

AFRICA MARITIME AGENCY GUINEA (AMA) –  
TRANSPORTATION SUMMARY AUDIT REPORT

**INTERNATIONAL CYANIDE  
MANAGEMENT INSTITUTE**

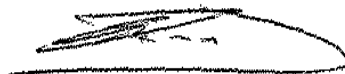
**Transportation Summary  
Certification Audit Report**

# **Africa Maritime Agency (AMA) Guinea**

8th to 10th July 2025.

For the  
International Cyanide Management Code  
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Signature Lead Auditor



30<sup>th</sup> October 2025

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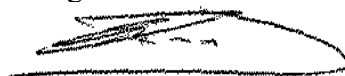
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**1.0 INTRODUCTION**

**1.1 Operational information.**

Name of Operation : Africa Maritime Agency (AMA)

Name of Operation Owner : Africa Maritime Agency (AMA)

Name of Operation Operator : Africa Maritime Agency (AMA)

Name of Responsible Manager : Mr. Xavier Plantier .  
(Quality, Health, Safety and Environment)

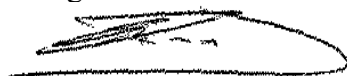
Address : Cité Chemin de Fer - Immeuble Kassa  
BP: 6681 - Conakry / GUINEA

Country : Guinea.

Telephone : Mobile: + 224 628 68 47 12  
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## 1.2 Audit scope.

The scope covers the road transportation of cyanide from the Port of Conakry in Guinea to five customer mine sites within Guinea. Cyanide is packed in one ton IBC's and stacked in 6-meter (20ft) sea freight containers. At the Port freight containers is taken from the vessel and stacked onto the trailers and transported from there along the transport routes directly to the Consignee's premises. The transporter do not have any warehouse facilities where the sodium cyanide can be stored.

## 1.3 Description of operations.

Africa Maritime Agency (AMA) Guinea's main operations are located at Cité Chemin de Fer - Immeuble Kassa, which is located approximately 1.5 km from the port of Conakry, in Guinea.

Africa Maritime Agency (AMA) Guinea is a wholly owned Guinean entity that was established to provide freight forwarding and logistics services to clients. The Company's Head Office is based in Conakry. Transporter is well equipped with modern communication equipment to facilitate world wide access to information.

AMA has been rated ISO 9001 certification and is authorized by the Guinea government (Department of Transport and Department of Security Services) to transport classified materials, including explosives, within the territory of the Republic of Guinea.

AMA Guinea is a logistics service provider transporting goods (bauxite, iron, manganese, gold, phosphate and uranium). to several mine sites in Guinea.

AMA has become a leading freight forwarder in Guinea and could compete with other freight forwarders in the African sub-region. The company has strategically focused on providing services to mining companies. Transporter transports solid sodium cyanide in 6-meter (20 ft) sea freight containers to SMD Lero, Siguiri SMD, Sykamore (Kiniero), Kouroussa Ville and Loila daris Mandiana. Distances varies from Conakry to end users varies from between 566 kilometers to 822 kilometers.

AMA is a Company operating as the sole handler of containerised import and export cargo in and out of the Port of Conakry. The sea freight containers, loaded with cyanide, are loaded directly from the ship onto the transporter's trailers.

The transporter is contracted with the following 5 mines: - SMD Lero (652 kilometres), Siguiri SMD (822 kilometres), Sykamore (Kiniero) (610 kilometers), Kouroussa Ville (566 kilometers) and Loila daris Mandiana (750 kilometers) for the transportation of solid cyanide (briquettes) packed in freight containers by road from the Port of Conakry to the consignees mine sites. The audit covers road transport exclusively from the Port of Conakry to these five mining sites.

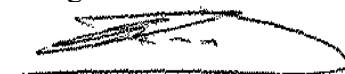
Sodium cyanide is received through the Port of Conakry by sea packed in sea freight containers, each of which holds 20 boxes of one ton of solid cyanide briquettes.

AMA operates as an individually certified transporter entity. In terms of the business agreement between the transporter and their clients their fleet consists of ten dedicated double tracking axle truck tractors, ten three axle flat deck trailers, fifteen dedicated truck drivers and their associated operating and maintenance facilities, records / documentation.

The audit covers road transport exclusively from the port of Conakry up to the various end users.

The truck tractors and trailers that are dedicated for the transportation of the sodium cyanide are stalled in a properly fenced off area situated in Conakry. Entrance to the area is under the control and supervision of a security officer on duty at the access entrance to the depot premises.

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

Since the last audit was conducted to date no cyanide incident experienced.

The last cyanide shipment was transported during 2022.

## 1.4 Road transportation.

Africa Maritime Agency Guinea (AMA) transports cyanide manufactured by Orica Australia Pty Ltd (Orica) who is a code certified producer by ICMI. The company has an agreement with Orica Pty Ltd to transport sodium cyanide (briquette) from the port of Conakry to various gold mines in Guinea.

