INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE (ICMI)

Transportation Summary
Re-Certification Audit Report
TRANSPORTATION SUMMARY AUDIT REPORT

Alistair Group,
Alistair James Company,
P.O.Box 4543, Plot no.27, Kurasini Street,
Dar es Salaam

15 and 16 April 2025

For the
International Cyanide Management Code

Operation General Information

Name of Transport Operation:	Alistair Group
Name of Facility Owner:	Alistair Group
Name of Facility Operator:	Alistair Group
Name of Responsible Manager:	Mr Manyanda Maziku
Address:	P.O.Box 4543, Plot no.27, Kurasini Street, Dar es Salaam
State / Province:	Dar es Salaam
Country:	Tanzania
Telephone:	Landline +255 753 715 554 Mobile +255 713 123 932
Fax:	N/A
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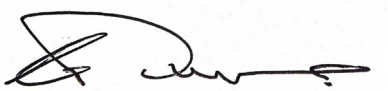
Operation Location Detail and Description
Alistair Group is a privately owned and operated company with its Headquarters in Dar es Salaam, Tanzania. The company provides short to long-haul transport services in the East, Central and Southern Africa region.

Alistair Group currently transports various chemicals and other commodities throughout the region.

The company has two vehicles workshops sites in Dar es Salaam where it conducts all its vehicle and tyre maintenance.

Auditor's Finding

Alistair Group Name of Operation.	 Signature of Lead Auditor	07 October 2025 Date

This operation is in
X full compliance
☐ in substantial compliance
☐ not in compliance
with the International Cyanide Management Code.

Compliance Statement

This operation has been found to be in full compliance with the requirements of the ICMI Cyanide transportation re-certification audit requirements. This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle

Auditor Information

Audit Company: Transheq Consulting and Auditing (Pty) Ltd

Lead and Transportation Auditor: Richard Durrant

Lead Auditor Email: richard@transheq.co.za

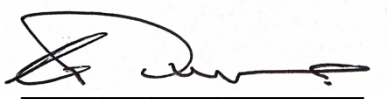
Names and Signatures of Other Auditors: N/A

Dates of Audit: 15 and 16 April 2025

Auditor Attestation

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

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

Alistair Group		07 October 2025
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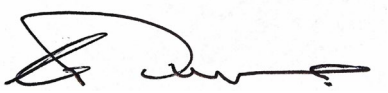
Alistair Group		07 October 2025
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Principles and Standards of Practice

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

Standard of Practice 1.1
Select cyanide transport routes to minimize the potential for accidents and releases.

X in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.1

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

A Cyanide Transport Management Plan (CTMP) is in place that outlines the measures to be undertaken during transport. Each cyanide transportation route is subject to a comprehensive route assessment from the port of entry to the designated mine site or supplier warehouse. The requirements for route assessments are laid out in the route selection, risk assessment & re-evaluation procedure. Subsequently the route assessment forms the basis of the route assessment data collection and risk assessment. Route Assessment Data Collection forms are in place for specific routes travelled.
Reference is made to high population densities and activities along the route especially where towns and villages exist and to traffic volumes as an indication of population density on the various routes travelled.
Infrastructure is considered regarding route road types, construction, nature of surface, dirt, rutted, poor road conditions, speed bumps, long term deviations, narrow bridges, one-lane bridges, steep downhill's (pitch and grade), sharp bends and other significant traffic hazards. Significant water bodies, crossings and bridges along the routes are noted and recorded as are any accessibility issues that may arise during the wet season. A Cyanide Convoy Feedback Form is used to record all aspects of the cyanide convoy and record all pertinent issues that arose during the convey. Opportunities for improvement are listed and persons responsible for actions and timeliness for completion are recorded, Route Condition Feedback Form is used by the Convoy Leader to record any significant changes to route conditions or circumstances of each trip conducted such as records significant changes to route conditions but also documents the measures taken to address the identified risks. This is achieved through the following process: noting any significant route condition changes (e.g., flooding risks, new settlements, road diversions, changes to checkpoints or border posts). The recorded changes feed into the Route, Data and Risk Assessment ensures that risks highlighted (rated Green/Yellow/Red) are matched with appropriate control measures such as reduced speed zones, driver instructions, grouping of vehicles at night, and emergency response planning. The route assessor and HSSEQ Officer review all data and ensure that every identified medium or high risk has corresponding documented controls. This ensures route risk assessments are living documents that evolve with changing conditions. HSSEQ (Health Safety Security Environment and Quality) Officer will review all data and ensure that every identified medium or high risk has corresponding documented controls. This ensures route risk assessments are living documents that evolve with changing conditions.

