Investor Solutions Limited
P.O Box 67562
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Kenya

ICMI RE-CERTIFICATION – SUMMARY REPORT

1.1 Operational Information.

Name of Transportation Facility:	Africa Global Logistics Ghana Ltd
Name of Facility Owner:	Africa Global Logistics Ghana Ltd.
Name of Facility Operator:	Africa Global Logistics Ghana Ltd
Name of Responsible Manager:	Patrick Banoeyelle (QSHE Manager)
Address:	Africa Global Logistics Ghana Ltd Commercial Warehouse, Tema, P.O. Box 51 Tema,
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1.2 Description of Operation – AGL Ghana Transport Logistics, Ghana Ltd.

1.2.1 Company Profile.

Africa Global Logistics (AGL) (previously Bollore) provides innovative, tailored logistics services to businesses, helping them ship, receive, store, and manage their goods across Africa and worldwide.
With expertise built over many years, AGL is a trusted multimodal logistics operator in Africa, covering every link in the supply chain: ports, rail, road, maritime, and air.

By working with key partners, including shipping and airline companies, carriers, customs authorities, and ports, AGL streamlines and optimizes logistics processes for its clients.

Over the past 15 years, AGL has played a significant role in improving port infrastructure, raising the competitiveness of the West African coast to global standards.

Today, AGL is building on this expertise and pursuing a new ambition as a member of the MSC Group, the world's leading shipping company. Its goal is to strengthen intra-African trade and exchanges with the rest of the world.

AGL's main growth potential lies in its logistics activities, which support key African trends: population growth and urbanization, intra-African trade, energy transition, and digitalization.

The company's offices are located in Tema. In addition to the major ports of Takoradi and Tema. AGL Ghana operates air freight services at Kotoka International Airport in Accra, the capital.

The organization offers complete end-to-end supply chain solutions to its clients, including airfreight, ocean freight—both FCL (Full Container Load) and LCL (Less Container Load), ground transportation, customs brokerage, warehousing &distribution, and many other value-added services.

AGL Ghana has a broad range of capabilities and experienced staff to handle both general cargo and project cargo with specific expertise in several vertical sectors, including mining, oil & gas, industrial projects, aid & relief, power & energy, telecommunications, high tech, FMCG & retail, soft commodities, and infrastructure. AGL Ghana is part of the AGL Group with the head office in France.

The company transports cyanide from the Tema Port to various mines for Samsung C&T, a supplier of sodium cyanide. The company has completed four (4) ICMI recertifications since its initial certification in 2013. This recertification is the fifth recertification audit.

1.2.2 Audit scope.

The scope of this audit covers the road transportation of cyanide from the Tema port in Ghana to Various Mines in Burkina Faso.

1) Kiaka Gold Mine
2) West Africa Resources Sanbrado Mine
3) Endevour Mining – Hounde Mine
4) Endevour Mana Semafo Mine
5)

1.3 Sodium Cyanide Transportation.

Samsung C & T, the supplier of Sodium Cyanide, ships the product to the port of Tema, Ghana, and has contracted AGL Ghana to handle the logistics, namely customs clearance and transportation. The contract states that AGL Ghana Services provides customs clearance and transportation of a containerized sodium cyanide consignment from the Port of Tema to Various mines in Burkina Faso.

AGL holds a permit from the Ghana Environmental Protection Agency (EPA) authorizing the transport of sodium cyanide by road. The permit is renewed annually.

Sodium cyanide in briquette form is packaged in polyethylene sacs, encased in Intermediate Bulk Containers (plywood boxes), with a pallet at the bottom to facilitate forklift movement. As additional support, the IBC (box) is secured with steel strapping, which further supports the packaging. The box is placed on a pallet to provide further protection during transit and offloading. Plywood boxes are then stacked into a 6-meter (20-foot) sea freight container. A maximum of 20 IBCs is packed into a freight container.

The Intermediate Bulk Containers (IBCs) are packed into a 6-meter shipping container and shipped by sea from the Consignor to the Tema port. Each IBC contains one (1) ton of sodium cyanide briquettes. A total of 20 IBCs are packed into a sea container with a gross weight of approximately 23 tons.

AGL Ghana transports cyanide from Samsung C & T, which is ICMI certified. Before arrival at the Tema Port, AGL ensures that all shipping documentation is submitted to Ghana Customs for processing and payment of customs duties, enabling prompt clearance of the shipment. The shipping line notifies BTL in advance of the vessel's Expected Time of Arrival (ETA).

Upon a vessel's arrival at the port, the containers are offloaded at the Meridian Port Services (MPS) terminal, a company contracted by the Ghana Port Authority to handle all hazardous cargo arriving at the Tema Port. The sodium cyanide containers are offloaded from the vessel and temporarily stored at the MPS terminal for up to 2 days to allow AGL to complete its documentation. MPS has the expertise to handle cyanide at the port. The containers are segregated from other chemicals incompatible with cyanide.

Upon the completion of all customs documentation, AGL Ghana dispatches trucks to the port. The trucks are loaded at the MPS terminal and then exit the port. The vehicles remain in AGL's yard for a few hours. The convoy is dispatched with an escort team, escort vehicles, and escort equipment.

Before the trucks depart for their destination, the Escort leader conducts toolbox talks with the entire escort team and drivers. Vehicles are pre-inspected before truck departure.

AGL Ghana transports containerized sodium cyanide to various mines in Burkina Faso. The trucks, which move in convoy, are escorted by Ghana Police personnel, AGL's Escort leader, and his team to the mine. On reaching the border between Ghana and Burkina Faso, the Ghana police return to their base, and the Burkina Faso military personnel escort the convoy from the border with the AGL's escort team to the mine site.