Solid sodium cyanide briquettes are packaged in plastic bulk bags within a polyethylene lining and then encased in plywood boxes (IBC) each weighing approximately 1 ton of product. A maximum of 20 IBC's are packed into a 6 meter (20 ft) shipping freight container and transported by sea to the port of Conakry in Guinea.

Once ship have docked at the Port of Conakry, the containers are offloaded from vessels by Port stevedores and placed upon trailers. According to the Port of Conakry regulations, hazardous materials must be transported same day of arrival to the Consignee's facility as there is no interim storage area / facility available at the port.

Africa Maritime Agency (AMA) Guinea's responsibilities of the cyanide, commences once the freight containers have been loaded onto the trailers and relevant documentation have been checked and "handover" documentation is signed.

AMA Guinea clears the consignment and AMA Guinea's vehicles collect the containers with the documentation and manage them under a Transport procedure (jointly agreed between the mine and AMA Guinea).

Vehicles depart in convoy format directly to the end user, led by a Convoy Leader and a second Convoy Leader who trails the convoy. The containers of cyanide are transported in convoy by AMA Guinea and a Guinean customs official to the mine sites.

Delivery routes (main roads) from Conakry to the mine sites are dedicate as per transport permit issued by the Guinean Authorities. Routes selected and approved by the Ministry of Security and Civil Protection & the Ministry of Transport. Movement of convoy on routes is checked by the transporter's OBC team based at their depot in Conakry.

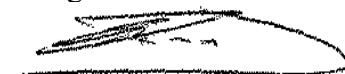
Each truck has a dedicated driver, who is accompanied by a safety officer.

The safety officer manages the communications between the truck drivers, the escort vehicle drivers, the convoy manager, and monitors the drivers.

The convoy includes a convoy manager, assistant convoy manager, a cyanide first aider, a mechanic, and cyanide emergency response equipment for spills and releases and cyano kit or medical equipment to treat cyanide exposures (splashes, skin exposures, inhalation and ingestion). The convoys include an armed customs escort through Guinea from start to finish.

According to the regulations of the port of Conakry, hazardous materials are delivered directly under hoist, there is no interim storage allowed.

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## 1.5 Transit Storage.

Sodium cyanide is delivered by ship to the port of Conakry in Guinea where the containers are offloaded from the ship and directly onto the trailers. This is done by a stevedores.

Within the scope of this audit there are no trans-shipping depots or interim storage facilities available at the port nor at the transporters depot. Customs clearance formalities are performed at the port. Once these formalities are completed, vehicles loaded with the freight containers loaded with cyanide, are allowed to depart from the port premises to customer mine site.

No storage nor interim storage done during the delivery journey.

Once loaded onto the trailers the road vehicles depart in convoy format directly to the end user led by a Convoy Leader and a second Convoy Leader who trails the convoy.

Africa Maritime Agency (AMA) Guinea's Code, responsibilities of the cyanide commences once the containers are loaded onto their trailers and the relevant documentation have been checked and "handover documentation" signed.

There is only one delivery route from Conakry to any of the mine sites and it is dedicated as per transport permit issued by the Guinean Authorities. Movement of convoy on routes is checked by the transporter's OBC team based at depot.

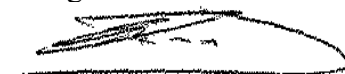
AMA Guinea clears the consignment and AMA Guinea's vehicles collect the containers with the documentation and manage them under a Transport procedure (jointly agreed between the mine and AMA Guinea).

The containers of cyanide are transported in a convoy of five (5) vehicles accompanied by an armed Guinean customs official to the various mine sites.

The convoy includes a convoy leader, assistant convoy leader, a cyanide first aider, a mechanic, relevant cyanide emergency response equipment for spills and releases to treat cyanide exposures. (splashes, skin exposures, inhalations and ingestion).

Should the transporter fail to present the vehicles to collect the freight containers, the cargo is not discharged from the ship and returned to the shipper on the same shipping vessel.

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**1.6 Auditor's findings and attestation.**

Audit Company: Private

E-mail : [tommieb.muller@gmail.com](mailto:tommieb.muller@gmail.com)

Auditor: Tommie Müller

Name and Signature of Transportation Auditor:

Name: Tommie Müller Signature:  .... Date: 30/10/2025 ....

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

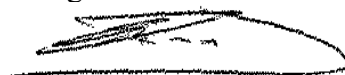
I attest that this Summary Audit Report accurately describes the findings of the verification audit.

I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Original date of audit: 8<sup>th</sup> to 10<sup>th</sup> August 2025.

Signed: Tommie Müller Auditor:  Date: 30/10/2025.

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**Auditor's Finding.**

This operation is

**in full compliance**

in substantial compliance

not in compliance

with the International Cyanide Management Code.

