

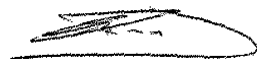
# **Allship Logistics Limited. Ghana. Transport Re-Certification Audit.**

## **Summary Audit Report.**

Report submitted to:-  
1400 I Street, NW, Suite 550  
Washington. DC 20005  
Unites Sates of America.

Report of:-  
Allship Logistics Limited  
P.O. Box BT 582  
Heavy Industrial area  
Opposite Tema Lube Oil  
Tema.  
Ghana.

Allship Logistics – Tema Ghana  
Name of facility



Signature of Lead Auditor

15<sup>th</sup> April 2023  
Date

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## 1.0 INTRODUCTION

### 1.1 Operational information.

Name of transportation facility	:	Allship Logistics Limited
Name of facility owner	:	Allship Logistics Limited
Name of facility operator.	:	Allship Logistics Limited
Name of responsible manager	:	Robert Kutin
Address	:	Allship Logistics Limited Head Office (Tema) Heavy Industrial area Opposite Tema Lube Oil P.O. Box BT 582
State / Province	:	Tema
Country.	:	Ghana
Telephone.	:	+233 (0)303 202362
Fax.	:	0303-206482
E-mail.	:	<a href="mailto:Robkutin@hotmail.com">Robkutin@hotmail.com</a> / <a href="mailto:info@all-ship.com">info@all-ship.com</a>

### 1.2 Audit scope.

The scope covers the road transportation of cyanide from the Port of Takoradi in Ghana to customers mine sites and Allship Logistics Warehouse in Dompim within Ghana. At the warehouse IBC's packed in 20ft sea freight containers previously destuffed from freight containers and stored at the Allship Logistics owned and operated warehouse facility which is situated along the transport route to mines sites. The warehousing of sodium cyanide at the Allship warehouse is addressed within a separate ICMI audit report.

### 1.3 Description of operations.

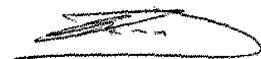
Allship Logistics Limited is a wholly owned Ghanaian entity that was established during 1990 to provide freight forwarding and logistics services. The Company's Head Office is in Tema, with branches in Accra and Takoradi which are well equipped with modern communication equipment to facilitate world wide access to information.

The Takoradi operational center is responsible for the Allship Logistics Ltd. Warehouse located at Dompim near Tarkwa, Ghana. Most operational activities take place at Tema and Takoradi primarily due to the port activities of both cities. Takoradi is a port situated in the Western region of Ghana

Allship Logistics has a 1.8-hectare truck yard and 3.4-hectare warehouse facility at its Head Office in Tema. It also has a 0.8-hectare truck yard in its branch office in Takoradi and a 0.5-hectare yard with a cyanide warehouse facility located in Dompim-Pepesa situated near Takoradi. The cyanide storage warehouse size is 65.50 meters by 24.50 meters with ridge height roof of 9.50 meters where IBC's containing solid sodium cyanide is stored.

With over twenty-five (25) years in business, Allship has become a leading freight forwarder in Ghana and could

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compete with other freight forwarders in the African sub-region. The company has strategically focused on providing services to mining companies which include Goldfields Ghana Ltd (Tarkwa and Abooso/Damang Mines), Golden Star (Bogoso/Prestea) Ltd, Golden Star (Wassa) Ltd, Chirano Gold Mines, Newmont Gold Ghana Ltd and Perseus Gold Mining Company all in Ghana as well as lamgold or Essakane Mining and Burkina Mining Corporation (BMC) or Youga Mines – in Burkina Faso, etc.

Allship, however transports solid sodium cyanide in 20 ft. sea freight containers to Perseus Mining Ghana Ltd, Adamus Resources Ltd, Prestea Sankofa, Golden Star Resources Ltd and the ALLSHIP Warehouse. .

The company is a member of International Federation of Freight Forwarders Association (FIATA) and Ghana Institute of Freight Forwarders (GIFF).

Allship Logistics have a 0.5-hectare brick fenced boundary wall yard situated in Dompim – Pepesa in the Western region of Ghana onto which a 1605 square meter cyanide storage warehouse facility (size of 65.5 meters by 24.5 meters). Dompim— Pepesa is about 88 kilometers from Takoradi which is in the Western Region of Ghana and approximately 171 kilometer west of Accra

Tacotel is a Company operating as the sole handler of containerised import and export cargo in and out of the Port of Takoradi. The sea freight containers, loaded with cyanide, are loaded by this Company onto the Allship trailers.

#### 1.4 Road transportation

Allship Logistics Ltd transports cyanide manufactured by Orica Australia Pty Ltd (Orica) who is a code certified producer by ICMI. The company has an agreement with Orica Pty Ltd to transport sodium cyanide (briquette) from the port of Takoradi Ghana to Adamus Gold mine, and Dompim warehouse. Cyanide deliveries are made from Dompim Warehouse to Perseus mining, Golden Star Resources Wassa mine and Prestea Sankofa Gold Ltd.

Solid sodium cyanide briquettes are packaged in plastic bulk bags within a polyethylene lining and then encased in plywood boxes each weighing approximately 1mt of product. A maximum of 20 IBC's are packed into a 20 ft shipping freight container and transported by sea to the port of Takoradi in Ghana.

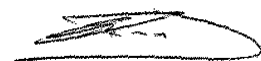
The containers are offloaded from vessels upon arrival at Tacotel terminal in the Takoradi port. Tacotel terminal subscribes to the IMDG Code. Pre-alerts are given to Allship prior to the arrival of a vessel. Allship commences the process of custom clearance prior to the arrival of the vessel. Upon arrival the containers are cleared from Ghana Customs and loaded onto trailers and delivered to the mine. A combination of a loaded trailer plus a freight container has a maximum gross mass of 24.2 tons. In some occasions deliveries are sent to Allship's warehouse in Dompim 68Km where it is kept in temporary transit for onward deliveries to Adamus Gold Mine, Perseus mining, Prestea Sankofa Gold and Golden Star Resources Wassa mine. The distances from the Takoradi port to Adamus Gold mine is 73Km, from the port to Dompim warehouse is 68km, from Dompim to Perseus mining a distance of 188.3Km, from Dompim to Prestea Sankofa Gold mine is 74.5Km and from Dompim to Golden Star Resources Wassa mine is 75.2Km,

Before arrival, Allship ensures that the shipping documentation is in order and the goods are cleared to allow prompt handling of the product through the ports. Upon arrival at the ports, the loading of the containers is performed by the port stevedores.

