
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
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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, 2021.

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.
-



Investor Solutions Limited

P.O Box 67562

Nairobi

Kenya

- 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 Mazaras 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.

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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 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
TEL.....	Transeast Ltd
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 15th May 2024 to 17th May 2024.

AUDIT TEAM

The audit team comprised:

- ✓ Kuldip S. Degon, PCQI, ICMI pre-certified Lead Auditor & Transport 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, 2018 & 2021.

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

in Substantial Compliance with

Not in Compliance with

THE INTERNATIONAL
CYANIDE MANAGEMENT
CODE

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

Dates of Audit:

The Re-certification audit of the Freight Forwarders Kenya Ltd was conducted 15th to 17th May 2024

Attestation:

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

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


Freight Forwarders Kenya Ltd.
Audited Company



Lead Auditor Signature

17th May 2024
Date

Freight Forwarders Kenya Ltd.
Audited Company



Lead Auditor Signature

17 May 2024
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

The transporter implements processes and procedures to select transport routes that minimize the potential and potential impacts of accidents and/or releases. The following are considered as part of the route selection process/procedure:

- Population density;
- Infrastructure;
- Pitch and grade; and
- Prevalence of water bodies and fog.

FFK and TEL have implemented a procedure for selecting transport routes that minimises the potential for accidents and releases. The cyanide transported by TEL on behalf of FFK is for mine site customers in Tanzania and the Democratic Republic of Congo (DRC). All cyanide remains bonded for the Kenyan leg of the journey. The selection of the transport route within Kenya is therefore controlled by the Kenyan Government and the TEL cyanide convoy is checked by Kenyan Customs Officers at three specific locations while travelling on Kenyan Roads. The Route Selection - SOP-FFG-002a - New Route Selection Rev 5 dated 30th 17 April 2024 sets out the details to be followed that include a requirement to develop a Route Risk Assessment (RRA) for all routes, not just Cyanide.

RRA Procedure - SOP-FFK-001 - Route Risk Assessment Rev6 dated 30th April 2024 outlines the requirements for the RRA. The auditors observed RRA 13-03-24, RRA 06-04-23 RRA 20.09.22.

The containers are transferred directly from the ship to the convoy, reducing the risks associated with storage at the Port. The containers are then transported to the CBL yard where the convoy either spends the night before starting the journey to the mine the next day or the containers are offloaded into the interim storage facility. Issues considered within the Route Risk Assessment include Population density, Infrastructure, Pitch and grade, Water bodies & fog. Ongoing monitoring of routes is performed through driver feedback and consultation with the mines. Relevant information is added to the Route Risk Assessments. For certain sections of the road where conditions are known to be difficult due to mud, localised flooding etc, the Convoy Leader will assess the road before the convoy progresses and if necessary, the convoy will stop over for a day or two to allow the road to dry out.

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.

The transporter has implemented a procedure to evaluate the risks of selected cyanide transport routes and has taken measures to manage these risks.

FFK have implemented a Risk/Route Assessment Policy, to regularly evaluate and review the risks of selected cyanide transport routes and take the measures necessary to manage these risks.

FFK's procedure includes a requirement to complete a new Route Risk Assessment at least annually.

In addition, if changes to the road conditions are identified then the Route Risk Assessment is revised.

To minimize the risk of rollover TEL has implemented a general requirement that Low-bed or Step-deck trailers be used to give a lower centre of gravity to the trailer and load.

The Convoy Leaders follow the directions in the Route Risk Assessment and convoy drivers follow this lead. Within the Route Risk Assessments there is documentation of existing controls, (e.g., using bypass to avoid construction areas) and driver actions to improve controls and thereby reduce the risks.

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 (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. If the Convoy Leader stops then the whole Convoy will stop. The latest route surveys were observed.

The transporter has implemented processes and procedures to periodically re-evaluate routes used for cyanide deliveries.

The transporter also has a procedure for obtaining feedback from Convoy Leaders & Drivers on the condition of the routes used. Drivers assess and report on conditions during or following each trip.

