



ICMI RE-CERTIFICATION - SUMMARY REPORT

Freight Forwarders Kenya Limited

Name of Cyanide User Facility:	Freight Forwarders Kenya Limited
Name of Cyanide User Facility Owner:	Freight Forwarders Kenya Limited
Name of Cyanide User Facility Operator:	Freight Forwarders Kenya Limited
Name of Responsible Manager:	Robert Owuor- QHSE Manager
Address:	Leslander House, Dar Es Salaam Road, Mombasa
Country:	Kenya
Telephone:	+254 709 967 514
E-Mail:	robert.owuor@ffkgrp.com
Audit Company	Investor Solutions Ltd

FREIGHT FORWARDERS KENYA LIMITED (FFK)

FFK became a Signatory to the International Cyanide Management Code on 22nd January 2008 as part of the repeated requests by companies to transport Cyanide to various mines in East and Central Africa. They were initially Cyanide Code Certified in May 2008. Recertification was completed in 2011, 2015 and 2018.

FFK is one of the main companies of the Freight Forwarders Group. They provide various services: with their Storage Yard run by Consolbase Limited (CBL) and their main Transporter Transeast Ltd, who they use exclusively for Cyanide Transportation

- General cargo haulage;
- Abnormal/out of gauge cargo haulage;
- Hazardous goods haulage; and
- Consolidated cargo haulage.

Consolbase Limited (CBL) operates and maintains cargo handling equipment in their yard which provides warehousing and related services and is a wholly owned company of FFK.



CONSOLBASE LIMITED (CBL)

Consolbase Limited is a container freight station based in Mombasa, Kenya which started its operations in October 2002. Consolbase Limited's operations involve handling of group age containers, house-house containers and vehicles with a warehouse space of more than 7,000 M³ for general cargo storage facilities, 12 Acres of secured open yard container cargo and 8 Acres for vehicle storage.

Consolbase Limited employs 90 permanent staff and between 150 -200 casual workers on weekly basis depending on the workload with the main objective of ensuring that cargo in Consolbase custody is safe and stored under prescribed conditions.

- Located 2.5 km from the port.
- Communication-Dedicated leased line.
- Private 24 hrs security guards/system.
- CCTV Surveillance 24 hours **in 3 different places.**
- Fully approved KRA licensed bonded facility.
- 2 Reach stacker 45T Each,
- 3,000 TEU's at any given time.

Transeast Ltd

Transeast Ltd is located along the Mombasa – Nairobi highway, 2km past Mazeras centre. The entrance gate is about 100m from the highway. The company specialises transport of regular containerised cargo, bulk cargo, out of gauge cargo and Dangerous Goods within the East and Central African region. Transeast Ltd is a subsidiary of FFK who its customer for the transportation of cyanide.

TRANSEAST LTD transports all cyanide for FFK. They utilise a fleet of well-maintained trucks with assorted trailers to move cargo from the Port of Mombasa to its various client destinations.

Cyanide is transported from Consolbase's interim storage facility along the Refinery Road onto the Mombasa to Nairobi highway and through border points into Tanzania or through Uganda to the DRC. From the border, the cyanide is transported to the mine clients for offloading.



Freight Forwarders Kenya Limited

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.

CONTENTS

INTRODUCTION	1
AUDIT TERMS OF REFERENCE	1
AUDIT SCOPE AND METHODOLOGY	1
STRUCTURE OF THE REPORT	2
AUDIT SCHEDULE	3
AUDIT TEAM	3
BACKGROUND	3
SUMMARY AUDIT REPORT	4
PRINCIPLE 1-TRANSPORT	5
PRACTICE 2 - INTERIM STORAGE:	11
PRINCIPLE 3 - EMERGENCY RESPONSE	14



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 programme 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). The Code is managed by the International Cyanide Management Institute (ICMI).

