INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary
RE-Certification Audit Report

AGL SENEGAL
DAKAR
12 – 18 September 2026

For

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Sensitivity: Internal

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1.0 Introduction

1.1 Company information

Name of Operation: AGL SENEGAL

Name of Operation Owner: AGL SENEGAL

Name of Operation Operator: AGL SENEGAL

Name of Responsible Manager: KHADIDIATOU SAKHO
QHSE Director

Address **AGL SENEGAL** KM 4,5 Boulevard du Centenaire de la Commune de Dakar
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Country: SENEGAL

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1.0.1 Company Profile.

AGL is the logistics branch of the MSC Group previously Bollore , is the leading carrier in North/South exchanges, and among the top 5 European freight forwarding groups.

Present in Senegal since 1926, AGL Transport Logistics Senegal relies on a large network throughout the continent of Africa, the continent's first integrated network.

The AGL Transport Logistics Senegal network in Africa contributes to the development of trade with the rest of the World, operating in conjunction with transit divisions and shipping lines.

AGL Transport Logistics Senegal (AGL) is one of the links in this integrated network, with the ability to provide the service of adequate transportation.

In addition to AGL Senegal's national headquarters located in Dakar, the company is present in towns such as Diamniadio, Kaolack, and Potou all in Senegal.
The organization leverages its competent collaborators and modern equipment to offer tailor-made and end-to-end logistics supply chain solutions to both local and international clients.
AGL Transport & Logistics Senegal has a broad range of capabilities and experienced staff to handle both general and project cargo with specific expertise in a number of sectors such as mining, humanitarian aid, FMCG, telecommunications, oil & gas, and healthcare.

The company is engaged in freight forwarding and cyanide transportation to mining companies in Senegal and Mali. Samsung C & T has contracted AGL to conduct clearing and transportation of sodium cyanide from the port of Dakar, Senegal to Mako Mining in Senegal and Resolute Syama mine, B2 Gold Fekola mine and AnglogoldAshanti Sadiola mines all in Mal and SIguri in Guinea.

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2 Audit scope
The audit scope is Re-Certification for AGL Dakar of cyanide road transport from DAKAR to mine site for solid sodium cyanide

3 Location detail and description of operation:
AGL SENEGAL DAKAR became a Signatory to the International Cyanide Management Code 2009 as part of the repeated requests by companies to transport Cyanide to various mines in West Africa.

AGL SENEGAL operations is based in DAKAR , AGL SENEGAL have a cyanide operation yard , the yard is located 3 km from the Main port based on the route taken
Address **AGL SENEGAL** TOUR NIGER - ROUTE NATIONALE N°1 – MARCHE NIGER - KALOUM
BP : 2011 - DAKAR - REP. DE SENEGAL

Sodium Cyanide Transport Process and Logistics in SENEGAL DAKAR

Packaging and Shipping

Sodium cyanide in briquette form is packaged in Intermediate Bulk Containers (wooden IBCs), which are then loaded into 6-meter (20-foot) freight containers. Each freight container holds up to 20 wooden IBCs, with a maximum product weight of 20 tons.

- The sodium cyanide is shipped by sea from the consignor to the Port of SENEGAL DAKAR .
- Independent shipping companies, coordinated by the consignor, handle the transportation to the port.

Port Handling and Pre-Clearance

- Before the shipment reaches SENEGAL DAKAR , AGL SENEGAL ensures that all shipping documentation is in order and that the containers are pre-cleared for prompt processing at the DAKAR terminal.
- Upon arrival, containers are directly transferred from the vessel onto AGL SENEGAL 's vehicles they are not stored at the port terminal.
- The steevedoring company, under the DAKAR Port Authorities, manages the unloading of containers from vessels and loading onto trucks.
- AGL SENEGAL collects the containers within 24 hours of vessel arrival and transports them to its yard in DAKAR for a short period, where they remain loaded on trailers, prepared for departure to the mine site the following morning.

Transport Route and Escort

- AGL SENEGAL AGL SENEGAL transports containerized sodium cyanide from DAKAR Port to Siguiri , covering a distance of 1600 KM.
- The trucks are escorted from:

    1. DAKAR Port Terminal to the Mine Site

- Escort teams include:

    - AGL Escort Team is contracted to AICES and Arcane Security
    - police

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Contractual Agreements

- AGL SENEGAL has a contract agreement with Orica to handle logistics, including sodium cyanide transportation from DAKAR Port to Siguiri .
- The transportation aspect is Managed by AGL , which provides vehicles and drivers. AGL SENEGAL retains full control over the movement of the cyanide convoys, ensuring compliance with safety protocols.
- Africa Global Logistics (AGL) acts as a cyanide transporter for Orica and other suppliers, transporting solid cyanide briquettes by road to Siguiri Mines.

Compliance and Due Diligence

- Cyanide shipments arrive in 20-foot containers, each containing 20 one-ton boxes of solid briquette cyanide.
- Stevedores offload containers at the port and directly load them onto trucks.
- Orica has conducted due diligence on the AGL operation, which must be renewed every three years to maintain compliance with the Cyanide Code.
- AGL SENEGAL 's responsibility under the Cyanide Code begins once the containers are collected from the port.
- Containers are delivered under Tackle (direct transfer from ship to truck).
- Stevedores handling the cyanide shipments comply with IMDG/IMODG Code requirements.

Transport Management and Safety Measures

- AGL SENEGAL vehicles collect the containers with all necessary documentation and manage transport under a jointly agreed Transport Management Plan (TMP) between the supplier and the mine.
- The containers are transported in escorted convoys to the mine site.
- Each convoy includes:
    - 2 escort vehicles
    - 2 safety officers
    - Each truck is operated by a driver and accompanied by an assistant.
    - Safety officers manage communication between the trucks, escort vehicles, and the convoy manager.

Convoy Team Composition and Emergency Preparedness

- Convoy personnel include:
    - Convoy Manager and Assistant Convoy Manager
    - Cyanide First Aid Personnel
    - Safety Officers
    - Mechanic
    - Emergency response equipment for cyanide spills and releases
    - Medical equipment for treating cyanide exposure (splashes, inhalation, ingestion, skin contact)
- Government Agency Personnel in Each Convoy:
    - 2 police Officers

Government-Regulated Escort Requirements

- It is mandatory for all cyanide transporters and end-users to use government agencies for escorting hazardous materials.

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- The escort agencies operate under the Ministry of Security, and escort charges apply per convoy.
- A fixed number of escort personnel is assigned per convoy, regardless of whether it consists of a single truck or multiple trucks.
- Formation of the Escort Agencies:

    - EPA are the government body in charge of chemical handling in SENEGAL .
    - These agencies are now responsible for monitoring all hazardous material (HAZMAT) cargo within SENEGAL n territory to ensure safe and compliant transportation.

4 - List of Employees and Contractors Interviewed

INTERVIEW SHEET			DATE 7-9-2026 to 12-9-2026
NAME	POSITION	CELL	EMAIL
KHADIDIATOU SAKHO	QHSE DIRECTOR	CELL+221 78 589 13 57	khadidiatou.sakho@aglgroup.com
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5 transit and Storage

The scope of the audit do not cover interim storage or storage
AGL SENEGAL operation is to transport from port to mine site within west Africa
AGL SENEGAL trucks passes through the yard just to fuel and do final check before departure

6 Auditor's Finding

This operation is

X in full compliance
□in substantial compliance
□not in compliance

with the International Cyanide Management Code.

This operation has not experienced compliance problems during the previous three year audit cycle.

Audit Company: Crown Transport & Logistics
Audit Team Leader: Ghassan Husseini
E-mail: ghass@ctllwa.com

Name and Signature of Lead & Technical Transport Auditor:

Name Ghassan Husseini Signature Date 27-9-2026

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Certification Auditors. I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Date of audit: 12-9-2026 to 18-9-2026

Ghassan Husseini
Lead Auditor Date 27-9-2026

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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 Transport Practice 1.1**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Senegal has established a comprehensive, multi-layered safety management framework governing the transport of sodium cyanide along the Dakar–Siguiri corridor.
This integrated system is built upon a foundation of rigorous route risk assessment, strict regulatory compliance, proactive community engagement, robust emergency preparedness, and a commitment to continuous improvement.
The framework is operationalized through a structured convoy configuration, real-time monitoring, and close coordination with national authorities.
This holistic approach reflects AGL Senegal's unwavering commitment to safeguarding personnel, communities, and the environment throughout the transport chain.

AGL Senegal operates under a dual-approval framework that ensures both technical safety and full regulatory compliance.
The transport of sodium cyanide is subject to strict oversight by the Ministry of Transport, and the National Environmental Protection Agency (DIREC).
Prior to any shipment, AGL Senegal applies for and receives formal transport permits from the Ministry of Environment and Sustainable Development for each convoy (e.g., dangerous cargo permit #002754-METE-DIREC-DCPN-mn,).
The designated route is government-mandated to prevent cargo diversion.
All convoys are escorted by armed police officers, and any deviation from the designated route is strictly prohibited without prior Ministry consent.

AGL Senegal's safety framework is a systematic process for selecting and evaluating transport routes, as detailed in the "Conducting and Using a Route Survey" procedure .
This procedure outlines the criteria for route selection, including distance, proximity to populated areas (towns, villages, schools), environmental sensitivity (proximity to rivers and water bodies), road infrastructure (sealed/unsealed, bridges, weight limits), and topographical challenges (pitch, grade, and conditions for wet/foggy weather).

The Route Risk Assessment (RRA), formalized in document "Rapport De Road-Survey" , is the foundational instrument for identifying, categorizing, and mitigating risks along the approved transport corridor. This assessment employs a data-driven methodology, using physical inspections, GPS coordinates, and photographic documentation to evaluate:
- Infrastructure: Road surface conditions, bridges, railway crossings, and dangerous curves.
- Environmental factors: Proximity to water bodies, fog-prone areas, and seasonal variations.
- Human activity: Population density, proximity to schools, markets, and pedestrian zones.

Specific high-risk locations along the corridor (e.g., Carrefour Manding, Kiniebakoura) have been identified with mandatory control measures.

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The RRA and Transport Management Plan are reviewed annually, with a comprehensive ground-up reassessment conducted yearly , or triggered by significant events such as flooding, landslides, major political shifts, or route changes.

All cyanide deliveries are conducted through a structured convoy system to ensure security and safety.
A convoy typically consists of a lead escort vehicle, a trailing escort vehicle, and between one and four cargo trucks.
Transport is strictly restricted to daylight hours (06:00 to 18:00) to ensure maximum visibility.
The Convoy Leader is responsible for setting the pace and controlling the convoy.

Key operational controls include:
- Security Oversight: The Senegal State provides a mandatory armed escort, comprising police and specialized agencies, to ensure cargo security.
- Cargo Integrity: Containers are locked and sealed before departure , with seal numbers recorded and inspected at every scheduled stop.
- Real-time Monitoring: All convoys are tracked via the GEORIS system, providing data on location, speed, and stop duration.
- Speed Management: Differentiated speed limits are enforced: 70 km/h on tarred roads, 40 km/h on laterite roads, and 20 km/h through villages and built-up areas.
Additional reductions (e.g., 10 km/h for narrow bridges) and minimum following distances are mandatory.
- Seasonal Adjustments: During Harmattan conditions, the Escort Commander is authorized to suspend travel, and following distances are increased to 100 meters to maintain clear sight lines.

