Terrassement Minier
BP: 463
Conakry
Republic of Guinea
West Africa

REPORT

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Distribution:

- 1 Copy – ICMI (+1 Electronic)
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Table of Contents

1.0 INTRODUCTION	1
1.1 Operational Information	1
1.2 Description of Operation	1
1.2.1 Transport Terrassement Minier	1
1.2.2 Road Transport	1
1.2.3 Transit Storage	2
1.3 Auditors Findings and Attestation	2
1.4 Name and Signatures of Other Auditors	2
1.5 Dates of Audit	2
2.0 TRANSPORTER 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.....	4
2.1.4 Transport Practice 1.4.....	5
2.1.5 Transport Practice 1.5.....	6
2.1.6 Transport Practice 1.6.....	6
2.2 Principle 2 – Interim Storage.....	7
2.2.1 Transport Practice 2.1	7
2.3 Principle 3 – Emergency Response.....	8
2.3.1 Transport Practice 3.1	8
2.3.2 Transport Practice 3.2.....	8
2.3.3 Transport Practice 3.3.....	9
2.3.4 Transport Practice 3.4.....	10
2.3.5 Transport Practice 3.5.....	10
3.0 IMPORTANT INFORMATION	12

APPENDICES

APPENDIX A

Important Information



1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	Transport Terrassement Minier
Name of Facility Owner:	Not Applicable
Name of Facility Operator:	Transport Terrassement Minier
Name of Responsible Manager:	David Gozlan, Director
Address:	Transport Terrassement Minier BP: 463 Conkary Republic of Guinea
State/Province:	Conkary
Country:	Republic of Guinea
Telephone:	+224 628 18 71 12
Fax:	N/A
Email:	d.gozlan@yahoo.fr

1.2 Description of Operation

1.2.1 Transport Terrassement Minier

TTM is a transportation and logistics company engaged in the transportation of goods within the Guinea. TTM is an ICMC signatory. TTM's head office is located in the Matoto region of Conakry. Further support offices and workshops are spread through Guinea to service the company's three core areas of business:

- Transport – TTM operates specialised transport services, including dangerous goods transportation for the mining and resource industries.
- Terrassement (Earthworks) – TTM operates a fleet of earth moving equipment, which service contracts with the Government for road building and repairs, the mining industry for building haul roads and access roads as well as earthworks at mining operations for tailings dams and heap leach installations.
- Minier (Mining) – TTM services mining contracts for movement of ore from mining operations to the processing plant. This includes the supply of labour, equipment and plant servicing.

TTM was founded in 1997. The company has approximately 350 employees and operates a range of transport, earth moving and mining equipment.

1.2.2 Road Transport

Upon arrival at the Port of Autonom De Conakry, the offloading of all containers is performed by stevedores using the ships cranes. Since 2012 Class 6.1 Dangerous goods are loaded directly from the ship onto the truck and no storage occurs at the Port. In the event that a truck was not present, the container would not be unloaded. Once the cyanide containers are collected from the Port, they are taken to the TTM Transport Yard where they are stored on the truck overnight in preparation for convoy departure the following morning at 0600 hrs. At no stage is cyanide removed from the trucks or containers prior to unloading at AngloGold Ashanti's Siguiro mine site, which is approximately 815 km away.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



1.2.3 Transit Storage

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 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.

1.3 Auditors Findings and Attestation

in full compliance with

Transport Terrassement

The International Cyanide Management Code

Minier is:

in substantial compliance with

not in compliance with

Audit Company:

Golder Associates

Audit Team Leader:

Mike Woods, Exemplar Global (113792)

Email:

mwoods@golder.com.au

1.4 Name and Signatures of Other Auditors

Name	Position	Signature	Date
Mike Woods	Lead Auditor and Technical Specialist		15 August 2016

No significant cyanide exposures and releases were noted as occurring during the audit period. One incident (not involving a release or exposure) occurred during the recertification period.

1.5 Dates of Audit

The ICMC Transport Recertification Certification Audit was conducted over two days between 7 and 8 March 2016.

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

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

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



2.0 TRANSPORTER 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

Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has implemented a procedure for selecting routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases. The procedure does include consideration of population, infrastructure, pitch and grade and the prevalence of water bodies. The identified hazards are detailed in the route assessment provided within the Transport Management Plan.

TTM, in consultation with its cyanide supplier/consignor and mining company customer, has implemented the procedure and conducted route surveys for the selected route. The ECOWAS (Economic Community of West Africa States) website is also consulted for advice and restrictions along with Government stakeholders. The surveys have been periodically updated.

There is currently only a single route available for the delivery of cyanide from the Port of Autonom De Conakry to AngloGold Ashanti’s Siguiri mine, which is located 815 km to the east-north-east of Conakry. The selected route corresponds to the Trans ECOWAS route or the main commercial route linking Guinea, Mali, Burkina Faso, Ghana and the Ivory Coast. The Operations Manager advised that ECOWAS routes are generally the best routes available.

