



Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

ICMI RE-CERTIFICATION – SUMMARY REPORT

1.1 Operational Information.

Name of Transportation Facility:	Africa Transport Conakry, Guinea
Name of Facility Owner:	Africa Transport Conakry, Guinea
Name of Facility Operator:	Africa Transport Conakry, Guinea
Name of Responsible Manager:	Mohamed Alkabir Sylla
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1.2 Description of Operation – Africa Transport, Conakry Guinea

1.2.1 Company Profile.

Africa Transport was founded in 2012. It is a leading transport company based in Conakry, Guinea in West Africa. It transports all types of goods including dangerous goods which includes Sodium cyanide, general cargo as well as machinery and offers a cutting-edge logistics solution. It offers transportation services both in Guinea and neighboring countries which borders Guinea. It also provides storage and warehousing services. The company is ISO14001:2018 certified.

Africa transport provides road transport and logistics services for mining companies, and other companies.

1.2.2 Audit scope.

The scope of this audit is the road transportation of solid sodium cyanide from the ports of Conakry (Port Autonome de Conakry to Societe Miner de Mandiana(SMM) a distance of 775Km from the port of Conakry.

1.3 Sodium Cyanide Transportation.

Sodium cyanide in IBC's which are packed in 20ft containers are loaded from the port of Conakry, Guinea and delivered to Societe Miner de Mandiana(SMM).a distance of 775km from the port to the mine site. The manufacturer of the sodium cyanide is Draslovka a cyanide manufacturer based in Czech Republic.

Bollore Conakry, Guineas has an agreement with Societe Miner de Mandiana (SMM) to do customs clearing and transportation but has subcontracted the transportation leg of the business to Africa Transport. The manufacturer of the sodium cyanide is Draslovka a cyanide manufacturer in Czech Republic. Africa Transport is a subcontractor of Bollore Guinea and does only the transportation of cyanide for its client. The clearing of the shipment of sodium cyanide from the port is conducted by Bollore Guinea.

Solid sodium cyanide is packaged in Intermediate Bulk Containers (IBC's) of 1000kg capacity. The briquettes are stored within a woven polypropylene bag, sealed with a PVC plastic liner, within a wooden crate. Packaging complies with International Maritime Dangerous Goods Code for Group 1 hazardous goods and has been subjected to the relevant tests required by the Code.

The solid sodium cyanide briquettes which are in IBC's are packed in 6-meter freight container and shipped by sea from the Consignor to the Port of Conakry, Guinea. A maximum of 20 wooden fabricated IBC's are packed into a freight container with a maximum gross weight of the product of 20 tons.

Upon arrival of a shipping vessel to the port, sodium cyanide containers are loaded directly from vessels directly onto Africa Transport's trucks and dispatched to Societe Miner de Mandiana (SMM) mine site. The trucks move in convoy under strict escort from Conakry port terminal to a temporary hold up area in Africa Transport yard for a few hours and from there begin their journey to the mine.

Africa Transport uses convoys with escort consisting of a maximum of four (4) trucks but occasionally there are two trucks in convoy. Depending on the truck configurations and capacity of a truck, two (2) or one container is loaded per truck The company has a permit issued by the Ministère Des Transports (Permit # 361/MT/CAB/SGG/2020 valid for 3 years.

The shipping of sodium cyanide consignment between the consignor and the Port of Conakry is conducted by independent shipping companies (Maersk Shipping) and coordinated by the Consignor.



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The clearing of shipments of cyanide upon arrival at the port of Conakry is done by Bollore Guinea which has the contract with the mine. Bollore Guinea makes sure that all shipping documentation covering every shipment has been processed through Guinea Customs to allow prompt clearing of the product from the port of Conakry. Upon arrival of a vessel at the port, Africa Transport which has been contracted by Bollore Guinea will make trucks available at the port and are loaded directly from vessels onto the trucks after which they exit the port. The Guinea port authority is responsible for the off-loading of all the containers from the shipping vessels and loading them onto the trucks.

The containers of cyanide are collected from the port within 24 hours of arrival of a vessel. From the port the loaded trucks are escorted to Africa Transport yard for a few hours where preparation for the journey is done and then they depart to the mine. The containers remain loaded on the trailers when the trucks are in temporary transit in Africa Transport yard.

Africa Transport transports sodium cyanide in 20ft containers to the mine (Societe Minier de Mandiana(SMM)). The sodium cyanide in IBC's which are packed in 20ft containers and sealed are loaded from the port and delivered to the mine site a distance of 775km from Conakry port.

Trucks in convoy are escorted from the port terminal to Africa Transport yard and from there to the SMM mine site under escort by the safety team of the company and two Guinea police personnel.

Bollore Guinea has the contract agreement with Societe Miner de Mandiana (SMM) but does only the clearing of the containers. The transportation has been contracted to Africa Transport.