The safety framework ensures a high level of preparedness for any potential incident.
Each convoy functions as a self-contained emergency response unit, equipped with specialized spill kits, neutralizing agents, first aid supplies, and personal protective equipment.
The Emergency Response Team includes trained first aiders, a mechanic, and a Fire Officer.
All operations adhere to the Emergency Response Plan , which provides detailed protocols for neutralization, decontamination, and first aid.

preparedness is further reinforced through coordination with external stakeholders:
- Medical Facilities: Selected medical facilities along the route are provided with Material Safety Data Sheets and consulted to ensure they have the necessary training to treat cyanide poisoning.
- Authorities: Law enforcement posts receive annual refresher training on securing spill sites and managing public safety during emergencies.
Government agencies in Mali (e.g., Civil Protection, Military) are notified and coordinated with through AGL's local subsidiary.

AGL Senegal maintains a proactive community safety stance through a formal engagement program.
This includes targeted awareness campaigns, distribution of informational flyers, and consultative meetings with local leaders.
These initiatives inform communities about the nature of cyanide, the dangers of exposure, and critical emergency actions (e.g., prohibition of water use from local rivers in the event of an incident).
Community engagement is formally documented through attendance lists and signed acknowledgment documents, ensuring accountability and traceability. Any demographic changes are incorporated into the annual RRA review, ensuring the route remains aligned with community safety requirements.

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AGL Senegal operates a robust continuous improvement cycle, incorporating field data and lessons learned into future planning. This is achieved through:
- Post-Convoy Feedback: Following every convoy, the Convoy Leader completes a Mission Update Form ("FICHE DE MISE A JOUR LORS DES MISSIONS"), documenting road conditions and observations.
- Periodic Re-evaluation: The route and Transport Management Plan are reviewed at least 1 annually, with at least one review during the dry season and one during the rainy season, and as necessary (e.g., before resuming operations after a stoppage).
- Document Control: All controlled documents are subject to rigorous version control, ensuring total traceability and alignment with regulatory requirements.
The route survey procedure mandates that all routes to the Fekola, Syama, Sadiola, and Mako mines are re-evaluated as stipulated.

Personnel Qualification and Training: AGL Senegal retains core accountability for driver recruitment, specialized training, and route management.
The Convoy Manager, a dedicated and experienced Road Transport Officer, is responsible for documenting feedback and incorporating it into each Journey Plan.
Personnel qualification is maintained through:
- Mandatory Pre-departure Briefings: Toolbox Meetings are conducted for all stakeholders (drivers, Convoy Managers, police officers) to brief them on mission-specific risks and control measures.

- Specialized Training: All personnel, including subcontractors, are required to participate in refresher training. Escort companies provide qualified trainers under the supervision of AGL's training department .

Verification and Audit Oversight: The effectiveness of AGL's safety framework is validated through multiple layers of independent and internal oversight.
This includes interviews of the RRA by lead auditors, periodic participation in convoys by Orica audit teams to confirm alignment with international mine safety requirements, and regular audits by government officials and the DIREC to provide independent assurance of regulatory compliance.
Stakeholder interviews with QHSE staff, Convoy Managers, drivers, and mechanics confirm that documented procedures are understood and consistently applied in practice

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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 X in full compliance with Transport Practice 1.2**

Summarize the basis for this Finding/Deficiencies Identified:
AGL Senegal maintains a comprehensive and rigorously enforced framework governing personnel recruitment, training, competency assurance, and operational responsibility for cyanide transport operations.
This framework ensures that all personnel involved in the transport chain are fully qualified, continuously trained, and equipped to manage the unique hazards associated with sodium cyanide transit along the Dakar–Siguiri corridor.
The Company's commitment to operational excellence is reflected in its clear distinction of responsibilities, stringent recruitment standards, structured training curriculum, and robust emergency preparedness capabilities.

AGL Senegal maintains a clearly defined operations, between road transport activities, and vehicle maintenance, ensuring specialized oversight and accountability at every stage of the cyanide supply chain.

- Port Operations The loading and sealing of cyanide containers onto transport vehicles is the exclusive responsibility of port stevedores, who are trained and authorized to perform these tasks in accordance with applicable port safety regulations.
This activity is covered by due diligence conducted by ICMC auditors.
- Transport Operations Once the vehicle has been cleared for convoy departure , AGL exercises full authority over the journey, including the management of drivers, vehicles, and all safety and security protocols.
The final unloading of the product is handled solely by authorized mine staff upon arrival at the designated mine site.
- Vehicle Maintenance While AGL retains overall responsibility for the transport and maintenance operation, ensuring all mechanical work is performed by qualified specialists.

Core transport activities are not subcontracted. Escort services are provided by 2 contracted companies (Arcane Security and AICES SA), which operate under AGL's standards and procedures as detailed in formal agreements. These companies are vetted, hold the requisite permits, and provide trained personnel under the supervision of AGL's training department .

AGL Senegal implements a stringent recruitment policy, governed by procedures , to ensure that only fully trained, qualified, and vetted personnel are entrusted with the transport of sodium cyanide. This process reflects the Company's recognition that the safe handling of hazardous materials begins with the competence and integrity of the individuals operating the vehicles and managing the convoy.

The recruitment process comprises the following stages
- Job Advertisement and Candidate Selection A formal job offer is issued via advertisement, followed by a selection and interview process for candidates.
- License and Qualification Verification All drivers are required to hold a valid government-issued professional driving license for heavy vehicles.
The baseline requirement is a Category "C" license; however, AGL prioritizes and verifies Category "CE" licenses for drivers operating the specific trailer combinations used in cyanide transport.
Driver's licenses are valid for 10 years and are accepted throughout the West African region.

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Validity is verified through physical checks before every convoy departure .
- Experience and Background Checks Candidates must demonstrate a minimum of five years of verifiable experience operating heavy trailer trucks.
The screening process includes driving record checks, previous employment verification, and criminal record checks.
- Literacy and Competency Testing Drivers are required to hold at least a Middle School Certificate and demonstrate full literacy in reading and writing to interpret transport documents, safety signage, and Material Safety Data Sheets.
The process also includes a theoretical test on transport regulations, a road sign comprehension evaluation, an alcohol and narcotics screening, and a practical road test.
- Job Offer Selected candidates are issued appointment letters to commence work.

AGL retains the absolute right to terminate any driver who does not meet these rigorous standards.
AGL Senegal utilizes a centralized Training Matrix to systematically track, schedule, and document all mandatory certifications and training activities.
This matrix ensures that every driver, driver's mate, and escort team member maintains current qualifications across the full spectrum of competencies required for safe cyanide transport.
The training matrix has been consistently updated, with records verified for 2023, 2024, and 2025 also include the mock drill 2026.

Personnel operating all vehicles and equipment are trained to perform their work to minimize potential releases and exposures.
The mandatory training curriculum, conducted annually, comprises the following core modules

Defensive Driving Emphasizes proactive hazard recognition, collision avoidance, and safe driving practices under diverse road and weather conditions.
Hazardous Chemical (Cyanide) Awareness Covers cyanide toxicity, routes of exposure, symptoms of poisoning, and safe handling protocols.
Essential for all personnel.
Convoy Management Focuses on convoy protocols, communication, and the specific responsibilities of the Convoy Leader in managing the convoy.
Fire Prevention and Control Conducted in collaboration with the Groupement des Sapeurs-Pompiers, covering fire safety and firefighting techniques.
Emergency Response prepare s personnel to respond effectively to cyanide-related incidents, including the deployment of neutralizing agents, containment measures, and first aid.
First Aid Provides training in basic life support and the use of medical oxygen equipment.
HSE Induction Provides a foundational understanding of health, safety, and environmental policies and procedures.

Refresher training is conducted annually during September/October.
New drivers undergo full training before they are permitted to drive trucks.
Driver's mates (assistants), who are part of the convoys, are also trained on cyanide awareness and emergency response, with their roles and responsibilities clearly defined.
Escort companies (AICES & Arcane Security) have their own training programs for their teams, conducted under the strict supervision of AGL's training department .

AGL utilizes simulations and mock drills as key training tools to evaluate the effectiveness of the Emergency Response Plan and ensure that all personnel are prepared to respond effectively to real-world incidents.
These exercises test coordination, communication, and equipment deployment across all participating parties, including drivers, AGL staff, and external emergency responders.

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Each simulation is followed by a formal assessment to identify areas for improvement, which are used to refine procedures and update training content.

The effectiveness of the training program is systematically verified through
- Attendance Registers and Certification Logs Records of training attendance (e.g. certificates Firefighting and First Aid, Defensive Driving, specialized "ICMI Training") were verified and noted.
Training certificates for team members of AICES & Arcane Security (dated 17-5-2024) were also sighted.
- Personnel Interviews Selected drivers interviewed were found to be knowledgeable in cyanide awareness, defensive driving, and other training they had attended.
- Compliance Verification Compliance with training and certification requirements has been verified for all active drivers, including Idrissa Sarr, Aliou Sene, Mohamad Diallou, Mamdou Sarr, and Issa Leye.

Ongoing Performance Monitoring and License Management: Driver performance is monitored through a cycle of constant verification and evaluation beyond the initial induction phase.
Key elements include
- Pre-departure License Checks The Administration and Human Resources department s perform physical checks of driving licenses and training certifications before every convoy departure , ensuring all documentation is current and valid.
- Proactive License Management Human Resources maintains copies of all original licenses and provides advanced warnings to drivers at four-month and three-month intervals prior to license expiry, preventing any lapse in legal compliance.
- Performance Evaluation Drivers employed on renewable six-month contracts are subject to ongoing performance evaluations based on
  - Speed control monitored through GPS data.
  - Adherence to mandatory rest periods.
  - Vehicle maintenance and pre-departure inspection practices.
  - Professionalism, including communication, teamwork, and adherence to convoy protocols.

Before every departure , the Convoy Manager organizes a mandatory briefing (Toolbox Meeting) for all convoy personnel.
Attendance is recorded on Form , and a Pre-Job Briefing is completed.
Records of Toolbox meetings held regularly.
These briefings ensure all participants understand their specific roles, mission-specific risks, and applicable emergency procedures.

AGL's accompanying emergency team, which includes specialized safety officers and medical staff, is fully trained and equipped to manage any incidents.
The team is responsible for the immediate deployment of neutralizing agents, containment measures, and first aid, minimizing the impact of any incident on personnel, communities, and the environment.
The convoy travels under police escort and carries a complete suite of cyanide-specific emergency equipment, including neutralizing agents, specialized PPE, first aid supplies, and gas detection instruments, ensuring self-sufficiency and capability to manage any incident along the corridor.

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

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

Summarize the basis for this Finding/Deficiencies Identified:
AGL Senegal operates a specialized, heavy-duty fleet engineered specifically for the high-risk transport of sodium cyanide, with a comprehensive focus on infrastructure preservation, regulatory compliance, and operational safety. The Company maintains a "zero-overload" policy, rigorous maintenance protocols, and stringent personnel qualification standards to ensure that all transport operations are executed safely, reliably, and in full compliance with national and regional regulations.
This framework is underpinned by clear accountability boundaries, with AGL retaining core responsibility for convoy management, training, and emergency response, while subcontracting specific maintenance functions subject to strict oversight and audit.

AGL Senegal utilizes a fleet designed to meet the heavy-duty requirements of sodium cyanide transport while ensuring vehicle stability and road infrastructure preservation.
The Company maintains a fleet of 25 vehicles allocated for deliveries to various mine site destinations.