Sodium cyanide, in solid form is transported on roads in Ghana. The routes include the following from the Tacotel terminal in the Port of Takoradi;

- ❖ Takoradi- Agona – Nseum – Simpa – Dompim - Bonsa – Tarkwa – Wassa Akropong – Ayamfuri – Perseus mines.
- ❖ Takoradi – Agona – Nseum – Simpa – Dompim Warehouse    Takoradi – Agona – Apimanim – Adjumako – Miemia – Essiama – Adamus Resources Ltd.

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- ❖ Takoradi – Agona – Apimanim – Nsuaem- Simpa - Dompim – Bonsa – Tarkwa – Bogoso- Prestea Sankofa Gold Ltd.
- ❖ Takoradi – Agona – Apimanim – Nsuaem- Simpa - Dompim – Bonsa – Tarkwa – Housing – Fanti Mines – Aboso – Damang – New Subri – Golden Star Resource Ltd.
- ❖
- ❖ Takoradi - Dompim warehouse facility.

### 1.5 Transit Storage.

Within the scope of this audit there are no trans-shipping depots or interim storage sites, as defined in the transport audit protocol. Storage in transit does occur at the port Takoradi while formalities such as customs clearance are performed.

Once customs formalities are completed, the cyanide containers will be collected and transported to customer mine sites or if required to the Allship warehouse in Dompim.

Allship's cyanide warehouse is located at Tarkwa Road, Dompim, a town with approximately 10 000 people and situated approximately 30 kilometers south-west of Tarkwa. Most cyanide is delivered by ship to the port at Takoradi and some cyanide been delivered via the Tema port.

At the warehouse the IBC's containing cyanide are destuffed from the sea freight shipping containers and packed inside the warehouse with a concrete flooring. This is kept there until required by the three mines namely Perseus Mining, Golden Star Resources and Prestea Sankofa Gold. Deliveries to Adamus mine is done directly from the port of Takoradi.

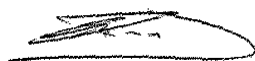
Upon request by the mine, the IBC containing cyanide, are removed from the warehouse using a forklift and packed into a shipping freight container, locked and sealed, ready for road transport to the customer site.

The storage of this cyanide has been audited as part of a separate cyanide warehouse audit using the *Cyanide Production Verification Protocol*.

### 1.6 Auditor's Findings and Attestation.

	<b>full compliance with</b>	
Allship's Logistics Ltd is in	substantial compliance with	The International Cyanide Management Code.
	Not in compliance with	
Audit Company	Tommie Müller South Africa	
Audit Team Leader	Tommie Müller	
Technical Specialist Auditor	Ben Amoo-Mensah	
E-mail address	<a href="mailto:tommieb.muller@gmail.com">tommieb.muller@gmail.com</a>	

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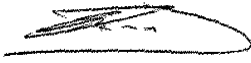



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Since the time of the previous audit three years ago to date of this audit, Allship Logistics Ltd has experienced no cyanide related incidents or compliance problems reported / recorded.

**Name and signature of Auditor/s.**

Name	Position	Signature	Date
Tommie Müller	Lead Auditor - CN Transport & CN Production		15 <sup>th</sup> April 2023
Ben Amoo-Mensah	Technical Specialist Auditor		15 <sup>th</sup> April 2023

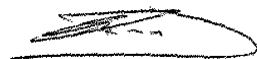
**1.7 Dates of Audit.**

The recertification audit of the Allship Logistics Transport Division was conducted over three (3) days between 27th February 2023 to 1st March 2023.

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 certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transport Certification Protocol and using standard and accepted practices for health, safety and environmental audits.

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**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.

The operation is **X in full compliance with**  
 in substantial compliance with Transport Practice 1.1  
 not in compliance with

**Summarize the basis for this Finding/Deficiencies Identified:**

Allship Logistics has developed and implemented a procedure for the selection of primary transport routes to identify and minimize the potential for accidents and releases. This procedure prompts the persons undertaking the survey to consider several various potential hazard types such as the condition of the road surface, road infra structure, the pitch of the road, potholes, trees, stray animals, traffic on the roads, traffic through towns, pedestrians, fog, smoke, rail tracks, population density, rivers, water bodies, bridges, sand storms, etc. These have been evaluated and noted in the route assessment documents. Recommended preventative actions to mitigate or eradicate the risks on selected routes are included in Route Risk Assessments (RRA document).

Five (5) Route Risk Assessments (RRAs) were conducted namely

- Port in Takoradi to Allship warehouse in Dompim,
- Allship warehouse to the four (4) mine sites, and
- Port of Takoradi to the Four (4) mine sites.

RRAs on primary route (main road) were conducted and observations have been documented. RRA procedures and assessments were found to be in place, appropriate and approved. The Ghana Environmental Protection Agency (EPA) issued a permit No. EPA/CCMC/GAR/HCT -6/22 dated 14/3/2022 that expires 13 March 2023 which allows transporter to transport hazardous chemicals by road within the Ghana boundaries.

Hazards identified during the route assessment and selection procedure, risks are assessed using the method outlined in clause 3.5.1 TRANSPORT ROUTES SELECTION AND REVIEW of the Transport Management Plan (TMP). The Route Selection Procedure guides the development of prevention or preventative measures to mitigate or eradicate these risks. Route selection procedure spells out the steps that are to be followed when conducting a Route Risk Assessments (RRA).

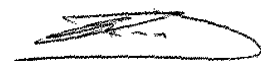
The Company has a process (de-briefing session) whereby Escort Coordinator and drivers provide feedback on route conditions noted during the journey and after each convoy delivery. Clause 3.5.1. of TMP refers.

Route Risk Assessments (RRA's) are conducted by the Transport and Safety Officers in consultation with Ghana Environmental Protection Authority (EPA), Ghana Highway Authorities and Orica Mining Services. Transporter only transport freight containers with sodium cyanide along the routes that have been approved by the receiving mine site and local authorities.

An off-dock terminal, Tacotel, is tasked to receive, store, and deliver import and export containers to cherish clients at the port of Takoradi. Tacotel is responsible for the loading of freight containers onto Company's trailers.

Procedure "Transport Management Plan" has been developed on routes to the mine, situated in Ghana. This plan outlines the process for the development and subsequent annual review of the detail captured in the route risk assessments. Procedure was approved by Allship Logistics Management and Orica. .

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The routes were reviewed in consultation with the Ghana Environmental Protection Agency Ghana Highway Authority and Orica Mining Services(supplier). Once a year Orica conducted audits on Allship and review the documented Transport Management Plan (TMP).

