



Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

ICMI RE-CERTIFICATION – SUMMARY REPORT

Golden Coach Limited - Tanzania



**ICMI Recertification Audit of Golden Coach Ltd-
Summary Report**



Investor Solutions Limited

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1.0 SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

Name of Cyanide User Facility: Golden Coach Limited
Name of Cyanide User Facility Owner: Golden Coach Limited
Name of Cyanide User Facility Operator: Golden Coach Limited
Name of Responsible Manager: Mohamedraza Dewji
Address: PO Box 38322
Dar-es-Salaam
Country: Tanzania
Telephone: +255 752 786 901
E-Mail: mrdeewji@goldentz.com

2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

Golden Coach Limited, (GCL), became a Signatory to the ICMC in May 2014. They have a "sister" Company under the name of Golden Fleet Limited, (GFL), but although they are run by the same Management team, they are considered to be a subcontractor. They operate out of the same premises, with GCL supplying some vehicles, but GFL doing the trucking.

They are located in Nelson Mandela Road in Dar es Salaam and use the same yard for their equipment as well as workshops.

For clarity, the rest of the report will refer to GCL as the applicant, and GFL as the subcontractor. GCL runs around 200 trucks and trailers, and they service several countries throughout East Africa and deliver the following:
Hazardous Goods (Cyanide),
General cargo, and,
Consolidated cargo loads.

Name of Facility:
Golden Coach Limited

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Lead Auditor

Date: 16.07.2021

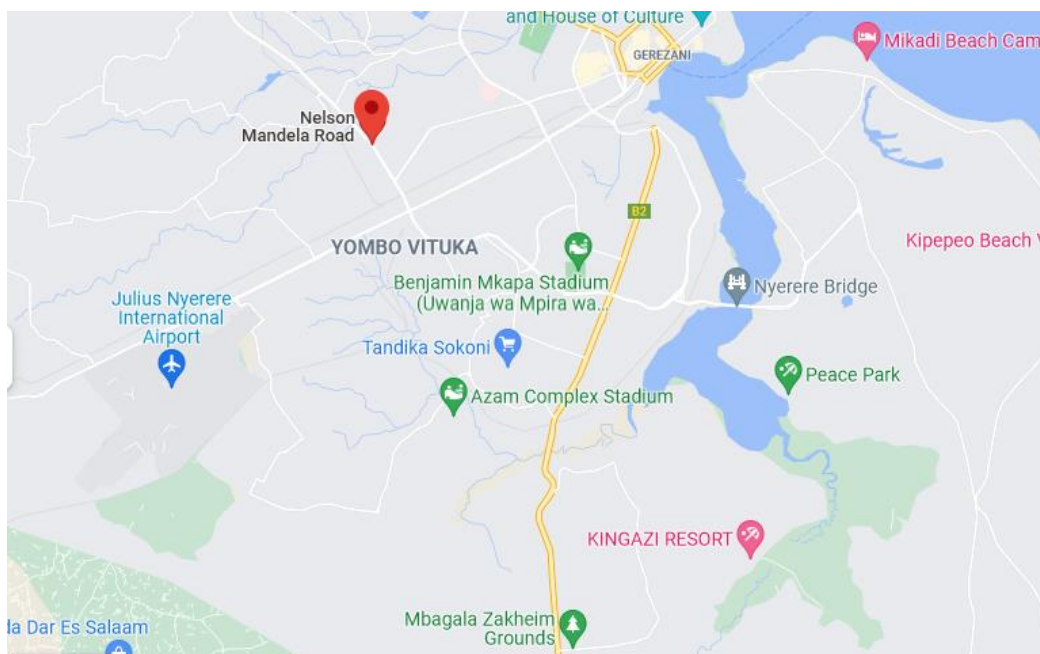


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As mentioned, they have their own workshops and have an extensive maintenance programme wherein the intention is to have a preventative maintenance programme. Besides truck engine maintenance, they also repair and replace tyres on site and have an equipped warehouse for parts that may be needed.