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

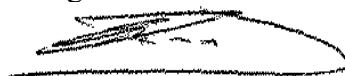
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Date of audit : 8<sup>th</sup> to 10<sup>th</sup> July 2025.

Revised date : 30<sup>th</sup> April 2026 and 11<sup>th</sup> May 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**

- in substantial compliance with Transport Practice 1.1
- not in compliance with

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

AMA has a road hazard mapping from Port of Conakry to five mines. Route between harbour and end users are all National roads. Route Risk Assessment (RRA) procedure and risk matrix available.

Routes Risk Assessments (RRA) was conducted from Port of Conakry to the five end users. Relevant documentation completed as required RRA procedure. Route Risk Matrix available that indicates the level of risks noted along the routes. Recommended preventative actions to mitigate or eradicate the noted risks are included in RRA. Risks such as condition of the road surface, the pitch of the road, potholes, trees, stray animals, traffic on the roads and through towns, pedestrians, overhead electrical power lines, pot holes, rail tracks, rivers, bridges, points to cross rivers, rest stops, "black spots", traffic on roads, bypass routes, population in towns, etc have been documented in relevant document. Road Hazard mapping and applicable photos available.

Due to the nature of the cargo, permits from two Government departments (Ministry of Transport and another by Ministry of Security Services) issued which dictate the routes that must be followed when delivering the cyanide consignment. Transporter only allowed travelling on high way roads. Also attach to the permits issued, a ledger detailing the conditions that the transporter needs to adhere to. The permit specifically states the routes to be followed when transporting cyanide within the borders of Guinea to the various mine sites. No vehicle allowed to travel on secondary roads.

The Route Risk Assessments from Conakry to the respective mine sites in Guinea high-lighting black spots, warnings of hazards and other issues to be on the look-out for.

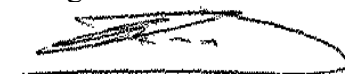
The Guinea customs ensures that the routes that are to be followed from port of Conakry to Consignees. Convoy is escorted by armed customs official because the cargo is under exemption and customs need to ensure that the cargo reaches the specific mine using the specific road as per the transporter's transport permit.

Convoy Leaders have copies of the full route risk assessments and operation assessment procedure. Prior to departure the contents of the Route Risk Assessment been discussed with the convoy crew.

The escorting customs officer is obliged to declare and perform certain formalities when convoy reaches the mine. Escorting documentation is stamped and signed as proof that cargo was not at any stage diverted.

Procedure available describing the process of the route selection that's to be followed to determine the risk level per route procedures and the approval thereof.

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Furthermore, the lead auditor verified the road and the assessment and noted contents. Revision of all procedures recommended to be done. Last cyanide consignment transported was done during 2022.

Maximum speed limits on tar surfaced, gravel roads and through towns and villages set and monitored. Speed of convoy controlled by Convoy Leader.

The local communities and external responders were notified about their responsibilities and the dangers of the product. Hospital representatives along the routes from Conakry port to the end users (mines) have been notified by AMA Logistics. Government organizations was handed a copy of the MSDS for sodium cyanide and the procedure that is to be followed in case of accident on the road.

Some of the Convoy Leader's main duties on the convoy are to direct or inform the safety officers on board of the trucks of all oncoming hazards that's to be communicated to the drivers, e.g. when overtaking can be done, oncoming traffic or if there is a barrier ahead.

Product information handed to emergency responders and communities, describes the safe handling of cyanide, the dangers of the product, the first aid procedures to be followed and Emergency Response information.

Precautionary measures to identified risks to be taken whilst on route with consignment of cyanide stipulated on RRA document are taken. Identified risks are discussed at tools box meetings prior to departure of the convoys. During debriefing session, Convoy Leader reports back to base on experiences noted on route. Report "new" risks sent to transporter's HSSE Director.

Transport Management Plan Number Pr-Trspt-002 found to be a little outdated and need to be revised.

Consultations were held and inputs were sought from the relevant stakeholders. Environmental Protection Agency (EPA) Guinea Police, hospitals, emergency services, Red Cross Services, local community representatives during which they were informed on their roles and responsibilities as well as product dangers. Copy of product MSDS handed to role players.

Due to the nature of the cargo and the lack of safety standard by service providers, transporter haven't entered into a contract with sub-contractors. The transporter retains the full responsibility of the operation and the only function that is subcontracted, is the loading of the freight containers onto the trailers by a Port stevedore.