FFK and TEL have a procedure to periodically re-evaluate the routes used for cyanide transport and take the measures necessary to manage identified hazards. However, major route changes are not practical given the limited number of routes available and the government policy that applies, which dictates the route that should be taken. Changes to conditions along the way result in requirements to modify operations. For example, convoy separation distances are increased in dusty conditions and convoys can be parked up if localised flooding is encountered. A revised cyanide transport Route Risk Assessment is performed at least annually with additional supplementary reviews if conditions change.

Drivers are briefed on a regular basis prior to the start of each convoy and each day of the convoy when they are warned of changes in route conditions. The transporter documents the measures taken to address risks associated with the selected routes.

FFK and TEL have documented the measures taken to address risks identified with the selected routes within the Route Risk Assessments.

The routes are re-surveyed annually, and the Route Risk Assessments updated. In addition, the Route Risk Assessments are updated if a convoy observes any changes to the route.

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, Drive slowly, Use Designated speed limits, Use low Gears, No Freewheeling downhill. An assessment of the residual risk based on the implementation of control measures are rated as nil, low, medium, or high.

The Convoy Leaders use the route instructions to reduce the transportation risk and provide information to the drivers by undertaking a toolbox talk prior to starting the convoy each day.

FFK and TEL have consulted various stakeholders and applicable governmental agencies as necessary in the selection of routes and development of cyanide management measures.

Routes within Kenya are managed by the Kenyan Government. The Department of Occupational Health and Safety Services (DOHSS) in Kenya when undertaking the route selection and assessment of risk management measures negated the need for public consultation.

The community has not been designated a role as part of the planned response to an emergency involving cyanide negating the need for community consultation on this issue. Within Kenya, the Government regulator for dangerous goods management is the DOHSS, who have been issued with the cyanide transport procedures including route selection and emergency response procedures.

FFK and TEL, HSE Managers performed a cyanide information road trip to consult with emergency responders and support agencies along the transport route in Kenya, Tanzania and the DRC.

The FFG Cyanide Procedures including roles during an emergency were also discussed. Consultation signoff sheets noted comments from police and medical practitioners regarding the cyanide procedures.

Evidence was also provided showing that stakeholders identified in the Cyanide Procedures regarding emergency response have been involved in the Emergency Response Planning process or that they have been made formally aware of their role in an emergency.

The stakeholders include:

- Emergency services (police and medical providers) in Kenya, Tanzania and DRC.
- National Environmental Management Agency (NEMA)– Kenya.
- Department of Occupational Health and Safety Services (DOHSS) – Kenya.
- Kenya Port Authority – Kenya.
- Tanzania International Container Terminal Systems (TICTS) - Tanzania
- Government Chemist Laboratory Agency – Tanzania.
- NMGM- Acacia Mining
- Kibali Mine – Randgold

The transporter uses convoys, escorts and additional safety and security measures as appropriate should the selected routes present special safety or security concerns.

FFK and TEL use convoys for all cyanide shipments. FFK and TEL personnel, including TEL’s QHSE Manager indicated that security is not usually a significant issue. They have carried out a number of convoys since the last recertification audit and no security issues have been experienced. They also notify the police in each region prior to starting each convoy and call the Regional Police at each region as they enter it during the convoy.

A review of convoy records has shown that convoys include the cyanide trucks Max 10 trucks in a convoy and two support vehicles, a Pilot pickup at the front and an Emergency Response Truck at the rear of the convoy. Each vehicle and fitted with signs and flags and uses dipped headlights.

FFK and TEL always use convoys when transporting cyanide. Convoys are used as a means of helping to manage the risks of the road conditions and responding to emergencies.

In addition to convoys, additional security measures are implemented including the use of locked and sealed containers, the use of angle plates, and GPS tracking.

FFK has a procedure to ensure that its sub-contractors follow elements 1, thru 7 of this Transport Practice 1.1.