Africa Transport provides vehicles and drivers for the transportation of the containerized sodium cyanide. The overall control of the movement of a cyanide convoy is the sole responsibility of Africa Transport. The company has its own trained escort team who provide escorts right from the port through to the mine.



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SUMMARY AUDIT REPORT AUDITORS' FINDINGS

Africa Transport Guinea is:

in full compliance with

in substantial compliance with

not in compliance with

THE INTERNATIONAL CYANIDE MANAGEMENT CODE

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

NAME OF OTHER AUDITORS

Benjamin Amoo Mensah – Technical Auditor: Transportation.

DATES OF AUDIT

The Re-certification Audit was undertaken during late 2021.

I hereby confirm that I meet the various criteria in terms of knowledge, experience and conflict of interest to assume the role of a Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I confirm that this Summary Audit Report accurately describes the findings of the verification audit. I can confirm that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations while ensuring that accepted practices for health, safety and environmental audits.



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:

Africa Transport has selected the appropriate route from Conakry port terminal to Societe Minier de Mandiana (SMM) mine. There is only one approved route to the mine. The company has a Route Transport Selection Procedure No, PRO/CNC/02. The company has a Transportation permit issued by the Ministère Des Transports (Permit # 361/MT/CAB/SGG/2020. Africa Transport has developed a Transport Management Plan (Plan de Gestion du Transport de Cyanure) to manage its transportation operation. The QHSE Manager is responsible person to conduct the route selection and route review in consultation with the operations manager. The QHSE Manager organizes all the resources such as 4x4 vehicle and conduct the route survey with the Operations manager and the convoy escort team leader. The road surveys are reviewed and updated.

- 1) Before resuming operations after suspension of operations for more than 6 months or subsequent to an unusual event (climate, political or social event)
- 2) Following a significant change which has occurred on the road. These include road construction and severe accident.
- 3) Following a significant change of operations performed on the route
- 4) During dry season and another during the rainy season.

After each delivery to the mine, drivers and escort leader reports major changes on the road conditions especially major deterioration, ongoing road works to the QHSE Manager. The operation has a Route Survey Procedure. The TMP is reviewed every 2 years. Africa Transport took into account the following when conducting the route survey:

- Population density
- Infrastructure
- Size of the road,
- Slopes, bridges, distance
- Number of towns and villages,
- Railway Crossings
- T-intersections
- Helipad
- Construction and general condition,
- Gradients and Steep turns
- Speed bumps
- Parking areas
- Schools
- Proximity to rivers and water,
- Road sealed or unsealed.
- Pitch and grade of road and road conditions for wet and fog

The operation has conducted Route Risk Assessment (RRA) from Conakry port to SMM mine which is located close to the town of Loila a distance of 775Km. The steps to follow in conducting the route survey have been captured in the route selection procedure.



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Population density in towns and villages along the route has been taken into account during the Route Selection Procedure. This was covered in clause 1 of the Route Selection Procedure.

Also, population density has been taken into consideration in the RRA and have been evaluated and documented.

Route Surveys conducted by the company took into consideration, the infrastructure of the roadway, construction activities on the selected route and general condition of the road.

RRAs that have been conducted reveal that different hazard types were considered and evaluated. It was evident from documentation presented that the findings with respect to road infrastructure and road condition were taken in consideration. Road markings on tarred road, surfaces and condition of road surface, impact of temperature on road surface, edges of tarred roads, inclines, adjoining roads and the possible effect should vehicles need to pull off the road, pitch and grade, rivers, water sources nearby and weather conditions have all been captured in the RRA.

Pitch and grade of roadway from Conakry to the mine site was taken into account when conducting the route risk assessment.

Africa Transport has implemented processes to periodically re-evaluate risks in the routes used for cyanide transportation and has a process of getting feedback on the risks noted by drivers / convoy leaders during journeys to the mine. The operation has a Risk Assessment Procedure Document No. CNT-Risk-001 which addresses evaluation of risks of selected cyanide transport route. Route surveys are conducted at least twice every year. It was evident that RRA's have been conducted in 2021 and 2022. After each delivery of containers to the mine. Escort leaders and drivers are given the opportunity to comment on areas of concern on the route or areas which are found unsafe to travel during the de-briefing sessions.

Prior to departure of the convoy of cyanide trucks, tools box meetings are held, and participants sign attendance sheets to indicate their presence. The QHSE department is responsible for organizing the toolbox meetings. The meetings are attended by the drivers, escort team and the police. Evidence of toolbox meeting attendance sheets have been placed on record.

The TMP requires route survey to be revised periodically. The Transport Management Plan mentions a process of continuously evaluating the transportation route using feedbacks obtained on the road condition after each trip. The Escort Leader completes a feedback report form on the road condition after each trip of cyanide delivery to the mine site. Route survey reports show periodic reviews of the road conditions from Conakry port terminal to the mine. Precautionary measures have been implemented. The TMP is also reviewed when necessary, depending on the feedback on the road conditions.