AUDIT TERMS OF REFERENCE

Investor Solutions Ltd was assigned by Freight Forwarders Kenya Limited (FFK) to conduct a Recertification Audit of their cyanide transportation activities.

Acronyms

FFK.....	Freight Forwarders Kenya Limited
CBL	Consolbase Limited
ICMC	International Cyanide Management Code
HGV.....	Heavy Goods Vehicle
HSE	Health, Safety & Environment
IMDG	International Maritime Dangerous Goods (Code)
NEMA	National Environment Management Agency
NEMC.....	National Environment Management Council
GCLA.....	Government Chemist Laboratory Agency

AUDIT SCOPE AND METHODOLOGY

The scope of this audit applies to those entities engaged in the transport of cyanide from its port of entry in Kenya to their Client mine sites. In addition to the physical carriers of the cyanide, any subcontractors whose activities are addressed by the Verification Protocol, as well as the cyanide producer, consignor and/or the mine itself may be subject to the Verification Audit depending on how the arrangements for delivery are structured. Other entities, such as contract transport vehicle maintenance facilities, may also be subject to parts of the Protocol.

Storage of cyanide in a warehouse (defined in the Code's Definitions and Acronyms document) is subject to the Cyanide Production Verification Protocol, and storage of cyanide at a gold mine site is subject to the Mining Operations Verification Protocol.

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 organisation are also detailed within that section.

AUDIT SCHEDULE

The Re-certification Audit was undertaken between 20 April 2021 and 22 April 2021.

AUDIT TEAM

The audit team comprised:

- ✓ Kuldip S. Degon, PCQI, ACEQU (ICMI pre-certified Lead Auditor); and
- ✓ Iain P. Turner (ICMI pre-certified Transportation Technical Specialist).

BACKGROUND

Freight Forwarders Kenya Limited (FFK) became a Signatory to the International Cyanide Management Code on 22nd January 2008 as part of the repeated requests by companies to transport Cyanide to various mines in East and Central Africa. They were initially Cyanide Code Certified in May 2008. Recertification was completed in 2011, 2015 and 2018.

FFK is one of the main companies of the Freight Forwarders Group. They provide various services: with their Storage Yard run by Consolbase Limited (CBL) and their main Transporter Transeast Limited, who they use exclusively for Cyanide Transportation

- General cargo haulage;
- Abnormal/out of gauge cargo haulage;
- Hazardous goods haulage; and
- Consolidated cargo haulage.

Transeast Limited maintains its vehicles at its own workshop which was visited as part of the audit. It has preventive maintenance systems in place to ensure that vehicles are checked regularly.

SUMMARY AUDIT REPORT

Auditors Findings

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with THE INTERNATIONAL CYANIDE MANAGEMENT CODE

in Substantial Compliance with

Not in Compliance with

----- // -----

FFK, and its Transporter Transeast Limited, operation has maintained full compliance with the International Cyanide Management Code throughout the 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 Iain P. Turner (ICMI pre-certified Transportation Technical Specialist)
Email Address turneriain@gmail.com



Specialist Signature *

23rd April 2021
Date

Dates of Audit

The Certification Transport Audit was undertaken over two days (four person-days) on 21 & 22 April 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

Freight Forwarders Kenya Ltd.
Audited Company



Lead Auditor Signature

23rd April 2021
Date

Freight Forwarders Kenya Ltd.
Audited Company



Lead Auditor Signature

23rd April 2021
Date

PRINCIPLE 1-TRANSPORT

Transport Cyanide in a Manner that Minimizes the Potential for Accidents and Releases

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

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Transport Practice 1.1
 in Substantial Compliance with
 Not in Compliance with

----- // -----

FFK, with its sub-contractors CBL & Transeast Ltd have implemented procedures for both storage and transport route selection to minimize the potential for accidents and releases, in an environment where there are limited practical alternative transport routes.