Overall control of a cyanide convoy is the sole responsibility of AGL Ghana, which provides escorts from the port to the mine, with an Escort leader in charge

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SUMMARY AUDIT REPORT AUDITORS' FINDINGS

AGL Ghana Transport Logistics is:

☒ **In full compliance with**

☐ In substantial compliance with

☐ Not in compliance with

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

THE INTERNATIONAL CYANIDE MANAGEMENT CODE

Audit Company:	Investor Solutions Limited - Kenya
Audit Team Leader:	Kuldip Degon, Lead & Transport Auditor
Email:	kuldip@islglobal.net

NAME OF OTHER AUDITORS N/A

DATES OF AUDIT

The Recertification Audit was conducted on 3rd to 5th November 2025.

Attestation

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute, and that all members of the audit team meet the applicable criteria for Code Certification Auditors, as established by the International Cyanide Management Institute.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further certify that the certification audit was conducted professionally, in accordance with the International Cyanide Management Code's Cyanide Transportation Verification Protocol and standard and accepted health, safety, and environmental auditing practices.

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

AGL Ghana Ltd — Name of Operation
Signature of Lead & Transport Auditor
11/12/2025 — Date

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

The operation is **X in full compliance with** Transport Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

AGL has a procedure for selecting transportation routes and conducting a route survey. The procedure is titled "Conducting and Using a Road Survey" NO. AGL-COR_HSE-PRO117 Rev 08 Dated 28.10.2022. The procedure is revised every three years.

The procedure involves selecting, planning, and performing a route survey. The relevant information for route selection is reviewed by a team comprising the Escort leader, QHSE Manager, and Logistics Manager. The team is responsible for study design, route selection, and resource allocation before conducting a route survey on the selected routes. The route survey is conducted by the QHSE department, with the QHSE Officer ensuring successful completion.

The route survey team consists of a driver and the QHSE Officer, who reports to a team comprising a Team Leader responsible for supervising the road survey, a Logistics Manager, a QHSE Manager, and an Escort Leader.

The procedure states that, in selecting the appropriate route, the following were considered and are documented in the route survey reports.

- Type of road Surface
- Condition of the road surface
- Width of the road
- Visible boundary lines
- Regulatory and recommended speed limits
- Width of the roadside
- Condition of the roadside
- Elevation of the road compared to the neighborhood
- Road surface
- Presence of potholes (with their depth)
- Type of traffic recorded during. The survey, particularly the size and kind of vehicles encountered
- Traffic density during the survey
- Kind of bridges on the roadie. Ie. Length, Width, Safety barriers, Load limit, condition.
- Height structures, for example, power lines, bridges, and their height
- Side roads
- Crossing roads
- Railway Crossings
- T-Intersections
- Mountain passes
- Slopes
- Gradients
- Population density
- The towns and villages along the route
- Water bodies such as rivers and streams
- Bridges
- Distance and general road condition

- Traffic situation
- Schools
- Road Intersections
- Pitch and grade (slopes, gravel, and unpaved roads)
- Weather conditions such as fog
- Environmental conditions
- Bridges
- Construction activities on the road

The documentation presented made it clear that the findings on road infrastructure and road condition were considered. Road markings on tarred roads, condition of road surface, impact of temperature on road surface, edges of tarred roads, inclines adjoining roads, and the possible effect should vehicles need to pull off the road, pitch and grade, rivers, other water sources nearby, and weather conditions have all been captured in route selection procedures.

Two forms, namely "Notes during Route Survey" ref no.AGL-COR-HSE-f-0512 and “Reporting Form" AGL-COR-HSE-F-0009 are used to record as accurately as possible the conditions of the road, its infrastructure, and all features of the selected transport route from Tema, Ghana, to the following mines.

1) Kiaka Gold Mine
2) West Africa Resources Sanbrado Mine
3) Endevour Mining – Hounde Mine
4) Endevour Mana Semafo Mine

AGL has a risk assessment procedure ref no. AGL-COR-HSE-PRO-0005 Rev 06 Dated 15/10/2025. A Route Risk Assessment of the various hazard types on the road has been undertaken. Each risk has been evaluated, and control measures have been implemented to eliminate or minimize those risks. RRA has been conducted for the selected road from the Tema Port to the various mine sites.

AGL Ghana has implemented processes to re-evaluate risks along the cyanide transportation route periodically and to gather feedback on risks identified by drivers and escort leaders during cyanide deliveries. The operation has a Risk Assessment Procedure that evaluates risks associated with the selected cyanide transport route. Route surveys and risk assessments are conducted annually, as evidenced by documents and records presented.

The Risk Route Assessments, Transport Management Plan, and Emergency Response Plan for various mines indicate that the risk on the selected route to the mine sites has been evaluated and reviewed by the QHSE Manager.

RRA's were conducted in 2023, 2024, and 2025. Escort leaders and drivers are allowed to comment on areas of concern on the route or areas that are found unsafe to travel during a de-briefing session after each cyanide delivery to the mine.

Before the convoy of cyanide trucks departs, toolbox meetings are held, and participants sign attendance sheets to confirm their participation. The QHSE department is responsible for organizing the toolbox meetings. The drivers, the escort team, and the police personnel attend the sessions. Evidence of toolbox meeting attendance sheets was noted. Risks identified on the route in previous trips are discussed at the toolbox meetings.

