



**Investor Solutions Limited**  
P.O Box 67562  
Nairobi, Kenya

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## ICMI RE-CERTIFICATION - SUMMARY REPORT

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### Description of Signatory

**Name of Transportation Facility:** Bolloré Transport & Logistics Côte d'Ivoire

**Name of Facility Owner:** Bolloré Transport & Logistics Côte d'Ivoire.

**Name of Facility Operator:** Bolloré Transport & Logistics Côte d'Ivoire

**Name of Responsible Manager:** Auguste Tano

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**Website:** <https://www.bollore-logistics.com/en/country/cote-divoire/>

**Audit Company:** Investor Solutions Ltd



## Investor Solutions Limited

P.O Box 67562

Nairobi, Kenya

### Description of Operation – Bolloré Transport & Logistics, Côte d'Ivoire

#### Company Profile.

Bolloré group was founded in 1822. The company was into thin paper in the beginning, but the group has diversified its product ranges and services. It is now involved in plastics films for capacitors and packaging, electric batteries, thin papers, transportation in Africa (freight forwarding and stevedoring, railways) and international logistics, fuel distribution and dedicated port terminals and systems.

The Africa transportation arm of the Group is managed by Bolloré Africa Logistics which has been established for more than 50 years. The Company is involved in port activity, terrestrial transport and logistics solutions. Bolloré Transport and Logistics is one of the largest transport and logistics operators in Africa.

Bolloré Transport and Logistics, Côte d'Ivoire conduct freight forwarding and transportation activities within West Africa.

Bolloré Transport & Logistics Côte d'Ivoire was established in 1959 with its Headquarters located in Abidjan. In addition to the major ports of Abidjan and San Pedro, the company operates the Abidjan–Ouagadougou railway. This strategic artery connects Côte d'Ivoire's economic capital and its hinterland to Burkina Faso.

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

Bolloré Transport & Logistics Côte d'Ivoire has a broad range of capabilities and experienced staff to handle both general cargo and project cargo with specific expertise in sectors such as oil & gas, mining, humanitarian aid, food & beverages, energy, telecommunications, and soft commodities.

Bolloré provides road transport and logistics services for mining companies, oil and gas industry and other companies.

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Bolloré Transport & Logistics, CI  
Audited Company

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Lead Auditor Signature

27<sup>th</sup> October 2021  
Date



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# **Bolloré Transport & Logistics Côte d'Ivoire**

This report has been prepared with all reasonable skill, care, and diligence within the terms of the Contract with the client, incorporating our General Terms and Conditions of Business and taking account of the resources devoted to it by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client, and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

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## **INTRODUCTION**

The “International Cyanide Management Code for The Manufacture, Transport, and Use of Cyanide in The Production of Gold” (the Code) was developed by a multi-stakeholder Steering Committee under the guidance of the United Nations Environmental Program (UNEP) and the then, International Council on Metals and the Environment.

The Code is a voluntary industry program for gold& silver mining companies, and companies involved with the production and transport of cyanide to gold& silver mining companies; it focuses exclusively on the safe management of cyanide. Companies that adopt the Code must have their operations, which manufacture cyanide, transport cyanide, or use cyanide to recover gold & silver, audited by an independent third party to determine the status of the Code’s implementation. Those operations that meet the Code’s requirements can be certified and are able to use a unique trademark symbol, which identifies the company as a certified operation. Audit results are made public to inform stakeholders of the status of cyanide management practices at the certified operation.

The objective of the Code is to improve the management of cyanide used in gold& silver mining and assist in the protection of human health and the reduction of environmental impacts (further information can be found at [www.cyanidecode.org](http://www.cyanidecode.org)). The Code is managed by the International Cyanide Management Institute (ICMI).

## **AUDIT TERMS OF REFERENCE**

Investor Solutions Ltd was assigned by Bolloré Transport & Logistics Côte d’Ivoire to conduct a Recertification Audit of their cyanide transportation activities.

## **Acronyms**

ICMC .....International Cyanide Management Code  
HGV.....Heavy Goods Vehicle  
QHSE .....Quality, Health, Safety & Environment  
HSE.....Health, Safety & Environment  
IMDG.....International Maritime Dangerous Goods (Code)  
EPA.....Environmental Protection Agency  
RRA .....Route Risk Assessments  
IBC..... Intermediate Bulk Container  
SPCIAC.....Secrétariat Permanent de la Commission pour l’interdiction des Arme Chimiques  
CIAPOL..... Centre Ivoirien Anti-pollution

## **AUDIT SCOPE AND METHODOLOGY**

The scope of this audit covers the road transportation of cyanide from the Ports of Abidjan in Cote d’Ivoire to Endeavour lty mine a distance of 681Km from the port.

## **STRUCTURE OF THE REPORT**

The Protocol, and audit findings against the Principles and Standards of Practice detailed within the Protocol, are presented in tabular form in Section 3 of this report. Observations that are not classified as audit findings but are noteworthy because they provide perspective on the status of cyanide management within the organization are also detailed within that section.

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### AUDIT SCHEDULE

This Transportation Recertification audit on Bolloré Transport & Logistics, Cote d'Ivoire a division of Bolloré group was conducted 25th October 2021 to 27<sup>th</sup> October 2021.