GCLA (Government Chemist Laboratory Authority) Sodium Cyanide transport permits are in place for every load of Cyanide transported. Routes to be followed are specified on the GCLA permit. Tanzanian Roads Authority (Tanroads) have specific restrictions on height and mass on some routes. These restrictions are identified during the compilation of each Route Data and Risk Assessment Form. No specific permit is required from Tanroads provide the

vehicle/load is not Out of Gauge. Police Stations are consulted during Route Data and Risk Assessment and Police National Emergency and Rescue Force and individual Police Station contact numbers are listed in each Route Data and Risk Assessment Form. Hospitals are consulted and emergency numbers listed on Route Data and Risk Assessment. The communities on route are not specifically consulted but the vehicles are clearly marked with a sign "Poisonous Danger" in the local language being Swahili as well as red flags on front and rear of each vehicle combination. Meet with police stations, fire stations, clinics, hospitals and emergency service providers to discuss Cyanide, gauge their concerns, control mechanisms, logistics for emergency response, response to poisoning, response to an accident, evacuation as stated in Transportation Route Analysis and Risk Assessment.
Convoys are used in all instances irrespective of the number of containers of Cyanide being transported. CTMP states that all cyanide containers will travel in convoys and will be escorted by one escort vehicle per convoy. A maximum of ten (10) trucks will make up a convoy. A fully equipped Emergency Response Vehicle (ERV) will accompany each convoy irrespective of the number of containers being transported.
No sub-contracting of Cyanide is permitted in terms of company protocols and risk standards.

Standard of Practice 1.2
Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

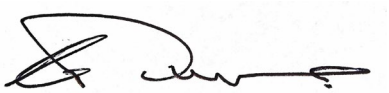
X in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.2

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

Driver Recruitment Training & Retention Procedure contains Selection and Recruitment Guidelines. Applicant must have at least five years driving experience on the type of vehicle required to be driven in the company. The applicant must possess a valid driving license for the appropriate vehicle to be driven. Applicant's age should be between 25-45 years at the time of recruitment. A clean driving record and knowledge of highway rules is required. A pre placement full medical examination and OSHA (Occupational Health and Safety Authority) medical is conducted. Twelve months after completion of initial training the Driver Trainer is to recall the driver for annual refresher training. Annual Refresher training must always be completed before 12 months have elapsed to ensure currency and competency. Cyanide Awareness/ERV & Convoy/ERV Response Training is company mandated annual training requirement. HAZMAT (Hazardous Materials) Training is only valid for 12 months. GCLA training certificates are required for all drivers transporting chemicals as a minimum. A Training Matrix is maintained on the Alistair Group Intranet indicating training required, training completed and re-training dates.
Advanced Cyanide Awareness PowerPoint training programme is in place. A Training Matrix is maintained on Alistair Group Intranet indicating training required, training completed and re-training dates for drivers, mechanics, welders, tire hands, vehicle washers and auto electrician. Safety Transportation of Sodium Cyanide training was conducted on 27/01/2025 and during a mock emergency drill conducted on 10/06/2025. Limited load of cyanide are currently being transported and no loads were transported in 2024.
No sub-contracting of Cyanide is permitted in terms of company protocols and risk standards.
No outsourced maintenance or tyre repairs or breakdown are conducted, only in house workshops and cyanide trained staff are utilised.



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Standard of Practice 1.3
Ensure that transport equipment is suitable for the cyanide shipment.

X in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.3

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

Truck tractors (6x4 axle configuration) drawing three axle flat deck or skeletal trailers with container twist locks are used for the transportation of chemicals. These same vehicles are used for the transport of solid cyanide boxes packed in 6 metre ISO sea containers. No forklifts or cranes that are operated by Alistair Group are used for the loading or offloading of Cyanide. All loading and offloading equipment for the handling of Cyanide will be supplied by the loading point and the gold mines for offloading.
Maintenance procedures and records are in place. Maintenance Works Instruction Manual and Road Freight Heavy Vehicle Maintenance is managed on Fleet Maintenance Pro (FMP) an electronic based vehicle maintenance programme. This Procedure describes the correct method to be used when completing any maintenance tasks on FMP. Service intervals are specified for all heavy trucks. Truck and trailers are serviced as mated combinations.
One six metre sea container is loaded onto each vehicle combination and the mass of the load is well within the Tanzania Road Traffic Act mass load limit on such a vehicle combination. Vehicle capacity is well within the loads imposed. The inspection of a trailer's framework/chassis forms part of the pre-trip checklist under chassis damage. Checks on framework/chassis for cracks and deformity are also conducted during routine maintenance.