AGL has implemented a process for getting feedback on the road conditions. The transporter has a system for obtaining feedback on road conditions, noting the risks in the reports, and implementing control measures to eliminate or reduce them. Reports for each trip, specifying road conditions and the journey outcome, are captured in the feedback reports.

The Transport Management Plan (TMP) requires the route survey to be revised periodically. The Transport Management Plan establishes a process for continuously evaluating the transportation route based on feedback on road conditions after each trip. The escort leader completes a feedback report form on the road condition after each trip of cyanide deliveries to the mine site.

Feedback reports are discussed with the drivers, the QHSE Manager, and the Transport Manager, and are also reviewed before any subsequent trip.

Route survey reports show periodic reviews of the road conditions from Tema to Burkina Faso. Precautionary measures have been implemented. The TMP is reviewed annually and, when necessary, based on feedback on road conditions.

Measures to reduce risks are covered in the RRA. The transporter's Route Risk Assessment Procedure outlines the categories of risks to be noted during a route assessment. Control measures for each hazard identified during the route survey are listed under the 'controls' heading in the RRA document. The control measures per the RRA are discussed during toolbox talks and training sessions. Attendance records for drivers and the escort team who were present are kept on file. The attendance register is also signed by all participants, acknowledging their presence at the toolbox meetings. Feedback reports on road conditions for 2023, 2024, and 2025 were reviewed.

AGL has sought input from all relevant government agencies. The transporter has secured an EPA permit. Additionally, AGL has a permit to transport dangerous goods within Ghana mines from the Inspectorate Division of the Minerals Commission, registration no. ID/2/A99. The permit allows AGL Ghana to transport hazardous chemicals, including cyanide. Ghana EPA does community consultation in conjunction with AGL.

AGL has sought input from stakeholders, including the Ghana Police, the Ambulance Service, hospitals, and the Ghana National Fire Service. Letters of notifications to Police Stations in towns along the transportation route, namely Amassaman Jejeti, Kwame Nkrumah University of Science & Technology, Offinso, Anyinam, Osino, Techiman, Buipe, Tamale, Walewale, Naurongo, Paga, which were acknowledged and stamped by the different stations, were verified. Letters to Ghana Fire Service Stations were acknowledged by station managers in towns which are along the route to the mine. The letters were dated. The Ghana Ambulance Service in Anyinam, Nkawkaw, Konongo–Odumase, Ejisu, Techiman, Buipe, Tamale, Walewale, Navrongo, Paga, and other towns has been notified and asked for input; they have acknowledged receipt of the notifications.

The operation uses convoys with escorts to ensure safe delivery of the cyanide shipment to the mine site. The Transport Management Plan details that all vehicles must move in convoy.
For three vehicles (3) in convoy, the escort team from Ghana consists of one (1) policeman, one (1) Escort leader, and one (1) Escort driver one escort vehicle, 1 Custom officer on the Ghana side & in Burkina Faso, 1Escort Driver, 1 Escort Leader, and the Number of Security personnel is at the discretion of the Burkina Faso Security office. For a maximum of eight (8) trucks, two (2) policemen are used, one (1) Escort leader, and two 1 Custom officer (2) Escort drivers and two (2) escort vehicles one in front and one in the rear up to the Ghana - Burkina Faso border & in Burkina Faso 2Escort Driver, 1 Escort Leader, Number of Security personnel is at the discretion of Burkina Faso Security office.

AGL does not subcontract any logistics or transport services. All jobs and transportation are handled independently.

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

The operation is **X in full compliance with** Transport Practice 1.2

Summarize the basis for this Finding/Deficiencies Identified:

AGL Ghana requires that all personnel operating cyanide-handling and transport equipment perform their jobs with minimal risk to themselves, the communities, and the environment.
To achieve this, the company uses only trained, qualified, and licensed drivers to operate its vehicles. AGL has a general Human Resources Recruitment procedure, AGL-GHA-HRE-PRO-0007 Rev01, dated 05th March 2024, that outlines a rigorous process for hiring drivers and other personnel.

Candidate pre-selection for driving is based on the following criteria.

- Prospective applicants should be between 18 and 60 years old
- Applicants must have a valid driver's license with Category 'F."
- The driving test is conducted on all shortlisted drivers
- Oral interviews are conducted
- Background checks may be done on prospective drivers
- Selected drivers are made to undergo a medical examination.
- The driver must have at least 5 years of driving experience.

All AGL Ghana drivers complete the following training programs, which are captured in the company's training matrix.

- Cyanide Awareness Training, Transport Management Plan, Route Survey Risk Assessment - Held Annually
- Defensive driving - Held Annually
- Fire Prevention Training - every two years
- First Aid - Held every 2 years

Training attendance records indicate that defensive driving training was conducted in 2023, 2024, and 2025. The training details include the physical and chemical properties of cyanide, Modes of exposure to cyanide, Administration of 100% oxygen, Use of PPE, Mechanisms of cyanide poisoning, Safe transport practices, and emergency response.

The National Road Safety Authority organized defensive driving training for drivers on 12th April 2025, and April 2022, whilst First Aid training was conducted by St John's Ambulance, Ghana. The next first aid training is scheduled for December 2023.

Training Attendance registers and training certificates have been kept on record. The Ghana National Services held firefighting training for all drivers. Records of recent firefighting training were on 10/09/24 for all drivers and staff. Drivers' driving licenses in category 'F' and training attendance registers were noted.

Copies of all relevant notifications, permits, and other documents have been retained as required.

AGL Ghana does not subcontract any of its operations.