FFK subcontracts the transport of cyanide to TEL, and the interim storage of cyanide to CBL, a signed Service Level Agreement is in place with both TEL & CBL. The auditors observed the SLA’s. Under these agreements FFK is allowed to assess the performance of TEL and CBL. FFK has developed an audit protocol to assist in the subcontractor performance assessment.

The elements covered adequately address those discussed within this Transport Practice. The audits of TEL and CBL were observed for 2022 & 2023

No other subcontractors except CBL and TEL have been involved with the storage and transportation of cyanide since the last

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

TEL and CBL only uses trained, qualified and licensed operators to operate its handling transport vehicles.

FFK, through its subcontractors TEL and CBL, only uses trained and competent operators to drive its trucks and container loaders.

There is no requirement in Kenya or the DRC for drivers to be licensed for dangerous goods transport. Nonetheless, TEL and CBL have a training scheme to ensure that all drivers and equipment operators are competent.

In Tanzania Drivers carrying dangerous goods must have an up-to-date certificate for Fire Extinguisher use and First Aid

Drivers are required to undertake, General Induction, Drivers Induction, Cyanide Awareness, First Aid certification for Convoy Leaders and Emergency Response personnel, Cyanide Convoys, including Emergency Response and Cyanide First Aid trainings

CBL Reach Stacker operators are required to undertake General Induction, Drivers Induction, Cyanide Awareness, Emergency Response and Cyanide First Aid trainings

The training presentations were observed by the auditors and were found to be comprehensive in the information they contained. Following the presentations, the drivers are required to undertake a test on their understanding.

TEL & CBL maintain records of training provided to its drivers and other personnel in the form of a matrix, which is continually updated. This matrix was observed by the auditors.

TEL requires drivers to take practical driving tests before they are employed. This testing is performed by the Automobile Association of Kenya.

TEL & 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.

Kenya & Tanzania are both in the East African community (EAC) where all members driving licences are accepted in each country.

The training of Cyanide handling and transport equipment operators is completed on regular (annually and/or semi-annually) each year.

In addition, on every convoy, TEL drivers are likely to be checked by police or customs officers at the weighbridges and border crossings and will have to produce their licence at that time.

The following training attendance records were observed:

- Training Matrix
- Cyanide Awareness
- Cyanide Convoy Procedures
- Cyanide Response
- Transport of Dangerous Goods
- Defensive Driving
- First Aid Certificates by Kenyan Red Cross

Drivers (from TEL) and Reach Stacker Operator from CBL were interviewed about their knowledge of the procedures and practices involving cyanide and provided good responses indicating effective knowledge and experience.

FFK has a procedure to ensure that its sub-contractors are in compliance with elements 1, 2 and 3 of this Transport Practice 1.2.

FFK subcontracts the transport of cyanide to TEL & Interim Storage to CBL, a signed Service Level Agreement is in place with both TEL & CBL. The auditors observed the Service Level Agreements Under these agreements FFK is allowed to assess the performance of TEL and CBL.

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

The checklist was not directly developed as a tool for assessing compliance against the Code, however, the elements covered adequately address those discussed within this Transport Practice.

No other subcontractors except TEL and CBL have been involved with the storage and transportation of cyanide since the last recertification.



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

The transport company only uses equipment designed and maintained to operate within the loads it will be handling.

FFK through its subcontractors TEL and CBL only use equipment designed and maintained to operate within the cyanide loads it will be handling. The mass of cyanide containers sent to Kenya are 23 tonnes. This is clearly shown on the chain of custody information provided with each shipment.

