October 2014

INTERNATIONAL CYANIDE MANAGEMENT CODE

United Mining Supply, Republic of Guinea, Transportation Certification Audit, Summary Audit Report

Submitted to:

International Cyanide Management Institute (ICMI)
1400 I Street, NW – Suite 550
Washington, DC 20005
UNITED STATES OF AMERICA

United Mining Supply
BP: 2162
Conakry
Republic of Guinea
West Africa

REPORT

Report Number. 147648002-005-R-Rev1

Distribution:

1 Copy – International Cyanide Management Institute
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Golder Associates

Table of Contents

1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility:	United Mining Supply
Name of Facility Owner:	United Mining Supply
Name of Facility Operator:	United Mining Supply
Name of Responsible Manager:	Pierrick Greusillier, HSEQ Manager
Address:	United Mining Supply BP: 2162 Conakry Republic of Guinea West Africa
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1.2 Description of Operation

1.2.1 United Mining Supply

UMS is a Guinean company with a presence in Guinea, Sierra Leone, Liberia, Afghanistan and Niger. The company has approximately 800 employees and operates a range of services across six core areas of business:

- Administrative Services
- Transport
- Logistics and Trade
- Civil Works
- Constructions
- Aviation Department.

1.3 Sodium Cyanide Transportation

Cyanide is transported by UMS from the Port of Autonom De Conakry to gold mines in Guinea. At the time of the audit, UMS had transported cyanide to:

- Society Miniere de Dinguiraye's (SMD) Lero-Karta Mine in Northern Guinea
- Semafo's Kiniero Mine located in north-eastern Guinea.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

UMS transports solid cyanide packaged within intermediate bulk containers. Approximately 20 IBCs are transported within locked and sealed 20 foot shipping containers.

1.4 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the Port, containers are temporarily stored on trailer at the UMS depot overnight in preparation for departure to the customer mine sites the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

1.5 Auditors Findings and Attestation

	☒ **in full compliance with**	
United Mining Supply is:	☐ in substantial compliance with	**The International Cyanide Management Code**
	☐ not in compliance with	
Audit Company:	Golder Associates	
Audit Team Leader:	Edward Clerk, CEnvP (112), Exemplar Global (020778)	
Email:	eclerk@golder.com.au	

1.6 Name and Signatures of Other Auditors

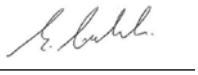
Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist		3/10/2014

1.7 Dates of Audit

The Certification Transport Audit of UMS was undertaken over two days between 19 and 20 February 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 Verification Protocol for Cyanide Transportation Operations* and using standard and accepted practices for health, safety and environmental audits.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	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:

UMS is in FULL COMPLIANCE with Transport Practice 1.1 requiring the transport of cyanide in a manner that minimises the potential for accidents and releases.

UMS has a procedure to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. The Road Survey procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step. Once a potential route has been chosen, the Control Department undertake a survey of the proposed route to assess potential issues and possible controls. The survey team also meet and discuss issues or concerns with the client and drivers.

UMS has developed a risk assessment procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. Risk assessment is applied at both the planning and operational phases of the project. UMS requires risks be reduced to a defined acceptable level before the route can be utilised. If controls cannot be implemented to achieve this, an alternative route must be found.

UMS has implemented a procedure to periodically re-evaluate routes used for cyanide deliveries. The Emergency Response Plan (ERP) and Transport Management Plan (TMP) require that routes are re-assessed each month or more frequently if the season changes/requires. Prior to departure, contact is made with the mines to obtain advice on current river levels and road conditions. During the convoy the Escort Commander provides real time risk management on the route condition. Feedback on the route is also documented in the End of Mission Report produced by the Escort Commander following each voyage. This is used as an awareness tool for convoy personnel.

UMS has documented measures taken to address risks identified with the selected routes. Risk assessments are documented. Upon completion of the route risk assessment and acceptance of the route by the Client and Authorities, UMS develop a TMP that details the agreed procedures for the specified routes. Risks and controls are also documented in the ERP for emergency situations.

UMS seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. The ECOWAS website is consulted for advice and restrictions along with Government stakeholders during the route selection process. UMS also seek advice from the mine and cyanide suppliers on the route selections including the survey team meeting to discuss issues or concerns with the client and drivers. On completion, copies of the Survey Report are sent to the mine site and external responders for comment and advice.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

The Ministry for Health and the Public Health and High Command of the National Police have also been consulted by UMS.