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

The operation is **in full compliance with** Transport Practice 1.3

Summarize the basis for this Finding/Deficiencies Identified:

The company uses only trucks designed and approved for transporting cyanide. In the company's Transport Management Plan, the following specifications apply to the vehicles used.

Generally, four 4-axle, 3-axle, and 2-axle trailers with weight capacities of 70 tons, 60 tons, and 53.5 tons, respectively, equipped with twist locks and designed to carry sea containers, are used.

- 6x4 axles trailers with total load capacities of 70t equipped with twist locks and designed to carry 2x 20ft containers of cyanide.
- Trucks are equipped with twist locks and GPS.

The trucks' capacities and configurations indicate they can handle the load they are designed to carry.

The vehicle brands are Renault and MAN Diesel, with horsepower (HP) ratings of 350 and 400. No retreated tires are used. Only new tires are used.

The Ghana Port Authority weighs the trucks at the port after loading, and Axle Load Weighing Certificates are issued.

Procedures are in place to prevent the overloading of the transport vehicle being used for handling cyanide

Each 6x4 truck trailer configuration is loaded with two containers, each weighing approximately 46.4 mt. Each 1x20ft shipping container holds 20 IBCs of cyanide, with a gross weight of 23 mt. The combined weight of the trailer, tractor unit, and 2x20ft containers is 63.4 mt, which is below the required regulatory limit. The total load for 6x4 vehicles is 70 tons per Ghana Highway Authority regulations.

The TMP addresses a process to ensure that vehicles are not overloaded. It specifies the different truck configurations and the loads they should carry. The total weight the trucks carry is within the required regulations of Ghana and Burkina Faso.

Before the trucks depart the Tema Port, they are weighed by the Ghana Port Authority. Weighing certificates are issued to each car. Copies of weighing certificates for trucks taken on 29.08.25 for vehicle numbers GT 7184-24 and GR-6057-25, GW6571-W dated 15.02.24 were noted during the audit. If trucks are found to be overloaded, the authorities impose a fine on the transporter. All weighing certificates verified during the audit confirmed that the vehicles are not overloaded.

The weight of each container load of cyanide is also stated on the shipment's Bill of Lading, issued by the shipping line.

BL's No's HLCUSEL250760129 dated 20.08.2025, No's 236176840 dated 25.03.2024, HLCUSEL230732382 Dated 17.08.2023

The operation has a Maintenance Procedure that outlines processes for Preventive and Corrective Maintenance for trucks and trailers.

Maintenance programs are planned and categorized into Maintenance A, B, and C. Maintenance A is performed every 350 hours or 15,000 km; Maintenance B is performed after 700 hours or 30,000 km; and Maintenance C is performed after 1,050 hours or 45,000 km.

Trailers are serviced during routine vehicle maintenance. Each vehicle has a servicing sticker on the right side of the windshield that shows the date of the last service and the next service date. The number of hours or kilometers on the odometer is recorded on the vehicle pre-departure checklist during inspection and before departure to the mine site. Defects noted on vehicles during inspections are repaired immediately before departure. If any defect is identified during the pre-departure inspection of the vehicles, the Transport Supervisor raises a job card, and the defect(s) is/are rectified. Maintenance of containers is not the responsibility of AGL Ghana. Containers are maintained by Shipping lines.

AGL Ghana does not subcontract any of its cyanide transport activities.

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

The operation is **X in full compliance with** Transport Practice 1.4

Summarize the basis for this Finding/Deficiencies Identified:

AGL has a procedure to ensure that cyanide is transported safely to the mine site intact. Cyanide briquettes are packaged within a woven polypropylene bag with a PVC (plastic) liner and encased in wooden Intermediate Bulk Containers (IBCs). The bag is sealed to prevent moisture from entering. The quantity of cyanide in each bag is 1000Kg. The packaging complies with the International Maritime Dangerous Goods Code (IMDG Code). As additional support, the IBCs (plywood boxes) are secured with steel strapping, further ensuring the packaging. The box is placed on a pallet to provide extra protection during transit and to facilitate easy lifting and movement between locations. The IBCs are then packed into 6-meter (20-foot) sea freight containers.

Twenty (20) boxes are in each 1x20ft container. The sea container doors are secured with a seal with a unique seal number. The quantity of cyanide, container number, and packing list are stated on the shipping documents prepared by the shipping company to cover the consignment.

AGLL Ghana has a "Convoy Identification Transport Units and Loading form, which is completed before a convoy departs for a mine. The form lists the vehicle and trailer numbers, the seal numbers for the cyanide containers, and the drivers' names. The form is signed by the Escort leader, the Police, and the Gendarme (in Burkina Faso).

Waybills are issued for each load that a vehicle carries. The waybills have seal numbers. Personnel at the designated mine receive the consignment, sign and stamp it to authenticate that the product has been received intact or in good condition.

Trailers are fitted with eight twist locks to secure the containers. Before the shipment departs from the port, it is the responsibility of the Escort Leader and the driver to check the condition of each container as well as whether the seals are still intact on the doors.

En-route to the mine, the Escort Leader checks the condition of the containers as well as whether they are still properly secured to the trailers any time the convoy stops for a brief rest. The gendarme from Burkina Faso, takes over from the Ghana police and joins the convoy at the Burkina Faso side of the border." A Trailer Trip Checklist for Transport of Containerized Solid Sodium Cyanide form" is completed daily whilst the convoy is on the road to the mine. Ghana Customs tracking devices are fixed on the containers to track them and ensure that the containers have crossed the borders of Ghana.