External responders along the routes were met and advised of their roles to be played and/or mutual aid during an emergency situation, if requested. Responders e.g. the Regional Commander of the Ghana Police Service, Takoradi local hospitals, EPA (local community), Ghana Fire Service and Ghana Health Services were met. The EPA consults with the community on issues that may affect them.

During these meetings Allship Logistics sought their inputs regarding routes that may be followed. Proof of such visits was noted. Product SDS handed to each of the emergency services.

As per the transporter's TMP route survey to be revised periodically. The company has implemented processes to periodically re-evaluate risks on the route used for cyanide transportation and has a process of getting feedback on the risks noted by drivers and escort leaders during delivery of cyanide. The Transport Management Plan mentions a process of continuously evaluating the transportation route surveys be at least on an annual basis and obtaining feedback on the road condition after each trip during debriefing sessions with the escort coordinator and drivers.

Procedure "Route Risk Assessments" is compiled and implemented. The Route Risk Assessment Procedure outlines the category of risks to be identified during the conducting of a route assessment. This procedure then guides the development of preventive measures which mitigate these risks. Identified risks on the road are discussed with the drivers during tools box meetings.

The performing of a Route Risk Survey procedure requires routes to assessed and risks identified along the route be noted and management measures to be documented within a Transport Management Plan. Allship Logistics has developed a Transport Management Plan for routes the transporter will be followed to the mines.

Procedure requires regularly evaluation and re-evaluation of the risks on the primary route that the cyanide consignment will travel on. Procedure states that the process for selecting transport routes and conducting of RRAs is re-evaluated on at least annually.

The transporter has a process for providing feedback on route conditions during the journey and after each convoy. Upon returning to the company's yard in Takoradi, the Convoy leader and drivers attend a debriefing session to discuss the journey and complete the journey feedback form.

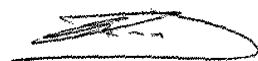
Further procedure requires that the identified risks be captured and managed.

A Convoy Management Procedure requires the use of one escort with four(4) trucks each carrying one container of cyanide. A maximum of eight (8) trucks per convoy will be allowed but then two ~~convoy~~ escort vehicles are required. The maximum speed to be travelled on tar and dirt roads is also specified in this procedure. The speed of the convoy is restricted to a maximum of 70 km/hour on sealed/ tarred roads and 30 km/hour on untarred/gravel roads depending on the road conditions at the time of travelling. TMP clause 3.6 refers and contents noted. Travelling speed confirmed during interview with escort coordinator.

Inputs sought from the Regional Commander of the Ghana Police Service, fire services, ambulance staff, the hospitals and Ghana Environmental Protection Agency (EPA) who represents the community in the selection of routes and development of risk management measures. Copies of product MSDS was sent along with letters. Consultations were held during 2020, 2021 and 2022. During these consultations inputs from the relevant stakeholders e.g. Fire Protection, Police Services, Hospitals and Ambulance staff were sought. Ghana EPA issued a permit No. EPA/CCMC/GAR/LHCT-6/22 dated 14/03/22 which expires 13th March 2023. Consultations with all stakeholders were held during 2020, 2021 and 2022 and is done annually. Evidence of notification letters and consultation were verified and noted.

Procedure and management measures were approved by Company Management of which copies were forwarded to Consignor.

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There is only one practical transportation route that Allship Logistics went through a selection and risk assessment process. The route was approved by the EPA and mine site management for the use for the transportation of cyanide. The Transporter's Emergency Response Plan (ERP) stipulates the roles and responsibilities required from the stakeholders, regulatory bodies and emergency services was handed to them. Written acknowledgement received from the external emergency services stating that they have received the ERP.

The EPA issued a permit to Allship Logistics for the transportation of cyanide.

The EPA is mandated to consult with the community on the issue of cyanide transport through their area.

Allship do not subcontract any aspect of their cyanide transportation activities.

**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	<b>X in full compliance with</b>	Transport Practice 1.2
	<input checked="" type="checkbox"/> in substantial compliance with	
	<input type="checkbox"/> not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

The transporter only uses trained, qualified and licensed drivers to operate their vehicles. The Transport Company (Human Resources) has a recruitment policy and procedures that specifies the process of selecting a driver for employment for handling transport equipment to perform their jobs with minimum risk to themselves, the communities, and the environment.

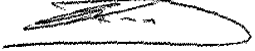
The transporter has an employment selection process that includes the following requirements for employment as drivers and other positions in the company.

- ❖ Vacancy is declared
- ❖ Position is advertised
- ❖ Application is received.
- ❖ Short listing of qualified personnel
- ❖ Conducting of interviews
- ❖ Most preferred candidate is selected
- ❖ Background checks are done on the prospective employee
- ❖ A person is given an appointment letter
- ❖ Induction is conducted for the personnel

Both practical training and theoretical training are organized for all drivers and escort team. A driver must be 18 years and above before being offered employment. Grade 12 school qualification and a minimum driver experience from between 5 to 10 years. Drivers go through a selection process which includes both practical training and theoretical training for drivers and escort coordinators. The selection process includes road test, written examination, previous employer reference checks, driving records, qualifications, sober habits, driver's health (mental and physical), eyesight, fitness to drive, valid driver's license class "F" is required.

A driver's license is renewed every 6 years but replaced every 2 years. Transport Officer and the Safety Officer to ensure that the driver's licenses are within valid dates. Driver's licenses are checked to ensure that they are within valid dates before departure on route.

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Training matrix captured the following training requirements for drivers to be trained in: -

- ❖ Company induction training.
- ❖ Cyanide awareness
- ❖ Loading and off-loading of cyanide freight containers on and from trailers,
- ❖ Company's Transport Management Plan (TMP) ,
- ❖ Outcome of the route risk assessment (RRA),
- ❖ Convoy management,
- ❖ Defensive driving techniques,
- ❖ Company emergency response plan (ERP),
- ❖ Mock drills,
- ❖ Incident / accident management,
- ❖ Basic first aid,
- ❖ Basic firefighting,
- ❖ Driver fitness,
- ❖ Drivers' competence and attitudes,
- ❖ Driver's knowledge of the local rules and of the road or highway codes.

Training matrix for drivers reflects these training requirements. Drivers attend toolbox meeting prior to each departure. Driver driving in convoy will be under supervision of convoy leader. Learner convoy leader drives along with competent convoy leader.