*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

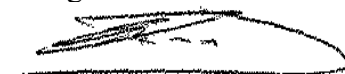
**in full compliance**

in substantial compliance

not in compliance with Transport Practice 1.2

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

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AMA GUINEA have a Procedure “Etapes du recrutement du chauffeur” No. Fr-PStrspt-003 rev 2 dated January 2025 which stipulates that only drivers who are in possession of a valid motor vehicle drivers license and who qualifies for employment in terms of their employment policy and procedures will be considered for employment. Transporter have their own training department. During preliminary interviews information on applicant' s professional background is scrutinized Following information required. Previous track record, education level verified, check validity of driver's license, minimum category 'C' driver's license required. Languish capability (French) and knowledge on road signs and road knowledge checked, category of driver's license. Practical driving maneuver test of vehicle, pass mark minimum of 60%. Behaviour on road, driving on wet road, good sober habits,

Transport has a training matrix in which certain elements of training is required for drivers transporting cyanide to be subjected to. Basic training such as basic firefighting (practical & theoretical), transportation of hazardous materials training, cyanide awareness training, cyanide first aid training, basic first aid training, Dangerous Goods Training, cyanide intoxication, cyanide emergency drill, accident on road in case of a vehicle roll over, accident reporting, Company's golden rules, the wearing of personal protective equipment (PPE), Company's off-site emergency procedures, Company's Emergency Response Plan, The rules to form of convoy Classification D /G. Load securing. Driver's wellness, Fatigue management, rules of the road, Driving techniques. Cyanide awareness, actions to be taken in the case of accident on route. Transport Management Plan (TMP), Route survey on Rute Risk Assessment, Company's Emergency Response Plan (ERP), etc.

"New" drivers are subjected to Company iinduction training as well as consignee's plant induction training. Learner convoy leader drives along with competent convoy leader and drivers on route travel under supervision of Convoy Leader. Drivers not directly involved in the loading and off-loading of freight containers.

Training presented captured on training matrix and employee attendance register.

The effectiveness of presented training is determined by subjecting employees to a training assessment on each of the subjects. Evidence of attendance register and the assessments are kept on drivers personal file.

Toolbox talks are held weekly during which various issues been discussed. .

No sub-contracting is undertaken, due to the nature of the cargo and the lack of safety standard by service providers. The transporter retains the full responsibility of the operation and the only function that is subcontracted, is the loading of the freight containers onto the trailers by a stevedore.

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

The operation is

**in full compliance**

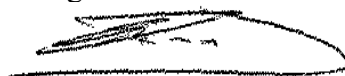
in substantial compliance

not in compliance with Transport Practice 1.3

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

Transporter have ten (10) dedicated double and tri-axel flat bed trailers fitted with twelve twist locks each. Trailers been designed and built to each carry 2 x 6 meter (20 ft) containers. Each hub is fitted with double tyres. 10 Duel tracking axle prime movers, each hub fitted with two tyres fitted are used.

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Trailers and prime mover are built in accordance with design specifications for truck tractors and trailers. Specifications are kept on file at transporters' offices. Transporter only fits brand new tyres on prime mover and trailers. Same brand of tyres and tread pattern are used.

Trailers are designed and manufactured to carry 2 x 6 meter (20 ft) container per trailer. Truck tractors with double axle used as prime movers each with a tracking mass that varies between 420 and 430 horse power.

Company has a planned Preventative and Corrective maintenance programme in place. Transporter has a fully equipped mechanical workshop with qualified mechanics in service. Pre-departure checks (list de Verification) are performed by driver and at time together with Operation clerk and Convoy Leader. Checks documented on "List de Verification". Defects noted during these checks and on route, gets attended to immediately. Post delivery, on returning to the depot, entire vehicle combination gets mechanically checked. Defects get reported to Transport and Mechanical Managers. Procedure for the release of vehicle from workshop, It is required that the Workshop Administrator, the driver and the Maintenance Manager endorse the release document before vehicle will be released from workshop. .

Scheduled maintenance services (PM 1) done every 5 000 kilometers (replace engine oil and filters). PM 2 every 2000 km (general checks done) on truck tractors. PM 3 service every 30 000 kilometers servicing and PM 4 a major service done at every 40 000 km. External service provider checks and services 5th wheel, twist locks and braking systems on trailers. Distance to and from mine sites varies from 566 km to 822 km depending where product was delivered. The on-board computer (OBC) on the truck tractors dictates the maintenance frequencies and type of service required.

Calculations for a three-axle loaded trailer plus the three axles on the truck tractor combination is 57.5 ton. Allowable combination mass is 69.0 ton. The Economic Community of West Africa State (ECOWAS) allowable axle mass in Guinea is 11.5 ton. Calculated axle mass of loaded combination is well within the allowable mass to move of Guinean soil.

Should vehicle combination be overloaded, Port do not issue a certificate. But vehicle combination will not be allowed to leave the Port premises. Mass to be loaded captured on way bill and other relevant documentation. If within legal load limits, Port issues a certificate and allow vehicle to leave Port premises. Interviewed convoy leader Mr. Sylla Lamine, who explains that he is responsible for checking the mass loaded onto the trailers and to ensure that each load is within the legal required mass.