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

### AUDIT TEAM

The audit team comprised:

- ✓ Kuldip S. Dagon, PCQI (ICMI pre-certified Lead Auditor); and
- ✓ Benjamin Amoo-Mensah (ICMI pre-certified Transportation Technical Specialist).

### Sodium Cyanide Transportation.

Bolloré Transport and Logistics, Côte d'Ivoire became a Signatory to the International Cyanide Management Code on 11 March 2011 as part of the repeated requests by companies to transport Cyanide to various mines in West Africa. They were initially Cyanide Code Certified in March 2015. Recertification was completed in 2018.

Sodium Cyanide in briquette form is packaged in Intermediate Bulk Containers (wooden IBC's) which are in turn packed into a 6-meter freight container and shipped by sea from the Consignor to the Port of Abidjan in Côte d'Ivoire. A maximum of 20 wooden fabricated IBC's are packed into a 20ft freight container with a maximum gross weight of the product of 20 tons.

Shipping between the Consignor and the Port of Abidjan is conducted by independent shipping companies coordinated by the Consignor.

Prior to the arrival at the Port of Côte d'Ivoire, Bolloré ensures that the shipping documentation is in order and the shipments are pre-cleared to allow prompt clearing of the product through Abidjan terminal. The sodium cyanide containers are loaded directly from vessels onto Bolloré CI's vehicles for them to exit the port. Containers are not stored at the port terminal. The off-loading of all the containers from the vessels and loading of trucks is performed by Abidjan port authorities.

Bolloré CI collects the containers within 24 hours of arrival of vessel and transports the loaded containers to an area at the Bolloré's CI yard in Abidjan for some few hours. The containers remain loaded on the trailers, in preparation for departure to the mine site early the following morning.

Bolloré Cote d'Ivoire transports containerized sodium cyanide to Endeavour Ity mine from the port of Abidjan (Abidjan terminal). The sodium cyanide in IBC and packed in 20ft containers are loaded from the port and delivered to the mine site a distance of 681km from Abidjan port.

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Bolloré Transport & Logistics, CI  
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Lead Auditor Signature

27<sup>th</sup> October 2021  
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The trucks are escorted from Abidjan port terminal to Bolloré yard and also from there to the mine site under escort by Bolloré Escort team, CIAPOL, Military, Chemical and Weapon Authority (SPCIAC-CI) commonly called Arme Chimique.

Bolloré CI has a contract agreement with Samsung C&T Deutschland GmbH to perform logistics services which includes transportation of sodium cyanide consignment from the port (Abidjan terminal) to Endeavour lty mine.

Bolloré CI has subcontracted the transportation aspect of the business to a transport company Konis Logistic. Konis Logistic provides vehicles and drivers for the transportation of the containerized sodium cyanide under the strict supervision and procedure of Bolloré CI. The overall control of the movement of a cyanide convoy is the sole responsibility of Bolloré CI who provides escorts right from the port to the mine.

### 1.3 Auditor's Findings and Attestation.

Bolloré Transport & Logistics Cote d'Ivoire is in **Full Compliance** with the International Cyanide Management Code.

### 1.4 Dates of Audit.

This Transportation Recertification audit on Bolloré Transport & Logistics, Cote d'Ivoire a division of Bolloré group was conducted 25<sup>th</sup>October 2021 to 27<sup>th</sup>October 2021.

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

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Lead Auditor Signature

27<sup>th</sup> October 2021  
Date



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**SUMMARY AUDIT REPORT**

**Auditors Findings**

	<input checked="" type="checkbox"/> in Full Compliance with	THE INTERNATIONAL
Bolloré Transport & logistics Ltd. (Côte d’Ivoire)	<input type="checkbox"/> in Substantial Compliance with	CYANIDE MANAGEMENT
	<input type="checkbox"/> Not in Compliance with	CODE

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Bolloré Transport and Logistics, Côte d’Ivoire, operation has maintained full compliance with the International Cyanide Management Code throughout previous three-year audit cycle.

Audit Company	Investor Solutions Ltd
Lead Auditor	Kuldip S. Degon, PCQI, (ICMI pre-certified Lead Auditor)
Email address	
Specialist Auditor	Benjamin Amoo-Mensah (ICMI pre-certified Transportation Technical Specialist)
Email Address	csbpgghana@ghana.com

_____	27 <sup>th</sup> October 2021
Specialist Signature	Date

**Dates of Audit**

The Certification Transport Audit was undertaken over three days (Six person-days) on 25<sup>th</sup> to 27<sup>th</sup> October 2021.

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


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

Bolloré Transport & Logistics, CI  
Audited Company

  
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Lead Auditor Signature

27<sup>th</sup> October 2021  
Date

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Lead Auditor Signature

27<sup>th</sup> October 2021  
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### 1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

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

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

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

Bolloré CI has a documented procedure titled Route Transport Selection Procedure (Realization et Utilization of D'un Route Survey) which details the process of selection of route to minimize the potential for accidents and releases. Bolloré Cote d'Ivoire has selected the appropriate route from Abidjan terminal to Endeavour Ity mine. To select the route, the responsible person who is the QHSE Manager organizes all the resources such as 4x4 vehicle, camera, phones and conduct the route survey with the Escort Leader. The route assessment team travels on the selected transport route(s) in order to physically assess and record the hazards and potential risks along the route(s).