The operation has a system of getting feedback on the road conditions and addressing the risk during feedback reports and putting in controls to eliminate or reduce the risk. Reports on each convoy specifying the road condition and how the journey went are captured in the reports. Reports show pictures of toolbox meetings, convoy of trucks and road condition. Feedback report form (Debriefing Retour Voyage doc# FO/LOG/27) is completed after each trip to the mine.

The state of the road which includes changes such as constructions on the road, potholes and sharp diversions which were identified after each delivery to the mine site details the condition of the road are documented. The company's Route Risk Assessment Procedure outlines the category of risks to be identified when conducting a route assessment, risk ratings, and the necessary controls to prevent any incidence as well as the responsible persons. Measures to reduce risks are covered comprehensively in the RRA. The control measures to the hazards identified in the RRAs are captured in the feedback reports which are kept on record.

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It was evident that Route Surveys have been conducted over the years. Recommended preventative actions to mitigate or eradicate the risks on selected route are included in RRA assessment document. The identified risk or changes on the route are discussed at toolbox meetings prior to departure of the next convoy. This is to ensure that each person in the convoy get to know the current risk on the route. Attendance registers of those present during the toolbox meetings are kept on record. Those who attends the meetings signs the attendance sheet to acknowledge that such training was presented. There is evidence of training attendance sheets on filed depicting the training programs.

Africa Transport has made consultation with the Guinea police, hospitals, gendarme, police and Ministry of Transport (Ministere Des Transport).

There is evidence of letters of notification to the Guinea police addressed to the Director General of Internal Intelligence (DGRI). As per the guidelines in Guinea, letters are written to notify the police anytime there is a convoy of sodium cyanide shipment departing to the mine. The police then assign two policemen as part of the escort anytime there are deliveries to the mine. Africa Transport has also sought input from the Civil Protection Unit. The Civil Protection Unit is responsible for community consultations which is part of their mandate. The Civil Protection Unit, Gendarme and hospitals in some selected towns along the transportation route have been consulted accordingly and evidence placed on record.

The company has a valid operational permit number 836/MT/CAB/SGG/2020 which was issued to them by the Ministry of Transport. This permit grants permission for the company's transportation of cyanide and other transportation activities. The permit is valid for 3 years and renewed after the expiration of the validity.

Africa Transport uses convoys with escorts to ensure safe delivery of cyanide shipment to the mine site destination. Africa transports uses its own escort team comprising of Escort Leader and escort driver, two (2) policemen, and occasionally one (1) Guinea Customs official. For convoys exceeding 4 trucks, two escort vehicles are used one in front of the convoy and one at the rear. Africa Transport does not subcontract any of their operational activities.



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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:

Africa Transport has a Recruitment Procedure (Procédure de recrutement et Intégration du personnel doc# PRO/RH/) dated 15th January 2020 version 03. The Recruitment procedure specifies the process of selecting a driver for employment. First, application is invited from qualified drivers to apply after which a pre-selection of candidates is done according to the following criteria.

- 1, Prospective applicant should be between 23-48 years.
2. He must have a valid driver's license.
3. Must have a minimum of 3 years' experience
4. Must have a guarantor

The prospective driver is expected to present.

1. Job application
2. 4 passport size photos
3. Guinea Residence certificate
4. Medical report
5. CV
6. Birth certificate
7. Copy of previous work certificate
8. Photocopy of identity card
9. Police extract about the driver
10. Valid driver's license

Before drivers are selected, they undergo theoretical and practical test. At the end of the training qualified drivers who pass the test are appointed permanently. Appointed drivers are taken through training and mentoring. The training they undergo is as follows and these have been captured in a training matrix.

- a) Defensive driving
- b. Road Risk Evaluation

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- c. Highway code
- d. Fatigue management
- e. Fire Fighting
- d. Cyanide Awareness training
- e. Emergency response and ER scenarios
- f. Health and Safety at work
- g. First Aid
- h. Alcohol, medical and drugs management
- i. Manual handling

All drivers are expected to have category "C" license.

Each of the training programs are organized once/year. Drivers answer questions posed to them verbally after the training to ascertain their knowledge about cyanide.

The details of training and a video used for the cyanide awareness training were found to be appropriate and comprehensive.

Yearly, ER scenarios are performed to ascertain the understanding of drivers and escort team during mock drills. Drivers attend toolbox meetings organized by QHSE department prior to each departure.

Drivers driving in convoy are under the strict supervision of Escort leader. After each cyanide training, certificates are issued to each participant. New drivers undergo defensive driving training before they are allowed to drive a cyanide truck. Certificates of selected drivers were noted and are record. Records show Training Attendance sheets for Cyanide Awareness training. Validity of driver's licenses is checked during pre-departure checks by the Logistics Coordinator to ensure that they are valid. Copies of driving license of some selected drivers were found valid, Drivers who were interviewed to ascertain their knowledge about cyanide proved that they have been trained and are knowledgeable in cyanide handling and emergency response.