The transport routes have been periodically reviewed (between 2018 and 2021) and analyzed for risks and restrictions. The main parts of the routes are good tarmac, however the roads from the tarmac to the mine sites are dirt/murram and susceptible to weather. Therefore, more emphasis has been placed on these sections. Numerous actions have been identified and implemented during the reviews to improve safety. Drivers assess and report on conditions during or following each trip. The following are considered as part of the route selection process/procedure:

- Population density: Areas where population density is high are identified within the Cyanide Transport Route Assessment and drivers are advised to exercise caution.
- Infrastructure; The transporter implements processes and procedures to select transport routes that minimize the potential and potential impacts of accidents and/or releases.
- Pitch and grade: The transporter selects transport routes that minimize the potential for impacts of accidents and/or releases. Transport is only via roads but the condition of the road (tarmac or murram (dirt road) is noted within the Cyanide Transport Route Assessment and details of the gradient are provided along with advice to the convoy on exercising caution/being aware of speed limits/using low gears, etc., where required.
- Water bodies & fog: The transporter selects transport routes that minimize the passing over or close to water bodies or areas of fog and potential impacts of accidents and/or releases. water bodies or impact of water are noted and advice provided; for example advice is provided about exercising caution when turning due to the potential for parts of the road to be washed away by rain. In some areas the potential for fog is noted. The convoy uses dipped lights at all times while travelling.

All cyanide remains bonded for the Kenyan leg of either journey. The selection of the transport route within Kenya is therefore controlled by the Kenyan Government and the Transeast Ltd cyanide convoy is checked by Kenyan Customs Officers at three specific locations while travelling on Kenyan Roads.

The Route Risk Assessments identify the need to implement numerous corrective actions to reduce the inherent risk of cyanide transportation along the selected route. This includes details on the identification of hazards and risks with control measures to be taken:

- Local population – especially high-density populations
- Road Surface – Tarmac or Dirt/murram
- Road conditions with culvert and potholes
- Steep uphill or downhill conditions

Control measures include

- Exercise caution
- Use Designated speed limits
- NO Freewheeling downhill
- Drive slowly
- Use low Gears

An assessment of the residual risk based on the implementation of control measures are rated as nil, low, medium or high.

Drivers are briefed on a regular basis (at the start of every consignment and at the start of each day) and warned of changes in route conditions (speed limits, construction work, etc.) and the measures required to mitigate the changes or increased risks. Convoy Leaders also advise others in the convoy of hazards ahead so they may take appropriate action. Interviews with Convoy Leaders confirmed that advice is provided at stop points.

FFK/Transeast, its clients and suppliers have consulted various stakeholders and applicable governmental agencies as necessary (during the period 2018 to 2020) in the selection of routes and development of cyanide management and incident response measures. The FFK Cyanide Procedures including roles during an emergency were also discussed. Consultation signoff sheets noted comments from police and medical practitioners regarding the cyanide procedures.

Convoys are used for every cyanide delivery as a means of managing the risks of the road conditions (e.g., traffic and people, poor road conditions, etc.). Each convoy is led by a support vehicle which is fitted with warning signs and flags, all vehicles use dipped headlights and flashing beacons.

FFK/Transeast Ltd largely manages its own emergency response but contacts emergency support (police and hospitals) along the route each year. These stakeholders have been consulted on cyanide and advised of their roles and responsibilities during an emergency.

FFK subcontracts the interim storage of cyanide to CBL and transport of cyanide to Transeast Ltd under Service Level Agreements. The Service Level Agreements require Transeast Ltd and CBL to comply with the ICMC.

FFK has developed and implemented an audit protocol to verify and assist in the subcontractor performance assessment

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.

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Transport Practice 1.2
 in Substantial Compliance with
 Not in Compliance with

----- // -----

FFK subcontracts the transport of cyanide to TRANSEAST LTD and the interim storage of cyanide to CBL under Service Level Agreements. The Service Level Agreements require TRANSEAST LTD and CBL to comply with the Cyanide Code and FFK Protocols

FFK has developed an audit protocol to assist in the subcontractor performance assessment.