The chain of custody documentation observed includes the following:

For the consignment delivered to Kibali Mine Consignment Note, Single Administrative Document/Declaration, Bill of Lading, Packing List, Delivery Note were noted

Equipment used to transport cyanide loads, consists of road vehicles (tractor units and trailers) that were purchased to a design specification appropriate for the cyanide transport task. Low loader skeleton trailers have now been purchased for the delivery of cyanide to help reduce the risk of roll overs

FFK in conjunction with TEL and its trailer suppliers have determined that the maximum trailer loading capacity is 45 tonnes for the trailers employed by TEL. The Kenyan Gross Vehicle Mass (GRV) allowed on roads is 48 tonnes, and 53 tonnes in Tanzania. Containers supplied to FFK, including the shipping container, are approximately 25 tonnes. The truck is around 10 tonnes and the trailer around 5.3 tonnes. TEL limits the loading to one container per vehicle. This ensures that the total loaded vehicle capacity is well within the GRV compliance weight in Kenya and Tanzania.

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

CBL uses a Trailer Side loader Crane to move cyanide but only in fully packed containers. The lift truck capacity of the Trailer Side Loader is 44 tonnes, and the containers sent to Tanzania are approximately 25 tonnes, including the container. Terex O2A Calibration Report was observed.

TEL maintains records of vehicle specifications and maintenance history. The company has a detailed program of preventative maintenance and enough capacity to ensure that they always have enough vehicles on the road for the task.

FFK has performed vehicle checks during the convoys carried out between 2018 and 2021, and these are documented. TEL also have routine maintenance schedules and maintenance procedures that include checks for structural problems on the vehicles

The loads are also checked at government weighbridges during the transportation and confirmed to be within the legal weight limits.

Procedures are in place to verify the adequacy of the equipment for the load it must bear.

TEL obtain trailer loading certificates from the Kenyan Government for all its trailers. All examples seen show that the trailers are allowed to carry over 31 tonnes. TEL and CBL carry out maintenance of vehicles (including Tractor, Trailer and Reach Stacker) on a regular basis. Records for each vehicle are retained by the maintenance departments.

The Reach Stacker is serviced by the supplier on an annual basis with interim work undertaken by the in-house maintenance department. The job cards were observed.

Following a completion of a cyanide convoy the trailer and truck will undergo regular service maintenance. In addition, the Mercedes trucks will undergo service at the suppliers (DT Dobie) at least every 20,000 km. The following are some of the Job Cards were observed:

- KCH649Z, KCK 229X, KCP 040R

The auditors observed a number of Cargo Allocation emails that are sent out on a daily basis identifying those trucks that require a service when they arrive back from a trip. The services are tracked using the SAP program.

There are procedures in place to prevent overloading of the transport vehicle being used for transporting the cyanide.

FFK with TEL & CBL have the following procedure

- SOP-TE-05-Store, Load & Offload P&P
- CBL Storage and Handling Procedures Cyanide

This procedure does not need to include the requirement to prevent the overloading of trucks as each truck only carries one shipping container of cyanide approximate maximum of 25 tonnes in total weight. This specification is included in this procedure.

The procedures and inspections carried out ensure that only one Cyanide container is loaded and that no other material is added to the vehicles. This complies with the legal requirements for the weight of HGVs in Kenya and Tanzania and the carrying capacity of the trailers. The auditors observed the trailer specifications for the Nelion Low Loader Skeleton Trailers used showing they can carry 45 tonnes.

This is reinforced during training provided to all parties involved within the convoy. Prior to the start of each convoy and during the convoy, loads are checked by the drivers and Convoy Leaders, and this is documented each day. FFK has a procedure to ensure that its sub-contractors are in compliance with elements 1, through 3 of this Transport Practice 1.3.

FFK subcontracts the transport of cyanide to TEL & Interim Storage to CBL, signed Service Level Agreements is in place with both. Under these agreements FFK is allowed to assess the performance of TEL and CBL.

No other subcontractors except CBL and TEL have been involved with the storage and transportation of cyanide since the last recertification.

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

Freight Forwarders Kenya Ltd. (FFK)	<input checked="" type="checkbox"/> in Full Compliance with <input type="checkbox"/> in Substantial Compliance with <input type="checkbox"/> Not in Compliance with	Transport Practice 1.4
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Procedures are in place to ensure that the integrity of the producer's packaging is maintained.