Upon delivery at the port, the containers are offloaded using container handling equipment as required by the Tanzanian International Container Terminal System. The containers are separated from general containers and away from any other dangerous goods due to the nature of the product.

Once all the paperwork has been completed, the containers are moved by road to the Inland Container Depot (ICD). This depot is approved and licenced by the Tanzanian authorities to accept dangerous goods. The same depot also has a bonded warehouse for other goods that are in transit.

The collection of the containers would be as follows: once all the customs' paperwork has been completed, a convoy sets off to go and collect the containers. The convoy is accompanied by a convoy leader and vehicle and the route is strategically worked out due to the ongoing roadworks in Dar es Salaam that are happening currently. The ICD is in an industrial area in the southern part of Dar es Salaam (Mbagala Industrial Area), and once the vehicles arrive at the ICD they either remain in the yard for dispatch or they are off loaded in an interim storage area for later transport to various mines.

The Tanzanian Government Chemist Laboratory Agency administers the Rules and Regulations and is the national regulator for dangerous goods management. The convoys to the various mines can comprise of up to 10 trucks at a time, each truck carrying only one container load at a time. They are also accompanied by relevant escort vehicles.

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These convoys will travel throughout Tanzania and throughout the general region of East Africa to deliver the cyanide to various gold operations.

SUMMARY AUDIT REPORT AUDITORS' FINDINGS

Golden Coach Limited is:

in full compliance with

in substantial compliance with

not in compliance with

THE INTERNATIONAL CYANIDE MANAGEMENT CODE

Audit Company:

Investor Solutions Limited - Kenya

Audit Team Leader:

Kuldip Degon, Lead Auditor

Email:

kuldip@islglobal.net

NAME OF OTHER AUDITORS

Sean Webster – Technical Auditor: Transportation, Production and Mining Operations.

DATES OF AUDIT

The Re-certification Audit was undertaken during July 2021.

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

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

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Golden Coach Limited

Lead Auditor

Date: 16.07.2021



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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.

The operation is:

in full compliance with

in substantial compliance with

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

GOLDEN COACH instituted a Policy and had over the years, improved on it, to ensure that transportation routes are selected in such a way as to minimise any potential for accidents.

Within their Operational Manual, they do have a Route Selection Policy that is revised on at least an annual basis or, whenever circumstances change. All staff will then be notified of any route changes and all documentation is updated to reflect these changes.

These assessments cover the following:

- Infrastructure – this ranges from the roads to the Port, to issues like road Pitch and Grade. GOLDEN COACH only transports containers via road, so the important issue here, will be the road conditions and the conditions of any bridges that need to be used. The issue of road gradient will play a key factor in limiting speed so as to minimise any potential risks. The current situation in Dar es Salaam is that there is a major project whereby roads are being upgraded so temporary alternatives are constantly being monitored. The remainder of the Country had the road infrastructure upgraded some years ago.
- Population Density – the route plan makes provision for when the convoys enter more densely populated areas. This would consider issues such as lowering of speeds and keeping the convoy drivers more up to date with any immediate changes such as increased pedestrian traffic.
- Consideration of water bodies – water bodies such as stream, rivers or dams are noted and as far as practically possible, these are avoided. During the rainy season, extra care is taken in order to ascertain those sections of roads have not been damaged or washed away.

A Transporter (PMM) operates an Inland Container Depot (ICD) and they have the responsibility to collect the containers from the Port and move them to the ICD. This facility is approved by the Government as an interim storage facility but due to the ongoing road construction in the City, the routes need to be monitored on a nearly daily basis to ensure smooth transportation from the Port to the ICD.

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The ICD would then bring the containers in, and then MCL will be instructed by GOLDEN COACH to collect the containers. The containers would then be taken to the Mbagala Yard for either storage in a separate, banded area, or if the convoy is leaving the next day, the trucks would park in the yard for security reasons and then leave the next day.

The Government Chemist Laboratory Authority (GCLA) is the only authority that allows for the transportation of cyanide within Tanzania. Amongst all the importation documentation that needs to be filed, a permit needs to be applied for from the GCLA and this is valid for 30 days. During this time, the goods to be moved from the Port to the receiving mine.