Direct engagement of communities by UMS did not occur for the following reasons:

- The community was not designated a role as part of the planned response to an emergency involving cyanide, thus negating the need for community consultation on this issue.
- The risk management measures implemented for the cyanide transportation negates the need for community consultation in the development of such measures. An example of the measures adopted by UMS include:
  - Use of convoys
  - Speed limitations

UMS uses convoys as a means of managing the risks of road transportation and responding to emergencies. Each convoy consists of one four wheel drive vehicle leading and one four wheel drive vehicle following the convoy, trucks carrying cyanide containers (maximum of five) and police in front (armed) and behind (unarmed) the convoy. The primary role of police is to direct traffic and control crowds in the event of an emergency. The Escort Commander leads the convoy and determines the speed based on the condition of the roads.

In addition to convoys and armed escorts, additional security measures are implemented including GPS monitoring of the progress of the convoy along the route. All containers are locked and sealed, and the containers are inspected prior to departure and at regular intervals throughout the convoy.

UMS has advised external responders and medical facilities as necessary of their roles and/or mutual aid during an emergency response. Prior to departure, contact is made with specified stakeholders detailed in the Emergency Response Plan (ERP). Other external responders were advised of their roles during an emergency response through letters and training coordinated by UMS. Police undergo training before participating in convoys. In the event of an emergency, they primarily provide crowd control functions which is not outside the scope of their normal roles.

External agencies including the police and medical staff from local hospitals are also involved with incident scenario training simulations at least once per year.

UMS does not subcontract cyanide transport activities. UMS does not manage the loading, unloading or destuffing of containers.

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:

UMS 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.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

UMS only uses trained and competent operators to drive its trucks and escort vehicles. Drivers are required to have a Category C licence (for vehicles that transports goods greater than 19 000 kg, which includes articulated trucks). The Control Department check licences and registrations twice per week. Ten drivers are used for cyanide transportation (five per convoy).

Guinea does not have dangerous goods legislation; despite this, cyanide awareness training, incorporating elements of dangerous goods training is provided by UMS.

Drivers and Escort Leaders have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The training is coordinated by UMS. A structured process has been established for the training of new drivers and minimum training requirements have been established for cyanide drivers.

- First aid
- Training on cyanide awareness
- Site induction
- Chemical response
- Responding to accidents / incidents
- Crowd control

UMS does not subcontract cyanide transport activities.

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:

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

UMS only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide and UMS has procedures to verify the adequacy of the equipment for the load it must bear.

Drivers are paired with set trailer (20 foot) and prime mover (Mercedes Actros) combinations. The Company maintains a register of trucks and trailers (and their design specifications) used for the transport of cyanide.

The TMP states that the axle loads for all trucks and trailers used conform to the ECOWAS transportation standards and the ERP includes the calculation for determining whether the truck and trailer is appropriate for the load.

A Preventative Maintenance procedure exists for equipment used in the transportation of cyanide. At the completion of every journey the vehicles are sent to the workshop. The work conducted on the vehicles is based on the preventative maintenance schedule (hours and kilometers) and a discussion between the mechanic and the vehicle driver (reactive maintenance). Work orders are raised for all work conducted.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

Maintenance personnel also travel with the convoy in the event of equipment problems.

UMS maintains records of vehicle and trailer specifications and maintenance history.

UMS has processes to prevent overloading of its transport vehicles. All trailers used for cyanide transport are capable of transporting single 20 foot trailers. No other trailers are used and cyanide is not delivered in any other form.

The container weights are detailed on the Bill of Lading prior to container collection from the Port of Autonom De Conakry. These are checked to ensure that the transport equipment allocated is suitable. A scanner is used at the Port to verify that the correct container has been placed on the selected trailer.

2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

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

Summarise the basis for this Finding/Deficiencies Identified:

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

UMS has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. The TMP outlines that containers must be inspected prior to loading to ensure that all seals are intact and warning labels and registration numbers are in place. The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact. The container is also checked by the Mine upon arrival at the mine site.

Placards are used to identify the shipment as cyanide and the specific requirements are specified within the ERP

Prior to every convoy, vehicles and equipment are checked using the Cyanide Equipment Checklist. Completed checks form part of the convoy documentation.

A Preventative Maintenance procedure exists for equipment used in the transportation of cyanide. At the completion of every journey the vehicles are sent to the workshop. The work conducted on the vehicles is based on the preventative maintenance schedule (hours and kilometers). Work orders are raised for all work conducted.

Limitations on operator hours are managed through the convoy planning stage. The routes have been appropriately planned with set breaks and designated overnight stops. Convoys cannot travel between 18:00 and 06:00 without prior written permission and accompanying HSE measures in place. .