Load Security procedure states that freight containers like ISO containers, swap bodies etc. with a mass of more than 5.5 tonnes can only be carried on vehicles fitted with twist locks. Twist locks to be regularly inspected for wear, damage and operation defects. Each time cargo has been (un)loaded or redistributed, inspect the cargo and check for overload and/or poorly balanced weight distribution before starting the vehicle.
No sub-contracting is conducted for cyanide transport and Alistair Group are aware of the necessary process of making any sub-contractors aware of Code requirements well before any cyanide transport may take place.

Standard of Practice 1.4
Develop and implement a safety program for transport of Cyanide.

X in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 1.4

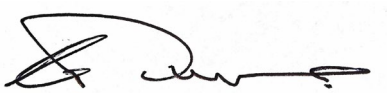
☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

Load Security procedure specifies that before the vehicle is loaded, it should be checked to ensure that its load platform, bodywork and any load securing equipment are in sound and serviceable condition. The packaging for the Cyanide being imported will conform to the International Maritime Dangerous Goods Code (IMDG) and is packed at source by the producer/consignor. The container will remained sealed for the duration of the delivery journey

to the mine. Convoy leader will ensure that the split placarding on the shipping containers is visible on four sides of each container on collection at the Port. Toxic UN 1689 Placard is affixed on the rear of the trailer and Toxic UN Class 6.1 diamond on the front of the truck tractor.
Detailed Pre-Start Vehicle Checklist are in use and are completed prior to each vehicle departure as well as daily on each day of each journey. Truck and Trailer Health, Safety and Environment (HSE) Inspection Checklist form to be handed to the Operations Trip Manager end of each trip for review.
The Maintenance Procedure describes the process for determining, providing and maintaining the heavy plant, infrastructure and facilities needed to achieve conformity to service requirements. Heavy Plant is defined as: Forklifts, Telehandlers, Trucks, Trailers, Service delivery vehicles, cranes, and associated mechanical equipment. Vehicle are inspected and/or services on the return from any long distance trip. Detailed maintenance records are in place in electronic format. The sea containers used to transport cyanide by road from the port to the mines and then returned empty to the port are not the property or the responsibly of Alistair Group.

Stop and Sleep Procedure in place states - A driver is required to have a minimum of 6 hours uninterrupted sleep per day (between 18h00 and 04h00). Drivers are not permitted to drive for more than 2 hours or 100 km without taking a break. This includes all convoys, He/she is to rest not less than 15 minutes every 2 hours. Should the need arise to drive between 18:00 and 06:00 drivers are required to obtain consent from their Project Controller. This procedure is monitored by the Tracking department between the hours of 05:00 to 20:00 daily. Any movement of vehicles between these "curfew hours" are monitored and investigated. Geofencing is in place to ensure vehicles follow designated routes. Safe Stop areas are also geofenced and trucks are not permitted to park in unauthorised locations. Out of Hours Report is used to request permission from the Project Manager for vehicles to be mobile beyond 18:00.
The packaging for the solid Cyanide being imported conforms to the IMDG Code and is packed at source by the producer/consignor. Twenty boxes containing solid Cyanide will be loaded into each container. The shipping container will remained sealed for the duration of the delivery journey to the mine. Container Tracking Checklist includes Seal Checks on Route to Client Site where seals must be check at once per day before departure. Any containers travelling cross border will be installed with a container tracking device for Customs purposes.
Currently limited cross border, out or Tanzania, cyanide loads are being transported.
CTMP stipulates that the Convoy Leader has the ultimate responsibility and authority to modified or suspended transportation should he/she determine that the risk to the vehicle, cargo and crews are unacceptable. Should there be a modification or suspension for transportation this will be communicated verbally to the Project Manager and recorded on the Route Condition Feedback Form. CTMP states - During the convoy the convoy leader will: 1) Contact Operations each 4 hours by SMS (Short Message Service)/ text message or phone to advise of convoy location and any circumstances affecting the convoy's movements 2) ensure that trucks/trailers are inspected at park ups for mechanical soundness 3) ensure that all container seals are checked and sliding locks remain in place.
Substance Abuse Policy - Procedure covers the use of illegal drugs, the misuse of legal drugs or other substances and the abuse of alcohol. Substance Test Registers are in place and evidence is in place that alcohol tests are conducted at the start of every day while cyanide convoys are in progress.
Records are in place for all of the records as indicated above. A Control of Document Procedure is in place. No stipulated retention periods for any company operational documents is in place. The practise is that all hard copy documents are scanned and uploaded onto the company server. The hard copies are then stored in an archive container on site. The archive container is managed by Stores Department and all documents are currently retained indefinitely.
No sub-contracting takes place.