We were shown various route assessments including some that were no longer being serviced due to the mines either being closed or no longer using their services.

Besides being formally reviewed on an annual basis, any immediate changes to the routes, such as road construction or damage by rain, are communicated back to the office and changes made to the routes wherever possible. Unfortunately, some cases dictate that the routes do not offer any alternatives so additional precautions need to be taken.

After every delivery, the Convoy Leaders are required to update the Trip Reports, and any changes are then communicated to the next convoy that will cover the same route, and as such, the route assessments are an ongoing update.

Once the permit from the GCLA is received, and dates confirmed for when the convoy will move, the GCLA will contact the Police stations in each town to inform them of the ETA and then when the convoy either stops at, or is close to the town, the Golden Coach Convoy Leader will contact the local Police to let them know that they are either close by, or in that area.

It might be a good time here to touch on the phone system in Tanzania. All drivers have their own cell phones. In Tanzania, there is a cell phone payment system in operation, that allows for drivers to make calls, buy food, and to pay for accommodation. So before each convoy sets off, each cell phone gets loaded with a certain amount of money and that covers calls, food and overnight stops. This ensures that nobody runs out of airtime and if anything should occur, more money can be loaded onto the relevant phone by the office. Also, "black spots" – areas without phone coverage are extremely limited, so moving maybe 1 or 2 KM's will move the driver into a clear reception zone.

On an annual basis, Golden Coach conducts a formal route assessment, and during that trip, will engage with Medical Services and local Police and they share their Emergency Response Plan. This is a more formal approach supplementing the feedback that the drivers share on their return from deliveries.

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Lead Auditor

Date: 16.07.2021



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

The operation is:

- in full compliance with
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Golden Fleet Limited only uses qualified, trained and licensed drivers to operate the vehicles. GOLDEN COACH does not supply any drivers, the only people it uses for the convoys is the Convoy Leader, and the operator that moves containers in the yard (the Terex Reach Stacker unit).

It is now a Legal requirement that all Dangerous Goods Drivers are required to be trained and Certified by a Government Agency which is GCLA.

GOLDEN COACH has developed a very comprehensive training matrix that tracks all training done, and when they are due for refresher training. This Matrix is also consulted prior to any convoy leaving to ensure that the drivers are up to date with their training in order to ensure that they are compliant in terms of company protocols as well as the GCLA requirements.

GOLDEN COACH offers the following training to their employees as well as PMM and this training is done as per the Matrix requirements:

- Induction – where relevant,
- Driver Induction – where relevant,
- Cyanide Awareness,
- Managing and Participating in Cyanide Convoys,
- Cyanide First Response.

Each Driver is given a card that they keep with them. This card will contain details such as what training has been received and when, what is the next training due and is the required training up to date.

Prior to the convoy leaving these cards are checked and a briefing is given. The Auditors were shown training records to testify and prove that the training records were up to date and continually upgraded.

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

The operation is:

in full compliance with

in substantial compliance with

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Cyanide manufacturers package the cyanide briquettes into 1 ton (or, in a few cases, 1,1 ton) bag boxes. These 20 IBC's are then loaded into 20 'containers. Once the weight of the product and the container is added together, they average out at around 26 tons which appears to be an industry average. These weights will appear on the shipping documents and will need to comply with the Tanzanian Regulations. Another aspect that needs to be factored in, is that the Tanzanian Regulations only allow for a maximum gross weight of 53 tons per vehicle, including payload and trailers. As such, only one container is loaded onto a vehicle, to ensure that overloading is not done and minimises various risks. Golden Coach does have a procedure for the loading of vehicles to prevent overloading of vehicles, but, they are also checked at Government Weighbridges so they need to ensure that they are within Legal Requirements.

All vehicles are selected according to industry criteria, such as payload capabilities, maintenance schedules, terrain suitability and availability of spares amongst other criteria. They also stick to a few brands to allow for easier maintenance protocols.