TRANSEAST LTD have only used trained and competent operators to drive its trucks (during the period between 2018 and 2021).

CBL, only uses trained and competent operators to drive its Reach Stacker within its Interim storage facility.

FFK, TRANSEAST LTD & CBL maintain files on their drivers that contain copies of licences (HGV drivers' licences) and other required training records pertaining to various HSE practices and handling Cyanide.

There is no requirement in Kenya for drivers to be licensed for dangerous goods transport, although these convoys can travel through Tanzania where there is a need. Kenya and Tanzania are both in the East African Community (EAC) where all members driving licences are accepted in each country. All personnel from FFK, TRANSEAST LTD & CBL operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The training of cyanide handling and transport equipment operators is completed on a regular (Annually and/or semi-annually) each year. Records show that such training continued during the period 2018 to 2021.

Interviews with drivers at Transeast Ltd & CBL indicated that all FFK and subcontractor personnel operating cyanide handling and transport equipment are competent to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

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

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Transport Practice 1.3
 in Substantial Compliance with
 Not in Compliance with

----- // -----

FFK and its subcontractors TRANSEAST LTD and CBL only use equipment designed and maintained to operate with the design loads.

TRANSEAST LTD and its trailer suppliers (Nelion Trading Limited) have determined that the maximum trailer loading capacity for the trailers they use for cyanide loads is 45 tonnes. Sodium Cyanide is supplied on 20' containers of approximately 23 tonnes weight which is well within the capacity of the trailers. FFK with TRANSEAST LTD also ensure that each trailer only carries one container. The Kenyan gross vehicle Mass (GVM) allowed on roads is 48 tonnes, and 53 Tonnes in Tanzania.

TRANSEAST LTD obtain trailer loading certificates from the Kenyan Government for all its trailers. All examples seen show that the trailers are allowed to carry loads over 31 tonnes.

FFK via CBL uses a Terex Reach Stacker vehicle to move cyanide but only in fully packed containers. The lift truck capacity of the Terex Reach Stacker is 45 tonnes and the containers sent to Kenya to are approximately 25 tonnes, including the container. The auditors observed the Calibration Report documentation:

The Reach Stacker is serviced by the supplier on annual basis with interim work undertaken by the in-house maintenance department. The auditors observed the maintenance documentation.

FFK and its subcontractors have procedures in place to verify the adequacy of the equipment for the load it must bear and its fitness for purpose. FFK has performed vehicle checks during the convoys carried out between 2018 and 2021, and these are documented. TRANSEAST LTD also have routine maintenance schedules and maintenance procedures that include checks for structural problems on the vehicles. These checks were performed during the period 2018 to 2021. TRANSEAST LTD & CBL maintain records of vehicle specifications and maintenance history.

FFK and its subcontractors have procedures in place to prevent overloading of the transport vehicles being used for handling cyanide. TRANSEAST LTD have sufficient vehicles of appropriate capacity to ensure that no other vehicles (without sufficient capacity) are used. The procedures and inspections carried out ensure that only one cyanide container is loaded and that no other materials added to the vehicles.

FFK subcontracts the transport of cyanide to TRANSEAST LTD and the interim storage of cyanide to CBL under Service Level Agreements. The Service Level Agreements require TRANSEAST LTD and CBL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment and these have been applied during the period 2018 to 2021.

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

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Transport Practice 1.4
 in Substantial Compliance with
 Not in Compliance with

----- // -----

FFK along with its subcontractors TRANSEAST LTD & CBL has implemented procedures (between 2018 and 2021) which have ensured that the cyanide is transported in a manner that maintains the integrity of the packaging. These include ensuring that containers are securely attached to the trailers using twistlocks and frequent inspection that the secure attachment remains in place during the convoy.