Training matrix reveals the following training requirements for drivers and escort coordinators; -

- ❖ Cyanide awareness (including loading and off-loading of cyanide) (Annually)
- ❖ Company's TMP, and Route Risk Assessment - Annually
- ❖ Convoy management - Annually
- ❖ Defensive driving techniques - Annually
- ❖ Emergency Response Plan - Annually
- ❖ Mock drills - Annually.
- ❖ Incident / accident management - Annually
- ❖ Basic first aid. (Every 3 years)
- ❖ Firefighting. (Every 2 years)
- ❖ Drivers' competence and attitudes - Annually
- ❖ Training on driver's rules of the road or highway codes- Annually

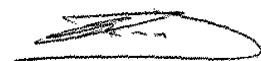
Training matrix was found to be updated. After completion of training, a driver is allowed to embark on a journey. A new driver drives with an old driver for his first trip to acquaint himself with the road condition. Validity of driver's licenses class "F" is checked before departure. Driver's license is valid for 6 years but replaced every 2 years.

Records of Cyanide Awareness training, Defensive driving training, Fire Fighting, First Aid training, and Mock drill attendance records for years 2020, 2021 and 2023 were noted. Verbal and written assessment is carried out on all drivers after the training.

Road test, written examination, valid license category checks, previous employer reference checks, driving records, qualifications, driver's health (mental and physical), eyesight and fitness to drive test. Valid driver's license Class "F" is a requirement for employment as a driver. Transport Officer and the Safety Officer ensure that the drivers licenses are within valid dates.

Allship Logistics only use dedicated trained and competent drivers to operate their delivery trucks that have appropriate training and valid vehicle licenses to transport cyanide. Personnel operating cyanide handling and

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

Learner convoy leader drives along with competent convoy leader. New drivers go through induction training before embarking on a journey. A new driver drives with an old driver for his first trip to acquaint himself with the road condition.

The company have not engaged in any sub-contractor for the transportation of cyanide.

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

**X in full compliance with**

The operation is  in substantial compliance with Transport Practice 1.3  
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Allship Logistics uses only equipment designed, maintained and is suitable for the transportation of cyanide.

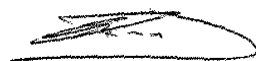
Allship Logistics have a policy only to use transport equipment that is designed and maintained to operate within the cyanide loads it will be handling. Transport equipment consists of diesel operated MAN 360horse power (HP) truck tractors (prime mover) with a configuration of 2 axles trailers (flatbed trailers) that can pull up to 40 tons weight.

Both prime movers and trailers are designed as per specification and is appropriate for the transportation of loaded sea freight containers by road. Technical specifications including truck tractor power, axle loadings and other parameters as set by the manufacturers specifications to ensure that the loads are within the legal capacities of public roads in Ghana. The total weight of the tractor unit, trailers and one container load of cyanide is 41.5 tons. As per the Ghana Highway Authority Axle Load Regulations a single axle truck is expected to take a maximum load of 44tons. This is within the requirements of the Economic Community of West Africa state (ECOWAS) of 10.5 tons per axle. The weights that the trucks carry is within the capacities of the trailer. A loaded vehicle with 20ft container of cyanide is within the allowable legal weights. The trailer carries one container of cyanide.

Transporter has a Vehicle Maintenance Procedure supported by manufacturer's specifications requires that vehicles are serviced in accordance to these requirements. Maintenance on vehicles is done as per the manufacturer's specification and in accordance with the Company's Vehicles Maintenance Procedure. Transporter's Vehicle Maintenance Procedure No.WS/SOP/01 Revision 07 dated 09/01/23 requires that truck tractors and trailers are serviced at 10 000 km maintenance service intervals with a variance of 500Km. The servicing of the twist locks is included on the service schedule for the trailers. Each flat deck trailer is equipped with eight twist locks of which only 4 at a time is utilized for 1x20ft container load of cyanide. Auditor conducted physical checks on the trailers and noted that the twist locks show signs of having been serviced.

The operation has an approved, fully equipped mechanical workshop where the trucks and trailers are serviced by qualified mechanics. Faults noted during pre-departure inspections are rectified immediately. Proper records of servicing done are kept and were sighted during the audit. Each trailer is loaded with one shipping container weighing approximately 24.2tons. The company's TMP contains a description of the configuration of the trucks.

Tyre maintenance procedure No. WS/SOP/01 revision 7 dated 9/01/23 is in use. Only new tyres are used on vehicles dedicated for the transportation of cyanide. Tyres are all the same size and tread depth still more than 4mm. Minimum of 4 mm tread depth is allowed. Transporter does not allow recapped tyres to be used on vehicles carrying cyanide.



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Adequate dry chemical powder fire extinguishers are fitted to truck tractor and trailer. There are two 6 Kg Dry Powder fire extinguishers, one on either side of each trailer, whilst 4Kg DCP fire extinguishers are in the cabs of prime mover. Fire extinguishers found to have been serviced in accordance with the National requirements of at least once every 6 months by an external service provider.

Transporter has a procedure in place to prevent overloading of the transport vehicle being used for handling cyanide. Transporter transports one container on a double axel trailer. Trailer configuration is allowed to be loaded with a mass of 40 ton. Each double axel trailer loaded with 1 x 6 meters (20 ft) loaded container with sodium cyanide has a mass of approximately 24.2ton.

The sea freight containers loaded with cyanide, are loaded by this Company onto the Allship trailers. The Economic Community of West Africa State (ECOWAS) requires mass of 10.5 tons per trailer axle. Loaded trailer's mass is 9.75 tons. No other load bearing equipment are used by Allship Logistics for cyanide transport.

The company has 10 vehicles combinations that are allocated to cyanide transportation. Each trailer has the capacities to load 1x 20ft (6 meter) container.

Allship Logistics have a procedure for the loading and off-loading of containers in place to prevent overloading of the transport vehicle being used for handling cyanide. Mass of trailer and loaded container is approximately 24.2 tons. The shipping documents such as the Bill of loadings covering the shipment also has the gross weight of the containers on them. Procedure do not require that loaded vehicles be weighed at the Port of Takoradi weighbridge before allowed to depart. On the way from Port to mines, there are weigh bridges where officials can pull a convoy over to be weighed to determine whether vehicles are not overloaded. Copies of bill of ladings and customs documentation of shipments are retained and kept on file for recor5d purposes.

Allship Logistics do not subcontract any of the cyanide handling or transport activities.