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

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

Summarize the basis for this Finding/Deficiencies Identified:

Africa Transport's uses Renault and Genlyon vehicles with the following configurations to transport cyanide to the mine.

1. 4x2 axles vehicle with 3 axles flatbed trailer to carry 2x20ft container (total weight of 46.4mt)
2. 6X4 with 4 axles interlink trailers to carry 2x20ft containers (46.4mt)
3. 4x2 and 6x4 trucks with 2 axle trailers to carry 1x20ft container (total weight of 23.2mt)

All the cyanide vehicles are equipped with GPS tracking systems. The HP (Horsepower) of the 6x4 vehicles is 440 and the HP of the 4x2 configuration of trucks is 450. The weight per axle for each loaded truck is 9.12mt which is within the Guinea maximum axle load regulation of 13mt/axle. The trailers that are used are both flatbed and skeletal trailers.

Prior to departure inspections are carried out using a vehicle pre-departure checklist (Reference# FO/QHSE/19). Defects noted on vehicles during inspections are repaired immediately before departure. If any defect is picked up, a work order (Ordre de travail) is raised, and defect(s) are rectified.

Evidence of work orders are on record. The Park Manager is responsible for raising the work orders after inspecting the trucks with the driver and QHSE Officer. The head mechanic ensures the defect is rectified and then signs off the work order form indicating the work done. The Workshop Manager countersigns the same work order to confirm that the defect on the vehicle has been rectified.

Pre-departure checklist for vehicles numbers selected trucks were reviewed.

The company uses only new tyres as replacements on vehicles dedicated for the transportation of cyanide. No recapped tyres are used. Pre-trip inspections are conducted on each truck prior to departure and checklist signed by the QHSE Officer and the driver. The operation has a routine maintenance and periodic maintenance programs for all its vehicles. In case of a breakdown on the road, the operation has a mechanical team who will quickly organize themselves and drive to the site of the broken-down truck and repair it. The maintenance records for work done on some days have appropriately been placed on record.

Each 6x4 truck trailer configuration carries two containers of weighing approximately 46.4mt the maximum required load per axle for vehicles as per the laws in Guinea is 13mt. The load per axle in 13mt. The load per axle for 6x4 trucks loaded with 2 containers is 9.1mt/axle. The 4x2 axle trucks with 2 axle trailers carry 1x20ft containers with total weight per axle of 9.3mt. The total weights that are carried by the trucks are within the required regulations in Guinea. Prior to departure of the trucks from the port they are weighed by the port Authorities.

Trucks which are found to be overloaded will be penalized by the authorities by imposition of a fine on the transporter. The Guinea Port Authority issues an interchange specifying which specifies the state of each of the containers. Evidence of copies of interchanges have been put on record. Waybills covering each container of cyanide are issued by Africa Transport. The waybills as well as the Bill of Ladings have the weights of each container of sodium cyanide on them.



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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:

The company's Transport Management Plan (Doc# PRO/CNC/03) describes the packaging of the sodium cyanide. Sodium Cyanide in briquette form is packaged in Intermediate Bulk Containers (IBC's). The cyanide in briquette form is packed in hermetically sealed PVC bags. The weight of each product in the IBC's is 1000kg. The bag is enclosed in a woven polyethylene bag that is encased in a custom designed strong plywood box and covered with a wooden lid. The boxes are strapped around with steel strapping which supports packaging further. The box is placed on a pallet to provide further protection during transit. The IBC's are stacked into 20ft sea freight container and the shipping container doors secured with seals having unique seal numbers. The seal numbers are stated on the Bill of Lading.

Prior to departure of a convoy, the Escort leader and the driver inspect the truck as well as the container. The pre-departure checklist is then completed. The container number and seal numbers are written on the checklist. The checklist is completed by the Escort leader. The information that is filled are the name of driver, container seal number, vehicle number, trailer number, container number and the gross weight of the cyanide. The checklist is signed off by both the driver and the escort leader.

Upon arrival at the mine site, the mine site personnel will sign the waybill acknowledging receipt of shipment in good condition.

Before the loaded trucks departs from the port of Conakry it is the responsibility of the Escort Leader and the driver to check the condition of each container as well as whether the seals are still intact on the doors. Each trailer of the trucks has twist locks which are inspected to ensure that they are firmly in place. Enroute to the mine, the condition of the container and seal are checked by the Escort leader anytime the convoys stop briefly at the designated resting stops. This is to ensure that the containers are properly secured to the trailers. The container waybills issued also has the container numbers and seal numbers on the container. Copies of waybills were verified. Journey plans (doc#FO/LOG/01 version 2) which show the times the convoy stops and time it departs whilst on the road to the mine were noted.