The fleet comprises primary tractor configurations:
- 6x4 Tractors: Featuring three axles employed for heavier multi-container loads.
- Tractors: Featuring 2 axles with 450 horsepower, utilized for single-container transport.

The brands of vehicles used include Renault, Sinotruk Hohan models.
All tractor units are equipped with GPS tracking systems for real-time monitoring.

Complementing the tractors, AGL operates a fleet of cyanide-specific skeletal trailers available in 2 - and three-axle configurations for single and dual containers respectively, as well as four-axle configurations.
All trailers are equipped with twist locks to securely accommodate 2X20-feet containers.

AGL maintains a stringent "zero-overload" policy through a combination of structural and procedural controls.
Sodium cyanide is delivered in sea-worthy 20-foot containers, which are pre-loaded by the producer with a fixed quantity of product.
The gross weight of a single container, including both product and tare, is consistently between 23 and 23.2 metric tons.
Because the producer sets this weight and the containers are sealed prior to shipment, it is physically impossible for AGL or the driver to add additional cargo or overload the unit.
This inherent design feature provides an absolute guarantee against overloading, eliminating the risk of exceedance through human error or operational pressure.

All containers are BIVAC-inspected and comply fully with the International Maritime Dangerous Goods (IMDG) Code for both sea and road transport.
The weights of the containers are specified in the Bill of Lading (BL) documents received from the supplier, which serve as an additional guide to ensure correct truck and load capacity assignment.

AGL does not manage the loading, unloading, or de-stuffing of containers.

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These operations are the exclusive responsibility of port stevedores, covered by the due diligence conducted by ICMC auditors.

AGL strictly adheres to the ECOWAS/UEMOA Regulation No. 14/2005/CM/UEMOA and applicable Senegalese and Malian national laws governing vehicle dimensions, axle weights, and total gross weight.
The legal maximum axle load in the ECOWAS region is established at 11.5 tons per axle.

The Company's fleet is configured to operate well within these regulatory limits:
- For a 6x4 vehicle with a 3-axle trailer, the maximum allowable weight limit is 64.4 tons.
- For a 6x4 vehicle with a 4-axle trailer, the maximum allowable weight limit is 72 tons.

In standard dual-container configurations, the total weight of the truck tractor unit (approximately 6.8 tons), plus trailer weight (6 tons for 3-axle, 8 tons for 4-axle), and 2 containers (totaling 46.4 tons) is approximately 61.2 tons, remaining well below the legal limits.
Per-axle loads are maintained within the permissible 11.5-ton threshold, ensuring full regulatory compliance, minimizing road infrastructure wear, and enhancing vehicle stability during transit.

Rigorous Weighing and Verification Protocol: To verify compliance with regional and national weight regulations, every convoy undergoes a rigorous weighing protocol that provides multiple layers of verification:

- Terminal Weighing: Conducted at Dakar both before and after loading to establish an accurate baseline and confirm the net load.
- Axle Load Declaration: Before entering the port, the Convoy Manager completes the Formulaire de Déclaration de la Charge-Essieux (Axle Load Declaration Form), detailing the specific axle configuration to ensure proper weight distribution.
- Government-Approved Weighbridge Verification: Formal verification is conducted at government-approved weighbridges, including Afrique Pesage Senegal, located on the outskirts of Dakar and at three additional stations along the transportation route.
- Documentary Evidence: Weighbridge tickets are maintained as part of the mission file, demonstrating compliance with axle load regulations. There is no evidence of overloading on the selected weighing tickets.

AGL enforces a "zero-defect" policy through a comprehensive, multi-layered maintenance and inspection framework, governed by an approved vehicle maintenance procedure.
Both Preventive Maintenance and Corrective Maintenance are carried out on all vehicles.

- Scheduled Preventive Maintenance: Performed every 250 operating hours, 10,000 kilometers, or 90 days, as dictated by on-board computer systems and manufacturer specifications.
- Post-Trip Maintenance: Mandatory after every mission.
- Maintenance Logging: All maintenance activities are systematically logged in the Maximo System, ensuring complete traceability of all interventions. Maintenance records of the vehicles were noted.
- Independent Inspections: All lifting equipment and vehicle structural integrity are inspected and maintained yearly by BIVAC International, an independent inspection authority.
Brake testing and technical inspections are performed by third-party specialists, manufacturer agents, or BIVAC at their specialized premises.

Pre-Trip Inspections and departure Controls: Before every departure , a rigorous pre-trip inspection is conducted in accordance with the Cyanide Equipment Checklist. The inspection checklist must be signed by the Inspection

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Officer, the driver, and the Convoy Manager, confirming that all critical systems have been verified. Key inspection points include:
- Assessment of the engine, brakes, steering mechanism, and fifth wheel coupling.
- Presence and condition of safety equipment, including fire extinguishers, warning triangles, and communication tools.
- Physical inspection of twist locks to ensure container stability and security throughout the journey.

A strict "No Recaps" policy is enforced. Only new tires with a minimum tread depth of 3 millimeters are permitted on cyanide-dedicated vehicles, significantly reducing the risk of blowouts and tire-related incidents.
AGL do not subcontracts any maintenance functions, it maintains absolute quality control over the equipment utilized.
only equipment meeting AGL's rigorous standards is deployed on cyanide transport missions.
All maintenance records are retained by AGL.

All tractor units are equipped with real-time GEORIS GPS tracking systems to monitor speed and adherence to the approved route.
This continuous monitoring capability ensures that vehicles are operated within safe design parameters and that any deviation from prescribed limits is immediately identified and addressed.

Clear Accountability Boundaries:
AGL retains full authority over:
- Specialized training and emergency response.
- On-road repair s and basic maintenance.
note the chief mechanic on the convoy is responsible to Maintenance functions (major repair s) .
Port and mine operations, including loading and de-stuffing of containers, are not managed by AGL and are covered by ICMC Auditor due diligence.
The Company does not subcontract the transportation itself; the provision of vehicles for shipments is the sole responsibility of AGL.

Verification

The information contained herein has been verified through interviews with the following operational stakeholders: Maintenance Manager, QHSE Manager, and Convoy Manager, and by reviewing maintenance records, weighbridge tickets, and Bill of Lading documents, ensuring alignment between documented procedures and field practices.

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

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

Summarize the basis for this Finding/Deficiencies Identified:
AGL Senegal has established a comprehensive, multi-layered safety management system governing the transport of sodium cyanide along the Dakar–Siguiri corridor.
This system integrates rigorous cargo integrity protocols, fleet maintenance, personnel competency, fatigue management, emergency preparedness, and continuous improvement mechanisms to ensure the highest standards of operational safety and environmental protection.
The framework is underpinned by structured convoy configuration, real-time monitoring, close coordination with national authorities, and a commitment to zero-failure performance across all operational domains.

AGL Senegal operates under a dual-approval framework that ensures both technical safety and full regulatory compliance.
The transport of sodium cyanide is subject to strict oversight by the Ministry of Transport, , and the National Environmental Protection Agency.
Given the duty-exempt status of the cargo, the route is dictated by government authorities to prevent diversion, and all convoys are escorted by armed police officers.
Route selections are validated through formal permits issued by the Ministry of Transport, including dangerous cargo permit #002754-METE-DIREC-DCPN-mn and normal cargo permit #002754-METE-DIREC-DCPN-mn. Any deviation from the designated route is strictly prohibited without prior Ministry consent.

The Route Risk Assessment (RRA), formalized in document serves as the foundational instrument for identifying, categorizing, and mitigating risks along the transport corridor.
The RRA employs a systematic, data-driven methodology that includes physical inspections using 4x4 vehicles, GPS coordinates, photographic documentation, and physical measurements.
The assessment evaluates road surface conditions, infrastructure elements, environmental factors, and human activity.

Specific high-risk locations along the corridor have been identified and documented with mandatory control measures.
Carrefour Manding in Siguiri is identified as a critical choke point where deteriorated road conditions frequently result in severe traffic congestion lasting in excess of 60 minutes, presenting significant hazards for slow-moving or stationary convoys in terms of security and vehicular stress.
The road from the central roundabout to Bassissé in Siguiri has sustained severe flood damage and remains unrepair ed, rendering it a hazardous and unpredictable route requiring heightened driver vigilance and reduced speeds.
Kiniebakoura on the Siguiri–Kankan Road is reported as a major hazard zone due to the anarchic parking of dump trucks along the roadside without appropriate signaling or warning devices, creating direct and immediate dangers for other road users, including convoy vehicles.
In the Bananikoro District of Siguiri, unfinished construction projects have left open gutters and exposed drainage channels, which have already caused accidents and injuries to both pedestrians and vehicles. Similarly, Quartier

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Énergie in Siguiri features open, unfinished gutters that pose serious hazards to pedestrians, livestock, and vehicles, particularly during periods of reduced visibility or adverse weather conditions.

The RRA is reviewed annually, with a comprehensive ground-up reassessment conducted yearly , or triggered by significant events such as flooding, landslides, major political shifts, or route changes.

AGL adheres to a rigorous multi-stage packaging protocol comprising four distinct layers.
The primary layer consists of hermetic PVC bags containing sodium cyanide, which are further enclosed within woven polypropylene bags.
These are then packed into plywood Intermediate Bulk Containers (IBCs), with twenty IBCs per 20-foot container.
Finally, the IBCs are packed into 20-foot sea freight containers.
All containers are BIVAC-inspected and comply fully with the International Maritime Dangerous Goods (IMDG) Code for both sea and road transport.

Strict "No-Open" protocols are enforced with uniquely numbered seals recorded and inspected at four critical stages, prior to departure from the port, during designated rest stops along the route, every morning before the convoy resumes travel, and upon final delivery at the mine site.
The container inspection is documented on the "Checklist d'Inspection Container" .
The Convoy Leader verifies container integrity, seal numbers against customs documentation, and correct labeling.
DP World Dakar Port issues Equipment Interchange Receipt (EIR) tickets for each container, detailing container numbers, cargo nature, and any pre-existing damage.
Delivery notes are signed and stamped by mine site personnel upon arrival, confirming receipt in good condition.
Samples of checklists viewed were signed and stamped by Syama mine.

All containers and vehicles display UN 1689 (Sodium Cyanide), Class 6 (Toxic) diamond-shaped labels, and Marine Pollutant placards.
Placards are affixed to all four sides of containers and are verified by the Convoy Leader and driver before containers are loaded and before departure from the port, as required by Clause 15.4 of the Transport Management Plan .

Fleet Composition, Load Compliance, and Axle Load Management: AGL operates a specialized fleet of 25 vehicles, including Sinotruk Hohan , Renault, and SINOTRUK HOHAN tractors in 6x4 and configurations, paired with skeletal trailers equipped with ISO-standard twist locks. Trailers are available in 2 , 3, and 4 axle configurations.

Each 20-foot container carries a fixed gross weight of 23 to 23.2 metric tons, comprising 20 tons of product plus tare.
Because the producer sets this weight and containers are sealed prior to shipment, overloading is physically impossible.
All vehicle configurations comply with ECOWAS/UEMOA Regulation No. 14/2005/CM/UEMOA. For a 6x4 vehicle with a three-axle trailer, the maximum allowable weight limit is 64.4 tons, while for a 6x4 vehicle with a four-axle trailer, the maximum allowable weight limit is 72 tons.
Per-axle loads are maintained below the 11.5-ton legal limit, with actual axle loads ranging from 9 to 10.5 tons per axle.
This substantial margin ensures full regulatory compliance, minimizes road infrastructure wear, and enhances vehicle stability during transit.