Due to the hazardous nature of sodium cyanide, the lack of safety standards and responsibility by transport service providers, AMA hasn't entered into a contract with a sub-contractor for the transportation of cyanide. The transporter retains full responsibility for the operation.

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

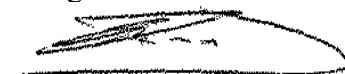
The operation is

**in full compliance**

in substantial compliance

not in compliance with Transport Practice 1.4

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

The transporter transports sodium cyanide in briquette form which is packed in hermetic sealed PVC bag. Bags weighing approx 1 ton are placed in another plastic bag, packed in a special designed wooden box and strapped with steel strapping.

Twenty (20) wooden boxes are packed into a 20 meter steel freight container and secured inside. Doors are closed and sealed at consignor's premises and shipped off to Conakry in Guinea. The end user at the mine removes the seals and container doors are opened. The integrity of the boxes and containers can only be damaged during handling or if moisture / water / liquids enter the containers.

Container acceptance procedure No. Pr-PS-HSE-008 in use and found to be appropriate. Doors are sealed with seals, each with a unique seal number. Seal numbers, detail of containers (identification numbers) and contents of the consignment, documented on the shipping documents. Container acceptance checklist completed. Defect noted on container/s, recorded on Official Equipment Interchange Receipt Document. Observation reported to Port Authorities and entries endorsed by them. Checklist for acceptance of goods No. Fr-PS-HSE-008 rev 1 dated Oct 2015 to be completed and signed by Driver and HSE representative.

At the mine site the transporter's waybills are signed by the mine site personnel on acceptance of the goods.

Recommended that checklist for acceptance of goods No. Fr-PS-HSE-008 rev 1, be revised as it dates back to 2015.

Placarding of the freight containers is done in accordance to the IMDG requirements. Split placarding is fitted on all four sides of the container during transport. In addition, transporter affixed a danger sign (skull & crossbones with the word "CYANIDE") to the front of the truck tractor as well as at the rear end of each flatbed trailer. Placarding and signage's are kept displayed from port of Conakry to the mine site. Once containers are off loaded from the trailers, the displayed signage's are then removed from the vehicles.

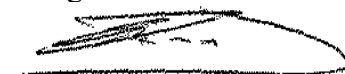
Transporter do have a transport safety programme consisting of various preventative measures to combat accidents / incidents and to ensure safety on route when transporting cyanide from Port of Conakry to various mine sites.

Safety programme consists of: documentation such as - Drug and alcohol policy and testing procedure. Pre-departure vehicle inspections, Equipment checklists. Driving hours, fatigue management, Vehicle and tyre management system. Servicing of equipment, Procedure for "actions to be taken if, during the journey, accident / Incident reporting and investigation thereof, an infringement which could jeopardize the safety of the transport. Procedures to prevent shifting of containers (load securement), speed control, night driving, driver's health (pre-employment and periodical medical examinations).

Some essential equipment have reached its expiry date or haven't been serviced or maintained. Recommended that these items be attended to before next consignment of cyanide is done.

Vehicles are inspected (pre-departure checks) prior of leaving the transporter's depot, once container loaded onto the trailer and during compulsory stops on route. Pre-departure checklist is completed for the truck, the trailer and the freight container before the loaded vehicles allowed to leave the Port of Conakry. Detail on pages 12, 13 and 14 of a procedure Pr-PsTrspt PROCEDURE TRANSPORT CYANURE 002 revision 5 dated 1st January 2026 refers. Transporter has a well-established preventative maintenance program. At pre-determined intervals vehicles are serviced. Service records are in place. Braking mechanisms on truck tractors and trailers are maintained by external service providers. Only brand-new tyres are used on the designated cyanide vehicles. At a minimum tread depth of 5mm the tyres are replaced. Defects on vehicles noted during pre-departure checks or on the

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road are attended immediately. Final release of vehicle from workshop and authorised to go ahead to load is granted by On Board Camera (OBC) control clerk.

The company has a journey management plan and Driving Rules for drivers. Convoys are allowed to travel for a maximum period of 2½ hours where after convoy is compelled to stop and rest for 20 to 30 minutes. This is controlled by OBC clerk. Driving time per day is maximum 9 hours and working time is maximum of 13 hours per day allowed. Hereafter driver needs to rest for minimum of 8 hours every day. Driving is allowed between 06:00 and 18:00 a day. Should it become a requirement to travel after 18:00, written permission must be obtained from HSSE Manager. Under normal conditions night driving is allowed. An On-Board Camera (OBC system) WIALON been installed in the cab of the truck tractor and a GPS system (TRACARE SOLED) fitted. Movement of vehicles is monitored continuously by On Board Controllers (OBC) clerks.