Golden Coach services the vehicles and has a strict maintenance policy. We were shown records for a few vehicles, and they covered the entire life of the vehicles from delivery to date. Paper copies are kept and as services are done, this is captured on SAP including spares that are used in order to calculate running costs. Services are done at every 10 000 km's with major services carried out at 30 000 km's.

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Lead Auditor

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

The operation is:

- in full compliance with
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Following on from the "Loading Procedure", and their own "Chain of Custody Procedure", GOLDEN COACH has implemented a Policy whereby all containers are checked upon arrival at the ICD.

Since the ICD has a Customs Office onsite, all container seals are checked and cross-referenced against the shipping documents.

As per IMO Regulations the supplier would have had the appropriate markings on the containers which, by Regulation, would include the UN Numbers and the Dangerous Goods Class Labels as required by the current IMDG Code. All these placards remain on the containers until delivery to the mine since none of the containers are off loaded into a storage warehouse. These markings are put on all four sides of the containers as per Industry norms.

All placarding is checked before loading, as the convoy leaves, and during delivery to the mine. The vehicles also have a local sign in the Language of Swahili which reads "Danger Poison". These signs are posted on the front of the vehicles.

All vehicles in the convoy are fitted with red flags to denote that they are carrying dangerous goods. These flags both act as a warning to other road users, as well that in the event of an incident, they could be used to check wind direction and to cordon off an incident zone.

- a) Prior to every departure, a Haulage Truck Checklist is completed. This covers various aspects such as ensuring that Dangerous Goods Requirements are met, that the driver has their Emergency Equipment, that the vehicle is roadworthy, and that all paperwork is completed. These checks are kept for every shipment that gets done.
- b) All vehicles are maintained as per the prescribed maintenance schedule and as mentioned earlier. Where an issue arises, the vehicle is pulled from service and the issue resolved, obviously with a record kept on any additional servicing as required for that specific vehicle.
- c) A service provider that does satellite tracking, is used to track all the movements of the convoys. From that system, one can see where, when and for how long each truck stopped. Each route that has been mapped out stipulates rest stops and overnight stops, so it is clear where the convoys have stopped whether it is a mandated stop, or, at worst, an incidental stop in which case the Convoy Leader will contact the home base and inform them. GOLDEN COACH does have a Policy in place that does give guidance as to rest stops and also, that driving after dark is strictly prohibited.

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- d) Sodium Cyanide manufacturers pack the product into Industry accepted IBC's. these IBC's are designed in such a way to ensure that once loaded into containers, there is minimum risk of movement within the container. Shipping lines are also very circumspect about the way in which they stow the containers. Once loaded onto the trucks, twistlocks are used to secure the loads in order to minimise any shifting of the containers. There is a Checklist that needs to be consulted before and during each trip to ensure that these twistlocks are in place and fully functional.
- e) During each delivery, the Convoy Leader is in touch with the office, and if anything were to happen, he can consult with the office in Dar es Salaam and a decision can be made as to either suspend the convoy in the case of bad weather, or to take alternative steps to ensure that the safety of the convoy is maintained. It appears that the main concern would be bad weather, and subsequent degradation of the roads, with, Civil Unrest being a low issue at the moment.
- f) There is a Drug Abuse Prevention Programme in place at GOLDEN COACH, as well as an updated Policy. This covers all Employees, but special focus is placed on the Drivers and Convoy Leaders. Performance is monitored and is re-iterated during refresher training and induction sessions. Any issues that do arise are kept on the Employees' Personnel File.
- g) We were shown several documents that have been updated, maintained, shelved and new Procedures that were introduced due to circumstances changing, but mostly, that the record keeping in all aspects are in fact done.

Each and every shipment made is recorded and various checklists are used to ensure that all Policies and Practises are followed in accordance with Company Policy. Each record is filed and maintained to ensure closure of every shipment.

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

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Lead Auditor

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The operation is:

- in full compliance with
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The transporter does not ship cyanide by sea or air.

Transport Practice 1.6 Track cyanide shipments to prevent losses during transportation.

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Golden Coach Limited

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Lead Auditor

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The operation is:

in full compliance with

in substantial compliance with

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 1.6; track cyanide shipments to prevent losses during transport.