Every convoy undergoes a rigorous weighing verification protocol.

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Terminal weighing is conducted at Dakar both before and after loading to establish an accurate baseline. Before entering the port, the Convoy Manager completes the Formulaire de Déclaration de la Charge-Essieux (Axle Load Declaration Form).
Formal verification is conducted at government-approved weighbridges, including Afrique Pesage Senegal, located on the outskirts of Dakar and at three additional stations along the transportation route.
viewed weighbridge tickets for vehicles 2 vehicles demonstrate compliance with axle load regulations.
The weights of the containers are also specified in the Bill of Lading documents received from the supplier, which serve as an additional guide to ensure correct truck and load capacity assignment.

Zero-Defect Maintenance Strategy: AGL enforces a "zero-defect" maintenance philosophy through a comprehensive, multi-layered framework governed by maintenance procedure.
Both Preventive Maintenance and Corrective Maintenance are carried out on all vehicles.

Preventive maintenance is performed according to a structured schedule.
Vehicles are serviced at 250 operating hours or 10,000 kilometers (Gamme A), at 500 operating hours or 10,000 kilometers (Gamme B), and at 750 operating hours or 110,000 kilometers (Gamme C), as dictated by on-board computer systems and manufacturer specifications.
All maintenance activities are logged in the Maximo Asset Management System, which generates work orders and prompts the Workshop Manager when service is due.
Each time the trucks are fueled, the operating hours are input into the Maximo system. A sticker is placed on the truck cab displaying the date of servicing and the next servicing date.
The maintenance workshop generates a report called "Planning Des Operations De Maintenance Preventive," which indicates which vehicles are due for servicing and which are not, and this document is sent by the Workshop Manager to all department s, including the Logistics department .

For corrective maintenance, whenever a fault is identified during pre-departure inspections, a work order is raised by the Logistics Supervisor on the Maximo system to the workshop for the fault to be rectified.
A work order form is printed from the computerized system, the work on the truck is executed, and the exact job done is written on the form.
The form is signed off by the mechanic who performed the job and countersigned by the Workshop Manager.
Work orders OT910382 were sighted and noted.

All lifting equipment and vehicle structural integrity are inspected and maintained yearly ly by BIVAC International, an independent inspection authority.
Brake testing and technical inspections are performed by third-party specialists, manufacturer agents, or BIVAC at their specialized premises.

AGL enforces a strict tire maintenance program.
Tires are checked every morning by the Company's vulcanizers and also by tire agents from CFAO Ltd in-country.
Every morning, a technician from CFAO checks all vehicle tires and sends a report to the Workshop Manager.
At a minimum tread depth of 3 millimeters, a tire is changed, and no retreated tires are used on the vehicles.
Pre-Trip and En-Route Inspections: Before every departure , a rigorous pre-trip inspection is conducted in accordance with the Cyanide Equipment Checklist.
The inspection checklist must be signed by the Inspection Officer, the driver, and the Convoy Manager, confirming that all critical systems have been verified.

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Key inspection points include assessment of the engine, brakes, steering mechanism, and fifth wheel coupling; presence and condition of safety equipment including fire extinguishers, warning triangles, and communication tools; and physical inspection of twist locks to ensure container stability and security throughout the journey.
The Vehicle pre-departure checks, documented on the "Checklist d'inspection Camion" , make provisions for the inspection of twist locks.
Clause 15 of the TMP states that it is the responsibility of the Convoy Leader to check the twist locks prior to departure and each morning before the trucks continue their journey, as well as during brief rest stops.

Before departure from stopping locations where the convoy spent the night, the Convoy Leader conducts inspections on the vehicles using the "Controle Technique Rapide Etape pendant le Trajet" to ensure they have not developed any defects during the journey.
Any defects identified during inspections are attended to immediately before vehicles are permitted to depart or continue their journey. Inspection records for vehicles were verified and noted.

AGL enforces strict fatigue management protocols as outlined in the "General Driving Rules" and the Transport Management Plan.
Drivers are permitted to drive a maximum of 10 hours per day. Furthermore, a driver is permitted to drive a maximum of 2 hours continuously on laterite roads and 3 hours on asphalt roads, followed by mandatory 30-minute rest intervals between driving periods.
Driving commences at 06:00 and stops at the latest 17:00, with no night driving permitted. Rule 7 of the driving rules mentions that all ICMC regulations regarding transportation of cyanide shall be strictly adhered to.

The operations has developed a journey plan form , which is completed by the Convoy Leader anytime the convoy stops for the drivers to take rest.
The time of departure and the time stopped are noted on the journey plan. The journey plan is signed off by the Convoy Leader, and the Logistics Supervisor cross-checks and countersigns the same form upon the return of the convoy to their base in Dakar.
Proof of driving hours logged on the journey plan was viewed and noted, with copies of journey plans to Fekola mine , Syama mine , and Sadiola mine also verified.

Speed Limits and Operational Controls: Differentiated speed limits are strictly enforced.
The maximum speed is 20 km/h through villages, built-up areas, and work zones; 40 km/h on laterite roads in open country; and 70 km/h on tarred roads.
These limits are formally enforced through the Convoy Procedure and actively monitored by the Convoy Leader and via GEORIS GPS tracking.
Additional controls include mandatory speed reductions to 10 km/h when crossing narrow bridges, minimum following distances of 50 meters in villages and 100 meters during Harmattan conditions, and the activation of visual and audible warnings to alert local populations.

AGL enforces a Zero-Tolerance Drug and Alcohol Policy .
Alcohol and the use of other drugs are strictly prohibited during working hours.
Alcohol tests are carried out randomly on drivers and the escort team by the Convoy Leader prior to convoy departure .
A breathalyzer (Drivaid brand) is used to carry out the test, and the Alcohol Test Checklist is completed with the names of drivers and the results obtained.
Samples of alcohol test reports were noted.
Any personnel testing positive are immediately removed from duty.

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Each convoy comprises a lead 4x4 escort vehicle, a trailing 4x4 escort vehicle, and between one and four cargo trucks (maximum four trucks per convoy, each carrying 2 containers).
Transport is strictly restricted to daylight hours from 06:00 to 18:00.
The Senegal State provides a mandatory armed escort, including police officers and Fire Service personnel.
All convoys are tracked via GEORIS GPS, providing real-time data on location, speed, and stop durations.

Each convoy serves as a self-contained emergency response unit, equipped with specialized spill kits, neutralizing agents, first aid supplies, and personal protective equipment.
The Emergency Response Team includes first aiders, a mechanic, and a Fire Officer, all trained to manage spills and environmental decontamination immediately.
Annual mock drills evaluate the effectiveness of the Emergency Response Plan and test coordination, communication, and equipment deployment across all participating parties.

In case of severe weather conditions, riots or civil unrest, military uprising, or collapse of a bridge, the Convoy Leader is authorized to stop the convoy at an appropriate place until the situation is brought under control.
The Convoy Leader communicates with the mine and the head office on the decision to continue the journey or not after suspension.
The convoy will only resume movement when the weather or civil unrest are over.

AGL maintains a rigorous recruitment policy governed by procedures.
The process entails issuing a job offer via advertisement, selection of candidates, interviewing of selected candidates, and offering appointment letters to commence work.
All drivers must hold a valid government-issued professional driving license for heavy vehicles.
The baseline requirement is a Category "C" license; however, AGL prioritizes and verifies Category "CE" licenses for drivers operating the specific trailer combinations used in cyanide transport.
Driver's licenses are valid for 10 years and are accepted throughout the West African region.
Candidates must demonstrate a minimum of five years of verifiable experience operating heavy trailer trucks.
The screening process includes driving record checks, previous employment verification, criminal record checks, a theoretical test on transport regulations, a road sign comprehension evaluation, an alcohol and narcotics screening, and a practical road test.
Drivers are required to hold at least a Middle School Certificate and demonstrate full literacy in reading and writing to interpret transport documents, safety signage, and Material Safety Data Sheets.

Training is treated as a continuous cycle.
AGL utilizes a centralized Training Matrix to systematically track, schedule, and document all mandatory certifications and training activities.
The training matrix has been consistently updated, with records verified for 2023, 2024, and 2025 .
Refresher training is conducted annually during September/October.
New drivers undergo full training before they are permitted to drive trucks.
Driver's mates (assistants), who are part of the convoys, are also trained on cyanide awareness and emergency response, with their roles and responsibilities clearly defined, including assisting to move bystanders upwind away from an incident site.

The mandatory training curriculum comprises defensive driving, which emphasizes proactive hazard recognition, collision avoidance, and safe driving practices; hazardous chemical (cyanide) awareness, covering toxicity, routes of exposure, symptoms of poisoning, and safe handling protocols; convoy management, focusing on convoy protocols, communication, and the responsibilities of the Convoy Leader; fire prevention and control, conducted in collaboration with the Groupement des Sapeurs-Pompiers; emergency response, preparing personnel to respond

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effectively to cyanide-related incidents including deployment of neutralizing agents, containment measures, first aid; and medical oxygen, providing basic life support and use of specialized medical oxygen equipment; and HSE induction, providing a foundational understanding of health, safety, and environmental policies and procedures.

Escort companies (AICES & Arcane Security) have their own respective training programs for the escort teams, conducted under strict supervision by AGL's training department .
Records of proof of training from both companies are kept on record by AGL.
Training records and attendance registers were verified, and selected drivers interviewed were found to be knowledgeable in cyanide awareness, defensive driving, and other training they had attended.
Training certificates dated 17-5-2024 for team members of AICES & Arcane Security were sighted.

Before every departure , the Convoy Manager organizes a mandatory Toolbox Meeting for all convoy personnel.
Attendance is recorded on Form and a Pre-Job Briefing is completed prior to each departure .
These briefings ensure all participants understand their specific roles, mission-specific risks, and applicable emergency procedures.
Records of Toolbox meetings held and were verified.

All safety-related records including vehicle checklists, maintenance work orders, driver hour logs, alcohol test results, and incident reports are retained for a minimum of five years in accordance with the document control procedures.
As per Clause 5.8 of the document, maintenance records and checklists are to be kept for a minimum of three years, and all other documents for a minimum period of five years.
Records are maintained in both physical files and electronic databases, ensuring readiness for internal reviews and external audits.
This comprehensive retention policy facilitates trend analysis, continuous improvement, and regulatory transparency.

Verification

The information contained herein has been verified through interviews with the following operational stakeholders: Maintenance Manager, QHSE Manager, Convoy Manager, Drivers, and Escort Team, and by reviewing maintenance records, weighbridge tickets, Bill of Lading documents, and journey plans, ensuring alignment between documented procedures and field practices.