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Standard of Practice 1.5
Follow international standards for transportation of Cyanide by sea.

X **in full compliance with**

The operation is ☐ in substantial compliance with Standard of Practice 1.5

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

Not applicable. The transporter will only transport solid Cyanide by road and is not involved in cyanide transport by sea.

Standard of Practice 1.6
Track cyanide shipments to prevent losses during transport.

X **in full compliance with**

The operation is ☐ in substantial compliance with Standard of Practice 1.6

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

CTMP describes the communication processes, contact details and escalations that may be required during cyanide transport. Communication with conveys, convoy leaders, fleet managers and HSSEQ Department (Health, Safety, Security, Environment and Quality Department) is via mobile phones and vehicle tracking. Hand held radio equipment (Walkie Talkies) are used to communicate between the convoy leader and individual vehicles in the convoy.
Emergency Response Vehicle Inspection Checklist lists all emergency equipment required to be carried on a convoy and it includes checking of GPS tracking system, hand held radios operational and ***s***atellite phone issued.
Blackout areas are monitored by Computer Information Technology (IT) Support Department together with mobile network providers. There are no blackout areas in Tanzania on routes travelled with Cyanide. Satellite phone/s are however available and issued if there is any concern regarding communication issues on any particular route.
Tracking systems are installed on all vehicles. Work Instruction Tracking - describes the process for Standard Operation Procedures (SOP) for tracking movement of trucks from the loading to the offloading site. This SOP is created to inform all relevant parties of the different processes involved in tracking movement of cargo deliveries for Alistair Group. Detailed and advanced tracking processes and records are in place and in use continually 24 hours per day. Tracking continually monitors the gap between each vehicle in the convoy.
The packaging for the solid Cyanide being imported conforms to the IMDG Code and is packed at source by the producer/consignor in 20 metre shipping containers. The shipping container will remained sealed for the duration of the delivery journey to the mine. Container Tracking Checklist includes Seal Checks on Route to Client Site check list where seals must be checked each day before convoy departure. Any containers travelling cross border will be installed with a container tracking device for Customs purposes. Currently limited cross border loads of cyanide are being transported. Driver Briefing Form is in place which lists all

applicable documents required per load. Safety Data Sheet for Sodium Cyanide UN 1689 (translated into local language - Swahili) is available and is issued for each load.
No sub-contracting is conducted

Principle 2 | INTERIM STORAGE
Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Standard of Practice 2.1
Store cyanide in a manner that minimizes the potential for accidental releases.

X **in full compliance with**

The operation is ☐ in substantial compliance with Standard of Practice 2.1

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:
Not Applicable. No interim storage is conducted. Containers of Cyanide are collected directly from Dar es Salaam Port or at the PMM Estates (2001) Limited warehouse/container terminal which is situated some 8 kms from the Alistair Group transport depot. Once containers are loaded at either location cyanide transport trucks depart directly to mine/s and they do not return loaded to the Alistair Group depot

Principle 3 | EMERGENCY RESPONSE
Protect communities and the environment through the development of emergency response strategies and capabilities.

Standard of Practice 3.1
Prepare detailed emergency response plans for potential cyanide releases.