Signs in both English and Swahili are used by FFK, TRANSEAST LTD & CBL to identify shipments as containing cyanide for storage and for each convoy. On convoys, these signs are attached to the lead vehicles and all cyanide containing vehicles. In addition, the vehicles carry red flags, flashing beacons and dipped headlights are used. The signage is inspected prior to starting the convoy and at various stops each day as the convoy progresses.

Equipment consists of road vehicles (trailers) that were purchased to a design specification appropriate to carry the cyanide containers. FFK has developed a Safety Program which is implemented in conjunction with its subcontractors TRANSEAST LTD & CBL. This includes vehicle inspections prior to each shipment and preventive maintenance activities.

FFK has developed a Safety Program which is implemented in conjunction with its subcontractors TRANSEAST LTD & CBL. This includes vehicle inspections prior to each shipment and preventive maintenance activities. All containers transported are held in place on the vehicles using twist locks and angle plates securing the doors are in place. Supplier and FFK seals are used on the container doors and checked at least 3 times per day during the convoy.

In Uganda Cyanide requires a Police Escort to ensure consignment integrity.

Limitations on driver hours are also managed; locally through use of Convoy Leaders who ensure that driver hours are limited each day, and through the use of the GPS system which also monitors driver hours.

Procedures have been implemented to prevent loads from shifting through the use of twistlocks.

Procedures are also in place for modifying or suspending travel during severe weather and the Convoy Leaders assess conditions and can take appropriate action.

FFK and its sub-contractors also have a drug prevention policy. Records are maintained for all aspects of the Safety Program.

FFK subcontracts the transport of cyanide to TRANSEAST LTD and the interim storage of cyanide to CBL under Service Level Agreements. The Service Level Agreements require TRANSEAST LTD and CBL to comply with the ICMC. FFK has developed an audit protocol to assist in the subcontractor performance assessment and such audits were performed during the period 2018 to 2021.

----- / / -----

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

FFK & TRANSEAST LTD is in full compliance with Transport Practice 1.5, based on the finding that the transport operation does not transport cyanide by sea or air. The operation is considered to be in full compliance due to this Transport Practice not being applicable.

This Transport Practice is Not Applicable

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

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Transport Practice 1.6
 in Substantial Compliance with
 Not in Compliance with

----- // -----

TRANSEAST LTD vehicles transporting for FFK have several means to communicate with FFK, with TRANSEAST LTD head office in Mombasa, with emergency responders and with the relevant mining operation.

All vehicles transporting cyanide have GPS fitted and are tracked constantly by TRANSEAST LTD. Alarms are fitted to the tracking system, which is monitored constantly during the cyanide convoys. The alarms register when the drivers speed (+80Kph), stop for any duration, or move outside the travel corridor. A panic alarm is also fitted.

Each driver within the convoy has a mobile phone and the numbers are provided at the start of the convoy so drivers can get in touch with Convoy Escort personnel and vice versa.

Each convoy leader has three cellular phone connections (Airtel & Safaricom) which ensure a constant mobile signal for the duration of the trip to contact FFK, local police, hospitals and the mine sites. The relevant telephone numbers are carried by the Convoy Leaders prior to starting the convoy.

There are no blackout areas along the routes due to the near universal coverage of the cell phone networks in Kenya, Tanzania, Uganda and DRC between the boarder and the mine site. Therefore, no special procedures have been implemented.

Prior to commencing each convoy, communication equipment is checked, and this is recorded in the Pre-trip Truck Inspection Checklist completed for every vehicle. Trucks are logged on to the GPS in the transport yard at the start of each day and before departure.

All communication equipment is checked periodically each day to ensure it functions properly. TRANSEAST LTD Convoy Leaders report to TRANSEAST LTD personnel in Mombasa each day.