Only one container is allowed per trailer, which is stated in the training presentations observed by the auditors. FFK ensures seals are checked on all containers and this is recorded on the Pre-Trip Truck Inspection Check sheet and Container Check sheet.

Truck checklists include Horse, HSE & Trailer details.

Container checklists are Check at Loading, Seals are Checked 3 times per day & Checked at Offloading

A sample of checklists were observed by the auditors.

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 using the GPS system which also monitors driver hours.

All Containers transported are held in place on the vehicles using twist locks and angle plates securing the doors are in place. Supplier & FFK seals are used on the container doors and checked at least 3 times per day during the convoy.

All containers transported are held in place on the vehicles using twist locks and angle plates securing the doors are in place

At the mine, the consignee signs chain of custody document to acknowledge receipt of the container in a good condition. He checks the condition of the load during the unpacking process and reports on the standard of the shipping container. The Delivery Manifest is signed to confirm the seals were in place on delivery and the delivery was acceptable.

The auditors did not observe any instances where the seals were not in place or where there was an unsatisfactory delivery.

Placards and signage are used to identify the shipment as cyanide and as required by local regulations or international standards.

As all cyanide is delivered by sea to the Port of Mombasa, containers arrive with placards already in place as attached by the supplier, in accordance with the International Maritime Dangerous Goods (IMDG) Code. These placards remain on the containers until the containers are unpacked at the mine sites.

The placards used on containers, which are prescribed in the United Nations Modal Regulations, IMDG Code and required by laws of Kenya, Tanzania & Uganda, include: UN Numbers – 1689, Dangerous Goods Class labels, Marine Pollutant labels

Signs in both English and Swahili are used by FFK, TEL & 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.

The vehicles also carry a sign on the front of each vehicle which reads, "Danger Poison" in English and Swahili

All vehicles in the convoy are fitted with this signage before they set off.

Red flags are also fitted to the lead vehicle and the vehicles carrying containers. This was observed on the front of trucks parked in the photographs supplied by TEL.

FFK, TEL & CBL implement safety programs for cyanide transport that includes (where appropriate or applicable) the following aspects:

- a) Vehicle inspections prior to every departure/shipment
 - Container checklists
 - ERP Kit Checklists
 - Truck checklists.
- b) A preventative maintenance program
 - TE-Workshop Procedures v5
- c) Limitations on operator/driver hours
 - TE-Driver Fatigue Management Policy
- d) Procedures to prevent loads from shifting
 - SOP-TE-05-Store, Load & Offload P&P
- e) Procedure to modify or suspend transportation if conditions require it
- f) 31.01.2024 FFK Cyanide Procedures v.20p
- g) A drug abuse prevention program
 - FFK-Smoking, Drug and Alcohol policy.pdf
- h) Retention of records documenting that the above activities have been conducted.

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

TEL have a checklist that is completed by the Convoy Leaders before each trip. The check sheet covers vehicle roadworthiness, dangerous goods requirements, signage and emergency equipment. Records are maintained for each shipment and the following were observed

- Consignment Note
- Single Administrative Document/Declaration
- Bill of Lading
- Packing List
- Import Licence
- Delivery Note

FFK has a procedure to ensure that its sub-contractors are in compliance with elements 1, 2, 3 & 4 of this Transport Practice 1.4.

FFK subcontracts the transport of cyanide to TEL & Interim Storage to CBL, signed Service Level Agreements is in place with both.

Under these agreements FFK is allowed to assess the performance of TEL and CBL.

No other subcontractors except CBL and TEL have been involved with the storage and transportation of cyanide since the last recertification.

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 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

Vehicles are able to communicate with the transport company, the mining operation, the cyanide producer/distributor and emergency responders.

TEL vehicles transporting for FFK have several means to communicate with FFK, with TEL 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 TEL. 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 two cellular phone connections (Safaricom and Airtel) which ensure a constant mobile signal for the duration of the trip. Convoy Leaders also carry mobile phones to contact FFK, relevant transporters, local police, hospitals, and the mine sites. The relevant telephone numbers are carried by the Convoy Leaders prior to starting the convoy.