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

***The operation is X in full compliance (NOT APPLICABLE) with Transport Practice 1.5**

Summarize the basis for this Finding/Deficiencies Identified:

AGL are not responsible nor contracted to manage cyanide consignment by sea
the scope of this audit is only land transport from port to destination..
AGL is not involved in managing sea nor ensuring compliance with IMO and IMDG
AGL is responsible for cyanide, land transport only.
AGL does not manage the loading, unloading or DE stuffing of containers.
or stevedoring .
however this requirement is covered by the due diligence done by
diligence done by ICMC AUDITORS .
and it is visible on the container on all the 4 sides the following
1- 1689 placard
2-marine pollutant placard
3-class 6 toxic placard
confirmed by interview with
Maintenance manager
QHSE Manager
convoy manger
escort team
driver
convoy mechanics

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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 Senegal has established a comprehensive, multi-layered communication and surveillance framework to ensure continuous connectivity, real-time monitoring, and operational coordination across the 3,-kilometer Dakar–Siguiri corridor.
This framework integrates redundant communication systems, advanced GPS tracking, structured reporting protocols, and rigorous physical inspections to maintain situational awareness, ensure regulatory compliance, and enable rapid response to any operational contingency.
The system is underpinned by a commitment to record retention, continuous improvement, and alignment with both national and international safety standards.

AGL ensures constant connectivity regardless of geographical location or cellular RN1 strength, AGL Senegal utilizes a robust and redundant communication infrastructure.
The Convoy Manager serves as the sole authority for external reporting and is equipped with multiple mobile phones, including a dedicated device, to maintain direct contact with the AGL Dakar head office and the mine client.
For extreme emergencies, the Convoy Manager also carries an Thuraya satellite phone, providing a reliable backup in the event of total RN1 failure.
Additionally, communication with the mine and the supplier is facilitated via emails as well as WhatsApp.

In accordance with cyanide transport regulations, AGL Senegal is permitted to utilize ICOM radio UHF (Ultra High Frequency) radio equipment, which has an operational range of up to 5 kilometers within towns and up to 20 kilometers in open areas.
Unlike GPRS or cellular systems, this equipment does not rely on local towers and has no blackout areas within Senegalese territory, ensuring uninterrupted communication regardless of local infrastructure conditions.
High-powered UHF units are installed in all escort convoy vehicles and at the AGL Senegal Head Office in Dakar.
The Convoy Manager carries active SIM cards from all major national providers, including YAS and Orange, ensuring the highest probability of cellular connection regardless of regional provider strength.
The cell phones used by the convoy crew are roaming phones and can pick up signal of any RN1 service provider within both Senegal and parts of Mali, with different RN1 service providers used as backup.

The Emergency Response Plan and the Route Risk Assessment identify specific zones with poor GSM coverage along the corridor.
During Route Risk Assessments conducted on routes, no blackout areas were identified on any of the routes in Senegal; however, blackout areas exist in some portions of the roads within Mali.
Protocols require the Convoy Manager to check in immediately before entering and after exiting these identified "black spots," ensuring that the Head Office maintains situational awareness even during periods of limited connectivity.
In blackout areas in Mali, the satellite phone is used to maintain communication.

The convoy utilizes a multi-layered approach to connectivity.

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Every vehicle is equipped with fixed or handheld radios & satellite phone thuraya for immediate tactical communication between trucks and the Convoy Manager.
2 -way radios & satellite phone thuraya are used for communication within the convoy.
Safety Officers stationed in each truck hold "Close User Group" (CUG) phones, providing free communication within the AGL .
Drivers may possess personal phones for use during rest periods, but usage while driving is strictly prohibited to prevent distracted driving.

All communication hardware is tested before departure and recorded on the Inventaire Matériel de Communication, ensuring that all equipment is fully functional prior to mission commencement.
The checklist specifies whether a particular communication device is fully charged and is in good condition.
The communication equipment which are checked include cellular mobile phones, chargers, batteries of the radios & satellite phone thuraya , satellite phones, and walkie talkies.
The checklist is completed and signed off by the Convoy Leader.
When a convoy is on the road, the Head Office maintains a 12-hour operator roster to ensure immediate response to any radio transmissions.
This continuous monitoring capability ensures that the control center can respond promptly to any emergency communications or status updates from the convoy.
Communication is governed by a strict schedule designed to provide the head office and the client with continuous situational awareness.
Pre-alerts are sent to the mine with copies to the supplier 24 hours before the convoy departs Dakar port via emails.
The Convoy Manager is required to check in with the AGL Head Office every 60 minutes to report position and status, with a status update provided to the Siguiri Mine every three hours. Emails are sent to the mines twice daily until the convoy reaches the mine sites.
Copies of emails were sighted by auditors.
All vehicles are fitted with GEORIS GPS tracking systems, providing 24/7 real-time data on vehicle speed, location, route adherence, and stop durations.
The GPS system has been integrated between the service provider and AGL's office in Dakar, Senegal. The GPS covers Senegal and any part of West Africa.
The GPS is monitored by Georis Group, which monitors the vehicles 24/7 and generates reports to the Logistics and QHSE Managers of AGL Senegal. Georis Group is the company which installed the GPS system on the trucks and also provides monitoring and tracking services.

In the head office in Dakar, the GPS is also monitored by the Technical Director.
This continuous telemetry is actively monitored, enabling immediate detection of any deviation from approved parameters.
The GPS tracking data is archived and can be "replayed" post-trip to audit driver behavior or investigate delays. An automatic alert is triggered if a truck remains parked and idling for more than 30 minutes, allowing for immediate inquiry into potential unauthorized stops or mechanical trouble.
Any deviation from the route is quickly communicated to the Technical Manager by Georis Group, though the Technical Manager also monitors the GPS directly.
The Convoy Leader contacts the home base twice a day. Copies of GPS reports for 2026 were verified.
The communication framework is supported by a comprehensive suite of physical safety checks.
Pre-departure inspections using the Checklist d'Inspection Camion verify engine health, braking systems, and tire integrity.
Container and truck checklists, including AGL-SEN-SCM-F0015 , verify the physical security and integrity of cyanide containers, ensuring that twist locks and seals are functional.

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The Emergency Response Plan (ERP) Kit Checklist (AGL-COR-HSE-F-0577) confirms that all neutralizing agents, personal protective equipment, and first-aid supplies are present and functional before departure .
Because of the closed-convoy structure, if any single truck experiences a problem, the entire convoy is mandated to stop.
This ensures that the escort team and mechanics can address the issue without leaving any vehicle vulnerable. The Convoy Manager possesses a comprehensive Emergency Contact List (AGL-COR-HSE-F-0016) containing direct lines for AGL management, regional emergency responders, police, and the mine's safety department , ensuring rapid access to appropriate resources in any emergency.
The Convoy Manager is empowered to halt the convoy due to insecurity, adverse weather, or infrastructure damage. In such cases, they use the cellular or UHF system to coordinate with Dakar and secure the vehicles in pre-identified "safe zones."
This delegated authority ensures that safety decisions are made promptly and effectively, without bureaucratic delays, and that personnel and cargo are protected during periods of heightened risk.
AGL Senegal has implemented comprehensive inventory controls and chain of custody documentation to prevent loss of cyanide shipment.
Shipping documents such as Bill of Lading, Packing List, and Transit Authorisation documents showing the quantity of cyanide being transported are always in the custody of the Convoy Leader.
A document called "Authorisation Provisoire d'Enlèvement" is issued by Senegalese Customs detailing the quantity of containers moving out of the port.
Senegal DP World, a service provider to the port of Senegal responsible for containers in the port, submits a notification to AGL about their shipment upon arrival of a vessel.
Shipping documents show clearly the total weight and quantity of cyanide for every shipment. Each shipment is accompanied by MSDS from the manufacturer, kept in the cabin of the trucks.
Shipping records were verified and noted by auditors.

The Senegal Ministry of Environment sends copies of permits (letters) to its branch offices along the transportation route to notify them of the specific number of cyanide containers being transported, serving as a means to track the shipment on the road.
The documents are checked by Senegalese Customs at customs check points along the road.
At both the Senegal, Mali & Guinea sides of the border, Customs officials finally check all shipping documents and Delivery notes covering the shipment.

Proof of Delivery notes and DP World's Terminal Interchange, which show the condition of each container at time of loading, accompany the consignment to the mines.
At the mine site, the mine personnel receive and sign all the requisite documents as proof of delivery. Delivery notes are signed off and stamped by mine site personnel on arrival.
At night stops, the escort assistants patrol the area around the parked vehicles to prevent anyone tampering with the containers.
As per Clause 8 of the Transport Management Plan, 2 escort assistants perform patrolling around the trucks during the night until morning when the convoy stops for the night.
At various rest stop places, the Convoy Leader further checks whether each container is intact, ensuring continuous verification of cargo integrity throughout the journey.

AGL prevent conflicting information, the AGL Dakar Head Office serves as the central hub for all high-level communications between the cyanide producer and the mine site.
The Logistics department and the QHSE department are responsible for communicating with the supplier and the mine.

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This centralized approach ensures that all information is coordinated, verified, and disseminated through a single authoritative source, preventing miscommunication and ensuring consistency in reporting.
All tracking data, communication logs, and signed journey forms are retained by the QHSE department for a minimum of five years, in accordance to procedure
This ensures a transparent audit trail for regulatory inspections and facilitates the continuous refinement of the Transport Management Plan.
Data gathered from GPS logs and OBC playbacks is reviewed annually to update the Route Risk Assessment and refine operational procedures, ensuring that lessons learned are systematically integrated into future operations.

Verification
The information contained herein has been verified through interviews with the following operational stakeholders: Maintenance Manager, QHSE Manager, Convoy Manager, and Convoy Mechanic, and by reviewing communication logs, GPS reports, shipping documents, and delivery notes, ensuring alignment between documented procedures and field practices.

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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 (NOT APPLICABLE) with Transport Practice 2.1**

Summarize the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, there are no trans-shipping depots or Interim storage sites, as defined in the audit protocol.
Following collection from the Port, the containers are sent to client site.
At no stage is cyanide removed from the trucks or containers prior to unloading at DIREC /police er mine sites.
N/A There are no situations where interim storage occurs
since the cargo is under the authority custody and the authority doesn't allow the cargo to park or be sent anywhere apart from the approved route.
AGL does not manage the loading, unloading or DE stuffing of containers.
or steveedoring .
however this requirement is covered by the due diligence done by
diligence done by ICMC AUDITORS .
and it is visible on the container on all the 4 sides the following
1- 1689 placard
2-marine pollutant placard
3-class 6 toxic placard
4- last convoy vehicle has banner indicating dangerous goods
There is a procedure that prohibits eating or drinking near the cyanide TMP LLD004.
Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
AGL implement chain of custody processes to prevent loss of cyanide during shipment.
confirmed by interview with
QHSE Manager
convoy manger
escort team
driver

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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 Senegal has established a comprehensive, multi-layered emergency response and transport management framework governing the road transport of solid sodium cyanide from the Port of Dakar to mine site destinations in Senegal, Mali & Guinea or Siguri Guinea.
This framework integrates rigorous route risk assessment, scenario-based emergency protocols, specialized personnel training, community engagement, and close coordination with national authorities to ensure the highest standards of operational safety, environmental protection, and regulatory compliance.
The system is underpinned by a clear command hierarchy, redundant communication systems, and a commitment to continuous improvement through regular reviews, drills, and post-mission feedback.

AGL Senegal operates an exclusively road-based transport model for solid sodium cyanide briquettes, with no provisions for rail, air, or water-based transportation.
Sodium cyanide is transported by road to four mining companies:
Mako mine in Senegal and Sadiola, Fekola, and Syama mines in Mali.
The cargo moves under a direct-delivery model, with freight containers loaded onto truck tractors and flatbed trailers.
Depending on the time the convoy exits the port, the containers are escorted directly to the mine or parked for a few hours at the Company's yard (depot) and dispatched from there to the mine site.
Freight containers are not off-loaded at the depot, and the truck tractor is not decoupled from the trailer, maintaining continuous control and minimizing exposure.
ISO tanks are strictly prohibited, and all cyanide is transported in sealed 20-foot sea containers secured to skeletal or flatbed trailers using ISO-standard twist locks.
This focused scope ensures that all procedures and emergency protocols are tailored specifically to the unique challenges of road transport along the Dakar–Siguiri corridor.