The cyanide manufacturer has visibly placarded all four sides of the cyanide containers as required by the International Maritime Dangerous Goods Code(IMDG) code of Practice. Placards are displayed on all four sides of the freight container. Hazard Class 6, skull & cross bones, UN number 1689, and Marine Pollutant labels are used. In addition, the required placards namely marine pollutant and hazard Class 6 and cross bones are displayed in front and at the rear of the trucks.

Africa Transport has implemented a safety program that includes Vehicle Inspections. Africa Transport has a vehicle pre-departure checklist. Vehicles are inspected and the checklist completed prior to departure. A work order is raised when any fault is picked up during the inspection and defect rectified before the convoy departs. Copies of checklists are signed off appropriately by the Escort leader and the driver. Another inspection is carried out on each truck upon return from a to the mine site. A checklist titled "Checklist Retour is completed. This inspection is carried out to ascertain whether there are no defects or any fault that has arisen during the trip. Escort equipment is also inspected, and an Equipment's Checklist is completed and signed off by the Escort Leader. Evidence showing completed copies of escort equipment checklist is on record.

Africa Transport has a Maintenance Procedure (Procédure de planification Et Réalisation Des Travaux De Maintenance) document # PRO/MAN/01.

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The company has both preventive maintenance and periodic maintenance program. When any fault is identified during vehicle inspection, the Park Manager is immediately informed who then raises a work order and escalates it to the workshop manager.

The fault is worked on, and vehicle tested, and the work signed off by the mechanic who worked on it and countersigned by the Workshop Manager. The Maintenance Procedure indicates that trucks are serviced at 10,000Km intervals as per the manufacturers' guideline. The operation has a software application called Nimba Software which is used for scheduling periodic maintenance and fault rectification requests and subsequent repairs of a particular truck. The software has all the history of work done and schedule of works to be done on the company's vehicles. The software ensures that no truck is missed when maintenance on a particular vehicle is due.

The speedometer readings (in Kilometers) showing the distance each truck has travelled are recorded on the pre-departure checklist during pre-departure inspection. This also ensures that the workshop does not miss any truck which is due for servicing.

Upon return from a trip each truck is inspected, and faults identified are fixed. The company has three escorts pick up vehicles. Evidence show that maintenance is carried out on trucks as well as the escort vehicles.

All vehicles undergo inspections (Carnet d'Expertise Technique) every six months which are conducted by the Ministry of Transport a government agency. The ministry issues certificates to prove that the vehicles are road worthy to continue to do delivery of cyanide after their inspection. Copies of certificates of selected trucks were evident that those independent inspections are carried out by the government agency every six months.

The company has a tyre management procedure # PRO/MAN/02. Tyres is inspected periodically to ensure that they are in good condition. During pre-departure inspections, tyres of each vehicle in convoy are also inspected and the condition of tyres noted on the pre-departure checklist. A tyre inspection form is completed any time tyres are changed on a particular vehicle. The tyre inspection form shows the brand of tyres changed, the serial numbers and the location on the tractor unit or the trailer. Tyers is replaced when they have done between 25,000Km - 30,000Km or as and when necessary.

As per the Transport Management Plan (doc # PRO/CNC/03 drivers are to respect the stipulated driving hours and take 15 minutes break for every 2hrs drive and 30 minutes for 4hrs of continuous driving. To conform to the fatigue management policy of the company the operation has developed a journey plan form (document # FO/LOG/01) which is completed by the Escort leader anytime the convoy stops for the drivers to take rest and the time of departing where they stop. No night driving is permitted and is strictly prohibited. Permitted driving hours is from 6am to 6pm. The GPS is monitored by the Trucking Manager during each trip to ensure that the convoy conforms to all the required driving regulations till they arrive at the mine destination. Completed copies of journey plans were noted.

Africa Transport has a procedure "Choosing trucks for Loading Operations" which states that a special attention is made to ensure that twist locks and the fifth wheel are well fitted on trailers to avoid unhitching during driving. The checklist also makes provision for checking that the twist locks are firmly in place prior to the departure of the trucks. During brief stops for rest or a brief refreshment break, twist lock as well as the entire container are inspected, and the outcome documented. A checklist "Tours Du Vehicle" is completed after the inspections before the convoy continues its journey. Evidence of copies of completed "Tours du Vehicle was verified.

The RRA covers various conditions such as bad weather conditions, violence or civil unrest. Drivers are to stop in case of bad weather condition that impacts visibility of the drivers. The convoy is to stop and park at safe location until any civil unrest or violence is over before the journey is continued.

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The company has a Drug and Alcohol policy (Doc# PO-DA-REV-02-2021) that prohibits the use of drugs and alcohol whilst at work. Alcohol tests are performed periodically by the QHSE team.