Bolloré CI took into account the following when selecting and conducting the route survey:

- State of the road, size of the road and recommended speed limit
- Slopes,
- population density
- distance
- Number of towns and villages
- Railway Crossings
- T-intersections
- Mountain passes and Gradients
- Steep turns
- Speed bumps
- Parking areas
- Schools,
- Proximity to rivers and water
- Road sealed or unsealed
- Bridges.
- Suitable and secured overweight areas
- Pitch and grade of road
- Road conditions for wet and fog conditions

Bolloré CI has a Transport Management Plan (Plan de Gestion du Transport de Cyanure procedure) which indicates that the route surveys are conducted annually or as and when necessary to ascertain the condition of the route and if there are any changes the TMP is amended.

Bolloré CI has a valid Transportation permit Certificat D'Inscription Au Registre Des Transporter registration No. 2015/CIRT/TPR/01/24845 dated 9th July 2015 which permits them to provide transportation and logistics business.

The operation has a Risk Assessment Procedure Document No. BLX-AFR-HSE-PRO-0005 which addresses evaluation of risks of selected cyanide transport route. Route surveys are conducted at least on an annual basis. Records

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indicate that RRA's have been conducted in the past 3 years namely 2019, 2020 and 2021 on the route from the Abidjan terminal to Bolloré premises and from there to Endeavour Ity mine a distance of 681Km from the port.

The operation has implemented a procedure to evaluate the risks of selected cyanide transport routes and takes the necessary measures to manage these risks. Recommended preventative actions to mitigate or eradicate the risks on selected routes are included in RRA assessment document.

The route assessment documents the hazards/threats identified and details the control measure for the hazards. Typically, the selected route is the major arterial roads designated for heavy vehicle transport.

The QHSE Manager is responsible for the selection of the route and also conducting the route assessments.

A review of records of RRA is evident of the implementation of RRA process. Steps to follow in conducting the route survey and what to look for on the route are captured in the Route Selection procedure.

Route Risk Assessments (RRA) have been conducted from.

1. Abidjan port terminal to Bollore depot (2.9Km)
2. Bollore depot to Endeavour Ity Mine (681Km).

Bolloré does implement a process or procedure to periodically re-evaluate routes used for cyanide deliveries. The operation also has a process for getting feedback on the road after each delivery to the mine.

The operation's Transport Management Plan requires that feedback reports are written by the Escort leader describing the state of the road. In the event of changes upon completion of each delivery to the mine site, a review of the TMP is done. Review of records from recent trips revealed that the appropriate Feedback Report Forms were completed. These reports contained route observations.

The Route Transport Selection Procedure (Realisation et Utilisation d'un Road Survey) notes that Road-Surveys will be reviewed and updated annually or as and when necessary.

Recommended preventative actions to mitigate, reduce or eradicate the risks on selected routes are included in RRA assessment document. Bolloré does document the measures taken to address risks identified on the selected routes.

The Route Surveys takes into consideration, the infrastructure of the roadway, construction activities on route and general condition of the road when conducting the route survey. RRAs that have been conducted reveal that various hazard types have been taken into consideration.

It was evident from documentation presented that the findings with respect to road infrastructure and road condition were taken into consideration. Road markings on tarred road surfaces and condition of road surfaces are included in the RRA. Road surface, condition of road, impact of temperature on road surface, edges of tarred roads (for deterioration), 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 been captured in the RRA

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 session after each delivery of containers to the mine. Prior to departure of the convoy of cyanide trucks from the Bolloré CI depot, tools box meetings are held, and participants

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sign attendance sheets to indicate their presence. The escort leader is responsible for organizing the toolbox meetings. The meetings are attended by the drivers, escort team, gendarme (military), Arme Chimiques (Chemical Weapon Authority SPCACI-CI) and Environmental Police (CIAPOL).

Bolloré CI has sought inputs from all the relevant governmental agencies which are ArmeChimiques(SPCACI-CI) which is Chemical Weapon Authority, Military (Action Civilo-Militaire), Environmental Police (CIAPOL) and selected hospitals along the selected routes.

The Arme Chimiques (SPCACI-CI) which is the authority in Cote d'Ivoire responsible for dangerous chemicals is responsible for community consultation. For each convoy to the mine site, all the governmental agencies are notified and asked to come and accompany the convoy to the mine site.

Copies of letters to CIAPOL, Military, ArmeChimiques (SPCACI-CI) are evident of the involvement of those governmental agencies in cyanide deliveries. Notifications to all the aforementioned government agencies are on record. Evidence of acknowledgement of the notifications by the governmental agencies have been documented. Again, notifications to selected hospitals along the transport route were noted. Hospitals which have been duly consulted included Hopital CSU Bonon, Hopital Generale de Duekoue, CSU De Logoule and CHR Daloa. As per records reviewed, each of notifications to them have been acknowledged and stamped by the hospitals. Copies of MSDS of sodium cyanide were given to each of these hospitals and the ER responders.

The mine does its own stakeholder and community consultations around towns and villages close to it with the ER responders.

Bolloré and its subcontractor transporter Konis Logistic utilizes road convoys as a means of managing the risks of the road conditions and responding to emergencies.

As per agreement, the subcontractor Konis Logistic only provide trucks and drivers but convoys are escorted by Bolloré CI's own escort team comprising of Escort leader, escort assistant, Bollore CI Fire Officer and one (1) spare driver.

Each cyanide convoy is escorted by the following personnel including the governmental agencies.