Chain of custody records are obtained by FFK from the supplier of cyanide. This chain of custody information details the amount of cyanide in transit with one sheet for each container. Shipping documents are included as part of every consignment and include:

- Consignment Note
- Import Licence
- Bill of Lading
- Delivery Note

The full Suppliers MSDS for solid sodium cyanide is kept by the Convoy Leader, which describes the necessary handling precautions. A summary data sheet that describes the Hazards, PPE requirements, First Aid Procedures and Emergency Procedures is also included within the driver's delivery folder and is in Swahili.

FFK has a procedure to ensure that its sub-contractors are in compliance with elements of this transport audit.

PRACTICE 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.

in Full Compliance with Transport Practice 2.1

Freight Forwarders Kenya Ltd. in Substantial Compliance with (FFK)

Not in Compliance with

----- / / -----

Consolbase Limited (CBL) provides warehousing and related services and is a wholly owned company of FFK. Transeast is also a subsidiary of FFK who is also its key customer.

CBL's interim storage facility is located on Refinery Road in the Portreiz district of Mombasa approximately seven kilometres (km) to the northwest of the Port of Mombasa and 11km to the northwest of the city of Mombasa at coordinates 4° 1'27.71"S - 39°37'56.56"E. The interim storage facility is close to the main Nairobi highway and Moi International airport. The facility covers an area 10 acres and is a roughly rectangular in shape with an entrance gate on the northern boundary. The interim storage facility holds bonded, transit and local cargos and is owned and managed by CBL.

- 1 Warning signs posted to alert workers
 - that Cyanide are present;
 - that smoking, open flames, eating and drinking are not allowed
 - what personal protective equipment must be worn
 - Flags are placed to show wind direction
 - Many signs about Cyanide and other DG's
- 2 There security measures in place to prevent unauthorized access to cyanide
 - The yard has a 3M wall fenced with electric fencing on top
 - There are 64 CCTV Cameras monitored in 3 places 24/7
- 3 Is cyanide separated from incompatible materials such as acids, strong oxidizers and explosives with berms, bunds, walls or other appropriate barriers to prevent mixing?
 - There is a Separate Storage Area away from all other Dangerous Goods.
 - The area is demarcated with bollards and barrier tape
- 4 Cyanide is stored to minimize the potential for contact of solid cyanide with water
 - Cyanide is stored in Seacontainers which are IMDG approved as Secondary Containment.
 - The Area is gas tested prior to entry by any personnel
- 5 Cyanide is stored with adequate ventilation to prevent build-up of hydrogen cyanide gas?
 - Area is open to the sky. Special Ventilation not required

6 CBL has a comprehensive Emergency Plan, there are systems in place with the capacity to contain any spilled cyanide materials and minimize the extent of a release?

- Set in a sloped area with a catchment area in case of spillages.
- The channel has gates to contain spills that can be neutralized before release to the regular drainage.
- Spill Kit includes Cyanide Testing equipment to ensure neutralization.
- Emergency Crash showers and eyewash available for personal contact with cyanide

CBL's facility is secured by a block wall approximately three metres high and topped with a multiple strand electric fence approximately one metre high. The steel entrance gates are also topped by the electric fence, are alarmed and have motion sensors. The security guards have panic alarms.

1 PRINCIPLE 3 - EMERGENCY RESPONSE

Ensure that Process Controls are Protective of the Environment.

Emergency Response Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Emergency Response Practice 3.1
 in Substantial Compliance with
 Not in Compliance with

----- / / -----

FFK & TRANSEAST LTD have a document entitled "Cyanide Procedures" Revision 17 that is updated at least annually. Last update 31st March 2021. It contains all of the details of how to respond in an emergency that involves cyanide.

The Cyanide Procedures document was originally adapted by FFK & TRANSEAST LTD from Orica Australia Limited's (Orica) Emergency Response Guide. The Orica Emergency Response Guide provides guidance in the development of specific site and transport route emergency response plans for the management of incidents involving spillage of sodium cyanide. The document has been modified by FFK to suit the conditions of East and Central Africa.