Alcohol test checklist (doc# FO/QHSE/40) is completed with the results of the tests performed indicating the name of driver, test result, date and signature of the QHSE person. Copies of alcohol tests records show the implementation of the drug and alcohol policy of the company.

The company has a document control procedure (Registre de Conservation des information Documentees document #FO/QHSE/03). All documented evidence of the activities conducted has been retained appropriately. Documents are retained for a minimum of 3 years.

Copies of all relevant notifications, permits and other documents have been maintained appropriately.

Africa Transport does not subcontract.



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

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

Summarize the basis for this Finding/Deficiencies Identified:

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



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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:

Africa Transport has radios in each of their trucks. Each driver has a Walkie Talkie and Orange Mobile phones for communication purposes.

Communication via emails and phone are also done between Africa Transport and Bollore Guinea (owner of contract) which in turn communicates with the mine. Bollore Guinea which has an agreement with the mine communicates directly to the manufacturer. Each vehicle in the convoy is fitted with a GPS tracking system.

The GPS system is monitored 24/7 by the Trucking Manager. Emails are sent by the Logistics department to Bollore Guinea who in turn informs the mine about the location of the convoy. Emergency contact list has contact cell phone numbers of the relevant emergency responders. Real time GPS reports were verified and noted. A list of emergency telephone numbers for the various stakeholders and emergency services were also noted. All equipment were found to be operative. All the communication equipment (phones and radios) are checked and tested by Escort Leader prior to departure of the convoy. The pre-departure checks have made provision for cells phones and radios to be checked during pre-departure inspections. Evidence of completed escort vehicles pre-trip checklists were sighted.

It is the responsibility of the Escort Leader to ensure that adequate communication equipment is carried by the convoy and also the checking of the communication equipment and record the findings on the Vehicle pre-departure checklist. The Escort leader further ensures that all mobile phones and radios are inspected and radios are fully charged.

There are no black out areas identified on the road. However, the transporter has made provision by using MTN service provider's sim card in case one network drops. MTN and Orange service providers are used during the trip. Apart from the radios, the Escort leader also travels with the two Sims cards from different service providers for the trip.

The operation uses GPS Tracking system to track the progress of the convoys. The GPS is monitored 24/7 by the Tracking Manager. The driver or escort leader is quickly contacted in case there is a deviation from the approved route. Escort Leader or driver when contacted is expected to give reason(s) for the diversion. Management is then informed and emergency response triggered when necessary. The Convoy Management Procedure specifies that email notifications are sent once every day to the client (Bollore Guinea) who then informs the mine about the location of the convoy. In case of over speeding an alert is automatically sent by the GPS to the Tracking Manager who will take the necessary action. After each delivery to the mine, tracking reports of each convoy are printed and sent to the client for their records. The client also has access to Africa Transport GPS link for them to check the location of the convoy and in turn inform its clients which SMM mine. Copies of GPS reports have been placed on record.

Shipping records such as Bill of Ladings and packing list are received by Bollore Guinea from the manufacturer. The Bill of Ladings have the number of containers, date shipped, container numbers and gross weights of the containers. Copies of Bill of Lading also show gross weights of containers.

Africa Transport does not subcontract.

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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 with** Transport Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

The transporter does not store any cyanide. Africa Transport does not have a cyanide trans-shipment depot or interim storage for Sodium Cyanide.



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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:

Africa Transport has an Emergency Response Procedure (ERP) document number PRO/CNC/04 which details the procedures to be adopted and the required actions during all phases of emergency response and management associated with the transport of sodium cyanide from Conakry port to SMM mining site.

The ERP is designed to provide the following.

1. Descriptions of response actions as appropriate for the anticipated emergency situation.
2. Physical and Chemical form of sodium cyanide transported.
3. Sufficient instructions to effectively deal with a cyanide transportation emergency
4. Minimization of risk to the public, environment, contractors, employees, emergency responders, property and equipment.
5. Roles of outside responders, medical facilities and communities.

The contents of the ERP were found to be appropriate to the company's transportation operations. The ERP contains the required PPEs which are part of the escort equipment. The escort equipment includes: Safety hat, Rubber Gum boots, Goggles, Neoprene Gloves, Disposable Overall; HCN detector, and Oxygen resuscitator.

The roles and responsibilities of external responders are stated in the plan. Different possible incident scenarios have all been addressed in the ERP. The ERP and the Transport Management Plan (TMP) are specific to the transportation routes used by the company.

ER Procedure is applicable for the transportation of cyanide from Conakry-India-Memo-Dabble-Kouroussa-Kankan-Mandiana (SMM mine site). The RRA, TMP and ERP took into consideration the road condition which includes rivers, slopes, curves, bridges, gravelled and un-gravelled portions of the road, road surface or dirt roads etc. The contents of the ER Procedure were found to be appropriate for the activities it has been designed for as it addresses issues particularly for the road transportation of the sodium cyanide.