TEL's Pre-trip Truck Inspection Checklist includes checking the details of the communication equipment. Emergency response guidance and contact information is carried in the convoy.

In the event of an emergency, Convoy Leaders telephone Contact One (currently Roger Lucheli or his designate) at TEL headquarters. Contact One calls FFK and the relevant mine (as well as local emergency responders). The mine sites are advised of dispatch time, estimated arrival time and extensive information on the container that was dispatched (container number, safety equipment on board, security seal numbers for outgoing and return loads, etc.)

The communication equipment is regularly tested to ensure that it functions correctly.

FFK through its sub-contractors TEL, employ a range of communication equipment for the cyanide convoys including GPS (for vehicles), mobile phones (two telecommunication providers, Airtel and Safaricom, are used in Kenya to provide coverage of all areas) and radio communication equipment. Text (SMS) messaging is also used to communicate between the Convoy Leader and the TEL head office in Mombasa to provide information on progress.

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. sample of checklists were observed by the auditors including the following: 09-02-24 Convoy CN Kibali, 04-04-24 Convoy CN NM, 17-05-23 Convoy CN Kibali, 07-12-23 Convoy CN Kibali, 03-08-22 Convoy CN Kibali, 19.06.22 Convoy CN Kibali

All communication equipment is checked periodically each day to ensure it functions properly.

TEL Convoy Leaders report to TEL personnel in Mombasa each day.

There are no communication blackout areas within Kenya on the transport routes used by TEL. These have been checked and as long as both telecommunications providers (Airtel, Safaricom) are available on the mobile phones then all areas are covered.

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

There are systems and procedures in place to enable the progress of cyanide shipments.

TEL has developed and follows procedures to track the progress of cyanide shipments.

Prior to the cyanide convoy departing the timing of the convoy between the pick-up point and the mine is estimated. The mine is then informed as to the estimated time of arrival.

The progress of the cyanide convoy is then continuously monitored using a GPS tracking system that allows the position and speed of the convoy to be viewed within the TEL offices in real time.

The transporter uses inventory controls and chain of custody documentation to prevent the loss of cyanide during shipment.

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. The documents indicate: Container numbers, quantities and weights, Seal numbers, Delivery location.

The delivery manifests are signed off by the mine representative following the unloading of the containers at the mine to confirm the containers were delivery with the seals intact and the stated quantity of cyanide has been delivered.

The chain of custody documentation the auditors observed includes the following:

For the consignment to Kibali Mine delivered on the 03 November 2019, 10 August 2020 and 09 March 2021 the auditors observed the documentation for the latter:

- Consignment Note
- Single Administrative Document/Declaration
- Bill of Lading
- Packing List
- Import Licence
- Delivery Note

During the convoy, the trucks have to pass through three weighbridge stops where the weight of the containers is compared to the chain of custody documentation.

Shipping records indicate the amount of cyanide in transit and Materials Safety Data Sheets are available during transport.

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. The documents indicate: Container numbers, quantities and weights, Seal numbers, Delivery location.

The delivery manifests are signed off by the mine representative following the unloading of the containers at the mine to confirm the containers were delivery with the seals intact and the stated quantity of cyanide has been delivered.

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 necessary handling precautions is also included within the driver's delivery folder and is in Swahili.

The auditors observed the following documents

- MSDS-NaCN-HEBEI
- FFK-TEL Reagent Info - NaCN-sm
- TEL Instructions in Writing

FFK has a procedure to ensure that its sub-contractors are in compliance with elements 1, 2, 3 & 4 of this Transport Practice 1.4.

FFK subcontracts the transport of cyanide to TEL & Interim Storage to CBL, signed Service Level Agreements is in place with both.

Under these agreements FFK is allowed to assess the performance of TEL and CBL.