The transport routes to the respective mines are as follows: for Sadiola mine, the route is Dakar–Mbour–Fatick–Kaolack–Tambacounda–Goudiri–Kidira–Kayes–Sadiola, covering approximately 815 kilometers over about four days on the road.
For Mako mine, the route is Dakar–Mbour–Fatick–Kaolack–Tambacounda–Mako, covering approximately 2 days on the road.
For Fekola mine, the route is Dakar–Mbour–Fatick–Kaolack–Tambacounda–Kédougou–Moussala–Fekola mine, covering approximately three days on the road.

The foundation of AGL's safety program is the continuous evaluation of road-related hazards through the Route Risk Assessment (RRA) and the Transport Management Plan (TMP).
The RRA provides a granular analysis of the Dakar–Siguiri corridor, identifying potholes, erosion-prone laterite sections, narrow carriageways, steep inclines, bridge load limits, and flood-prone areas.

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On development of the Emergency Response Plan, the actual conditions of roadways, water sources, markets, bridges, slopes, sharp curves, untarred and tarred roads, and hills were taken into account.
All aspects of transport infrastructure, including bridges, hospitals, markets, asphalt roads, curves, and slopes, have been considered in the ERP.
The ERP was reviewed by auditors and found to have covered all aspects of the road infrastructure.

The RRA is reviewed annually, with a comprehensive ground-up reassessment conducted yearly , and is continuously updated through post-trip feedback from the Convoy Manager and drivers.
Differentiated speed limits70 km/h on open asphalt and as low as 20 km/h in villages and work zones are enforced based on the RRA findings.

The Emergency Response Plan serves as the cornerstone of AGL's preparedness, providing comprehensive protocols for prevention, response, and recovery.
The ERP is subject to a mandatory annual review, with immediate amendments triggered by real-world activations or feedback from mock drills.
The plan defines a clear command hierarchy, with the Convoy Manager serving as On-Scene Commander, supported by Firefighters, QHSE Coordination, and external authorities including the Police, DIREC , and Fire Service.

The ERP outlines various possible incidents and their handling, including risk analysis of an incident, spill contingency plans and response action plans, communications with outside emergency responders, scenarios of possible cyanide incidents, and roles and responsibilities of all stakeholders involved in emergency response.
In the case of remote site incidents, arrangements have been made in the ERP to establish contact with local emergency responders along the route to assist in responding to the incident.
The ERP was found to be appropriate for the selected transportation routes.

The ERP outlines 6 specific scenarios anticipated during transportation of cyanide by road, with detailed response actions for each:
The ERP outlines six distinct scenarios to ensure that the response is proportional to the risk.
Scenario 1 addresses a mechanical accident without spill or container damage and no casualties.
Scenario 2 addresses a rollover without spill but with container damage, focusing on cyanide spill prevention.
Scenario 3 addresses a rollover with limited spill on the ground.
Scenario 4 addresses a high-risk incident involving a cyanide spill with casualties.
Scenario 5 addresses a critical incident involving a cyanide spill into a watercourse, requiring immediate downstream notification to protect water users.
Scenario 6 covers operational disruptions such as road erosion, truck breakdowns, or driver illness, ensuring that non-chemical incidents are also managed effectively.

The various response actions have been spelt out for each of the incidents in the ERP.

The ERP addresses the physical and chemical properties of sodium cyanide, which are detailed in the ER Plan and also described in the Transport Management Plan.
Product MSDS from the supplier (Orica) also describes the physical and chemical properties of the cyanide.
Sodium cyanide is described as white solid briquettes.
The ERP states the results of reactions when in contact with acids and other incompatible chemicals and when exposed to moisture.
The plan mentions the type of placards on cyanide shipments, namely UN No. 1689, Class 6, and Marine Pollutant.
Clause 4 of the ERP is allocated to product description, packaging, and method of transport.

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The ERP addresses the design of transport vehicles.
The Company uses 6x4 truck tractors of 450 HP equipped with GPS tracking systems.
The brands of vehicles used are Renault Karax, and SINOTRUK HOHAN vehicles.
The weight of the truck tractor unit is approximately 6.8 tons.
The trailers utilized are three-axle and four-axle trailers.
A three-axle trailer weighs 6 tons, while a four-axle trailer weighs 8 tons.
A loaded container weighs approximately 23 tons, and 2 containers are loaded per trailer, with the total weight of the truck tractor, trailer, and 2 loaded containers being approximately 60.6 tons.
Trailers are equipped with 8 manually operated twist locks with which the containers are stabilized onto the framework of the trailers.
The auditor reviewed the Plan and confirmed that it has appropriately considered the design of the transport vehicle.

In the event of cyanide exposure, AGL follows a standardized medical escalation process.
The victim is immediately administered 100% medical oxygen using specialized apparatus carried in the escort vehicle and transported to the nearest pre-vetted medical facility.
While AGL provides the MSDS and technical support, the Cyanokit antidote is administered exclusively by a qualified medical officer at the hospital, ensuring safe and appropriate use.
Mouth-to-mouth resuscitation is strictly prohibited to prevent secondary exposure.

Every convoy is accompanied by an Emergency Response Team equipped with specialized gear, including HCN gas detectors, medical oxygen apparatus, neutralizing agents (10% sodium hypochlorite), and comprehensive personal protective equipment.
The ER Team is capable of managing localized spills, establishing 100-meter isolation perimeters, and performing decontamination procedures.
The ERP provides detailed flowcharts for neutralization, PPE cleaning, and environmental monitoring to ensure that the site is returned to a safe state.

AGL utilizes a redundant communication framework to maintain constant connectivity across the transport corridor.
The Convoy Manager is equipped with multiple mobile phones, UHF radios & satellite phone Thuraya satellite phone for extreme emergencies.
Active SIM cards from all major national providers ensure cellular coverage regardless of regional provider strength.
In GSM "black spots," UHF radio serves as the primary backup, and the Convoy Manager is mandated to check in before entering and after exiting these zones.
All communication hardware is tested before departure and recorded on the equipment inventory.

In alignment with Senegalese mandates, every cyanide convoy operates under a mandatory state security umbrella.
The escort team includes police officers, Fire Service Chemical Division Officers, and DIREC representatives, operating under .
This team provides armed security, traffic control, and ensures that no third party interferes with the cargo or the scene of an accident.
The escort reinforces the security and integrity of the transport operation and ensures that the ERP can be implemented without interference.

AGL recognizes that local communities are the most vulnerable stakeholders during a transit incident.

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AGL distributes informational flyers in French and explained in local Senegalese languages to villages along the corridor, providing clear instructions on avoiding accident sites and refraining from using water from nearby rivers or wells until authorities provide clearance.
In the event of a spill into a watercourse, the ERP dictates that community leaders assist in disseminating urgent public notices to prevent secondary poisoning.

All personnel undergo rigorous training in cyanide hazards, emergency response, defensive driving, and first aid, including the use of medical oxygen.
Under the training Matrix , police officers assigned to the escort receive specific cyanide response training.
The Convoy Manager is trained to conduct random alcohol testing, and drivers receive specialized training to assist in crowd management, perimeter establishment, and traffic control during incidents.

All safety-related records including vehicle checklists, maintenance work orders, driver hour logs, alcohol test results, communication logs, and community awareness acknowledgment are retained by the QHSE department for a minimum of five years in accordance AGL procedure .
This comprehensive retention policy ensures a clear audit trail, supports regulatory inspections, and facilitates continuous improvement through annual reviews and trend analysis.

Compliance with the emergency framework has been verified through sighted documentation, including the current ERP .
Equipment inventories confirm the presence of all required emergency equipment, and interviews with the QHSE Manager, Convoy Manager, and Fire Service Chief have confirmed alignment between documented procedures and field practices.

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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 Senegal has established a comprehensive, multi-layered framework governing emergency response, personnel competency, and equipment readiness for the road transport of solid sodium cyanide from the Port of Dakar to mine site destinations in Senegal, Mali & Guinea .
This framework integrates rigorous training and certification programs, a clear command hierarchy, scenario-based emergency protocols, dual-tier inventory systems, and multi-stage inspection regimes to ensure the highest standards of operational safety, environmental protection, and regulatory compliance.
The system is underpinned by continuous improvement through annual reviews, mock drills, and post-mission feedback, ensuring that all personnel, equipment, and procedures remain mission-ready at all times.

AGL Senegal operates under a rigorous competency-based model, governed by the Critical Task and Critical Position Manual and supported by a dynamic digital Training Matrix.
This system tracks the real-time status of employee and subcontractor training, ensuring that no personnel are deployed without valid, up-to-date certifications.
All transport personnel must demonstrate competency across mandatory training modules, including Cyanide Awareness, Emergency Response, Defensive Driving, Basic First Aid and Firefighting, and Hazardous Materials Handling.

The Company's Training Matrix specifies annual emergency response training for all staff, including drivers and clearing staff.
The escort companies (AICES & Arcane Security) are trained by qualified external trainers under the supervision of AGL's training department .
In addition, the escort companies provide their own internal emergency response training.
Training attendance records have been appropriately completed as evidence that training programs are carried out.
Proof of drivers' training were verified and noted, and training attendance records for the escort companies were duly noted.

The Cyanide Awareness training module was scrutinized and noted.
The contents of the training include how to respond to a cyanide-poisoned person, handling spills and decontamination, mechanism of cyanide poisoning, and various responsibilities of the escort team and emergency responders, among others. Annual refresher training and full-scale mock drills ensure that knowledge remains current and that all personnel are prepared to respond effectively to real-world incidents.

The Emergency Response Plan establishes a clear command hierarchy to ensure coordinated incident management.
Clause 18 of the ERP outlines the roles and responsibilities of outside responders and medical facilities.

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The overall coordination of an incident is the responsibility of the Convoy Leader, who is responsible for calling all outside responders to the accident scene.

The Convoy Leader serves as Incident Commander, overseeing all on-scene activities and taking initial steps to cordon off the incident site to prevent bystanders from entering the area.
The HSE Officer manages exclusion zones and HCN monitoring.
Escort Drivers establish perimeters and manage crowd control with the assistance of other drivers, while the police direct traffic and secure the area from a distance.
The nurse is responsible for administering oxygen to a possible cyanide victim and, if necessary, the cyanide antidote, and accompanies the patient in the ambulance to the nearest hospital.
Clean-up of spills is the responsibility of all escort team members.
The Convoy Mechanic provides technical support.
The logistics department is responsible for communicating with the mining company and providing equipment for recovery of damaged containers.

External agencies are integrated into the response framework, each with clearly defined roles and responsibilities.
The police accompany the convoy in Senegal and change with Malien police at the border until it reaches the mine site.
The ambulance transports poisoned or injured persons to the hospital and continues administration of 100% oxygen to stabilize the patient.
The hospital is responsible for treatment of a cyanide-poisoned person, with further treatment offered by the doctor if necessary.
The fire department assists the escort team in carrying out their responsibilities and handles any fire incidents.
The mine receives the container involved in the incident and uses the product appropriately.
The Ministry of Environment in both Senegal, Mali & Guinea is responsible for providing technical advice to the local community.
The emergency responders in Mali provide support similar to their counterparts in Senegal.