- Escort team leader
- Escort vehicle driver
- Two (2) people from SPCACI-CI
- One (1) person from CIAPOL
- Three (3) Military personnel
- 1 spare driver

Convoys are made up of 5 trucks and 3 escort vehicles. Each truck carries two 20ft containers of cyanide. The military leads the convoy, followed by the escort vehicle the trucks, CIAPOL and SPCACI-CI in that order.

As per Bolloré CI procedures, the transportation of cyanide is strictly prohibited during the night. The allowed convoy hours are from 05:00 in the morning to 18:30 in the evening. The Chief of Escort ensures that required rest stops are respected and that convoy follow the required speed limits and correct travelling distances.

During stops of short duration, the Escort leader ensures that the trucks do not present a risk and that the twist-locks and straps holding the containers to the trailer have been checked.

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Bolloré CI ensures that all the drivers of the subcontractor have extensive experience in driving dangerous goods vehicles, and they participate in annual cyanide awareness and emergency response training, firefighting training, and emergency response drill. Bolloré is responsible for the overall management of the convoys to the mine site. The escort team who manages the convoys are Bolloré CI own employees.

Bolloré has an agreement with Konis Logistic and the contract states that the subcontractor is to abide by all Bolloré procedures. The contract mentions the roles and responsibilities of both parties. The subcontractor role is provision of vehicles and drivers. Bolloré CI manages all the aspect of safety of Konis Logistic cyanide drivers. Dedicated drivers for cyanide transportation are subjected to routine checks by the QHSE Manager of Bolloré CI to ensure that they conform to Bolloré required standards.

Training of the subcontractor's drivers is done by Bolloré Training Department. Training records and procedures indicates that training is conducted once/year in cyanide awareness and emergency response and every five (5) years in case of defensive driving.

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

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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:**

Bolloré CI requires that personnel operating cyanide handling and transport equipment perform their jobs with minimum risk to themselves, the communities, and the environment.

Bolloré CI uses trained, qualified, and licensed operators for its transport vehicles. All drivers undertaking cyanide transport must have a government issued current driver's license with relevant category along with mandatory internal training.

All drivers are expected to have category "E" license. Drivers' licenses are valid until 3 years. The operation has a recruitment policy and procedures that specifies the process of selecting a driver for employment. The process of employment includes road test, written examination, and valid license checks, and category checks, employment reference checks, driving records, driver's qualifications, drivers' health and face to face interviews.

The transport contractor Konis Logistic has a recruitment procedure. Recruitment policy specifies the process of selecting a driver for employment. Applications are invited from qualified drivers to apply. Pre-selection of candidates are done according to the following criteria.

- Number of years of heavy truck driving experience
- Theoretical knowledge test of driving and the rules of the road.
- Screening test for alcohol and narcotic substances
- Heavy truck driving test

Once an applicant is selected the drivers are sent to the Pan African training center for the following additional trainings.

- Defensive driving training
- Fire Safety with assistance of Groupement des Sapeurs-Pompier (Fire department)
- First Aid training

At the end of the training qualified drivers are appointed for a fixed term of 6 months renewable contract.

During this period, the drivers are regularly graded on the following points.

- Regularity of driving
- Speed controls
- Compulsory rest periods
- Punctuality and seriousness of their professional service
- Maintenance and cleaning of vehicle entrusted to them as well as breakdowns and possible failures on return from any trip.

The operations training matrix captured the following mandatory training requirements for the drivers of its subcontractor Konis Logistic.



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Training of the subcontractors' drivers are done by Bolloré training department. The training covers the following training modules.

- Cyanide awareness training (Once/year),
- Defensive driving (5times/year)
- Basic Firefighting (twice/year)
- Company Emergency Response Plan (Once/year)
- Mock drills, Incident / accident management (Once/year)
- Basic first aid (Once/2years)
- Hazardous material training (once/ 2years)
- Mock drills (twice/year).

Records of training for drivers and escort team have been retained. All drivers attend toolbox meeting organized by Bolloré CI Escort leader prior to departure of each convoy and tools box attendance register signed by each participant. Convoys are all the time under the strict supervision of the escort leader.

New drivers go through training at the training center of Bolloré CI before embarking on their very first journey. Certificates are issued to new drivers after defensive driving training before a driver is allowed to drive a cyanide truck. The certificates are valid for 5 years.

Copies of cyanide training and defensive driving certificates for the drivers of the subcontractor Konis Logistic have been placed on record. Validity of driver's licenses are checked during pre-departure checks and vehicle predeparture checklist completed. Drivers answer questions posed to them verbally after the training to ascertain their knowledge about cyanide. Yearly, emergency response scenarios are performed to ascertain the understanding of drivers and escort team during mock drills.

A review of training records of drivers and escort team against the company's training matrix confirmed that personnel undertaking cyanide transport have completed the mandated training. Selected drivers and escort team personnel who were interviewed confirmed the training system and are knowledgeable in handling of cyanide as well as convoy management. Copies of training attendance register have been retained.

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

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

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

As per the requirement of Bolloré CI, KonisLogistic uses the following vehicle specifications;

- 6x4 and 4x2 Sinotruck vehicles equipped with GPS tracking system,
- 2 Axle skeleton trailers equipped with twist locks and can carry 1x20ft container
- 4 Axle skeleton trailers equipped with twist locks which carry 2x20ft containers.