X **in full compliance with**

The operation is ☐ in substantial compliance with Standard of Practice 3.1

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

CTMP – Cyanide Transport Management Procedures form the basis on how Alistair Group manages cyanide transportation and potential emergency response scenarios in the Africa Region.
Each cyanide transportation route is subject to a comprehensive route assessment from the port of entry to the designated mine site or supplier warehouse. The requirements for route assessments are laid out in the route selection, risk assessment and re-evaluation procedure. Subsequently the route assessment forms the basis of the route assessment data collection and risk assessment. Route assessments provide the opportunity to collate contact data for key stakeholders along the route thus providing the required contact data for the emergency contact list. Route assessments are in place for the specific routes currently travelled with Cyanide.

The operation's emergency response procedures are tailored to both the physical/chemical form of sodium cyanide (solid briquettes) and the method of transport (Intermediate Bulk Containers inside maritime shipping containers moved by truck convoys).

Physical and Chemical Form:
The Cyanide Transport Management Plan (CTMP) specifies that the scope covers solid sodium cyanide briquettes. The plan includes detailed Spill and Emergency Response Guidelines (SERGs) designed for this form, such as: Dry sodium cyanide spill inside a shipping container, Handling wet sodium cyanide IBCs, Dry spill into waterway, Decontamination of solid/liquid cyanide to soil and Fire involving sodium cyanide. These clearly demonstrate that the emergency response procedures are written specifically for cyanide in solid briquette form and anticipate scenarios where moisture or fire could generate hydrogen cyanide gas.
The CTMP requires that cyanide is transported in sealed Intermediate Bulk Containers (IBCs) inside maritime shipping containers and moved in escorted convoys. Emergency response procedures directly address this mode, including containerised cargo checks, convoy communication protocols, and company Spill and Emergency Response Guideline (SERG), which deals with spills inside shipping containers.
Spill Response Equipment Overview Checklist and Convoy Spill Response Equipment Checklist confirm that convoys are equipped with Hydrogen Cyanide gas detectors, chemical PPE (respirators, suits, gloves), sodium hypochlorite for neutralization, drums, shovels, and barriers. These align with the response measures described in the CTMP for IBCs inside containers, Handling wet sodium cyanide IBCs, Dry cyanide spill into waterway, Decontamination of solid/liquid cyanide to soil and Fire involving sodium cyanide.
The CTMP requires that cyanide is transported in sealed Intermediate Bulk Containers (IBCs) inside maritime shipping containers and moved in escorted convoys. Emergency response procedures directly address this mode, including containerised cargo checks, convoy communication protocols, and SERG1, which deals with spills inside shipping containers.
Supporting documents such as the Spill Response Equipment Overview Checklist and Convoy Spill Response Equipment Checklist confirm that convoys are equipped with Hydrogen Cyanide gas detectors, chemical PPE (respirators, suits, gloves), sodium hypochlorite for neutralization, drums, shovels, and barriers. These align with the response measures described in the CTMP for IBCs inside containers.
The emergency response procedures are appropriate and specific to the operation's conditions. They explicitly cover the solid form of sodium cyanide briquettes and the transport method (IBCs in sea containers by truck convoy), with detailed scenario-based SERGs, operational controls, and matching equipment checklists to ensure effective response.

Road transport only is conducted - Each cyanide transportation route is subject to a comprehensive route assessment from the port of entry to the designated mine site or supplier warehouse and this assessment includes the transport infrastructure being the suitability and condition of the road to be travelled.
No storage is conducted. The transport vehicles configurations for the transport of cyanide containers include truck tractors (6x4 axle configuration) drawing three axle trailers with container twist locks are used for the transportation solid cyanide boxes packed in 6 metre ISO sea containers.
The emergency plan contains details of Emergency Contacts, Emergency contact list, truck and trailer inspection checklist, cyanide container check sheet, ERV equipment checklist, breakdown and accident flowchart, Safety Data Sheets (SDS). Technical advice is in a form as supplied by all sodium cyanide supplies in the form of emergency response plans and emergency response actions. In the absence of such technical advice Alistair Group will utilize the generic emergency response plan that is built into the CTMP. The referenced technical advice form and the generic emergency response plan both include descriptions of response actions appropriate for anticipated emergency situations. Section 2 (Purpose, Objective and confirms that supplier technical advice provides emergency response actions, and in its absence the CTMP's generic plan is applied. The generic plan sets out detailed response

actions in the Emergency Plan Activation which describes roles, responsibilities, notification, and scene management, and the Spillage Emergency Response Guides), which provides step-by-step response procedures for scenarios such as spills inside containers, wet cyanide IBCs spills to waterway, soil decontamination, and fires. Both the supplier technical advice and the CTMP's generic plan explicitly describe the response actions to be followed in the event of anticipated cyanide transport emergencies.
Police Stations are consulted during Route Data and Risk Assessment process. Police National Emergency and Rescue Force and individual Police Station contact numbers are listed in each Route Data and Risk Assessment Form. Hospitals are consulted and emergency numbers listed on Route Data and Risk Assessment. Communities are not expected to participate in any emergency. Vehicles are clearly marked with as sign "Poisonous Danger" in Swahili as well as red flags on front and rear of each vehicle combination to warn all persons of the danger.