Placards are used to identify the shipment as cyanide as required by International standards as well as the IMDG code and are conspicuously displayed on all four sides of a container. The TMP, indicates that cyanide containers should be marked by the required placards. The cyanide manufacturer has visibly placard all four sides of cyanide containers as required by the IMDG code of Practice. The placards are Hazard Class 6 (Toxic 6 label), Skull & Cross bones, UN number 1689, and Marine Pollutant labels.

In addition, the same required placards are on the vehicle, namely marine pollutant and hazard class 6 and cross bones are displayed in front and at the rear of the trucks. Placards are verified during pre-departure inspection and a Trailer Trip Checklist completed. Required placards were verified and noted.

AGL Ghana implements a safety program that includes vehicle inspections. Truck Inspections Checklist, Trailer Trip Checklist and Container Checklist are completed during inspections and prior to the departure of a convoy and also when on the road to the mine. Records of inspection checklists were noted. Job cards are raised for any defect or fault detected during the inspection, and the defect is rectified before the convoy departs. Copies of pre-departure checklist for selected trucks numbers were verified. The checklists have duly been signed off appropriately.

Vehicles are inspected at the workshop after each trip and any faults are rectified before they undertake additional trips. These inspections are carried out once the convoy stops to ascertain whether there are any defects or any faults that have arisen during the trip to the mine site. For reported defects, it was noted that work orders were generated by the Transport Supervisor, the defects were rectified at the workshop by the company's mechanic, and he signed off as the job was completed.

AGL Ghana has a Maintenance Procedure which guides both Preventive and Corrective Maintenance. Maintenance programs are planned and categorized as Maintenance A, B and C. Maintenance A is carried out after 350hrs or 15000Km, Maintenance B is done at 700hrs or 30,000Km and Maintenance C are done at 1050hrs or 45,000Km.

The number of hours or kilometers a vehicle has done is noted on the vehicle pre-departure checklist during inspection and prior to vehicles departing for the mine site. Defects noted on vehicles during inspections are repaired immediately before departure. Job orders are raised by the Transport supervisor and the job on a particular truck is done at the company's own workshop.

Records of Job cards for selected vehicles were verified. BTL Ghana has a tire management process that requires tires to be replaced once the tread depth is below 3mm. Tires are inspected before each trip. No retreaded tires are used.

AGL Ghana has a General Driving Rules policy. The policy stipulates the following.

Maximum time allowed for continuous driving is 2hrs on laterite roads, and 3hrs on asphalt road. Drivers must take rest for a minimum of 30minutes after the 2hrs before continuing the journey.

- 20km when driving through villages
- 20km/hr. when driving on road with works in progress
- 40kph when driving on outside roads, urban area and villages
- 50kph on driving in town on asphalt road
- 80kph when driving on asphalt roads out of town

Night driving is strictly prohibited. Permitted driving hours is from sunrise and sunset. From 5am to 7pm. The vehicles have Guildford Ventures systems installed in them and is monitored during drive time by the transport dept during each trip to ensure that the convoy conforms to all the required driving regulations till they arrive at the mine destination.

Trip Itinerary forms are completed for each trip. The form has the times that the convoy stopped on the road for rest and the times that it departed. Trip itinerary reports dated 2023 to 2024 & 2025, were verified.

The TMP provides a detailed description of the step-by-step process for loading a container onto a truck. The trailer inspection checklist provides for checking that the twist locks are secured firmly on the containers prior to the convoy's departure.

Any time the convoys stops for a brief rest and refreshment break, the twist lock as well as the entire containers are inspected, and conditions documented. These checks ensures that the containers do not shift, or slip form the trailer. Selected copies of completed Trailer Trip Checklists were sighted as a proof that the containers are secured with twist and stabilized to prevent shifting.

The operation has a detailed procedure to address weather condition, civil unrest and crowd movement. The p*rocedure* states that the convoy is to suspend the delivery operations during civil arrest, bad weather condition, bridge collapse, mudslides, and other adverse conditions. The Escort Leader is to stop the convoy and park at a safe location until any civil unrest or violence has subsided and bad weather conditions have passed. The RRA covers various conditions such as severe weather conditions, and violence or civil unrest. The Emergency Response Plan also addresses same.

AGL has an Alcohol and Substance Abuse Policy that prohibits the use of drugs and alcohol whilst at work. Alcohol tests are performed periodically by the Escort leader. A breathalyzer is used to conduct random alcohol tests.

After a random alcohol test, a checklist is completed, including the driver's name, test result, date, and the Escort leader's signature. Records of completed alcohol test checklists were verified.

Calibrated breathalizer device is used for the alcohol tests. A copy of calibration certificate of the breathlyzer and HCN gas detectors were reviewed. The punishment of drug and alcohol abuse is dismissal.

The operation has a document control and retention procedure titled "Structure and Control of Documents" ref no. AGL-COR-QUA-PRO-0002 Rev9.1. The procedure which mentions when and how documents are retained and years that must be kept before disposal. Documents are retained for a minimum of 5 years. All documented evidence of the above activities were verified by the auditors.

AGL Ghana do not subcontract any of its cyanide transport activities.

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

The operation is **X in full compliance with** Transport Practice 1.5

Summarize the basis for this Finding/Deficiencies Identified:

Not applicable to this operation as no shipment of cyanide is done by sea.

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

The operation is **X in full compliance with** Transport Practice 1.6

Summarize the basis for this Finding/Deficiencies Identified:

AGL Ghana has a means of communicating with the mining operations, cyanide producers, and outside responders. Communication is by cell phones (WhatsApp), two-way radios, and satellite phones. Communication via emails and phone is also done between AGL Ghana and the mine sites, as well as the supplier (Samsung C & T).