The Horse Power(HP) of the 6x4 vehicles is 371 and the HP of the 4x2 configuration of trucks is 370. The trailers that are used are all skeletal trailers. Defects noted on vehicles during inspections are attended to immediately.

Only new tyres are used on vehicles dedicated for the transportation of cyanide. The capacity of the trucks as well as the configuration indicates that the trucks can take the load that they can carry. No recapped tyres are used. Pre-trip inspections are conducted on each truck prior to departure and checklist signed by the escort leader and driver. If any defect is picked up, a job order is raised and defect(s) are rectified before departure.

Maintenance records of vehicles have appropriately been retained.

Each trailer is loaded with two containers weighing approximately 46mt. The maximum required load for the 6x4 vehicle as per the laws in Cote d'Ivoire is 71.3mt. The allowable load per axle in Cote d'Ivoire is 16mt. The load per axle for 6x4 trucks loaded with 2 containers is 15.5mt. The total weights that are carried by the trucks are within the required regulations.

Each 1x20ft shipping container contains 20 IBC's of cyanide. Gross weight of one container is 23mt. The vehicles with configuration of 4x2 carry one container (23tonnes) whilst 6x4 axle trucks carry two containers (46tonnes). The weights are within the design specifications of the prime movers and trailers being used. Currently all the vehicles used for cyanide transportation are new.

All vehicles are weighed at Abidjan terminal before entering and leaving the port. Trucks are weighed before and after loading. Also, on the way to the mine site the vehicles are weighed at government approved weighing bridges (Port de pesage) to ascertain that the weight is within the axle load regulation of Cote d'Ivoire.

Prior to entering the port, a form "Formulaire de Declaration de la Charge-Essieux" is completed. The configurations (number of axles) of truck that is entering the port are to be stated on the form. The form is completed by the Escort leader. Records of weighing tickets issued by the government weighing bridge unit (Afrique Pesage Cote d'Ivoire) have been retained.

A review of Bolloré CI's subcontractor Konis Logistic maintenance records of vehicles that conducted cyanide transport during the period confirmed that preventative maintenance activities had been conducted in accordance with Bolloré and their own procedures.



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The subcontractor of Bolloré CI has 10 dedicated new vehicles for the transportation of cyanide. There are procedures to verify the adequacy of the equipment for the load it must bear. Shipments arrive as per a schedule from the supplier (Samsung) and the deliveries are planned by Bolloré CI in consultation with Konis Logistic.

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

Konis Logistic has maintenance and repair file called "Fiche De Gestion Entretien and Reparation Tractors" that shows work done on each truck. Each truck has a maintenance/repair form that is completed after each repair and maintenance work. Trucks are serviced after each 250hours trip performed by a vehicle. Maintenance records of vehicles have been retained.

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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:**

Bolloré CI has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging.

Sodium cyanide in briquette form is packed in hermetically sealed PVC bag. This bag is enclosed in a woven polyethylene bag that is encased in a one tonne custom designed strong plywood box and closed 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 then stacked into 20ft sea freight container. Each IBC contains 1mt of product and each 20ft container contains 20 IBC's. Container doors are secured with seals with unique seal numbers. The seal numbers are stated on the Bill of Lading.

Prior to departure a delivery note (Identification du Convoi) form is completed. The information that is filled out are the name of driver, vehicle number, trailer number, container number, the seal number and the weight of the gross weight of the cyanide. The completion of the form is done by the escort leader who signs off the document. It is also signed off by the government agencies who accompany the convoy and they are the military personnel, CIAPOL representative and Chemical Weapon Unit personnel (SPCIAC-CI).

Delivery documents(waybills), MSDS, copies of TMP and ER procedures are carried in the escort vehicles. Upon arrival at the mine site, the mine site personnel sign and stamp the document indicating that the containers have been received intact.

Placards are used to identify the shipment as cyanide as required by International standards as well as the IMDG code and are conspicuously displayed on all four sides of a container. Sodium cyanide placards (toxic 6 labels and marine pollutant labels) are displayed in the front of the cabin of the truck tractor. Also, the manufacturer has affixed emergency information panel (EIP) on each container. One EIP is placed on the vehicle so that it is visible from the rear.

The trailers are fitted with twist locks. The escort leader is responsible for all checks on the vehicles and the containers before and during the trip to the mine. During stops, escort Leader checks the condition of the containers as well as whether containers are still properly secured to the trailers by the twist locks.

The Escort leader completes Journey plans by noting the times the convoy stops and departs whilst on the road to the mine.

Bolloré CI implements a safety program that includes;

- Vehicle Inspections,
- Health & Safety policy
- Drug and Alcohol abuse prevention
- Fatigue management
- Maintenance program

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The safety program ensures that drivers drive in accordance to their procedure and the national regulations. Records of daily pre-trip checks and the requisite forms have been retained. Bolloré CI has a vehicle predeparture checklist (Checklist D'inspection Camion). Each vehicle is inspected and the checklist completed prior to departure.

Bolloré CI and its transport partner Konis Logistic have a maintenance procedure (Materiser Les Entretien Oreventifs & Les visites Techniques).

Trucks are serviced at 250hrs intervals. Faults rectifications are done as and when faults are identified during pre-departure inspections of the vehicle. A work order is raised and repairs which are carried out are put on record.

The operation has General Driving policy (ReglesGenerale De Transport Afrique).