Standard of Practice 3.2
Designate appropriate response personnel and commit necessary resources for emergency response.

X in full compliance with

The operation is ☐ in substantial compliance with Standard of Practice 3.2

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

Transportation of Dangerous Goods procedure - All drivers are trained in dangerous goods, cyanide awareness and defensive driving.
Management Advanced Cyanide Awareness training PowerPoint training presentation is in place covering Introduction to Cyanide Code & Background, Cyanide Awareness, Cyanide First Aid, Convoy Rules, Emergency Response, Roles & Responsibilities, Cyanide Accident Spill Control, Accident Case Study, Table Top Exercise.
Driver Cyanide Awareness training in PowerPoint format is in place covering Introduction to Cyanide Code & Background, Cyanide Awareness - Appropriate and thorough training for normal, abnormal and emergencies activities, Convoy Rules, Emergency Response, Cyanide Accident Spill Control, Accident Case Study, Truck, Trailer & Cargo Checklists.
Training records are recorded on the Driver Training and Training Matrix and only drivers who have attended GCLA and Cyanide training will be utilised to transport Cyanide.
Emergency Response Vehicle Inspection Checklist is in place and in use and lists of all emergency response equipment that must be available during transport. A full list of all the emergency equipment that is carried on the ERV is in place and inspections are carried out using the ERV Inspection Form. The emergency equipment is stored and transported in a specifically designed and build 1,000 litre capacity wooden container that is loaded onto the ERV using a forklift truck. This container and its contents and recent checklists were sighted during the audit.
DGMP- Includes requirements for truck and trailer inspection checklist, container check sheet, Emergency response equipment checklist. ERV Inspection Form is used to verify that equipment is in place. No contractor/s are engaged to handle any chemical incidents or spills. All incidents and spills including cyanide incidents are handled by in-house trained personnel. The mine will assist the Alistair Response Teams in the remediation and recovery process and disposal of any spilt cyanide through the mine processes.

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Standard of Practice 3.3
Develop procedures for internal and external emergency notification and reporting.

X **in full compliance with**

The operation is ☐ in substantial compliance with Standard of Practice 3.3

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

Both the Dangerous Goods Transport Management Plan (DGMP) and the Cyanide Transport Management Plan include reporting requirements with contact information for notifying the appropriate entities in case of an emergency which includes - Emergency Contacts specifies that in the event of an incident, the Convoy Leader or delegate must immediately notify operational staff per the Emergency Contact List. The Emergency Plan Activation details the communication chain and explicitly includes external notifications to Cyanide producer and suppliers, Customer (mine sites), Regulatory agencies in the countries operated in or traversed, External response providers (outsourced ER teams, fire departments, hospitals/clinics), Medical facilities and hospitals, Potentially affected communities through local authorities, Police, and media communication protocols, Incident and Accident Reporting procedure sets out reporting obligations to internal management, regulatory bodies, and external agencies. It requires immediate notification of authorities, emergency services, and affected stakeholders using the provided contact lists. The Dangerous Goods Transport Management Plan (DG TMP) aligns with aligns with the ADR (international Transport of Dangerous Goods by Road) and IMDG Code (International Marine Dangerous Goods Code) requirements for dangerous goods transport, ensuring contact information for emergency responders, regulators, and communities is integrated into the reporting chain. The reporting requirements in both plans do include the necessary contact information for notifying cyanide producers, customers, regulatory agencies, external response providers, medical facilities, and potentially affected communities. This ensures that all relevant parties are informed promptly in the event of an emergency.

The CTMP is reviewed annually in December and the latest document update was made on 20/10/2023. CTMP includes the requirements for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document. No significant cyanide incidents that have occurred since the last external audit or at any time prior to that.