The Cyanide Procedures document has been developed to be appropriate for the selected transportation routes and interim storage facility, transport infrastructure, the physical and chemical form of cyanide and the design of the transport vehicle.

Approximately 1.1 tonnes of solid Cyanide, in the form of briquettes, is packaged inside heavy-duty plastic bags inside nylon bulk bags. These bags are then placed inside IBC standard wooden boxes. Depending upon the client requirements there are between 17 & 20 boxes loaded into a steel Rear-door Sea Containers for shipment."

The Cyanide Procedures cover specific circumstances where they will be used. The document includes Emergency Response Guides for specific scenarios including:

- RG1 Dry Sodium Cyanide Spill inside interim storage facility;
- RG2 Dry Sodium Cyanide Spill outside interim storage facility;
- RG3 Dry Sodium Cyanide Spill Inside a Sea Container;
- RG4 Sea Container Decontamination;
- RG5 Handling Wet Sodium Cyanide;
- RG6 Dry Sodium Cyanide Spill to a Waterway ;
- RG7 Decontamination of a Spill of Solid Cyanide into Soil; and
- RG8 Response to an Incident with a Fire Involving Sodium Cyanide.

External responders identified in the documents and are made aware of their role in an emergency during the annual Community Awareness campaign.

Road transport is now the only means of transporting dangerous goods including sodium cyanide in Tanzania". Cyanide is transported by FFK from Mombasa to North Mara Mine in Tanzania. This is also the case for transportation of cyanide to Kibali Mine in the DRC. The Cyanide Procedure therefore explicitly excludes any other form of transportation.

The road type varies from tarmac to dirt road. The Route Risk Assessments provide information on the condition of the road (surface type, number of carriageways and incline), specific hazards at different points along the route and specific precautions to be undertaken such as use of high or low gears and speed limits.

The Route Risk Assessments detail local hospitals and police departments and air strips that can be used in the event of an emergency.

External responders identified in the documents and are made aware of their role in an emergency during the annual Community Awareness campaign.

The Cyanide Procedures include incidents where an incident occurs to the convoy, but all the solid cyanide is still contained within the metal shipping container and those incidents where it is spilled from the shipping container. The latter has not happened since Cyanide transportation has been done by FFK /Transeast.

Emergency Response Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Emergency Response Practice 3.2
 in Substantial Compliance with
 Not in Compliance with

----- // -----

The operation provides emergency response training for appropriate personnel on Cyanide related emergency response procedures.

TRANSEAST LTD & CBL provide the same training to their respective employees which is given by TRANSEAST LTD's Health and Safety Officer.

All drivers transporting cyanide, CBL facility operators including handling equipment operators and banksmen receive the Cyanide Awareness course and First Response Course. The drivers received the Cyanide Convoy Procedures course. The latter two courses are given annually or bi-annually

The Cyanide Procedures identify the key roles and responsibilities in the event of an emergency for the following positions:

- Cyanide Code Manager
- Emergency Response Truck Driver
- Local Authorities
- Interim Storage Yard Worker.
- Cyanide Convoy Leader;
- Convoy Lead Drivers;
- Interim Storage Yard Supervisor

The requirements are clear and unambiguous and are also covered in the training programmes.

All emergency response equipment is taken in an Emergency Response vehicle as no other equipment is available en-route.

Both TRANSEAST LTD and CBL have lists of emergency response equipment that is documented on a checklist. The equipment is checked before every convoy of vehicles leaves. The Storage Yard Equipment's is checked every 2 weeks

The lists were viewed during the audit. In addition to the emergency response vehicles all drivers are issued with a "Get out alive" kit bag when the convoy assembles that includes essential PPE. Each driver carries an MSDS for sodium cyanide. And a CHEM-CARD that indicates the essential information for the driver including Hazards, PPE, First Aid and Incident Response

FFK has an audit procedure to ensure that its sub-contractors are in compliance with elements 1, 2 & 3 of this Transport Audit.