The ERP mentions the physical and chemical composition of sodium cyanide. It describes the nature of cyanide and its packaging and other chemical properties. The plan describes the physical and chemical properties of the sodium cyanide. It details the results of reactions when on contact with acids and other incompatible chemicals and when exposed to moisture. The type of placards, namely toxic six and Marine pollutant labels. The plan further addresses the neutralization of released cyanide.

The emergency procedure focuses on the transportation of cyanide by road. No transportation is done by rail or sea. Route surveys RRA have been conducted for the transportation routes from Conakry port to the mine site.



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The ERP considers all aspects of transport infrastructure. The transport infrastructure is covered in the RRA. Evaluation of the route is done during route survey and outcome is mentioned in the route survey report. The nature of the roads, tarred or untarred, slopes, bridges, water bodies, towns and villages are appropriately covered.

The company's ERP considered the design of the transport vehicle. Africa Transport uses the following vehicle configuration for the transportation of cyanide.

1. 4x2 trucks with 3 axles flatbed trailer to carry 2x20ft container (total weight of 46.4mt)
2. 6X4 trucks with 4 axles interlink trailers to carry 2x20ft containers(46.4mt)
3. 4x2 and 6x4 trucks with 2 axle trailers carry 1x20ft container (total weight of 23.6mt)

The ERP gives descriptions of response actions by various emergency responders as appropriate for an anticipated emergency situation.

The plan addresses the following four (4) incident scenarios.

- 1) Rollover of cyanide shipping cyanide container on dry ground without any spillage.
- 2) Rollover of shipping cyanide container resulting in spill on dry ground
- 3) Rollover of shipping container into water body.
- 4) Rollover of cyanide container resulting in injury.

The ERP addresses the roles of emergency responders namely Guinea Police, Gendarme, Ambulance, Fire Service, Ministere De Environment, and the mine site (SMM Mandiana).

In the event of an accident the Escort leader will notify the QHSE Manager who in turn will notify management about it. The QHSE Manager will then inform the company's crises management team. The QHSE Manager will activate the emergency response immediately. The Escort leader will contact the local authority and supporting government agencies. The ER team led by the escort leader will then cordone off the area and move people upwind. Action will be taken by the ER team to do a cleanup, neutralize and recover the container(s). The overall coordination and management of an incident is the responsibility of the Escort Leader in consultation with the QHSE Manager.

The ERP contains the phone contact numbers of all external responders namely Guinea Police, Gendarme, Ambulance, Fire Service, Ministere De Environment and the mine (SMM Mandiana).



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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:

The company has a training program for all its workers.

The TMP details the following general training for both drivers and escort team.

1. Proficiency in the management of emergencies involving the spill of sodium cyanide
2. Proficiency of understanding emergency procedures in the event of a cyanide spill
3. The recognition and classification of sodium cyanide
4. Specific transport procedures and precautions
5. General awareness in cleanup operations.

Training is conducted practically and theoretically on cyanide handling.

Africa Transport has the following mandatory training programs.

- a) Cyanide awareness training
- b) Health & Safety at work
- c) Defensive driving
- d) Emergency response
- e) Fatigue management training
- f) Highway code (driving code)
- g) Fire Fighting
- h) First Aid Training

All the training are conducted once per year. It was evident that training has been conducted in the past years. There is evidence of two years records of training attendance sheets.

The training details cover all aspects of cyanide awareness and emergency response. The QHSE Manager is responsible for conducting the training.

Training matrix shows annual refresher ER training which are organized for employees. To ascertain the effectiveness of the training, assessment of participants are done by verbal assessments (questioning and answering verbally).

The ERP give details of the duties and responsibilities of the escort team and each emergency responder. In case of an incident, the Escort Leader will be in charge of the overall management of the incident. He takes the appropriate measures for the management of any emergency in consultation with the emergency responders.

The company's transport department will be responsible for providing human and material resources for the proper management of emergency situations during cyanide transportation incident. The police will assist in traffic



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management, moving of people from the accident area, protect people and secure the incident site and write their accident report. The Fire Service will be in charge of providing assistance to victims in the event of an emergency. The administration of 100% oxygen to a victim is the responsibility of the Escort team leader. The hospitals are responsible for the treatment or administration of antidote to a person poisoned by cyanide. The Ministry of Environment will give expert advice and also advice on remediation measures.

Africa Transport has a list of emergency equipment document No.CL/CND/01 containing the names of the individual items and quantities.