Each flatbed trailer is fitted with twelve (12) twist locks. Freight containers fit tightly to the chassis of the trailer which match the four corners of the container. Twist locks interlocks to containers. During walkabout Auditor noted that twist locks were fitted with a locking device preventing twist lock dislodges from container. Only twist locks are used for the securing of the containers. During 2009 the Guinean Government decided that the use of chains as load secure device must be ceased and that only twist locks be used. Checking of twist locks is done during pre-departure checks by drivers and prior to departing from compulsory stops. During planned maintenance of trailers, twist locks are serviced but items do not appear on service checklist.

Transporter do have a procedure “Cyanide Handling and Convoy Management” which stipulates the corrective or preventive actions the convoy leader must follow in case of suspending or modification of the transportation process e.g. bad weather condition, bad road condition, heavy rains, security threats, flooding of the road, etc. Procedure forms part of training process for drivers. Once situation has normalized, Convoy Leader informs the Company’s Transport Department of the proceeding of the convoy.

Transporter’s drug and alcohol policy clearly states the use, possession of an illicit substance or being under the influence of alcohol and or drugs are prohibited. Employees are acquainted with the contents of this policy. Employees are subjected to breathalyser test prior participating in the transfer of sodium cyanide. Findings documented on appropriate checklist. If test result is positive could lead to disciplinary actions against such employee. Members of the convoy also subjected to breathalyser test on entering consignee’s premises. Once test is performed driver acknowledges that test was performed and signs that he accepts the test results. During annual medical examinations employees are subjected to a drug and alcohol test. Testing for drugs and alcohol usage are done during pre-employment examination,

Retention (archive) procedure noted during audit. Medical records for employees are retained for a period of 40 years. Financial and other records are archived for a period up to 10 years. of 6 years. Any vehicle related records are kept for the life time of the vehicle. Disposal of records addressed in procedure for this purpose.

Due to the hazardous nature of sodium cyanide and the lack of safety standards and responsibility, the transporter hasn’t entered into a contract with a sub-contractor for the transportation of sodium cyanide. The transporter retains full responsibility for the operation. he only function that is subcontracted is the placement of freight containers onto transport trailers by the stevedore.

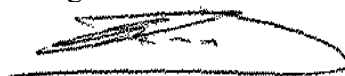
*Transport Practice 1.5: Follow international standards for transportation of cyanide by sea and air.*

The operation is

**X in full compliance**

in substantial compliance

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- not in compliance with Transport Practice 1.5

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

The transporter is not involved in managing sea or air shipments of cyanide. Only land transport performed.

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

The operation is

**X in full compliance**

- in substantial compliance
- not in compliance with Transport Practice 1.6

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

Communication media with Convoy Leaders in the cyanide convoy, is by using mobile phones, onboard phones (hands free system), VHF short-wave radios and satellite phones.

Drivers do not communicate with the depot in Conakry, emergency service providers or the consignees. This is the duty of the Convoy Leader. The accompanying safety officer in each truck communicates with the convoy leader and support vehicles. Convoy Leaders have satellite phones and mobile phones. List of appropriate telephone numbers to communicate with AMA Guinea head office, appropriate emergency responders for emergency services if needed on the convoy route, available in each vehicle.

The transporter has the procedure "De La Procedure de Transport de cyanure" in use that relates to the communication equipment. Prior to departure of a convoy, all communication devices and other required equipment are checked and tested to ensure operational. This includes the contracted servicing of equipment which is in continuous use with the radio communication company.

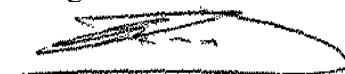
During route risk assessments conducted blackout areas were identified and areas are noted. Required actions by the Security Officer in the convoy before and exiting these areas are covered in procedure. Truck tractors are fitted with GPS devices and on board cameras. (OBC). The movement of the convoy is monitored 24/7 by the OBC clerks.

Inventory controls and chain of custody documentation are implemented to prevent loss of cyanide shipment. Handover and reception of containers is done by signatures from Convoy Leader and Port Authorities. Transporter's Logistics Department periodically contacts the Convoy Leaders by phone to determine their position and then compared with detail on the satellite tracking system. It is required from Convoy Leader to report their position when pulling off at compulsory rest stops and when departs from there.

Chain of custody data such as container numbers, waybill numbers, shipping documentation, packing list, bill of lading, customs declarations, tremcard, product MSDS and producer's invoice, accompanies the convoy. Plans to prevent loss of product captured on "handover and reception of container" document. The total of freight containers transported as well as the mass of the cyanide in transit, are captured on shipping records which are kept in the designated space of each prime mover.

Due to the hazardous nature of sodium cyanide and the lack of safety standards and responsibility, the transporter hasn't entered into a contract with a sub-contractor for the transportation of sodium

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cyanide. The transporter retains full responsibility for the operation. The only function that is subcontracted is the placement of freight containers onto transport trailers by the stevedore company.