UMS's procedures require twist locks to be engaged and checked for the transportation of cyanide containers. At the Port, containers are secured using four twist locks. The engagement of the twist locks is checked throughout the journey.

In the event of demonstrations or accidents or natural hazards being encountered during transportation, the Execution Transport Procedure directs the convoy to stop and the Convoy Leader to contact senior management for instructions.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

UMS has a HSE policy that commits to training staff HSE matters, misuse of drugs and alcohol and preventative actions relating to drug and alcohol. The policy also notes that UMS will carry out testing (random and for cause) for use of drugs and alcohol and in the event of a positive test will result in actions including further preventative training.

Records are maintained and were inspected in regard to UMS's cyanide safety program.

UMS does not subcontract cyanide transport activities.

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 UMS.

UMS does not transport consignments of cyanide by sea 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:

UMS is in FULL COMPLIANCE with Transport Practice 1.6 requiring the tracking of cyanide shipments to prevent losses during transport.

UMS vehicles use cell phones to communicate directly with the UMS Office, the mining operation, emergency responders, and indirectly with the cyanide producer.

The escort vehicles are equipped with mobile phones. Where no reception exists, the Convoy Commander calls before and after the reception black spot. The ERP contains a map showing areas without telephone reception.

All prime movers and escort vehicles are equipped with satellite tracking which is monitored at the UMS depot.

VHF radio, headlights and horns are used to communicate incidents between vehicles in the same convoy. The closed nature of the convoy allows trucks experiencing troubles to communicate with at least one escort vehicle and this vehicle communicates with the other. In the event of a problem with one truck, the entire convoy stops.

Communication equipment (GPS, mobile phone, radio,) is periodically tested to ensure it functions properly. The GPS tracking system is checked though continuous use.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

UMS track the progress of cyanide shipments through the use of the satellite tracking system fitted to prime movers and escort vehicles.

UMS implement chain of custody processes to prevent loss of cyanide during shipment. The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact. The container weights are also detailed on the Bill of Lading. A scanner is used at the Port to verify that the correct container has been placed on the selected trailer and the truck is weighed along the highway to confirm that the weights are unchanged.

The container seals are checked by the Mine upon arrival at the mine site to confirm no loss of product. UMS also uses convoys as a means of managing the risks of road transportation, responding to emergencies and to prevent product loss.

The delivery documentation notes the container numbers, weights and seal numbers. The ERP is also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.

UMS does not subcontract cyanide transport activities.

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**	
The operation is	☐ in substantial compliance with	**Transport Practice 2.1**
	☐ not in compliance with	
	☐ not applicable	

Summarise the basis for this Finding/Deficiencies Identified:

UMS is in FULL COMPLIANCE with Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Following collection from the Port, containers are temporarily stored on trailer at the UMS depot overnight in preparation for departure to the customer mine sites the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	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.

The operation is

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

Transport Practice 3.1

Summarise the basis for this Finding/Deficiencies Identified:

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

UMS has developed documents to cover emergency response for potential cyanide releases during cyanide transportation. The ERP details instructions in the event of four emergency situations:

- Accident without sodium cyanide discharge
- Accident with sodium cyanide discharge
- Accident with sodium cyanide discharge in water
- Fire

ERP also lists the following abnormal operations that have been identified as potential risks along the transport route:

- The temporary closing of a road due to floods on the road
- The closing temporary of the road due to an accident/incidental along the road
- The temporary closing of the road due to civil disorders
- Access to the mine site is refused
- Container rupture
- A breakdown of the vehicles of escort
- The escort vehicle is involved in an incident/accident on the route
- The driver falls ill.
- Controls during the rainy season.

In the event of abnormal operations, personnel are instructed to contact senior management before proceeding.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

Physical and chemical forms of cyanide are described in the ERP and TMP and copies of MSDS are carried on the convoy.

The TMP and ERP are based on road transportation between the Port and:

- Society Miniere de Dinguiraye's (SMD) Lero-Karta Mine in Northern Guinea
- Semafo's Kiniero Mine located in north-eastern Guinea

The documents were developed as an outcome of the route assessment process and consequently consider the physical and chemical form of the cyanide, aspects of the transport infrastructure and the method of transport (i.e. road).

The ERP includes descriptions of response actions, for four emergency response guides:

- Accident without sodium cyanide discharge
- Accident with sodium cyanide discharge
- Accident with sodium cyanide discharge in water
- Fire

A flow diagram is included in the ERP that outlines the flow of information in the event of a cyanide incident during transport.