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

The operation is	<input checked="" type="checkbox"/> <b>X in full compliance with</b>	Transport Practice 1.4
	<input type="checkbox"/> in substantial compliance with	
	<input type="checkbox"/> not in compliance with	

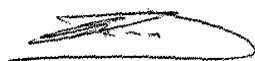
Summarize the basis for this Finding/Deficiencies Identified:

Allship Logistics has a procedure to ensure that packaged Sodium Cyanide stacked in freight containers, is transported in a manner that maintains the integrity of the producer's packaging. Container collection forms part of the TM Plan No. G4.1.4 rev 9 dated 2/1/2023. Clause 2.2 "Container Security and design". A container handover procedure is in use that requires the findings of the physical inspection conducted on the integrity of the packaging (container) to be documented. TM Plan clause 3.5 deals with the procedure for receiving at port and clause 3.5.4 refers to loaded consignments. Safety officer checks that containers are in good condition e.g., no structural damages, no deformities, no holes, no obvious product leakages, rusts, that all containers are safe to use, and that the metal seals are still intact on the doors.

Packaging complies with International Maritime Dangerous Goods Code for Group 1 hazardous goods, and has been subjected to the relevant tests. This specific design of wooden IBC been approved by the Consignor as well as the Department of Mineral and Petroleum Resources approved the packaging.

The containers, once loaded onto the trailer is properly secured to the framework of the trailer by means of the four twist locks and container belts. The Escort Coordinator or Safety Officer ensures that the load is correctly secured to the trailer before departure from the port is allowed. The inspection includes the checking of the

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seals on the container doors. On route during stops, escort coordinator checks the condition of the containers and whether the containers are still properly secured to the trailers by twist locks and container belts.

A clause in the "Container Handover Procedure" in use that refers to the checking of the integrity and condition of the container prior to loading at the Port, to ensure that the seals are still intact, container seal numbers and container number corresponds with that on shipping documentation.

Escort Coordinator or Safety Officer will only allow departure from port once he is satisfied everything is in order. Checking of container twist locks and container belts on trailers are performed prior to departure with consignment and when convoy is on the road.

Placards (Hazard class 6 diamond, a skull & cross bone, UN number 1689, and Marine Pollutant labels) are used to identify the shipment as sodium cyanide as required by International Standards as well as the IMDG code and are conspicuously displayed on all four sides of a container. Diamond placard displaying hazard class 6 are affixed on the front of the cabs of the prime movers as well as at the rear end of the trailer.

The operations implement a safety program for vehicle inspections and emergency equipment and inspections are conducted prior to departure of a convoy. Vehicle inspections and emergency equipment inspections are performed on a monthly and prior to departure with a convoy. Findings are recorded on appropriate checklist.

Allship logistics has a vehicle maintenance procedure number WS/SOP/01. Maintenance (servicing) is done at 10,000Km intervals with a variance of + or - 500Km. Truck tractor and trailer are serviced as combination. Any faults picked up during pre-departure inspection on the vehicles are rectified immediately. The driver informs the Workshop Supervisor and the Safety Officer about the fault and a work order is raised by the workshop supervisor. The work on the vehicle is done and details of work specified on the work order and signed off by the workshop supervisor. Detail of repairs performed then captured by workshop manager on electronic filing system. Copies of work orders were inspected and noted.

Transporter has a Convoy Management Plan No. G4.1.3 rev 9 dated 2/1/2023 and Fatigue management policy No. HSE/P/07 rev 7 dated 4/1/2023. Maximum driving time within a 24 hour period not to exceed 10 hours. Maximum driving time in a 7day period is 70 hours. No night driving is allowed. Day light driving as from 06:00 to 18:00. Driving hours is controlled by the Escort Coordinator with a back-up of a journey planner and the GPS tacking system. Type of GPS system in use is Sky FMS. GPS is monitored daily by the Transport Manager and the Safety Officer at the depot. Allowable speed to travel is specified for tar surface roads and gravel roads.

Four (4) twist locks and container belts are used to stabilised the freight container to the trailer. The TM Plan specifies that twist locks and container belts to be used to secure the freight containers to the trailer and prevent it from shifting. Procedures are in place that specifies that twist locks and container belts be checked before vehicles leave the port. Findings on twist locks and container belts are recorded on a checklist. En-route during compulsory stops these load securement devices are also checked.

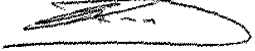
The checking of twist locks is included in the list of items that are to be checked during preventative maintenance.

Procedure is in place to suspend the operations during civil arrest, bad weather condition, road collapse, mud slides, etc. Procedure to be followed by convoy leader are spelt out in clauses 3.6.1, 3.6.2, 3.6.3 and 3.6.4 of the TMP No G4.1.4 dated 2/1/2023. If already on route, the Escort Coordinator identifies a safe parking area where the convoy can be parked and wait for mine site instructions or wait for the adverse weather condition to subside. If no alternative route exists, the convoy will return or remain in Allship's depot (clause 3.6.2 (4) of the TMP refers) and await instructions from the mine for the weather to subside.

If escort coordinator becomes aware of civil disorder occurring on road, the following actions-would be taken:

- Bring the convoy to a stop and park at a safe location
- Notify the Ghana Police Service on emergency number 19118555.

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- Notify supervisors at transporter's depot.
- Wait for disorder to subside or move back to warehouse for safety.

The transporter has an approved Drug & Alcohol policy number HSE/P/04 Revision 06 dated 03/01/23. Unannounced alcohol tests are conducted randomly using the breathalyzer. The Alco Blow breathalyzer is used for the testing. Each truck driver and escort team are tested before undertaking any trip.

The Safety Officer is responsible for conducting the tests occasionally. Safety Officer trained to perform this task. Anyone found having consumed alcohol, is suspended from work in the first instance and summarily dismissed from the company if found to have repeated the same act. Records of Alcohol test results documented, were noted. The breathalyzer was calibrated on 20th February 2023. A Calibration certificate with number AB23025 was sighted. Calibration was done by Ultimate Resources Ltd. Drivers subjected to annual medical checks to ensure that they are always healthy to perform their work.

Document "Control of records" No. HSE/SOP/03 revision 6 dated 04/01/23 was noted. Document "Control of Records" implemented and stipulate the retention period of commercial and other transport related documents. Clauses noted by auditor.

Allship does not sub-contract any of the transportation of cyanide business.

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

**X in full compliance with**

The operation is  in substantial compliance with Transport Practice 1.5  
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Not applicable to this Transporter as no shipment of cyanide is done by sea and air.

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

**X in full compliance with**

The operation is  in substantial compliance with Transport Practice 1.6  
 not in compliance with

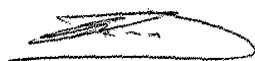
Summarize the basis for this Finding/Deficiencies Identified:

All vehicles have communications systems that include drivers and convoy leader's own cell phones. Truck tractors are fitted with GPS tracking system and Company cell phones for the escort vehicles. The GPS tracking system is manned 24/7.