Each vehicle in a convoy is fitted with a Gilford Ventures System. Before the convoy's departure, the Customer Service Officer at AGL sends emails to the mining company. Emails are sent twice a day to the mine to inform them of the convoy's location until it reaches the mine site.

The GPS Tracking Coordinator monitors the GPS from 5 am to 7 pm. Emergency responders are communicated to via cell phones and satellite phones.

In Ghana, communication is done with service providers MTN and Telecell. Once the convoy crosses the border into Burkina Faso, the escort leader switches to the Orange mobile network.

All communication equipment is detailed in the ER equipment checklist.

The emergency contact list includes cell phone numbers for external emergency responders. GPS reports were verified in real time by the auditors. A contact list of emergency telephone numbers for stakeholders, including mine personnel, the cyanide supplier, and emergency responders, was noted.

All communication equipment is periodically inspected and tested by the Escort Leader. The QHSE Manager is responsible for ensuring that all the required equipment is tested. The equipment checklist is completed and signed after an inspection. It is the responsibility of the Escort Leader to check the communication equipment and record the findings on the Equipment Checklist. Before the convoy departs, all mobile phones and radios are inspected and fully charged.

No blackout areas are identified on the road. AGL Ghana has made provision by using two service providers: MTN and Vodafone SIM cards. If one phone network drops whilst en route to the mine site, the escort leader can fall back on the other. In Burkina Faso, the Orange network is used during the trip. The Satellite phone is also used as a backup.

The GPS tracking system tracks the progress of convoys from 6 am to 7 pm, as monitored by the Tracking Coordinator, until the convoys reach the mine site. The TMP states that emails and WhatsApp messages are the preferred means of updating all stakeholders on the convoy's progress each day before arrival at the mine site. Evidence of emails sent to the mine and supplier, as well as WhatsApp messages, was verified. In the event of an unforeseen road diversion during a trip, the escort leader promptly communicates with all concerned, including the mine and the AGL office.

When the GPS indicates that a convoy has stopped, the Tracking Coordinator contacts the escort leader to explain the reason for the stop. AGL management is notified, and emergency response is triggered as needed. In case of

convoy over-speeding, the GPS automatically sends an alert to the Tracking Coordinator, who will take the required action. Tracking reports for each convoy are downloaded daily and sent to the Transport Manager, Logistics Manager, and QHSE Manager for review. Real-time monitoring of a couple of trucks was witnessed. Night driving is prohibited unless authorized by the transport manager, approved by the General Manager, and the convoy is tracked until it reaches its overnight stop.

Shipments are cleared by AGL Ghana's Clearing and Forwarding department. Copies of Bill of Lading # MEDUK4702040 dated 24/05/2025, HLCUSEL230732382 dated 17/08/23, and 236176840 dated 25/03/2024 were noted. The Bill of Lading specifies the quantity of product, gross weight of the sodium cyanide, container numbers, seal numbers, the gross weights of each freight container, Shipper's information, Consignee's information, description of packaging, and chemical name of shipment.

AGL issues waybills for each consignment, which are submitted to the mine site representative for signature and retention on copies to verify that the containers have been received intact and in good condition. Copies of waybill numbers 216635, 216641, and 216636, which departed on 25/06/2025, were noted. Container interchanges which are issued by the port authority also indicate the condition of the container load of cyanide at the time of loading in the port. Container interchanges were noted.

Shipping records, such as Bill of Lading and packing list, are received by AGL Ghana from the supplier. The Bill of Lading lists container numbers, shipment date, container numbers, and gross weights. Copies of the Bill of Lading were sighted. An MSDS accompanies each shipment. The product MSDS is contained in the Emergency Response Plan. A copy of the product MSDS from the supplier is available with the Escort Leader. The MSDS is in the company's vehicle pre-trip checklist.

AGL Ghana Transport and Logistics does not subcontract 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** Transport Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

AGL Ghana Transport and Logistics is in full compliance with Transport Practice 2.1, based on the finding that the transport operation does not store any cyanide. AGL Ghana does not have a cyanide trans-shipment depot or interim storage of Sodium Cyanide.

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

The operation is considered fully compliant because this Transport Practice is not applicable.

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** Transport Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

AGL Ghana has a detailed Emergency Response Plan (Ref. no. AGL-GHA-HSE-WI-0002) that addresses all incident-related issues. The ER specifies procedures to be followed and actions required at all phases of emergency response for emergencies involving the transportation of solid sodium cyanide.

The ERP discusses the following.

- Descriptions of appropriate response actions for the anticipated emergency.
- Physical and Chemical Forms of Cyanide
- Spill management and clean up
- Minimization of risk to the public, environment, employees, members of emergency response service, property, and equipment.
- Roles of outside responders, medical facilities, and communities.
- Incident investigation
- Emergency scenarios, roles, and responsibilities. Different possible incident scenarios have all been addressed in the ERP
- Emergency contact numbers of all emergency responders, both in Ghana and Burkina Faso
- Details of required Personal Protective Equipment (PPE) for emergencies

The content of the ERP was found to contain all the required information to handle cyanide incidents.

Cyanide deliveries are made from Tema to the Kiaka, Mana Semafo, Hounde, and Sanbrado mine sites, all in Burkina Faso.

The TMP, RRA, and ERP have considered the road condition, including rivers, slopes, curves, bridges, tarred and dusty roads, and road surface. The plan was reviewed and found to be appropriate for the activities it has been designed for, as it addresses issues regarding road transportation of cyanide.