To conform to the fatigue management policy of the company the operation has developed a journey plan form (Feuille De Route) 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.

As per the procedure, drivers are expected to drive based on the following;

- 2hrs on laterite road and 3hrs on asphalt road and rest for 30 minutes.
- 20Km/hr when crossing villages on laterite roads
- 20Km/hr when crossing work zone
- 40Km/hr when crossing outside villages
- 50Km/hr when crossing towns on asphalt road
- 80Km/hr on asphalt road outside towns in all cases.

The overall control of a convoy is the responsibility of the escort team. All vehicles are fitted with SKY FMS GPS system (Global Position System) to track the locations of each vehicle any time. The GPS is monitored by Bolloré personnel. Convoy movement is monitored on the GPS till arrival at the mine.

No night driving is permitted. Bolloré procedures spells **out** clearly that transport of cyanide is prohibited during the night. Cyanide convoys drive between the hours of 05:00am to 18:30pm. The escort leader ensures that required rest stops at every three (3) hours are respected throughout the transportation journey.

The operation's procedure titled Safety Conditions (Conditions et Critique De Securite) stipulates that the Escort Leader is entitled to stop a convoy if conditions such as insecurity on route, army activities, bad weather condition, damages to road or bridges, insurgency or civil unrest. Escort Leader will inform Bolloré offices in Abidjan using his cell phone at his disposal, informing the Transport Manager on the reason for suspending the movement of the convoy. Escort Leader will ensure that the vehicles park at a secured place. Based on the information received a member of the Bolloré Management could call on assistance from emergency services in that area. Once situation have normalised, convoy will then proceed to its destination.

Bolloré has a Zero Tolerance Drugs and Alcohol Policy. The use of drug or alcohol whilst performing company related activities are forbidden by the company's policy.

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Lead Auditor Signature

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Policy content was reviewed and found to be appropriate and applicable. Records of test results of alcohol test conducted on drivers and other personnel at different times have been retained. Alcohol testing is carried out randomly at the depot and whilst on road by the Escort Leader. Escort leader who does the testing has been trained on how to operate the testing device. Drug and alcohol abuse are prevented by education of workers, refusing to admit personnel under the influence of alcohol or drugs on a convoy or onto the work site.

The subcontractor Konis Logistique conforms to the Bolloré CI standards as they are under the control of Bolloré CI procedures.

Records of activities namely Maintenance records, inspection and convoy records, alcohol test records over the past years have been retained.

A Document Management procedure(Structure et Maitrise des Documents) requires that copies of policies be kept for at least 3 years and all other documents be kept for a minimum period of 5 years The QHSE Department is responsible for the control, retaining and also archiving of old documents.

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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:**

Bolloré CI is in full compliance with Transport Practice 1.5, based on the finding that the transport operation does not transport cyanide by sea. The operation is considered to be in full compliance as this Transport Practice not applicable.

**This Transport Practice is Not Applicable**



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

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

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

Bolloré CI vehicles are equipped with radios in them for communication purposes. Radios are also assigned to the government agencies namely, CIAPOL, SPCAIAC-CI, Military and Escort leader who do the escorting of the convoy of trucks to the mine.

Also, all drivers have their own cell phones to communicate with one another but not during driving as this is prohibited by the company's policy. The escort leader has been allocated with cellular phones for his communications with its office in Abidjan and emergency responders. Communication between the mine, cyanide supplier Samsung C& T Deutschland GmbH is done by the head office in Abidjan.

Each vehicle in the convoy is fitted with a Global Positioning System (GPS) tracking system (SKY FMS type). The GPS system is manned 24/7 by Bolloré ITOfficer and the Transport Manager of Konis Logistic (the subcontractor) who monitor the locations of the convoy regularly till arrival at the mine.

The GPS tracking system continuously transmits locations and other useful data from the convoy throughout the trip. The information the GPS transmits includes speed, location and duration of stop over.

Updates of the convoy locations are sent to all relevant stakeholders including the mine sites during the trip. Bolloré CI's Customer service officer is responsible for sending the updates via emails to all concerned prior to delivering the cyanide to the mine as well as informing them of the locations of the convoy at any given time. Updates on convoy locations are done on 2 hourly basis. Live tracking of location of trucks illustrated that the GPS works perfectly.

Communication equipment namely radios (Walkie Talkies), cell phones are fully charged, and Safety and Communication Pre-Departure Checklist completed prior to departure to the mine site destination. The pre-departure checks have made provision for cells phones and radios to be checked during pre-departure inspections.

Emergency contact phone numbers of all government emergency responders, mine, head office in Abidjan are listed in the Emergency Contact list in the Emergency Response Plan. The contacts list includes, Mining client, police, military, CIAPOL, SPCAIAC, hospitals and Ambulance Service.

There are no black out areas identified on the road. However, in case one network drops other cell phone service providers can be used. MTN, Orange and Moov cell phone service providers' sim cards are carried by the Escort leader as back-up communication.

Shipments are cleared by Bolloré CI Shipping department. The shipments come with Bill of Ladings and the MSDS of the consignment. Container Numbers, seal numbers, the gross weights of each freight container, Shipper's information, Consignee's information, description of packaging and chemical details of shipment are stated on the Bill of Ladings and packing list.

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Delivery notes (Identification Du Convoi) are issued by the escort leader. Information put onto the delivery note includes container numbers, seal numbers, tractor unit number, trailer number and name of driver.