The selected route is documented in the transport management plan together with the controls to mitigate them. Common controls have been considered through the cyanide transport risk assessment.

The drivers and escorts complete a series of checklist as part of the convoy and these include commentary on road/route conditions. This information is feedback to operations management personnel.

In addition to the drivers observations TTM conducts periodic reviews of the routes and updates the route assessments. TTM documents the measures taken to address risks identified with the selected routes. This is provided within the transport management plan and communicated to the drivers and escorts via presentations and pre-departure briefings.

TTM through the mining operation has consulted with the community and external responders. TTM follows approved routes for the transport of dangerous goods and transport convoys are escorted by the Police.

TTM does not subcontract the transport of cyanide.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

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

The operation is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM does only use trained, qualified and licensed operators to operate its transport vehicles. A review of training records and comparison to convoy records confirmed that transport vehicle operators had completed TMM designed training and held suitable licences.

TTM personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. TTM trains their drivers and escorts in the procedures to transport cyanide including pre journey inspections, convoy controls and the actions to be taken in the event of an emergency.

TTM does not subcontract the transport of cyanide.

2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 1.3 requiring that transport equipment is suitable for cyanide shipment.

TTM only uses equipment designed and maintained to operate within the loads they will be handling. TTM transports cyanide with a prime mover and single trailer for transporting a single sea container per vehicle. TTM has an onsite workshop and undertakes both preventative and corrective maintenance on its vehicles and trailers.

A review of convoy documentation and maintenance records confirmed that vehicles used to transport cyanide are maintained. In addition to maintenance records, pre-departure checks include inspection of the vehicles and signature to confirm that equipment is in suitable condition. An inspection of transport equipment found them to be in serviceable condition consistent with the condition detailed in TTM's inspection records.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



TTM has procedures to verify the adequacy of the equipment for the loads it must bear. This is addressed through specification of the prime movers and the trailers and through the maintenance program. TTM uses a 6 x4 prime mover and trailer per container of cyanide. The weight of the container is within the capabilities of the equipment used.

TTM does not subcontract the transport of cyanide.

2.1.4 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

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 1.4 requiring the operation develop and implement a safety program for transport of cyanide.

TTM has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producers packaging. TTM transports the cyanide within the shipping container and part of their checks include checking that the seals on the container are intact. Checks are performed periodically through the convoy and the convoy is escorted by the Police.

Placards and signage are used to identify the shipment as cyanide as required by local and international standards. Placarding is provided on the front and rear of the vehicle and on the sides of the containers in the form of diamonds with the UN 1689 number and poisons symbol.

TTM completes vehicle inspections prior to each departure and records of the inspections are retained in the convoy records. TTM has a preventative maintenance program that includes an inspection of the vehicle following completion of each convoy and a tiered maintenance regime based on kilometres travelled. A review of maintenance records confirmed that prime movers and trailers used for cyanide are included in TTM's preventative maintenance program. An inspection of vehicles and workshop confirmed maintenance activities are undertaken.

TTM does have a limitation on driver hours. Cyanide convoys are undertaken during daylight hours and are limited to a maximum of 60 hours in 6 days. TTM has a fitness for work process that includes drugs and alcohol. Vehicle operators are breath tested prior to the commencement of the convoy and the Escort Commander is responsible for checking on the fitness of operators during the convoy.

TTM secures the shipping containers used to transport cyanide to the trailers using twist locks. The Escort Commander has control of the convoy and is responsible for contacting the operations manager in the event modification or suspension is necessary. The convoy is also escorted by the police.

TTM does not subcontract the transport of cyanide.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



2.1.5 Transport Practice 1.5

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

in full compliance with

The operation 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 TTM.

TTM 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

The operation is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM is in FULL COMPLIANCE with Standard of Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

The transport vehicles do have means to communicate with the transport company, the mine, cyanide producers and emergency responders. The vehicles are fitted with two-way radios and in addition mobile phones provide coverage along the route. There are regular communications between to convoy and the transporter throughout the route. The communication equipment is periodically tested to ensure it functions properly.

TTM has systems and procedures to track the progress of cyanide shipments. The convoy escort provides regular updates on the progress of the shipment and the vehicles are fitted with GPS tracking that allows for real time monitoring of the progress of the convoy. In addition the convoy is escorted by the police

The container numbers and seals are recorded when the shipment is collected at the port and these are cross checked when delivered at the mine. A review of convoy documentation confirmed that inventory controls are in place.

Shipping records indicating the amount of cyanide in transit and safety data sheet (SDS) are available during transport. The inventory documentation details the amount of cyanide in the convoy and SDS are held in the cabin of the trucks.

TTM does not subcontract the transport of cyanide.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



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.