Besides every vehicle equipped with a tracking system and each driver also has a cell phone.

The tracking Company does ongoing maintenance every three months to ensure uninterrupted service provision. The same company keeps backups for trips done and these can be accessed by the GOLDEN COACH Office.

The drivers communicate at least twice a day with the office – this is over and above of the communications that the Convoy Leader does.

The convoys are continually monitored and a Geofencing application is used, so if a truck moves off from the planned route, an alarm will be raised. Their speed is monitored as well as how long they stop at rest stops.

As mentioned earlier, a certain monetary value is loaded onto all the cell phones to cover any incidentals. This is to ensure that nobody runs out of airtime especially during an emergency.

All equipment is checked prior to any convoy leaving the yard to ensure full functionality of all communication equipment and if a problem arises, it can be resolved before leaving.

The convoy leader has a list of all the emergency numbers to be called such as police, hospitals and people at GOLDEN COACH and MLC – this is in addition to the internal WhatsApp group that is set up for each convoy. The Convoy Leader also carries a copy of the SOP pertaining to the movement of convoys.

It would appear that the issue of mobile phone blackout spots has been resolved by the mobile phone operators, so communication is seamless.

The mines are informed of the ETA for every shipment, and all the required paperwork is carried with the convoy to ensure a seamless chain of custody. Shipping documents include delivery manifests, truck checklists, MSDS's, quantities loaded and container seals.

Each driver also has a basic version of the MSDS in the local language, Swahili to ensure that there is no confusion with any information that the driver needs to know.

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PRINCIPLE 2 – INTERIM STORAGE

Design, Construct and Operate Cyanide Trans-shipping Depots and Interim Storage Sites to Prevent Releases and Exposures

Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

The operation is:

in full compliance with

in substantial compliance with

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 2.1; store cyanide in a manner that minimizes the potential for accidental releases.

Currently, no interim storage is done by Golden Coach. The only storage that is done is at the Inland Container Depot.

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Golden Coach Limited

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PRINCIPLE 3 – EMERGENCY RESPONSE

Ensure that Process Controls are Protective of the Environment

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

The operation is:

- in full compliance with
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.1; prepare detailed emergency response plans for potential cyanide releases.

GOLDEN COACH has a comprehensive Emergency Response Plan that integrates with GFL since GFL is the transport division of GOLDEN COACH.

This Standard Operating Procedure is revised on an annual basis, and if any changes occur between any revisions, it is immediately revised, updated, and shared between all parties concerned.

The response plan has been developed over the years to make it relevant for cyanide related incidents taking into account the local conditions that the convoys may encounter.

Although electronic copies are available at the operational offices, the convoy leader will also have a hardcopy. The plan covers as far as possible any potential incidents that the convoy may find themselves in and has been developed to be as comprehensive as possible.

The plan includes issues such as the following:

- Route assessments – the latest versions that are available per route,
- Essential Emergency Response Procedures for instance, dry spills, spills into waterways,
- What PPE needs to be used that is appropriate per incident,
- Guidelines to be followed for a variety of potential incidents.

Since only solid cyanide is transported, the guidelines focus on that, unless of course waterways are impacted, then there are guidelines for that, and that is mainly where the GCLA is involved, and they are represented at every convoy to give more advice.

As mentioned earlier in this report, the only means of transport is the following:

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- Solid IBC's containing dry, solid Sodium Cyanide briquettes,
- Loaded into 20' shipping containers,
- Movement of these containers are limited by road and no ferry or ship option is used.

Since only road transport is used, the plan takes into consideration various road conditions that may be encountered en-route. There are also route assessments that are specific to certain routes, There are also various types of terrain that the convoy will encounter, and as such, the Plan does take all these aspects into account.