A list of emergency contact numbers is incorporated in the Company's Transport Management Plan (TMP) Ref. No. TR/SOP/04 revision No. 5 dated 1/10/2019 in the format of appendix G1, G2 and G3. The company's "Emergency Response Plan and Evacuation procedures" (ER Plan) Ref No. GEP4.11.1 dated Oct 2019, also reveals these contact numbers as per annexure G1 to G3 and G4.

**Company's Transport Management Plan.**

Appendix G1 – The contact information of personnel and facilities to call upon in the event of an incident e.g. Allship Logistics Ltd, Orica Mining services, Perseus Mines, Adamus Resources Ltd, Golden Star Resources Ltd, Prestea Sankofa Gold Ltd.



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Appendix G2 - Medical support and Emergency Equipment contacts. Tema Government Hospital, Effia Nkwanta Hospital in Takoradi, Tarkwa Government Hospital, Allship Emergency Equipment/Resources, Allship Logistics Limited – Tema, Allship Logistics Limited – Takoradi, Allship Logistics Limited – Tarkwa.

Appendix G3: Emergency contacts of other External Responders e.g. Ghana police, Ghana National Fire Services, Ambulance Services, Ghana Environmental Protection Agency, Ghana Water Resources Commission and Assemblyman/Unit Committee Chairman (Dompim Electoral Area).

Appendix 1,2 and 3 were noted and found to be in order, up to date and appropriate.

**Company's Emergency Response Plan and Evacuation procedures (ER Plan).**

- Appendix G1: Emergency Call List Incident. Same detail as in TM Plan appendix 1.
- Appendix G2 : Medical Support and Emergency Equipment Contacts. Same detail as in TMP appendix G2.
- Appendix G3: Emergency Contacts of other External Responders. Same detail as in TMP appendix G3.

Communication equipment is tested on a monthly basis to ensure its availability and that it functions properly. All vehicles used for the transportation of cyanide have been fitted with GPS systems. Mobile phones are tested before vehicles are allowed to depart from depot and findings documented in pre-departure checklists.

Emergency Communication procedures as per Appendix F (pages 96 to 97) of the ERP and APPENDIX F: Emergency Communication procedures (pages 27 to 29) in the Transport Management Plan were noted and were found current and up to date.

Clause 3.5.4 (Loaded Consignments) paragraph 4" of Company' s Transport Management Plan (TMP) No. G4.1.,4 revision 9 dated 2/1/2023 stipulates that all emergency equipment is inspected or checked for functionality, availability, adequacy, neatness, are within the validity date and are up to manufacturers specification. Findings have been recorded on the "escort pre-trip equipment' checklist. During interview with escort leader/ safety officer, Mr. Ebenezer Arthur, pre-mentioned detail was confirmed.

The Escort Leader checks the communication media and ensure that the cell phone batteries as fully charged. Findings recorded on the equipment checklist. Cell phone chargers are kept inside the cabin of the tractor unit. Prior to departure of the convoy, mobile phones are inspected, tested for functionality and to be fully charged and pre-departure emergency equipment checklist completed accordingly

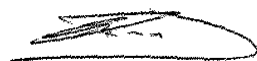
No communication blackout areas noted along the route. Cell phones have 100% coverage along the routes. Sim cards for MTN cell phone network and Vodafone are used throughout the trip. In case one service provider drops out, the alternative network service provider is used. This ensures constant communication.

GPS tracking system is used to track and monitor the position and progress of the cyanide shipment.

Transporter has implemented inventory controls and or chain of custody documentation to prevent the loss of cyanide during shipment when it commences cyanide transportation activities. This is achieved using waybills which are created based on the shipping documentation for each container. Shipping documents and MSDS accompany the containers throughout delivery. The waybills are signed by the transporters clerk and the customer's representative upon receipt. Upon signing the customer representative acknowledges that the consignment was received in good condition and unopened.

Allship Logistics maintains records that indicate the mass of the cyanide in transit when it commences the transportation of the product. This is achieved through the creation of a waybill which is based on the information provided in the shipping documentation. The waybills include a description of the goods including the freight containers detail and weight.

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A product material safety data sheet accompanies each shipment to the end user. The product MSDS is incorporated in the Transport Emergency Response Plan and Evacuation Procedures Plan. A copy of the product MSDS been made available to the Convoy Leader prior to the departure of the convoy. Proof thereof noted on a completed vehicle pre-trip checklist.

Allship Logistics do not sub-contracts any of its cyanide transport operations.

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

**Transport Practice 2.1:** Store cyanide in a manner that minimizes the potential for accidental releases.

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

Summarize the basis for this Finding/Deficiencies Identified:

Questions 2.101 to 2.106 are not applicable to this transporter, as no cyanide trans-shipment or interim storage of Sodium Cyanide will not be done on the Transporter's depot facility.

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

No trans-shipping facilities or interim storage sites noted at the 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 **X in full compliance with**  
 in substantial compliance with Transport Practice 3.1  
 not in compliance with

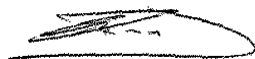
Summarize the basis for this Finding/Deficiencies Identified:

The transporter has developed an Emergency Response Plan & Evacuation Procedures (ERP), document No. HSE/GEP/04 dated 02/01/23. The ERP outlines various response actions during an incident that guides responses to potential cyanide emergencies. The ERP and the Transport Management Plan (TMP) are specific to the road transportation routes used by Allship Logistics.

Sodium Cyanide, in briquette form, is transported by road stacked in 6-meter sea freight containers. No product is transported by rail or air. Sodium Cyanide enters Ghana through the port of Takoradi.

The transporter has developed detailed documents to cover emergency response for potential cyanide releases for cyanide transportation within Ghana. The scope of this plan is to provide information to all role players (in and external responders) with regards to each responder's role and responsibility who will be involved in the primary stage of an emergency. A list of Emergency Contact numbers is included in both the Emergency Response Plan and the Transport Management Plan.

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The Transport Management Plan and Emergency Response Plan are based on road transportation of solid sodium cyanide over the routes to the Allship Warehouse in Dompim and four mine sites namely Adamus Resources mine, Perseus mine, Golden Star Resources Ltd, Prestea Sankofa Gold Ltd. The ERP was found to be appropriate for the transportation of cyanide by road on the selected and approved roads.