Emergency Response Practice 3.3: Develop procedures for internal and external emergency notification and reporting.

in Full Compliance with Emergency Response Practice 3.3

Freight Forwarders Kenya Ltd. in Substantial Compliance with
(FFK)

Not in Compliance with

----- // -----

The Emergency Call List and General Emergency Response sections of the Cyanide Procedures contain details on how the emergency response procedures are activated including details of who is contacted.

The procedure requires the following companies to be contacted in the event of an incident:

- FFK
- Cyanide Supplier
- Kenya Ports Authority (KPA)
- Department of Occupational Health & Safety Services (DOHSS) when in Kenya
- Emergency Services (Police, Fire & Medical Providers)
- NEMA (when in Kenya)
- NEMC (when in Tanzania);
- GCLA (when in Tanzania);
- Client (mine);

The Convoy Leader does not contact the local community directly in the event of an incident. They contact the local Police and Hospital services along the route. These services personnel are contacted on an annual basis during the Local Awareness campaign.

The relevant contact details for parties identified are provided in the Emergency Call List of the Cyanide Procedures.

It contains information on contact names and positions within the respective organisations as well as office numbers and mobile numbers.

A test of the telephone numbers of the internal and external responders is undertaken annually to update the latest contact sheet.

Cyanide Awareness Campaigns to the mines were undertaken in December 2020, and the Mombasa area in March 2021. These are also used to update contact details.

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

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Emergency Response Practice 3.4
 in Substantial Compliance with
 Not in Compliance with

----- // -----

There are procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

The Emergency Response Guide RG 6 Dry Sodium Cyanide Spill to a Waterway (part of the Cyanide Procedures) states that FFK, TRANSEAST LTD and/or CBL subscribe to the recommendations of the International Cyanide Management Code in that no chemicals are to be added to a flowing waterway in the event of a cyanide spill as these may only exacerbate the situation with their own toxicity characteristics."

RG 7 'Decontamination of a Spill of Solid Cyanide into Soil'

- This recommends using sodium hypochlorite for where there has been contamination of the soil.
- Ferrous sulphate and hydrogen peroxide are not carried by the convoy as part of their spill kit.

The Secondary Response section of the Cyanide Procedures states that FFK in conjunction with regulatory authorities will undertake a monitoring program at an accident/incident site where cyanide is released into surface water.

----- // -----

Emergency Response Practice 3.5: Periodically evaluate response procedures and capabilities and revise

Freight Forwarders Kenya Ltd. (FFK) in Full Compliance with Emergency Response Practice 3.5
 in Substantial Compliance with
 Not in Compliance with

----- // -----

The Cyanide Procedures contains provisions for periodically reviewing and evaluating its adequacy and they are being implemented.

The Cyanide Procedures state that: "Emergency response simulation drills are done at least every six months but in stages whereby one or two specific aspects of the plan are evaluated. E.g., Communications systems, Yard Response, Driver Response, etc. This is usually done as a desk top exercise

Full scale incident scenario including interaction with external agencies such as GCLA, Mining Companies, Police, Fire Service and a Hospital or Clinic will be done once every three years and can be beneficial in evaluating the overall plan

In addition to this the Review and Audit Process Section of the Cyanide Procedures states that the responsible people are required to coordinate a review at least annually, and after any of the following resulting from or affected by the transportation of cyanide:

Incidents;
 Emergencies;
 Emergency exercises; and
 Transportation audits and assessments.

FFK & TRANSEAST LTD have held full scale incident scenarios were undertaken in 2019,2020 & 2021. The latter was conducted on 15th April 2021

The last drill was undertaken 1km from the centre of Maungu along the Mombasa highway with the transportation of one 20 tonnes shipping container to North Mara Mine. The drill simulated the driver being affected by cyanide.