Upon arrival at the mine site, the delivery note is signed by the mine representative acknowledging that the consignment has been received in good condition and that the containers are intact. Copies of the Material Safety Data Sheet (MSDS) of the sodium cyanide are kept in the escort vehicles.

The monitoring of the convoy on GPS tracking system is the responsibility of both Bolloré CI and its subcontractor Konis Logistic on separate platforms. Clearing, delivery notes and inventory controls are the responsibility of Bolloré CI.

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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 1.1

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

Bolloré CI is in full compliance with Transport Practice 2.1, based on the finding that the transport operation does not store any cyanide. Bolloré CI does not have a cyanide trans-shipment depot or interim storage for Sodium Cyanide. Within the scope of this audit, there are no trans-shipment depots or interim storage sites as defined in the audit protocol.

The operation is in full compliance due to this Transport Practice not being applicable.

**This Transport Practice is Not Applicable**

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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:**

Bolloré CI has an Emergency Response Plan (ERP) which guides responses to potential cyanide emergencies. The ERP and the Transport Management Plan (TMP) are specific to the transportation routes used by the company.

The ERP address various neutralization processes namely

- Neutralization of solid briquettes of sodium cyanide
- Procedure for decontamination of PPE's and equipment.
- Spill site actions

Five scenarios of emergency situation have been addressed in the plan. The plan describes the various actions of each of the emergency responders that are to be taken in case of an incident.

The physical and chemical composition of sodium cyanide is detailed in the ER Plan. Solid Sodium Cyanide, in briquette form and in IBC's and stacked in 6-meter sea freight containers is transported by road.

In the ERP is the MSDS, which provides information on the physical and chemical form of cyanide and the associated hazards and response actions, its UN No. 1689, product description and packaging. It also describes the reactions that may result when in contact with acids and other incompatible chemicals and when exposed to moisture.

The emergency procedure focuses on the transportation of cyanide by road. Route surveys have been conducted for the transportation routes from Abidjan terminal to the mine destination.

RRA's conducted describes the nature of the road. It was evident from documentation presented that the findings with respect to road infrastructure and road condition were taken into consideration. The nature of the roads (graveled or ungraveled), slopes, bridges, water bodies, towns and villages, road markings on tarred road surfaces and condition of road surface are included in the RRA.

The designs of the vehicles are considered in the ERP and are appropriate for the load of sodium cyanide. The ERP considered the design of the transport vehicle. Konis Logistic (subcontractor) uses 6X4 and 4x2 Sinotruck vehicles equipped with GPS tracking systems.

The ERP addresses the following incident scenarios.

- Rollover without spillage and without impact on the integrity of the container and no casualties
- Roll over without spill but with injury
- Roll over without spill and without a victim.
- Rollover of cyanide container with victim



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- Roll over of cyanide container into a water body.

The details of the procedure were found to be appropriate to Bolloré CI's operations.

The required PPEs: Helmets, Rubber Gum boots, Chemical splash goggles, Neoprene Gloves, Disposable Overall, HCN detector, Oxygen apparatus are appropriately listed in the plan.

Roles and responsibilities are spelt out clearly in the ER plan. This includes the roles & responsibilities of the following.

- Escort leader and assistant,
- Fire Service
- Police
- Mine client (Endeavour lty mine)
- Military
- CIAPOL
- SPCAIC

In the event of an incident, the escort leader will notify the Transport Manager. The overall coordination and management of an incident is the responsibility of the Escort Leader. The documents contain the phone contact numbers of all the external responders. Cyanide antidote is carried with the victim who will be on 100% oxygen to the nearest hospital. The administration of the cyanide antidote will be done by a medical officer in the hospital.

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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:

Bolloré CI provides emergency response training of personnel to fulfill the duties outlined in the ERPs. The procedure titled Practical Training and Exercises (Formation Et Exercice Practiques) makes provision for emergency training and exercises to be conducted. Trainings are conducted practically and theoretically on cyanide handling.

- ER training is held once per year.
- First Aid and Firefighting exercises are conducted once/year.
- Hazardous material training is organized once every 2 years,
- Defensive driving is organized once/5years.

When conducting emergency mock drills, the external emergency responders are invited to join. Emergency response exercises have been conducted over the period which involved the government agencies such as ArmeChimiques (SPCIAC-CI), CIAPOL, police, Cote D'Ivoire Maritime Authority (DGAMP) and the military.

Training is conducted by the QHSE Manager and QHSE Coordinator. Attendance records of participants who attended ER training and ER exercises have been filed appropriately.

Training matrix shows annual refresher ER training presented to employees. Effectiveness of training is done by conducting verbal assessments, {posing questions and soliciting the right responses}.

Descriptions of the specific emergency response duties and responsibilities of personnel are clearly stated in the ERP.

In the event of an incident, the Escort Leader will be in charge of the people and equipment as well as the overall management of the incident. He informs the QHSE Manager of any emergency situation. He will take the appropriate measures for the management of an incident together with government emergency responders who are part of the convoy.

The company's transport department is responsible for providing human and material resources for the proper management of emergency situations. Competent local authorities namely CIAPOL, ArmeChimiques (SPCIAC-CI) and military will participate in handling the emergency situation by protecting people and securing the incident site. The Fire Service personnel will be in charge of providing assistance to victims in the event of an emergency. The fire personnel will also assist the Escort team for the administration of therapeutic oxygen to the victim and assists them to the nearest health center. The hospitals are responsible for the treatment or administration of cyanide antidote to a cyanide poisoned person.