**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**

- in substantial compliance
- not in compliance with Transport Practice 2.1

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

There are no situations where interim storage occurs since the cargo is under the customs custody and customs doesn't allow the exempt cargo to park or be sent anywhere apart from the approved route. There is a procedure that prohibits eating or drinking near the cyanide and the Emergency response plan manages different scenarios on how to manage spill and contain releases.

**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**

- in substantial compliance
- not in compliance with Transport Practice 3.1

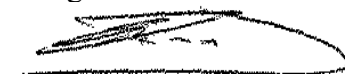
*Summarize the basis for this Finding/Deficiencies Identified:*

The transporter do have an appropriate emergency response plan which was revised during June 2025.

Procedures are reviewed and amendments made to procedure on the following conditions: -

- a) annual reviews of relevant documentation;
- b) feedback reports received from Convoy Leaders;
- c) after an accident / incident investigation and deficiencies identified and recommendations to procedure been made;
- d) after an emergency mock drill have been evaluated and deficiencies identified;
- e) road conditions or other risks have changed.

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- f) amendments to applicable legal requirements and or permits.

During revision process inputs from all relevant parties are sought. Once amendments to procedure content have been approved and implemented, relevant parties subjected to retraining.

ERP deals with the roles and responsibilities of – The Convoy Leader, convoy members in case of an accident / incident, the wearing of Personal Protective Equipment, cyanide awareness and cyanide first aid to be applied, included in the procedures.

A list of Emergency Contact numbers forms part of the procedures. The procedures are available for the use by Convoy Leaders. Should accident conditions require external assistance, the Convoy Leader can call for assistance from Guinea Police, Fire Department, Ambulance and Hospitals. Available support can be obtained from Transporter's depot in Conakry if required.

Transporter obtained permits from the Dept of Transport in October 2021 and from the Dept of Security Services dated May 2021. These permits allows transporter to transport sodium cyanide by road from the Port of Conakry to the mine sites. Permits dictate the routes that are to be followed. Convoys may only travel on the main roads. Secondary roads not suitable from port to end users suitable (poor road conditions) for the transportation of the cyanide. If such roads might become available, transporter is not allowed to use it. The Route Risk Assessments "General Comments" reveals detail on condition of road surfaces, population along the route, water sources, rivers, rainy conditions, bridges, prevailing winds, etc. The secondary roads are all dirt roads and are in poor condition.

ERP Procedure stipulates the roles and responsibilities of external and internal emergency providers. However the roles and responsibilities of Hospital staff members, Fire services and Community leaders of the affected, could not be traced.

Transporter has its own Training Department with appointed training officer who presents the cyanide transport procedures and cyanide awareness and first aid training. Training requirements captured on training matrix. Training matrix reveals the already presented relevant training and refresher ER training for the personnel. Effectiveness of training is done by conducting an assessment after subject training was presented. Training assessments and attendance registers kept on record and documents of training presented, noted.

Emergency drill was held on 29<sup>th</sup> May 2025. Summary of the exercise simulated an accident with product spill and fire. Minutes of the emergency drill was noted. Some external emergency responders attended this drill. Report of drill noted.

The transport emergency plan considers all aspects of road transportation of cyanide. Transport Emergency Management Plan (TEMP) found to be appropriate. Cyanide is transported by road.

*Transport Practice 3.2: Prepare detailed emergency response plans for potential cyanide releases.*

The operation is

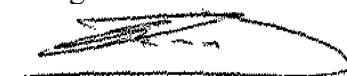
**X in full compliance**

in substantial compliance

not in compliance with Transport Practice 3.2

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

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Transporter has its own Training Department with appointed training officers who presents the cyanide transport procedures and cyanide awareness and first aid training. Training requirements which include cyanide awareness, captured on training matrix. Training matrix reveals the already presented relevant training and **refresher ER training for the drivers and all other relevant personnel captured on training matrix. Proof of refresher training presented, attendance register reflecting the names of the attendees. Record of this type of training kept on file.** Effectiveness of subject training material presented, is done by conducting an assessment for completion. Assessment document and attendance registers kept on record and documents of training presented, noted. Participation in emergency mock drills and toolbox talks is also regarded as training. Training found to be appropriate.

In ERP procedures for the following four scenarios sketched and available: -

- a) Roles and responsibilities of the members of the convoy in the event of a simple accident.
- b) Roles and responsibilities of the members of the convoy in the event of an accident with spill.
- c) Roles and responsibilities of the members of the convoy in the event of an accident with fire.
- d) Roles and responsibilities of the members of the convoy in the event of an accident with spill & fire.

All members of the convoy team (escort vehicle drivers, truck drivers, mechanics, safety officers, etc) were subjected to training in the contents of the Emergency Response Plan. These members are subjected to receiving regular refresher training and also partake in emergency mock drills. Pre-departure briefing with drivers includes refresher of emergency procedures.