ERP describes the physical form of cyanide and the chemical properties of cyanide. Cyanide being transported is in white solid briquettes. It also mentions the chemical composition of sodium cyanide.

It describes the nature of cyanide, its packaging, and other chemical properties. The ERP covers reactions that occur when in contact with acids and other incompatible chemicals, and when exposed to moisture. It provides a detailed description of the physical and chemical properties of sodium cyanide, including the required placards identifying the product. These placards are UN No. 1689, Toxic 6, and Marine pollutant labels. Neutralization processes for a spill are documented in the plan.

The TMP states that transportation is by road. Route surveys and RRAs were conducted for the transportation route from Tema port in Ghana to the mine in Burkina Faso.

AGL Ghana's ERP cross-references the RRA document number MANA SEMAFO-BLX-GHA-HSE-WI-Revision 2, which covers all aspects of transport infrastructure, including road condition (gravelled or unravelled), curves, bridges, water bodies, slopes, and villages and towns. Various conditions along the transportation route have been risk-assessed.

The vehicle design has been considered in the ERP and is appropriate for transporting sodium cyanide in IBCs. The ERP details the specifications of the trucks used. These are as follows:

- 6x4 axle, three axle, and two axle trailers with weight capacities of 70tons, 60tons, and 53.5 tons, respectively, equipped with twist locks and designed to carry sea containers.
- 6X4 axle trucks are equipped with twist locks and carry 2x20ft

The truck brands used are Renault and MAN Diesel, with horsepower (HP) ratings of 350 and 400.

The ERP details the various response actions during an incident. Clause 10 of the ERP describes the following scenarios and response actions during emergency situations. The following have been addressed vividly.

- Vehicle rollover with no spillage caused by the driver over speeding while negotiating a curve to catch up with the Convoy.
- Vehicle rollover into a river caused by a driver veering off a narrow bridge with possible spillage
- The vehicle, knocking down a pedestrian/motor rider, was caused by the rider not respecting convoy movement and forcefully manoeuvring his way through the convoy.
- Extreme weather conditions, i.e., severe rainfall, thunderstorms and road flooding
- Civil unrest/Crowd movement i.e., community agitations
- Cyanide Spill on Road Shoulder (Dry)
-

The ERP describes the roles of emergency responders, the escort team, drivers, the mine, and the supplier in the above incident scenarios.

The ERP outlines spills and the cleanup and neutralization processes to be followed.

ERP addresses the roles of emergency responders, namely police, fire service, mine, and supplier (Samsung). The escort leader will activate a response by immediately taking initial actions at the incident site. The overall coordination and management of an incident is the responsibility of the escort leader in consultation with the QHSE Manager.

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

The operation is **X in full compliance with** Transport Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

AGL provides emergency response training to appropriate employees as specified in the ER Plan. The training matrix indicates that annual ER refresher training is conducted for employees. The company has planned training programs for drivers, the escort team, and other staff. Cyanide Awareness training and mock drills are covered in the ERP. ER training is organized annually. Records of Emergency response training were noted. Records of the training attendance register were verified.

The company has a training plan (document no. AGL-AFR-HR-F-002) that outlines the dates of each training session and the subsequent training dates. To assess the effectiveness of the training, participants' verbal assessments (questioning and answering) are conducted.

Responsibilities of personnel as well as the emergency responders are specified in clause 7.1.4 (Crises Management team responsibilities outlining responsibilities for CMT Leader (Crises management team Leader) (Operations Director), CRT Leader (Crises Response Team Leader) (Escort Leader), Transportation Leader (Transport Manager), Human Resource Director, QHSE/Security Manager, Legal Manager, Finance Director.

The escort leader is responsible for the overall management of the incident. The escort team will cordon off the incident area, move any victims from there, and will also be involved in the cleanup of the cyanide briquettes. AGL Ghana will provide equipment to recover the container. Mine site will receive the container and also provide recovery equipment when necessary—Samsung, which the supplier will offer technical support as appropriate. The Ghana Police Service will assist with traffic management, move people from the incident site, and prepare a report, protecting people and securing the site. The firefighters will be responsible for assisting victims during emergencies.

The Ghana Environmental Protection Agency will provide specialist advise and technical and regulatory advice. The escort leader will be responsible for administering 100% oxygen to a victim of cyanide poisoning. The Ghana Ambulance Service will be responsible for the transportation of a patient to the hospital as well as administration of oxygen to a person while on the way to the hospital. The hospital is responsible for the treatment and the administration of cyanide antidote to the patient in conjunction with oxygen.

AGL Ghana has notified the Ministry of Environment Affairs in Burkina Faso, through its subsidiary office there, of its activities. The ministry will assist in providing technical advice in case of a significant incident. No special transport permit is required in Burkina Faso.

The Civil Protection Agency, National Ambulance Service and police in Burkina Faso have been notified and will be called upon to assist in case of an incident. The police accompany the convoy from Burkina Faso side of the border to the mine site. The contact phone no's of all these stake holders are detailed in the ER contact list.

A list of emergency equipment is contained in the company's Emergency Response Plan. All the required first aid equipment and recovering equipment are listed in the ERP.

According to the ERP escort equipment is checked at regular intervals and before a cyanide convoy departs to the mine. The list of equipment's include.