The operation is in full compliance with **Transport Practice 2.1**

in substantial compliance with

not in compliance with

not applicable

Summarise the basis for this Finding/Deficiencies Identified:

Standard of 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 TTM.

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 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.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

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

The operation is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has developed and implemented an emergency response plan (Reponse de secours or ERP) for responding to cyanide transport incidence. TTM has developed a plan and supporting training content to inform drivers and escort commanders on the actions to be taken in the event of a cyanide release.

The ERP together with the route assessment and Transport Management Plan is appropriate for the selected transportation route and does consider road infrastructure.

The ERP does consider the chemical and physical form of cyanide. TTM's response processes have been built around responding to solid sodium cyanide product transported within IBCs within sea containers. The plan does consider the potential for liquid cyanide to be formed is spillage comes into contact with water and whether hydrogen cyanide gas could result from a spill.

The ERP does consider the method of transport. The plan considers the transport of cyanide via road in convoy with the cyanide packaged in IBCs within sea containers that are secured to trailers via twist locks.

The ERP also includes descriptions of response actions for the escorts, drivers and police escorts for incidents along the transport route. The escort commanders is responsible for coordinating response action at the scene and reporting back to the operations manager who provides overall response coordination and communication with mine and supplier.

2.3.2 Transport Practice 3.2

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



Summarise the basis for this Finding/Deficiencies Identified:

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

TTM provides emergency response training of appropriate personnel. Training is provided to drivers and escort commanders on the actions to take in the event of a cyanide incident and this is provided through presentations and mock drills. A review of training records confirmed that drivers and escorts involved in cyanide transport have received the designated training

Drivers are to assist the escort team in controlling the incident scene and the escort personnel are responsible to assessing the situation, contracting the operations manager and taking action to control the situation within their training.

A list of all emergency response equipment that should be available during transport or along the transportation route is detailed in the escort vehicle checklist and in the Response de secours presentation.

TTM has the necessary emergency response and health and safety equipment available, including personal protective equipment during transport. TTM completes checks on equipment prior to transport including personal protective equipment as part of pre-convoy checks. An inspection of equipment, vehicles and review of convoy documentation confirmed that the equipment is available during transport.

TTM provides initial and periodic refresher training in emergency response procedures including implementation of the Emergency Response Plan to drivers and escorts. Training is provided on an annual basis through presentations and via mock drills.

TTM has procedures to inspect emergency response equipment and assure its availability when required. These checks are incorporated into pre-departure checks, an inspection confirmed that designated equipment was available in the transport vehicles.

TTM does not subcontract transport of cyanide.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers and medical facilities. The Escort Commander is responsible for notifying the operations manager who will notify the mine, supplier and other agencies as necessary depending on the circumstances. An updated contact list is available in the transport vehicles and at TTMs office.

TTM has systems in place to ensure that internal and external emergency reporting procedures are kept current. Contact information is review annually as a minimum and updated where there are changes.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

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

The operation is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

TTM 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.

TTM Reponse de secours provides the framework for remediation of spills in consultation with the supplier and mine. The Transport Management Plan provides further details on the remediation of and recovery of spills including:

- Handling Hazards and Precautions
- Containment
- Recovery and Treatment of Spills
- Water Resource Treatment
- Neutralisation
- Reporting and Investigation.

These aspects are also covered in the cyanide awareness training package. The procedures do prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water. Section 7 of the Transport Management Plan contains a statement prohibiting the use of ferrous sulfate to treat cyanide that has been released into surface waters.

The emergency response section of the cyanide awareness training programme provided to all TTM Drivers and Escort team personnel details that chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide should not be released into surface water.

2.3.5 Transport Practice 3.5

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

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

TTM has provisions in place for periodically reviewing and evaluating the plans adequacy and they are being implemented.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



TRANSPORT TERRASSEMENT MINIER, SUMMARY AUDIT REPORT

TTM has a procedure that requires it to update and assess the ERP and Transport Management Plan annually. A discussion with the Operations Manager and the revision numbering on the documentation confirmed that this procedure is being implemented.

TTM has provisions for the periodic conduct of mock emergency drills and has completed a number of drills during the period. The drills are recorded in the form of a report that details the scope, observations, conclusion and photographs of the drill. There is also a practical component of the cyanide awareness training that is completed by drivers and escorts.

There is a procedure to evaluate the plans performance after its implementation and revise it as needed. TTM has not had cause to implement the plan during the audit period however the ERP contains provisions for conducting a review after an incident.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



3.0 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.

Transport Terrassement Minier

Name of Facility

Signature of Lead Auditor

15 August 2016

Date



Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read "Mike Woods".

Mike Woods
ICMI Lead Auditor and Technical Specialist

MCW/EWC/hn

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APPENDIX A

Important Information



IMPORTANT INFORMATION RELATING TO THIS REPORT

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