The ERP is structured around multiple scenarios to ensure proportional response.
Clause 13 of the ERP describes specific emergency scenarios with the response duties and responsibilities for each.
Scenarios range from rollovers without spillage or casualties to major spills with casualties and water body incidents, each with specific response actions.
Emergency responders from AICES & Arcane Security attend to possible cyanide incidents, supported by external responders including the Senegalese Police, Ambulance members, Fire department , Civil Protection Agency, and Mine site teams.

Detailed tactical guides cover scene isolation, physical recovery of briquettes, chemical neutralization of residues, and environmental monitoring.
Protocols explicitly prohibit chemical treatment of cyanide in water, requiring downstream notification and authority coordination instead.

Medical Emergency Protocols and Antidote Administration: In the event of cyanide exposure, a standardized medical escalation process is activated.
The victim is immediately administered 100% medical oxygen using specialized apparatus carried in the escort vehicle and transported to the nearest pre-vetted hospital. The nurse, a qualified personnel whose role is to administer 100% oxygen and, if necessary, the cyanide antidote to a cyanide-poisoned person, is trained to administer the cyanide antidote.

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While AGL provides the MSDS and technical support, the Cyanokit antidote (Hydroxycobalamine) is administered by qualified medical personnel at the hospital.
Mouth-to-mouth resuscitation is strictly prohibited to prevent secondary exposure.
The ambulance continues with the administration of 100% oxygen to stabilize the patient and conveys him/her to the nearest hospital, where further treatment is offered by the doctor if necessary.

AGL maintains a dual-tier inventory system to ensure neutralizing agents and recovery hardware are available both at the origin and destination.
The Dakar yard serves as the primary mobilization hub, while strategic stocks are permanently stationed at the mine sites.
Each convoy carries mandatory neutralizing product for localized spills.
All emergency response equipment is subject to monthly inspections and pre-departure audits, with items evaluated for quantity, condition, and serviceability. Specialized equipment including HCN detectors, oxygen systems, and medical kitsis calibrated and verified before every mission.

The transporter has an inventory checklist (Inventory of all emergency equipment,) listing quantities of each escort equipment item, including PPE, cleaning equipment, HCN gas detector, oxygen, and others.
The escort equipment is inspected prior to departure with the convoy, and the escort equipment checklist is completed after the inspection.
The quantity and condition of the equipment is checked during pre-departure inspection.
It is the Convoy Leader's responsibility to ensure that all emergency equipment is checked and meets manufacturer specifications prior to convoy departure .

Every convoy is governed by a mandatory checklist system, with the Convoy Manager conducting a comprehensive physical audit before departure .
The escort equipment includes full face respirators and canisters (ABEKP3 type), HCN gas detector, Tyvek overalls, PVC gloves, full oxygen cylinder, First Aid Kit, rubber boots, shovels, brooms, cones, reflector tape, ferrous sulphate (50kg bag), cyanide antidote kits (Hydroxycobalamine), spray pack, empty sacs, caution tape, and tarpaulin.
All equipment is kept in lockable boxes and accompanies every convoy. The escort equipment was verified during the audit.

The PPE includes chemical suits, full face gas masks, respirators with the appropriate canisters (ABEKP3 type), PVC gloves, and disposable Tyvek overalls.
Arcane and AICES have adequate PPE and other equipment to use in escorting activities.
The HCN Gas Monitors have been calibrated as per manufacturer specifications.
The antidote is stored as per manufacturer instructions and within expiry dates.
The equipment is also inspected when not in use to ensure availability anytime there is a convoy.
The ER equipment is inspected regularly, and any obsolete items are immediately replaced with new ones.
The oxygen cylinder is regularly checked.

All HAZMAT cargo in Senegal is escorted by a state team, including police representatives, operating under .
This escort provides armed security, traffic control, and ensures that no third party interferes with the cargo or the scene of an accident.
The security umbrella ensures that the convoy remains undisturbed and that the ERP can be implemented without interference.
The police accompany the convoy when it reaches the Malian side of the border right to the mine site.

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AGL distributes informational flyers in French and explained in local Senegalese languages to villages along the corridor, educating the public on the "Zero-Approach" rule during accidents and warning against using local water sources until cleared by authorities. In the event of a spill into a watercourse, the ERP dictates that community leaders assist in disseminating urgent public notices to prevent secondary poisoning.

All safety-related records including training attendance sheets, equipment checklists, maintenance logs, communication logs, and drill evaluations are retained by the QHSE department for a minimum of five years in accordance procedure .
This comprehensive retention policy ensures a clear audit trail, supports regulatory inspections, and facilitates continuous improvement through annual reviews and trend analysis.

AGL has subcontracted the escort of the convoy to AICES & Arcane Security.
The contract agreement between AGL and the escorting companies has clearly specified the roles and responsibilities. In addition to escorting the convoy to mine sites, the escort companies are to attend to any cyanide incident appropriately as per AGL's emergency response procedures.
The contract agreement stipulates that the escort companies are to have all the recommended escort equipment in accordance with AGL's escort equipment inventory checklist.
As per the contract agreements, the escort companies use the Emergency Response Plan of AGL and are expected to abide by the details of the plan.
The escort companies provide qualified trainers who organize refresher training for staff under the supervision of AGL's training department .
AICES & Arcane have all been granted permits by Senegal's Ministry of Environment to escort dangerous goods, including sodium cyanide.

During interviews with AICES & Arcane Security Convoy Leaders, it was clear that the equipment accompanies the convoy during the transportation of the cyanide, and they are conversant with its use. The escort equipment was displayed for inspection by the 2 escort companies.

Compliance with the emergency framework has been verified through sighted documentation, including the current ERP , signed checklists, and calibration certificates. Equipment inventories confirm the presence of all required emergency hardware.
Interviews with the QHSE Manager, Convoy Manager, Fire Service Chief, and Drivers have confirmed alignment between documented procedures and field practices.
Specific response duties and responsibilities of personnel in case of a cyanide incident were noted.
Each of the external responders have been notified of their roles and responsibilities.

Verification

The information contained herein has been verified through interviews with the following operational stakeholders: QHSE Manager, Convoy Manager, Fire Service Chief, and Drivers, and by reviewing the Emergency Response Plan, training attendance records, equipment inventories, and inspection checklists, ensuring alignment between documented procedures and field practices.

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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 Senegal has established a comprehensive, multi-tiered emergency communication and incident reporting framework governing the transport of solid sodium cyanide from the Port of Dakar to mine site destinations in Senegal, Mali & Guinea .
This framework integrates structured notification protocols, incident classification systems, live contact directories, and mandatory international reporting obligations to ensure that all internal and external stakeholders are notified immediately and accurately during a cyanide-related incident.
The system is underpinned by rigorous document control, pre-departure verification, annual updates, and practical testing through mock drills, ensuring that all communication protocols remain current, functional, and aligned with both national regulations and international best practices.

AGL Senegal utilizes a structured, multi-tiered communication system to ensure real-time connectivity and immediate stakeholder notification during a cyanide incident.
The Emergency Communication Plan for Cyanide Transport establishes the mandatory notification flow, ensuring a standardized chain of command from the Convoy Manager to the AGL Senegal Base in Dakar, which then serves as the central hub for coordinating with mines, government bodies, and local communities.
This centralized approach ensures that all information is coordinated, verified, and disseminated through a single authoritative source, preventing miscommunication and ensuring consistency in reporting.

The list of contact telephone numbers is contained in the ERP document, which the Convoy Leader carries during the journey.
The list includes hospitals, ambulance services, police, fire service, Ministry of Environment in Senegal, Mali & Guinea , and the mines, as well as the contact cell phone numbers of the Logistics Manager, QHSE Manager, Technical Director, and other AGL staff.

Every vehicle in the convoy carries a laminated Material Safety Data Sheet (MSDS), prominently displayed in the cabin.
This card contains immediate "First Responder" contact numbers and basic spill instructions, ensuring that all personnel have rapid access to critical safety information and emergency contact details without the need to consult additional documentation.
Communication is maintained via mobile and satellite phones to bypass cellular "black spots" identified during the annual Route Risk Assessment.

In accordance with the Incident and Accident Management Procedure, AGL Senegal categorizes incidents into three severity levels to determine the urgency of notification.
A Level 3 (High) incident is defined as a cyanide spill, human exposure, or release into water, requiring notification within four hours.

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A Level 2 (Medium) incident is defined as a minor mechanical accident without product release, requiring notification within 24 hours.
A Level 1 (Low) incident is defined as a near-miss or minor mechanical breakdown, also requiring notification within 24 hours.
This structured classification ensures that the response and notification efforts are proportional to the severity of the incident.

AGL Senegal maintains a live document, the Emergency Contact List, which serves as the central directory for all internal and external responders.
The list includes not only the telephone numbers for regional hospitals, ambulance services, fire brigades, police posts, and the mine sites but also the individual names and roles of the key contact persons at these institutions.
The QHSE Manager is the primary authority responsible for ensuring that internal and external contact phone numbers and emails are kept current.
The ERP specifies that the emergency response contact numbers are reviewed and confirmed annually.
Also, Clause 7.2 of the Transport Management Plan states that the internal and external emergency notification reporting procedures will be reviewed annually and as when necessary.
During each route survey conducted annually, the contact phone numbers are checked to ascertain whether they are still valid.
Any changes in the contact phone numbers are amended immediately.
Any new contact data discovered during road surveys is integrated immediately, ensuring that the directory reflects the most current information available.

To prevent communication failures during transit, AGL Senegal has implemented a dual-verification system before any convoy exits the yard.
Per the ERP, the list is reviewed by the QHSE Manager for accuracy and then physically verified by the Convoy Manager before every convoy departure .
A copy of the validated contact list is laminated and placed in each escort vehicle as part of the mandatory emergency folder, ensuring that all personnel have immediate access to critical contact information.
This pre-mission verification ensures that all contact information is current and that the Convoy Manager has immediate access to the necessary resources in the event of an emergency.
AGL Senegal management is contractually obligated to notify the International Cyanide Management Institute (ICMI) of any significant incidents. Clause 5.10 of the ERP describes significant incidents as follows: 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; and theft of cyanide.
The procedure states that ICMI will be notified when any of the above incidents occur.
To date, no significant cyanide incidents have been recorded since the Company's recertification in the past three years.

All incidents, regardless of severity, must be documented using the standardized Incident and Accident Report Form.
This form captures the technical details required for both internal root-cause analysis and external reporting, ensuring that all relevant information is recorded and available for review.

The reporting framework assigns specific roles and responsibilities to ensure accountability and clarity.
The Convoy Manager is responsible for initial scene reporting and on-site coordination.
The QHSE Manager is responsible for verifying incident severity and preparing formal reports for ICMI.

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AGL Management is responsible for final authorization and international transmission of incident data.
Government Liaison, through the police, is responsible for consulting with potentially affected communities in coordination with AGL Senegal.

The effectiveness of these notification and reporting systems is tested through practical application. AGL Senegal conducts annual emergency mock drills to evaluate the response time and clarity of the communication chain. These drills involve calling the external numbers listed in the ERP to simulate real-world coordination with Senegalese authorities.
The implementation of these systems was verified through on-site audits and interviews with the QHSE Manager, Convoy Manager, Fire Service Chief, and Transport Manager.
Physical copies of the Emergency Communication Plan and Contact List are confirmed present in all transport vehicles.