- Full Oxygen Cylinder
- Oxygen Mouth to mask
- Oxygen regulator (Flowmeter)
- Humidifier
- Antidot Cyanokit
- First Aid Kit
- Stretcher
- Full Face Respirator
- Filter/ Cannister
- Tyvek Coveralls
- PVC gauntlet Gloves
- Rubber Boots
- HCN Gas meter
- Safety Triangles
- Revolving Top light
- 6kg or 9 kg DCP Extinguisher
- Cyanide Danger Toxic Sign Board
- Cones
- Shovel
- Broom
- Rubbish Collector
- Tarpaulin
- Bulker Bags
- Bucket
- Spray pack
- Reflector tape
- Ferrous Sulphate mono hydrate
- Torch with Batteries
- Water drums 200 Ltrs
- Container belt to hold drum
- Danger Flags/ traffic Warden light
- Two-way radio
- Megaphone
- Car radio charger
- Satellite phone + Charger
- Mobile phone + Charger
- Alcohol Test kit

Cyanokit is stored according to manufacturer's recommendations. Oxygen gas cylinder is periodically checked for Oxygen levels.

The HCN gas and the Breathalyzer have been duly calibrated as per the manufacturer's recommendations. Calibration certificate number GHA25269 dated 13th August 2025, expiring on 13th August 2026, for HCN gas detectors with serial numbers J619-Z009720, J0619-Z010948, J618–Z009344, J619–Z010954 were noted.

A Breathalyzer with serial number TB15H0034 and calibration certificate number AGA25052, dated 11th July 2025, was noted. The HCN gas detectors and the Breathalyzer were calibrated by Ultimate Resurgence Services in Ghana.

The Emergency Response Equipment are available and ready for use should they be required. Emergency equipment is carried in the escort vehicle during the journey. The Escort leader is responsible for the equipment. The equipment is kept intact in the company's store.

The emergency response equipment is inspected monthly, and the equipment checklist is completed. The ER equipment is also checked before the commencement of a journey. Auditors verified the ER equipment during the audit.

AGL Ghana does not use subcontractors for the transportation of cyanide.

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

The operation is **X in full compliance with** Transport Practice 3.3

Summarize the basis for this Finding/Deficiencies Identified:

AGL Ghana's ERP includes up-to-date contact information and a process for notifying external responders, including the Police, EPA, Hospitals, Ambulance, and Customs. The list consists of regulatory agencies in Ghana and Burkina Faso.

The plan contains the current emergency contact list of all external responders, including regulatory agencies (EPA) and mine Sites. The QHSE is responsible for ensuring that the contact numbers and email addresses of all stakeholders are up to date. In the event of an incident, it is reported to the relevant authorities and emergency responders as required. The Ghana Environmental Protection Agency, the mining client, and the affected community (notification done by the EPA), the Police, Fire Service, and Ambulance are notified.

Revision of internal and external notification and reporting procedures is the responsibility of the QHSE Manager. ER contact numbers are reviewed and confirmed annually, as needed. A test of selected contact phone numbers confirmed they were active.

Clause 7.1.2. The ERP states that in the event of a significant cyanide incident, the company will notify ICMI about it.

- Human exposure that requires an emergency response team to take action, 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 requires 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

The Procedure was verified and noted in the ERP.

No significant incidents occurred during the past three years.

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** Transport Practice 3.4

Summarize the basis for this Finding/Deficiencies Identified:

ERP addresses the following recovery and neutralization processes.

1. Recovery of solid or solution
2. Neutralization of the removal of soil
3. Treatment and/or disposal of excavated soil
4. Treatment and/or disposal of recovered cyanide
5. Recovery and treatment of groundwater

The procedure states that soils contaminated with cyanide residues will be removed during cleanup and conveyed to the mine site, where the mine will dispose of them.

The ERP states that the use of sodium hypochlorite, ferrous sulfate, and hydrogen peroxide to treat cyanide is prohibited and that under no circumstances should they be released into surface water.

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

The operation is **X in full compliance with** Transport Practice 3.5

Summarize the basis for this Finding/Deficiencies Identified:

The ERP plan is reviewed at least once a year and as needed. The annual review will be initiated in accordance with AGL Ghana's document control system. The QHSE manager is responsible for ensuring that the Emergency response plan is reviewed and evaluated. The ERP has been reviewed in 2023 & 2024. Auditors verified copies.

Mock drills are organized once a year. ERP makes provision for annual emergency response drills. Cyanide Emergency response exercises are conducted annually involving drivers, the escort team, and other logistics staff. The QHSE department is responsible for organizing the drills. The Mock drills included both Cyanide exposures and releases. The training matrix also provides for mock drills to be conducted annually. Mock drills are reviewed and evaluated. And any corrective action plan put in place. Records of mock drill reports were seen by the auditor. The report includes incident scenarios, non-conformities and corrective action plans.

The operation has a procedure for evaluating the plan's performance after implementation. The ERP makes provision for periodically reviewing and evaluation of the procedures. Mock drills organized show that the mock drills were repeated to ensure perfection. The head of logistics, head of transport and workshop, Quality and Safety Manager, Samsung C&T representative, and mine representatives notified after the evaluation.

The operation has a procedure to evaluate the plan's performance after its implementation. The ERP makes provision for periodically reviewing and evaluation of the procedures. Mock drills organized on 23rd April 2022 and 16th August 2022 show that the mock drills were repeated to ensure perfection. The head of logistics, head of transport and workshop, Quality and Safety Manager, Samsung C&T representative, mine representatives notified after the evaluation.

Following any incident, lessons learned are used to trigger the evaluation of the ERP. Non-conformances noted during the previous mock drills were recorded and attended to. Mock drills are evaluated through debriefing and corrective action plans put in place to correct any lapses. All the non-conformities in the mock drills are rectified when the drills are repeated. The corrective action plans are used to revise the ER procedures.

No incidents occurred during past three years recertification period