No other subcontractors except CBL and TEL have been involved with the storage and transportation of cyanide since the last recertification.

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.
(FFK) in Substantial Compliance with

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 its key customer is also.

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 are 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 & TEL have a document Cyanide Procedures Revision 20 that is updated at least annually. Last update 31st March 2021. It contains all the details of how to respond in an emergency that involves cyanide.

The ERP is an integral part of the FFG Cyanide Procedures. The document covers FFK, TEL and CBL. This is the document to be used in the event of an emergency involving Sodium Cyanide. The auditors observed the documents

- 31-01-24 FFK Cyanide Procedures v.20
- CBL Emergency Response Plan V 1.0

The Cyanide Procedures Document was adapted by FFK from Orica's Emergency Response Guide to provide guidance in the emergency response plans for the management of incidents involving spillage of sodium cyanide. The document used by FFK, TEL & CBL & is updated at least annually to suit the conditions of Kenya, Tanzania, Uganda and the DRC.

It is stated Cyanide Procedures that a copy must be carried by all escorts of the cyanide convoys.

The Cyanide Procedures includes an Emergency Flow Chart that guides the management of an incident.

The Cyanide Procedures is appropriate for the selected transportation route(s) or interim storage facility.

The Cyanide Procedures include the following:

- Basic Incident Flow Chart for Cyanide Convoys;
- Basic Emergency Response Procedures;
- Emergency Response Guides for specific scenarios:
 - 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.

Flags are installed near the Cyanide Storage Area at CBL to alert workers as to wind direction

In addition, there are route risk assessments for specific routes, which details the risks associated with specific routes.

The Cyanide Procedures considers the physical and chemical form of the cyanide.

The Scope section of the Cyanide Procedures states "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 Basic Emergency Response Procedures and Emergency Response Guides detailed in question 3.1.2 describe scenarios for the solid briquette form of cyanide and within the shipping containers.

The Plan considers the method of transport. The Scope section of the Cyanide Procedures states:

“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 emergency response guides detailed in question 3.1.2 describe scenarios for interim storage and within a sea container.

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.
(FFK)

in Substantial Compliance with

Not in Compliance with

There are procedures and current contact information for notifying the shipper, receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities in the event of an emergency.

The Cyanide Procedures includes an Emergency Flow Chart that guides the management of an incident. In addition, the Cyanide Procedures contain information for notifying the following:

- Emergency services along the route (police and medical providers);
- Transporter representative;
- Kenya Port Authority (KPA)
- Department of Occupational Health and Safety Services (DOHSS) when in Kenya;
- National Environmental Management Authority (NEMA) when in Kenya;
- National Environmental Management Commission (NEMC), when in Tanzania;
- Government Chemist Laboratory Agency (GCLA) when in Tanzania;
- Clients (mining companies); and
- Cyanide supplier.

The relevant contact details for parties identified are provided in the Emergency Call List of the Cyanide Procedures. These details are kept current at least annually during the Cyanide Awareness Campaign

Emergency Call List contains information on contact names and positions within the respective organisations as well as office numbers and mobile numbers

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 Cyanide Procedures document the role of the Clients (mine sites) where emergency response and medical facilities are available.

Systems are in place to ensure that internal and external emergency contact information and reporting procedures are kept current.

On transport routes regional hospitals and police are listed in the emergency contact information including individual names and roles.

These people or their representatives are visited annually as part of the Community Awareness Campaign. The Cyanide Procedures document is given to them and is discussed along with their role in emergency situations. The updated contacts lists were observed by the auditors.

The GCLA in Tanzania is contacted at least on a monthly basis and contact numbers are updated if required. Mines are contacted at least on a monthly basis. Supplier Numbers are updated at least annually

Cyanide Awareness Campaigns to the mines were undertaken in December 2022, and the Mombasa area in March 2023. These are also used to update contact details.

Emergency Response Procedures states that in an event of a significant cyanide incident ICMI will be notified within 48hrs.