Bolloré CI has inventory of all emergency equipment which are sent along with cyanide convoys.

A list of required escort equipment is available, and contents of equipment are checked to ensure availability and operability. The Emergency and Communication inventory checklist (Fiche d'inventaire material d'urgence et de communication) is completed during the inspection. A visual inspection of the escort equipment was conducted to verify that all the required items are present and in serviceable condition. Each morning, whilst on the road to the mine site, the Escort Leader checks the equipment and document findings.

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The list of escort equipment's are.

- Tyvek Overalls
- Pairs of waterproof boots
- Pairs of waterproof gloves
- Masks and cartridges
- HCN Detector
- pH paper
- Beacon
- Reflective cones
- Florescent vest
- Water Spray gun
- Whistle
- Caution tape
- Escort vehicle flag
- Danger sign board
- Tarpaulin
- Empty sacs (reinforced garbage bags)
- Shovels and brooms
- Bucket
- Sodium hypochlorite
- Torch light
- Megaphone
- Radios (Walkie Talkies)
- Digital camera
- Oxygen resuscitator
- Cyanide antidote (Cyanokit)
- 6Kg Fire extinguishers
- Helmets

Emergency response is the sole responsibility of Bolloré CI. The subcontractor (Konis Logistic) only provides the trucks and drivers. Provision of escort vehicle, escort equipment, escort personnel and the overall management of an incident is the responsibility of Bolloré CI.

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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 3.2

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

The Transport Management Plan and Emergency Communication Plan for Transport of Cyanide (Plan de Communication d'urgence pour le Transport de cyanure) contain procedure and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.

The procedure contains all the contact details of the ER responders namely, Endeavour Ity mine, Bolloré CI office contacts, police/gendarme, CIAPOL, SPCAC and hospital. The escort leader has a list of all relevant contacts during delivery of cyanide to the mine.

Revision of internal and external notification and reporting procedures are kept current by QHSE Manager. New contact phone numbers which are obtained each year when conducting the route risk assessments are updated in the ER procedure. RRA is conducted by QHSE Manager and escort team. QHSE Manager is tasked with the responsibility of updating the list of current internal and external emergency telephone numbers as well as the reporting of incidents to the authorities. Selected contact numbers which were called were found to be active. Records show that the ERP and contact information has been updated in the past 3 years.

Procedures are in place for notifying of any significant cyanide incidents as defined in ICMI's Definitions & Acronyms documents. ERP reference BLX-CIV-TRU-MAN-0002 Rév. 06 clause outlines the procedures and events of communicating to ICMI the following scenarios are considered-

- Human exposure that requires action by an emergency response team, such as decontamination or treatment.

(b) An unauthorized discharge that enters natural surface waters, on or off site.

(c) An unauthorized release that occurs off-site or migrates off-site.

(d) An on-site release requiring the intervention of an emergency response team.

(e) A transport incident requiring an emergency response in the event of a release of cyanide.

(f) A multiple wildlife death event where cyanide is known or credibly suspected to be the cause of death.

(g) Theft of cyanide.

The QHSE Department is responsible for reporting any of the above events to ICMI, if applicable.

There was no Cyanide related incident over past three years.

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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 3.2

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

Bolloré CI's ERP addresses the remediation procedures for the following anticipated emergency situation.

- Recovery of sodium cyanide solid material
- Neutralization of contaminated soil
- Neutralization and/or disposal of recovered solution.
- Neutralization of soil and/or water in situ
- Neutralization and disposal of excavated soil".

The initial cleanup is the overall responsibility of the Escort Leader ensuring that the government agencies that are part of the convoy assist in recovery and neutralization. The initial cleanup of spill is the responsibility of the escort leader. In the case of a large spill of product, the escort leader will take the initial response and then call in the outside responders to assist. Any contaminated soil / product removed during clean-up will be sent to the mine site where the waste will be disposed of by the mine appropriately.

The ERP prohibits the use of Sodium Hypochlorite, Ferrous Sulphate and Hydrogen Peroxide to treat cyanide that has been released into surface water. This statement is made in clause 7.5 of the ERP. Sodium hypochlorite is part of the escort items used for decontaminating equipment or neutralizing small residues of solid sodium cyanide when necessary, after the cyanide briquettes have been swept and shovelled into sealable container to the mine.

**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 3.2

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

Bolloré CI's ERP makes provisions for periodic review and evaluation of the response procedures and capabilities adequacy, and they are being implemented. Since 2014, records indicate that the emergency response plan has been updated five times.

The ERP states that all documents are reviewed and updated when significant or critical changes have been observed or reported. The evaluation of the Transport Emergency procedures is required at least once per year after a mock drill is held, after major changes in the road, change in outside responders, changes to the transport equipment used, lessons learned from accidents / incidents, new identified risks on route and/or after conducting annual route survey.

The ERP makes provision for annual emergency response drills. Also, the training matrix makes provision for emergency drills to be conducted annually. Training records of mock drills conducted from 2019 to 2021 is evident of emergency response drills conducted over the period. Reports for each of the mock drills which were reviewed gave details of the scenarios, participants, non-conformities, and corrective actions. Mock drills when evaluated are repeated to ensure perfection when there are some non-conformities.

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