Verification
The information contained herein has been verified through interviews with the following operational stakeholders: QHSE Manager, Convoy Manager, Transport Manager, and Fire Service Chief, and by reviewing the Emergency Response Plan, Transport Management Plan, and emergency contact lists, ensuring alignment between documented procedures and field practices.

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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 Transport Practice 3.4**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Senegal has established a comprehensive, multi-layered framework governing post-incident remediation, chemical neutralization, decontamination, and waste management for cyanide transport operations along the Dakar–Siguiri corridor.
This framework integrates strict environmental protection protocols including an absolute prohibition on chemical treatment of natural water bodies with rigorous physical recovery procedures, personnel safety requirements, and controlled waste disposal practices.
The system is underpinned by continuous training, practical mock drills, and pre-departure briefings, ensuring that all personnel are fully aware of their responsibilities and capable of implementing the required protocols effectively.

AGL Senegal maintains total responsibility for all cleaning and remediation operations following a transit incident, ensuring that all sites are properly restored and that environmental impact is minimized.
These actions are governed by the Emergency Response Plan and the Transport Management Plan, which together provide comprehensive protocols for containment, recovery, neutralization, decontamination, and waste disposal.
The Convoy Manager acts as the Incident Lead, coordinating with embedded government agencies including the Fire Service and Police to execute recovery and neutralization operations.

AGL undertake containment, neutralization, and cleanup of spills and may be assisted by the mining customer depending on the location of the incident, under the supervision of the Ministry of Environment .

For minor incidents, the convoy's internal Emergency Response Team manages the site, ensuring that small-scale spills are contained and remediated without external assistance.
In the event of a large-scale spill, the Convoy Manager activates the AGL Head Office and external responders through , ensuring that additional resources are deployed promptly when needed.

The priority in any spill involving solid cyanide briquettes is the physical recovery of the product before any chemical treatment is applied.
Responders utilize non-sparking plastic shovels and brooms inventoried in the Emergency Equipment Inventory to sweep briquettes into reinforced high-density garbage bags.
Recovered solids are sealed and labeled for transport, ensuring that they are properly contained and identifiable.
The spill site is covered with 12-meter water proof tarpaulins to prevent wind-borne dispersion or reaction with rainwater during the recovery process.

Clause 7.0 of the ERP addresses the following recovery and neutralization processes: neutralization of contaminated soil and decontamination; recovery of solid or solution; treatment and/or disposal of excavated soil; treatment and/or

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disposal of recovered cyanide; recovery of sodium cyanide material; neutralization and/or disposal of recovered solution; neutralization of soil and/or water in situ; and recovery and treatment of ground water.

Chemical neutralization is a secondary process, applied only to the thin layer of residue or contaminated soil remaining after the bulk solid has been recovered.
AGL utilizes a 10% sodium hypochlorite solution as the primary neutralizing agent, with a 50-liter stock of sodium hydroxide maintained for specific applications.
The ER plan contains detailed descriptions of different methods of neutralization, including a discussion on the main treatment chemicals such as ferrous sulphate and sodium hypochlorite, and the need to be cautious in their usage.

The solution is applied using a 10-liter sprayer, and the contaminated soil is mixed to ensure saturation, then left to react for one to 2 hours.
Personnel applying neutralizers must wear full-body protection including Tyvek suits, water proof gloves and boots, and full-face masks with A2-B2-P3 cartridges as sodium hypochlorite is a hazardous corrosive.

The site is audited following the reaction period using 2 verification methods: HCN detectors confirm that atmospheric levels are below the 4.7 parts per million safety threshold, and pH paper or ferrous sulphate testing confirms that the treated area has reached a neutral pH level.
Only when both criteria are met is the site considered safe for re-entry.

AGL Senegal operates under a strict, zero-tolerance policy against using neutralizing chemicals in natural water sources.
The Emergency Response Procedure explicitly prohibits the use of sodium hypochlorite & ferrous sulfate, to treat cyanide that has been released into surface water.
It is strictly forbidden to use neutralizing chemicals in surface water, moving watercourses, or groundwater.
The ERP explicitly states that cyanide that falls into water cannot be neutralized, and response is limited to physical containment and downstream notification.
The Convoy Manager must immediately halt all chemical application and request instructions from the Dakar Head Office, with priority given to notifying local authorities and downstream communities to prevent human or livestock consumption of affected water.

Strict protocols prevent the spread of cyanide beyond the incident perimeter.
Contaminated tools including shovels, brooms, and buckets are washed with sodium hypochlorite solution followed by a copious water rinse.
Disposable PPE used during the intervention is treated as hazardous waste and placed into reinforced bags for transport.
A 22-liter field shower is available on the escort vehicle for immediate decontamination of personnel in cases of direct skin contact.

AGL Senegal does not perform final disposal of hazardous waste at the incident site or at the Dakar depot.
All remediation debris including recovered cyanide briquettes, neutralized soil, used PPE, and contaminated cleaning materials are consolidated into reinforced bags or sealed drums.
Recovered materials and impacted soil are transported under escort to the mine site for management and proper disposal.
The mining customer assumes responsibility for permanent disposal in authorized hazardous waste facilities, ensuring compliance with local and international environmental standards.

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The efficacy of these remediation and environmental protocols is maintained through continuous education and practical testing.
Annual training focuses on the environmental consequences of chemical neutralizers in water.
The February 2026 mock drill specifically validated the team's ability to manage water hazards without chemical intervention.
Pre-departure Toolbox Meetings reinforce the "No Chemicals in Water" rule as a mandatory briefing topic.
Interviews with the QHSE Manager, Convoy Manager, and Fire Service Chief confirmed a universal understanding that chemical treatment of water is an environmental violation.

Verification
The information contained herein has been verified through interviews with the following operational stakeholders: Fire Service Chief, QHSE Manager, and Convoy Manager, and by reviewing the Emergency Response Plan, Transport Management Plan, and mock drill records, ensuring alignment between documented procedures and field practices.

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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:

AGL Senegal has established a comprehensive, multi-layered framework governing document control, performance evaluation, root cause analysis, and continuous improvement for cyanide transport operations along the Dakar–Siguiri corridor.
This framework integrates a strict "Live Document" policy, mandatory annual reviews, immediate revision triggers, data-driven performance evaluation during mock drills, rigorous competency enforcement, and systematic root cause analysis following actual incidents.
The system is underpinned by robust document distribution controls, pre-mission verification protocols, and a commitment to continuous learning, ensuring that all procedures remain current, accurate, and aligned with operational realities and international best practices.

AGL Senegal operates under a strict "Live Document" policy, ensuring that safety protocols are never static and that all procedural documents remain current, accurate, and aligned with evolving operational conditions, regulatory requirements, and lessons learned.
In accordance with the relevant procedures, the following core documents undergo a mandatory comprehensive review at least once per year: the Emergency Response Plan, the Transport Management Plan, the Emergency Contact List, and the Route Risk Assessments.

Clause 7 of the Transport Management Plan makes provision for annual reviewing of all transport-related procedures.
The evaluation of the Transport Emergency procedures is required at least once per year after a mock drill has been held, after major changes in structures on the roads, change in contact phone numbers of outside responders, changes to the transport equipment used, lessons learned from accidents or incidents, and new identified risks on routes after conducting the annual route survey.
When significant or critical changes have been observed or reported, the contents of the TMP, ERP, and the relevant working documents and forms are reviewed.

The QHSE Manager and the Logistics Manager are the responsible authorities for initiating, documenting, and approving these annual reviews.
Documents were noted and found to be up to date.
The Emergency Plan was revised on 2023, demonstrating the Company's commitment to maintaining current documentation.

Beyond the annual cycle, specific "high-priority" triggers mandate immediate updates to the ERP and TMP.
Following any accident or near-miss, the document is revised to incorporate "Lessons Learned" and new preventative measures.

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If a mock drill reveals a variation between the written procedure and field implementation, the ERP is amended to correct the gap.
Revisions are also triggered by significant modifications to transport equipment, changes in external responder personnel, or the identification of new risks discovered during the Annual Route Survey. All amendments are recorded in a chronological Document History section, providing a complete audit trail.

AGL Senegal maintains a high state of readiness through mandatory annual mock drills, as required by the Training Matrix and the ERP.
The training matrix indicates that mock drills are part of the training programs.
Mock drills were held on 17-2-2026.
Attendance registers of each of these drills have been compiled and kept on file for record purposes.
The mock drills involve the escort companies, AGL drivers, and external emergency responders such as the Senegalese Fire Brigade and Police.

Mock drill reports dated 17-2-2026 were sighted and noted by auditors.
The reports narrate the scenario of an accident involving a cyanide truck resulting in a spill and a possible poisoned person.
They discuss the actions taken and the lapses observed during the drill.
A recent full-scale drill was conducted on 17 February 2026, as documented.
The exercise tested cyanide spill containment, casualty evacuation with medical oxygen, and real-time communication with the mine site, ensuring the team is prepared for the full range of potential incidents.

Mock drills are evaluated, and corrective action plans are put in place to correct any lapses.
The corrective action plans are used to revise the emergency response procedures.
Evaluation observers utilize a standardized template featuring specific tactical actions, each scored on a numerical scale. Following each exercise, the raw data is entered into a master spreadsheet, enabling visualization of performance across all response segments.

Any individual task or collective action scoring below the established threshold automatically triggers mandatory retraining for the entire team on that specific deficiency. In a recent drill, formal refresher training was mandated regarding the "time taken to dress and act," demonstrating AGL's commitment to addressing even minor performance gaps. Lessons learned from mock drills are used to review and update the ERP.

For actual incidents or high-consequence near-misses, AGL utilizes a systematic methodology for root cause analysis.
This framework assesses Manpower, evaluating training and fatigue; Method, reviewing the specific procedure used; Machine, inspecting for mechanical or tool failure; Material, evaluating chemical packaging and briquette state; and Environment, analyzing road and weather conditions.
The findings are used to directly update the Document History section of the ERP, ensuring every incident leads to a stronger safety protocol.

Document Distribution and Version Control: Once a revision is approved by the QHSE Manager, it is immediately implemented across the fleet.
Outdated versions are withdrawn and destroyed to prevent the use of obsolete procedures.
Updated plans are circulated to all stakeholders, including the mine sites, government agencies (DIREC and Police), and the AGL Head Office.
As a final fail-safe, the ERP requires a pre-mission verification of the Emergency Contact List, ensuring that names and numbers for local hospitals and police posts remain accurate.

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The effectiveness of these systems is verified through multiple audit methods. Auditors have physically sighted analysis sheets and Drill Evaluation Forms for exercises.
Direct confirmation of the retraining rule and investigation protocols has been obtained through interviews with the QHSE Manager, Convoy Manager, and Fire Service Chief.
Operations are supported by mandatory government permits and an armed police escort.
AGL Senegal maintains full compliance with ICMI Code requirements through preventive vehicle maintenance, strict adherence to the training matrix, annual cyanide awareness courses, detailed tactical guides for all scenarios, and controlled circulation of updated plans.

Verification: The information contained herein has been verified through interviews with the following operational stakeholders: QHSE Manager, Convoy Manager, and Fire Service Chief, and by reviewing the Emergency Response Plan, Transport Management Plan, training matrix, mock drill reports, and evaluation forms, ensuring alignment between documented procedures and field practices.

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