The ERP (Part 2) identifies the roles of outside responders and medical facilities procedures. The mine site primarily provides logistical support in the event of an emergency. The roles of the police and local hospitals are in accordance with their duties. External responders were advised of their emergency response roles through letters and training coordinated by UMS.

The communities have not been allocated a role during an emergency and have consequently not been consulted.

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	

Summarise the basis for this Finding/Deficiencies Identified:

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

UMS provides emergency response training for appropriate personnel, including police officers involved in the convoy. UMS has developed a training matrix for transport personnel. This matrix identifies the minimum training requirements for escort personnel and convoy drivers:

- First aid
- Training on cyanide awareness

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

- Site induction
- Chemical response
- Responding to accidents / incidents
- Crowd control

Additional training is provided to personnel involved in responding to an emergency:

- Initial response and oxygen administration
- PPE
- Sodium cyanide safety
- Emergency response
- MSDS
- Emergency fire and evacuation
- Roles and responsibilities

The ERP contains four emergency response guides to be followed in the event of an incident involving cyanide and it details the specific actions to be taken by UMS members:

- Escort Leader
- Escort Vehicle 1 Driver
- HSE Officer
- Police
- Driver
- Reservist Drivers
- Assistants Drivers
- Escort Vehicle 2 Driver

Emergency simulations are carried out twice per year where specific aspects of the emergency plan are evaluated. A training simulation involving external responders is conducted at least once per year. Records of this training are kept for future evaluation.

Discussions convoy personnel confirmed that they knew what their roles were in an incident. The auditor questioned their knowledge of what they learnt in the training in relation to what their role was in a spill and what PPE they should use.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

UMS has procedures to inspect emergency response equipment and assure its availability when required. UMS has a checklist for emergency equipment, personal protective equipment that is available during transport. Equipment lists are provided in the Appendix of the ERP. Checklists include the presence of equipment required and also check the state (good/bad) of equipment. Copies of these completed forms were sighted and personnel were interviewed who confirmed that checks are undertaken.

UMS provides transport vehicle operators with initial and periodic refresher training in emergency response procedures. Training is provided by UMS annually or more frequently if needed.

UMS does not subcontract cyanide transport activities.

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:

UMS is in FULL COMPLIANCE with Transport Practice 3.3 requiring the operation develop procedures for internal and external emergency notification and reporting.

The ERP and associated documents contain procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.

The ERP includes a contact list of staff / companies that must be contacted before each voyage is undertaken. This includes manufactures, Stevedores, mine sites and key UMS representatives.

A flow diagram is included in the ERP that outlines the conveying of information in the event of a cyanide incident during transport. In the event of an emergency incident, it is the Escort Leader's responsibility to contact the required people outlined in the flow diagram.

UMS has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current. The ERP requires a review of the Contacts List prior to the convoy departure. This ensures that the list is kept up to date. The Transport Preparation procedure designates it the responsibility of the Health Safety Security and Environment Officer / Convoy Leader to ensure that contact numbers are checked and validated prior to departure.

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:

UMS is in FULL COMPLIANCE with Standard of Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

The ERP contains 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.

In the event of a spill, all cleaning will be carried out by UMS. Personnel are first required to contain the spill or discharge as soon as possible to avoid greater contamination of the site. Residual cyanide will be recovered and neutralised according to the procedures for neutralisation which were established by the manufacturer. Both the ERP and TMP have statements prohibiting the use of chemicals such as sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to 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:

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

UMS has provisions for periodically reviewing and evaluating the adequacy of its plans. The Route Survey Procedure requires an assessment of the route to be undertaken each month or more frequently if the season permits it. The procedure requires the ERP to be reviewed and updated (if necessary) following the completion of the survey.

In addition the ERP contains a requirement that it is to be reviewed and updated (if necessary) following emergency drills and incidents.

UMS has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current. The ERP requires a review of the Contacts List prior to the convoy departure. This ensures that the list is kept up to date.

UMS conducts annual mock drills as part of the cyanide awareness training. The emergency simulations are carried out twice per year where specific aspects of the emergency plan are evaluated. A training simulation involving external responders is conducted at least once per year.

No cyanide incidents have been reported to date.

The ERP has had one revision since its development.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	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.

United Mining Supply		3 October 2014
Name of Facility	Signature of Lead Auditor	Date

Report Signature Page

GOLDER ASSOCIATES PTY LTD

Ed Clerk
ICMI Lead Auditor and Technical Specialist

BJL/EWC/hsl

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APPENDIX A

Limitations

LIMITATIONS

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