The procedure describes the processes in addressing each of the incident's scenarios below. The ERP has roles and responsibilities of each external responders such as the Allship Logistics, Ghanaian Police Services, Ghana National Fire Services, Ghana Ambulance Services, Ghana Environmental Protection Agency, Ghana Water Resources Commission, mining companies, Orica(supplier), medical facilities, hospitals, and Escort Coordinator.

The ERP also enumerates the various cyanide neutralization processes in handling spills and decontamination.

Categories of Sodium Cyanide Emergency scenarios during transport: -

- ❖ Rollover of Cyanide container during a rainy day.
- ❖ Rollover of Cyanide container with spill in or outside a community.
- ❖ Rollover of cyanide container without spill in or outside a community;
- ❖ Rollover of cyanide container with injury.

The ER Plan was designed and reveals the descriptions for the response to anticipated emergency situations in the transportation of cyanide by road that have been identified during the conducting of the route risk assessment process. This plan describes the sequence of events during a road transport incident. External responders identified in the documents are aware of their roles and responsibilities in the event of an emergency. ER Plan describes the medical treatment of a person who have been exposed to HCN gas or cyanide powder. The contents of the procedure as per ERP found to be appropriate for the activities it is been designed for as it addresses issues particularly for the road transportation of the sodium cyanide solid.

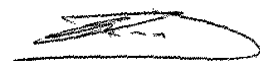
Procedures for the clean-up and decontamination of Sodium Cyanide solid as stipulated in the ER Plan was reviewed and found it to be appropriate for the type of cyanide transported.

The ERP stipulates the procedure for clean-up, neutralization and decontamination of spilled product and the required Personal Protective Equipment (PPE) that is to be worn to performs these tasks. The roles and responsibilities of emergency responders, the Escort Coordinator and the drivers are clearly documented. Clean-up operations will be conducted by the Escort Coordinator. Remaining residue of cyanide on the ground is treated with a small quantity of ferrous sulfate. The contaminated material from an incident site will be transported safely to the mine site for disposal.

The ERP also discusses the following;

- Emergency and contact information
- Nature of operation
- Hazard information namely physical and Chemical form of cyanide transported.
- Security provisions
- Emergency resources
- Neutralization processes
- Spill management and clean up
- Communication
- Notification of authorities
- Termination of emergency response and debriefing
- Incident investigation
- Exercises training and review
- Emergency scenarios and role and responsibilities of emergency responders

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The product MSDS available at the transport facility as received from Orica the producer / consignor of sodium cyanide solid. The product MSDS accompanied each shipment to either the end user or warehouse. Both the transporter's ER Plan and the TM Plan details the physical and chemical properties of sodium cyanide. ERP and TMP focuses on the transportation of sodium cyanide by road. No transportation of this product is done by rail or water. No interim storage of product at the depot noted during walkabout.

The ER Plan refers to the horsepower of the truck tractors. Truck tractors with 360 horsepower (HP) engines are used for single axle and those with 480 horsepower (HP) engines to pull double axel trailers. Flatbed trailers are fitted with four (4) manually operated twist locks utilised to stabilise the container to the trailer framework. In addition to the twist locks, container straps are also fitted around the containers. Trailers with dimensions of 12.8m x 2.4 meter are utilised for the transportation of the freight containers loaded with sodium cyanide. Only one (1) 6-meterfreight container loaded onto a trailer. Dimension of a 6 meter container is 6.1 x 2.3 m. Trailers are built in accordance to manufacturer's specifications. The design of a trailer is appropriate for the load of a 1x20ft container loaded with sodium cyanide.

Tacotel terminal in the port of Takoradi manages the freight containers loaded with cyanide upon arrival of a vessel. Customs Clearance of the containers from the port are done by Stellar Logistics (a company contracted by the supplier) after which the containers are loaded onto Allship trucks.

The Transport Emergency Response Plan details the roles and responsibilities of outside emergency responders and medical facilities in the event of an emergency. External stakeholders, include emergency response organisations and government authorities / departments. External responders identified in the Emergency Response Plan are aware of their roles and responsibilities during an emergency.

**Transport Practice 3.2: *Designate appropriate response personnel and commit necessary resources for emergency response.***

**X in full compliance with**

The operation is  in substantial compliance with Transport Practice 3.2  
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

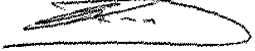
The transporter has a well-structured training program. Allship Logistics provide emergency response training to appropriate employees as specified in the ER Plan. The cyanide awareness training is provided once per year. All the transporter's cyanide drivers and Convoy Leaders have been fully trained. Cyanide awareness and emergency response training have been presented by an external service provider. Training for the external Emergency Responders on route was presented by transporter's Safety Officer. External Emergency Responders attended a mock drill as part of the refresher training. Last mock drill was held on 1<sup>st</sup> November 2019.

The training records were reviewed and discussions with transporter's drivers and the escort team confirmed that they have completed the training. All training presented are captures in a training matrix which was found to be up to date. Attendance register kept for each subject presented. An external consultant been contracted to conduct the cyanide transport procedures and cyanide awareness training. Training was presented by the external consultant Training attendance registers for 28/10/2020, 28/9/2021 and 15/12/2022 completed. A total of 23 employees have received initial and periodic refresher training in emergency response procedures.

The Emergency Response Plan identifies the specific emergency response duties and responsibilities of personnel for the four scenarios. Descriptions of the specific emergency response duties and responsibilities clearly documented.

Allship Logistics maintains a list of available emergency response equipment needed during the transshipment of cyanide on the transport route. The safety equipment and PPE are checked on a monthly basis and prior to

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departure of each convoy to ensure availability and functionality. Volume of oxygen in cylinder checked by external service provider. The antidote is stored in cupboard at room temperature which is in line with the manufacturer's recommendation. Used or outdated equipment gets replaced immediately. HCN gas monitoring device is available and Convoy Leaders have been trained in the use of such equipment. Calibration certificate noted to be still valid.

Escort Team, Drivers, Transporter's Emergency Response Team, Forklift Operators, Security personnel and warehouse personnel attended the following: -

Minimum mandatory training for drivers and Escort Team

1. Cyanide awareness. annually
2. Defensive driving training. Annually.
3. Cyanide emergency response scenario training (MOCK DRILLS). Annually.
4. Convoy management Annually
5. Fire-fighting. Every two years
6. Use of Personal Protective Equipment Annually
7. Calling for assistance Annually
8. Measures to halt the spill of cyanide from the transport vehicle. Annually
9. First Aid Training Every Three years
10. First aid for cyanide exposure Annually

Emergency Response Team, Forklift Operators, Security Personnel, Warehouse Workers.