In case of a significant incident, an Accident Report Form will be completed by the QHSE Manager with the findings, causes and corrective actions and ICMI notified accordingly.

The ERP details significant incident as defined in the transporter's ERP and ICMI protocol are as follows.

- Human exposure that requires action by an emergency response team, such as decontamination or treatment.
- An unauthorized discharge that enters natural surface waters, on or off site.

- An unauthorized release that occurs off-site or migrates off-site.
- An on-site release requiring the intervention of an emergency response team.
- A transport incident requiring an emergency response in the event of a release of cyanide.
- A multiple wildlife death event where cyanide is known or credibly suspected to be the cause of death.

Procedure for notifying ICMI in the event of a significant incident were sighted by auditors. No cyanide incident has been recorded by the transporter in the past years.



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.

In the Cyanide Procedures there is The Emergency Response Guide RG 7 'Decontamination of a Spill of Solid Cyanide into Soil'.

This details the decontamination of a spill of solid cyanide into soil and also includes details if water is impacted. The emergency guide details the following:

- Appropriate PPE;
- Determine the area affected;
- Measure pH of contaminated soil;
- Determination of soil type;
- Instructions to contact the supplier where required for assistance on concentrations of sodium hypochlorite needed;
- Addition of alkali reagent (lime or sodium bicarbonate);
- Need to excavate soil;
- Testing sub-soil;
- Replacement with fresh soil;
- Taking bore samples;
- Consultation with Water Authority; and
- Decontamination of clothing and equipment following the procedure.

It includes a procedure for disposal of cyanide contaminated soil and wash water. It states that contaminated soil and spilt material will be disposed of at a mine site facility/tailling. There are also procedures for dealing with a dry spill and for dealing with a wet spill.

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

The Emergency Response Guide RG 6 Dry Sodium Cyanide Spill to a Waterway (part of the Cyanide Procedures) states that "FFK & TEL 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' (part of the Cyanide Procedures) recommends the use of sodium hypochlorite for use 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.

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

There are provisions for periodically reviewing and evaluating the adequacy of the Cyanide Procedures and they have been and will continue to be implemented. The Cyanide Procedures were observed by the auditors

- 31-01-31 FFK Cyanide Procedures v.20

The Document History section of the Cyanide Procedures details the date of publication, new revision number and a description of the revision.

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.

Amendments made to the document are to be noted within the “Document History” section and implemented immediately. The revised document is to be circulated to parties identified on the distribution list.

The latest revision is shown as being due to “Inclusion of new CN supplier, change of Tanzania CN Incident contact”.

There are provisions for periodically conducting mock emergency drills and they have been and will continue to be implemented.

The Cyanide Procedures state that: “Emergency response simulation drills are done at least 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.

The Drills over the past 3 years have not included the response to a Cyanide Spillage, but drills in the past have done so.

“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.”

The following mock drill reports were observed:

- 18-08-22 Cyanide Emergency Drill
- 22-04-23 Cyanide Emergency Drill
- 27-09-21 Cyanide Emergency Drill
- 21-08-21 Cyanide Emergency Drill

Following the drill, the write up included areas where improvements could be made which included additional training requirements, specifically training of Operational Department Leaders.

The last drill was undertaken near centre called Apinaka along the Aru – DOKO road in the DRC with the transportation of one 20 tonnes shipping container to Kibali Gold Mine. The drill simulated the driver being affected by cyanide.

The last drill learning point was “Review the incident and provide confidence on the few drivers that looked apprehensive.

There is a procedure to evaluate the performance of the Plan after its implementation and this has been and will continue to be followed.

The Cyanide Procedures are currently on Revision 20.

The Document History section of the Cyanide Procedures details the date of publication, new revision number and a description of the revision.

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.

There have been no cyanide incidents or emergencies within the last 3 years.

Amendments made to the document are to be noted within the “Document History” section and implemented immediately.

The revised document is to be circulated to parties identified on the distribution list.