In the front of the Plan is a list of internal contact numbers comprising of staff from GOLDEN COACH, but the Plan also needs to take into account external stakeholders who may be involved with any incident that may occur along any of the routes, and these would be for example, the following:

- The receiving Mine,
- National Environmental Management Commission (NEMC),
- Tanzanian Port Authority,
- Tanzanian International Container Terminal Systems,
- The shipper – in other words, the Manufacturer,
- Hospitals,
- The Police will have been informed of the impending convoy, so their relevant numbers would feature on the convoy list as well as in the plan, and then,
- Government Chemist Laboratory Agency (GCLA), even though they have a member in the convoy.

The Emergency Plan covers most eventualities that they may encounter, from Emergency Response Procedures to Handling Guidelines.

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

The operation is:

- in full compliance with
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.2; designate appropriate response personnel and commit necessary resources for emergency response.

A very comprehensive training system is in place for the appropriate staff members. According to the appropriate levels staff members are given training on a regular basis dependent on their roles within the company. The staff who receive training are as follows:

- It would be all the convoy drivers,
- The convoy leader as well as the person who acts as the main coordinator in the event of an emergency,
- It extends as far as the workshop staff including the yard emergency responders and the tyre section,
- This would also include the operations supervisor and the health, safety and emergency coordinator.

The procedures document has a clear outline of the key roles and responsibilities in the event of an emergency. These requirements are outlined in the job descriptions and all compliant with the training requirements.

An emergency vehicle in other words, a convoy escort vehicle is available for every convoy and is fully equipped with necessary equipment to respond to any incident.

Emergency equipment is compliant with all the standards that they have within their emergency response plan. The equipment is checked on a monthly basis as well as prior to any convoy leaving the premises.

The drivers are also issued with a "get out alive kit" prior to leaving the premises. They also have the required personal protective equipment necessary in case of any incident.

All checklists are checked against what needs to be done before any convoy leaves the premises. Any updated or missing equipment is checked and replaced as a matter of course.

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

The operation is:

- in full compliance with
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.3; develop procedures for internal and external emergency notification and reporting.

All emergency response plans, and internal procedures are updated on an annual basis or, if names, positions or numbers change, these contacts are changed and shared with all stakeholders. These changes also take into account any Legislative changes that may occur, and these changes are then updated into the various plans and procedures. The contact list does include the shipper, consignee, medical facilities any outside responders and even contact within communities that they travel through.

All emergency contact numbers that are in the various procedures are updated as these change, and cover, Governmental Agencies, cyanide manufacturers, mines, police stations and hospitals.

Communities are represented by the local police, so in the event of an incident, the police would be the first point of contact.

Their one particular procedure which will be covered in the main report, highlights a procedural flow chart and also instructs what roles each person has to play in the unfortunate case of an incident.

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Golden Coach Limited

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Lead Auditor

Date: 16.07.2021



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

The operation is:

- in full compliance with
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.4; develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

We observed procedures for full remediation of spillages into the soil and how to neutralise solids, and in severe cases, solutions. They have procedures in place in order to either decontaminate soils, or how to dispose of contaminated soil.

For example, any contaminated soil should be taken to the mine, and processed there in order to minimise any other chemical reaction into the environment.

Also, dry spills and spills into waterways are treated separately so as to not cause a greater environmental issue.

This procedure prohibits the use of any chemical to be used within any water body, and complies fully with the Cyanide Management Code.

Also, once the spill has been cleared, GCL will work with the Regulatory Bodies to ensure that any monitoring programme is done - either at a dry site or within a water body.

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Lead Auditor

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Transport Practice 3.5: Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is:

- in full compliance with
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

The operation is in full compliance with Transport Practice 3.5; periodically evaluate response procedures and capabilities and revise them as needed.

GCL has a very strict system of monitoring their Procedures and these are done either periodically, as people move around, or, as situations change.

They have a Procedure to capture these changes. All procedural changes are monitored in every manual.

They are committed to audit systems that are done by competent people and, as such, these systems are of a standard that will cover their operations in a responsible manner.

All Audits are done on an annual basis and cover issues like:

- Transportation and routing assessments,
- Emergency Drills,
- Incident Management,
- Emergencies that may arise.

Emergency drills are conducted on a regular basis and are documented. They also conduct full scale emergency drills with stakeholders such as Mining Operations, Police Services, Hospitals and the GCLA.

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