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

X **in full compliance with**

The operation is ☐ in substantial compliance with Standard of Practice 3.4

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

No contractor/s are engaged to handle any chemical incidents or spills. All incidents and spills including cyanide incidents are handled by in-house trained personnel. The mine will assist the Alistair Response Teams in the remediation and recovery process and disposal of any spilt cyanide through the mine processes.

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The CTMP specifically states “Sodium hypochlorite, hydrogen peroxide and ferrous sulphate **must never be used** to treat cyanide that has been released into natural surface water bodies. These chemicals are toxic to aquatic life.”

Standard of Practice 3.5
Periodically evaluate response procedures and capabilities and revise them as needed.

X **in full compliance with**

The operation is ☐ in substantial compliance with Standard of Practice 3.5

☐ not in compliance with

The basis for this Finding/Deficiencies Identified:

CTMP and associated documents are reviewed annually or when there is a significant change. ISO 9001:2015 document control procedures are also in place.
Alistair Group have not conducted the cyanide specific mock emergency drills strictly on an annual basis since the last ICMI compliance audit. The reason being is that only two containers of cyanide briquettes have been transported over this three year period and another two containers were transported in May 2025.
Despite this reduction in cyanide transportation business Alistair Group has indicated its it wishes to maintained its compliance with the ICMI Management Code for Transport.
Alistair Group have committed to conduct cyanide specific mock emergency drills prior to the movement of any containers of cyanide.
General chemical mock emergency drill and table top exercises are conducted on approximately an annual basis.
Evidence is in place that cyanide spills and cyanide exposures were simulated in the drills. Drills evaluated if adequate procedures, appropriate equipment, and proper training was in place. Evidence in place of corrective actions and improvements having taken place.
Emergency response procedures and capabilities are continually being assessed and evidence is in place of implementation.
Evidence sighted that two recent cyanide drills were conducted:

- Sodium Cyanide Emergency Drill held on 05 February 2025 before a delivery to DRC having been loaded in Kenya
- Sodium Cyanide Emergency Drill held on 10 June 2025. This was a live operational drill, tracking actual cargo destined for the DRC.

The operation has established provisions to evaluate and revise its emergency response procedures following any cyanide-related emergency that requires their implementation, and these provisions have been applied during this ICMC (International Cyanide Management Code) recertification period.

Cyanide Transport Management Plan Review and Audit Process requires that the plan be reviewed annually each December, and additionally after incidents, emergencies, emergency exercises, or audits/assessments. This ensures that real-world experience and lessons learned are systematically incorporated.

Section Exercises & Drills requires annual tabletop exercises and full-scale simulation drills every three years. Both exercises and actual emergencies must be followed by an evaluation of the response and updates to procedures, training, and equipment where necessary. Section Investigative Follow-Up reinforces that after emergencies or exercises, the effectiveness of the response is assessed to identify shortcomings, procedural changes, or

further training requirements. Accident, Incidents and Near Misses Procedure require that all incidents, including those involving cyanide, are investigated using root cause analysis, with corrective and preventative actions formally tracked through the HSSEQ system.
Lessons Learned & Incident Review requires all incidents to be reviewed at least yearly as part of Occupational Health and Safety management reviews. Lessons learned must be communicated to staff, and procedures or risk assessments updated accordingly. This mechanism ensures continuous improvement and organisational learning after any significant emergency event. The Emergency Procedure requires that emergency plans be re-assessed at regular intervals and particularly after any incident, re-organisation of processes, or personnel changes. The Medical Emergency Response Plan requires regular drills and training exercises, embedding post-incident evaluation and procedural updates into medical response planning

Evidence During This Recertification Period: The CTMP revision history confirms that the plan was reviewed and updated in October 2023, ensuring that lessons learned were incorporated into cyanide-specific emergency response procedures. The Accident, Incidents and Near Misses Procedure was further revised in May 2025, refining investigation and lessons-learned processes, and confirming that emergency response procedures were reviewed and strengthened during this ICMC cycle. The operation not only has documented provisions to evaluate and revise its cyanide emergency response procedures after actual emergencies, but it has also demonstrated implementation of these provisions. Reviews and updates in October 2023 and May 2025 confirm that emergency response procedures were actively evaluated and revised during the current ICMC recertification period

End of Report

Alistair Group — Name of Operation.
Signature of Lead Auditor
07 October 2025 — Date