The list of equipment is

1. Oxygen resuscitator
2. Tyvek Overalls
3. Cyanide Antidote kits
4. First Aid kits
5. Full face respirator and filter
6. HCN Detector
7. Spare filters
8. PVC gauntlet gloves/overalls
9. Rubber boots
10. Safety triangles
11. Convoy signs
12. Cones
13. Shovels
14. Broom
15. Tarpaulin
16. Bulk bags
17. Plastic bucket
18. Spray pack
19. Reflector tape
20. Ferrous sulphate
21. Touch
22. Water drums (200liters)
23. Danger flags
24. Distress device
25. 3meter
26. Sodium hypochlorite
27. Torch light
28. Megaphone
29. Radios
30. Digital camera
31. Oxygen resuscitator
32. Cyanide antidote (Cyanokit)
33. 6Kg Fire extinguishers
34. Helmets

Calibration certificate of the HCN gas detector is evident that the detector has been duly calibrated. The calibration of the gas detector was done by Shenzhen JKD Technology Co. Ltd.



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The Escort leader is responsible for the equipment. As per the ERP, the escort equipment is inspected at regular intervals and before a convoy departs to the mine. This is to ensure availability and operability. Emergency equipment's are carried in escort vehicle during the journey to the mine site.

The Escort Equipment is kept in the QHSE Manager's office and buffer stock of the spares at the company's warehouse.

The ER equipment's are inspected by the escort leader prior to departure of a convoy. An escort equipment checklist is completed after the inspection.

Africa Transport does not subcontract.



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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:

The operation has procedures and current contact information for notifying the appropriate stakeholders. The Reporting and Investigation sections in the ERP states that all incidents and near misses during the transport operations are to be reported to Africa Transport QHSE department. This will allow for investigation of events and causes, and for tracking any follow up actions that arises. All transport incidents or accidents are to be reported to the relevant competent authorities as required.

The ERP has the list of Emergency contact phone numbers of external responders such as police, gendarme, Civil Protection, Ambulance, Fire Force, Hospitals, Bollore Guinea and the mine (SMM). Consultation with the mine and the cyanide producer is done by Bollore Guinea which has a direct contract with the mine and has subcontracted the transportation leg of the business to Africa Transport. The Civil Protection Authority of Guinea is responsible for community consultations.

Revision of internal and external notification and reporting procedures are kept current by QHSE Manager. As per the ERP, the ER contact numbers are reviewed and confirmed twice a year during a route survey. The QHSE and Operations Managers are responsibility for updating the list of current internal and external emergency telephone numbers as well as the reporting of incidents to the authorities.

The ERP details a procedure to notify ICMI about any significant cyanide incidents that may occur. These include the following events:

- a) Human exposure that requires an action such as decontamination or treatment.
- b) Accidental release which enters natural surface waters, on or off-site.
- c) Accidental release that occurs off-site or migrates off-site.
- d) An onsite release requiring action by an emergency response team.
- e) A transport incident requiring emergency response for cyanide release.
- f) In case of a multiple wildlife fatalities where cyanide is the cause
- g) In case of theft of cyanide



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

The operation is **X in full compliance with** Transport Practice 3.4

Summarize the basis for this Finding/Deficiencies Identified:

The ERP discusses remediation procedures for the following.

- Clean up and recovery of sodium cyanide solid material
- Neutralization and disposal of contaminated soil
- Neutralization and disposal of recovered solution.
- Neutralization and or disposal of removed topsoil.

The process of neutralization of soil using ferrous sulphate has been addressed appropriately in clause 17 of the ERP. The Escort team leader is responsible for the initial overall management of recovery in consultation with the external responders.

Any contaminated soil or product removed during clean-up will be sent to the mine site where the waste will be disposed off appropriately by the mine.

Clause 20 of the ERP prohibits the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.



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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:

Africa Transport's ERP makes provisions for periodic review and evaluation of the response procedures and capabilities adequacy, and they are being implemented. As per the procedure, the ERP is reviewed at least every two years or when changes to system or procedures make it necessary. The biennial review is initiated based mainly on Africa transport document control system. The ERP has been reviewed once with a current reviewed date of 27/09/21.

The ERP makes provision for annual emergency response drills. Cyanide Emergency exercises are conducted annually involving drivers, HSE and logistic agents. Training is organized by the QHSE department of the company. The QHSE Manager is responsible for developing the strategies and training outcomes. The training matrix also makes provision for emergency drills to be conducted once annually. Recent mock drill was conducted on 1st June 2021. Mock drill report dated 5th June 2021 noted and content was scrutinized. The report describes the incident scenarios, participants, non-conformities and corrective action plans.

The operation has a procedure to evaluate the plan's performance after its implementation. There is a provision made in the ERP for periodic reviewing and evaluation of the procedures. Records of mock drill reports shows that mock drills were repeated to ensure that any non-conformities are rectified. Non-conformances noted during the last drill were appropriately addressed. Mock drills are evaluated through debriefing and corrective action plans put in place to correct any lapses. The corrective action plans are used to revise the procedures.

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A handwritten signature in black ink, appearing to be 'J. M. M.', written over a horizontal line.