1. Cyanide Awareness Annually
2. Cyanide Emergency Response Scenario Training (Mock Drill). Annually
3. Fire Fighting Training Every two years
4. First Aid Training Every Three years
5. Defensive Training Annually
6. Convoy Management Annually
7. Use of personal protective equipment Annually

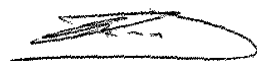
Mock emergency drills were held on 1st November 2019, for 2018 done 12th September 2018, and for 2017 one was held on 11th February 2017. Ghana police and ambulance members attended a mock drill as part of the refresher training on 1st November 2019. Drills that were held simulated transport related cyanide incidents.

It is required from the Escort Leader to keep the Logistics Manager updated of the progress either on the movement of the consignment or emergency. Logistics Manager will keep the MD informed. The Safety Officer as the escort leader contacts the external emergency responders when required.

The required roles and the responsibilities of the External Emergency Responders and that of the Allship Logistics employees who will attend to a cyanide incident / accident, are stipulated in the Allship Logistics Ltd "Emergency Response Plan and Evacuation Procedures".

Transporter do not use subcontractors for the transportation of cyanide.

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

**X in full compliance with**

The operation is  in substantial compliance with Transport Practice 3.3  
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Appendices G1-G4 of the Emergency Response Plan and TM Plan, in appendix G3 reveals the list of all the relevant and current emergency contact agencies. The Safety Officer being the Convoy Leader is responsible for ensuring that the list of emergency contact numbers is updated.

The Transport Management Plan and Emergency Response Plans contain procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.

Both these plans contain a list of all the emergency contact numbers. A similar list of numbers is kept in the Convoy Leader's vehicle and call-out procedure stipulated in both plans.

Systems are in place to ensure the internal and external emergency notification and reporting procedures and contact telephone numbers are kept current.

The Company's Safety Officer is tasked with: -

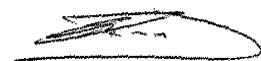
- ❖ The up-keeping of internal and external emergency reporting procedures;
- ❖ The reporting of all incidents, near-misses, emergencies during the transport of all chemicals including sodium cyanide to regulatory authorities;
- ❖ To receive correspondence from clients, regulatory authorities, and local communities.
- ❖ List of Emergency Responders telephone numbers e.g. the Ghana Police, Local Fire Services, Hospitals, Ambulances, EAP and that of Allship's Logistics Ltd to be kept current.

Clause 3.8.2 " REPORTING AND INVESTIGATION OF ACCIDENT" of the Emergency Response Plan states that in case of significant incidents during the transport of sodium cyanide shall be reported by the Transporter to the manufacturer of the cyanide, the mine site and ICMI. These incidents shall be investigated by the Transport company and lessons learnt out of them documented to prevent reoccurrence of the incident. Copies of the reports shall be submitted to the mine site and the manufacturer of the cyanide and ICMI.

Significant incident as per clause 3.8,2 of the ERP includes the following;

- Human exposure that requires action by an emergency response team, such as decontamination or treatment.
- An unauthorized discharge that enters natural surface waters, on or off site.
- An unauthorized release that occurs off-site or migrates off-site.
- An on-site release requiring the intervention of an emergency response team
- A transport incident requiring an emergency response in the event of a release of cyanide
- A multiple wildlife death event where cyanide is known or credibly suspected to be the cause of death.
- Theft of Cyanide

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

The operation is **X in full compliance with**  
 in substantial compliance with Transport Practice 3.4  
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Transporter has procedures titled "Recovery of solid Sodium Cyanide Material" and "Neutralization and or disposal of excavated soil" available. The initial clean-up and rehabilitation process of an effected area is the responsibility of the Convoy Leader. To attend to larger spills is the responsibility of the Safety Officer to take the initial response and call in outside responders to assist.

Allship Logistics has entered into a joint venture agreement between them and the Consignee of the consignment with regards to the cleanup and disposal of contaminated soil/product. The contaminated soil / product will be removed to the mine site where the waste will be disposed.

The Transport Emergency Plan, clause 3.5.1 prohibits the use of sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water e.g. dams or rivers. Ferrous Sulfate is used to neutralize residues of solid sodium cyanide(powder) after clean-up of the cyanide briquettes has been done. Some Ferrous Sulfate in small quantity is kept in the escort vehicle as part of the escort equipment.

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

The operation is  in full compliance with  
**X in substantial compliance** with Transport Practice 3.5  
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

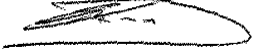
The Emergency Response Plan and the Transport Management Plan states that all emergency response documentation be reviewed and updated. Periodically reviewing and evaluating of the plans is based on the outcome of the yearly mock drills, when significant or critical changes have been observed or recommendations made after a transport incident investigation. Transport working documents and forms are reviewed periodically and as and when required.

Refresher training presented in cyanide awareness and procedures which is done annually was noted. Company's TM Plan refers. ER Plan requires the conducting of emergency mock drills which is found to have been done annually. Drills are evaluated to determine if response time, the procedures are adequate, equipment is appropriate and if personnel are still acquainted with the emergency requirements. Mock drill review meetings are held and shortfalls noted.

The mock drills that were held simulated transport related cyanide incidents where "Rollover of Cyanide Container with product been spilt". A mock drill held on 30/9/2021, simulated a cyanide incident with a cyanide spill as well as an employee being overcome by HCN gas. Feedback on drill exercise and photos found to be in accordance to procedures. The drill included external emergency responders (police and ambulance staff) attended the mock drill exercise. Last mock drill was performed on 15th December 2022.

The training records were reviewed and discussions with Transporter's drivers and the Convoy Leaders confirmed that they have attended training sessions.

Allship Logistics – Tema Ghana  
Name of facility

  
Signature of Lead Auditor

15<sup>th</sup> April 2023  
Date

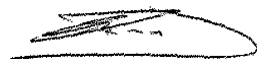
Non-conformances observed during the last drill were noted and attended to. Drill was repeated and found to have been more successful. Records of mock drill reports depicts that mock drills were repeated to ensure the rectification of any non-conformities.

Transporter have procedures in place with regards to the evaluation and review of the TMP and the ERP and emergency response procedures. Document history of the TMP and ERP reveals that the contents of these documents were reviewed every year.

Since the previous audit was conducted up to the time that this audit was conducted, no cyanide related incidents have been recorded and reported.

End of report.

Allship Logistics – Tema Ghana  
Name of facility



Signature of Lead Auditor

15<sup>th</sup> April 2023  
Date