All necessary emergency equipment is carried with the convoys as listed on the convoy checklist. Detail as per training matrix reveals that training in the use and handling of emergency Personal Protective Equipment (PPE) and other equipment was handed to employees.

Some crucial emergency equipment need to be attended to before next delivery of cyanide is undertaken. Outdated cyanide antidote discarded and replenished.

Due to the hazard nature of the cargo as well as the lack of safety standard by service providers, AMA haven't entered into a contract with other contractor firms for the transportation of cyanide. AMA Guinea retain the full responsibility of the road transport.

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

The operation is

**X in full compliance**

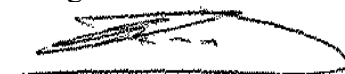
- in substantial compliance
- not in compliance with Transport Practice 3.3

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

Contact procedures and who is to be contacted and under what conditions, is covered in EMP document. Detail in this procedure sets out the roles and responsibilities of internal and external emergency responders. An updated list of contact telephone numbers included in the EMP.

It is the responsibility of the HSSE Manager to ensure that the emergency procedures and the contact phone numbers are kept up to date at all times. Police and hospital was contacted and both calls were answered.

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HSSE Manager and Convoy Leader were interviewed on their responsibilities. Both could give account of their duties.

Annually internal and external emergency notification, emergency procedures, telephone contact list and reporting procedures are kept reviewed and updated where required by HSSE Manager.

The convoy leader communicates with the HSSE Manager who is responsible to divert the communications to interested and affected parties and any other institutions.

A list of emergency telephone numbers is available and the roles and responsibilities of internal and external emergency responders and an updated list of their contact telephone numbers been included in these plans. In case of a cyanide transport incident, the Transporter's ERP and procedures stipulates the need of notification given thereof to the consignor, Regulatory Agencies, consignee, the local emergency responders and **procedures Pr-PsHSSE-019 revision 5 dated 1st January 2026 and Pr-PsHSSE-023 revision 4 dated 1st January 2026, stipulates that the ICMI must be notified in the event of a cyanide transport incident.** The notification of these institutions is the responsibility of the Transport Manager. Telephone numbers of relevant office bearers at Head Office and Depot are available. It is the responsibility of the HSSE Manager to ensure that the emergency procedures and the contact phone numbers of all those listed, are kept current. This is done annually. The Convoy Leader communicate with the HSSE Manager who will regulate communications to interested and affected parties and any other institutions.

*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**

in substantial compliance

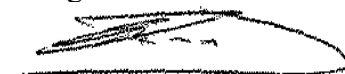
not in compliance with Transport Practice 3.4

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

The Emergency Response plan addresses the actions to be taken to control a spill of sodium cyanide that could pose a risk to people and the environment. Recovery, treatment of Spills, Neutralization or removal of soils. Transporter is responsible for the safe cleanup as well as the rehabilitation of the affected area.

Procedure for the remediation of the area such as recovery or neutralization of dry sodium cyanide, the decontamination of soil, the decontamination media and management of the spill debris was collected. A clause in Company procedure No. Fr-PsHSSE-019, prohibits the use of sodium carbonate, sodium hypochlorite and / or hydrogen peroxide to treat a cyanide spill that have entered into surface water source.

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

The operation is

**in full compliance**

**in substantial compliance**

not in compliance with Transport Practice 3.5

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

Clause in Emergency Response Procedure states that contents of the ERP be evaluated, reviewed and amended (if required) to ensure appropriateness, effective, adequate and its implementation thereafter.

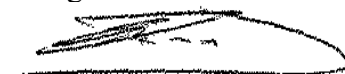
Procedures are reviewed on the following conditions: -

- a) annual general review of procedures and amendments required.
- b) after an accident investigation, preventative recommendations on deficiencies identified are made, contents of company procedures (including the ERP) to be reviewed, applicable amendments made and “new” procedures implemented.
- c) after an emergency mock drill have been evaluated and deficiencies been identified.
- d) hazards on road conditions have changed.
- e) applicable legal requirements been amended.

Emergency Response Procedures stipulates that an emergency drill be done at least once every six months. In terms of procedures the target for drills to be held is 2 per year. The drills are designed to simulate appropriate emergency situations. Drill proceedings are held to evaluate and to determine the adequacy of response procedures and emergency responders’ competency and level of training received. Last drill done during August 2022. Due to a fire with extensive damages, the transporter had to relocate to another premises in Conakry and no cyanide was transported during 2024. **Procedure available that requires that mock emergency drills be held at least twice per year as well as the roles and responsibilities of emergency responders. Clauses in procedure noted. Company conducted 2 emergency drills during 2025. Cyanide Mock Drill Exercise Sheet (attendance register) and copy of the minutes of the scope and evaluation of the emergency drills held, retained for future reference.**

End of report.

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