INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary Re-certification Audit Report

LYNX LOGISTICS ABIDJAN COTE D'ÍVOIRE 13TH TO 17TH OCTOBER 2025

For

International Cyanide Management Institute
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Catalog

1.0 Introduction

1.1 Company information

Name of Operation: LYNX Logistics

Name of Operation Owner: Marc Moukarzel

Name of Operation Operator: LYNX Logistics

Name of Responsible Manager: Eric Yoboue
QHSE Director

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2 Audit scope
The audit scope is re certification for LYNX of cyanide road transport from Abidjan to mine site for solid sodium cyanide

3 Location detail and description of operation:
LYNX Logistics operates as a contracted cyanide transporter for ORICA and other suppliers within Côte d'Ivoire, handling the road transport of solid sodium cyanide briquettes from the Port of Abidjan to the Tongon Mine. The company's cyanide transport operations are based in Abidjan, where LYNX maintains a dedicated yard specifically for cyanide logistics. The audited facility used for the receipt, inspection, and dispatch of cyanide shipments is located approximately 18 kilometers from the Port of Abidjan, at Yopougon Zone Industrielle, 26 BP 1261 Abidjan 26, RCCM CI-ABJ-2016-B-28424, CCN1709801N.
At the port, cyanide arrives in 20-foot sea containers, each containing 20 boxes of solid cyanide briquettes weighing 20 tonnes in total. These containers are offloaded and segregated by port stevedores in accordance with international hazardous materials handling standards. A due diligence assessment of port operations was previously conducted by ORICA as part of its cyanide supply chain verification process.

For the purposes of Cyanide Code transportation compliance, LYNX's responsibilities begin upon collection of sealed containers from the port and end upon delivery at the mine site gate. Once released by the port authorities, the containers are transported under LYNX's Transport Management Plan (TMP), jointly developed with the supplier and the receiving mine. All cyanide transport is carried out in escorted convoys with strict adherence to the TMP and Emergency Response Plan (ERP).
Each convoy is composed of LYNX trucks, each driven by a qualified driver and assistant, accompanied by two escort vehicles and a team of safety officers. The escorting and oversight of all hazardous material (HAZMAT) transport within Côte d'Ivoire is mandated by the government agency SPECIAC, which operates under the Ministry of Defence. The SPECIAC escort team consists of eight trained personnel, including:
2 Fire Service Chemical Division officers,
2 Gendarmerie/Military officers,
2 CIAPOL (Centre Ivoirien Anti-Pollution) officers, and
2 SPECIAC representatives.
The convoy management structure includes a convoy manager, assistant convoy manager, mechanic, safety officers, and first aid personnel trained in cyanide emergency response. Each convoy carries dedicated emergency response and spill containment equipment, as well as medical kits capable of addressing cyanide exposure through inhalation, ingestion, or skin contact.
LYNX uses vehicles specifically dedicated to cyanide transport, all maintained to comply with ECOWAS transport standards and ICMC requirements. Throughout the previous three-year audit cycle, LYNX's cyanide transport operations have been free of any compliance issues or incidents, reflecting the company's consistent adherence to safety, security, and environmental protection standards.

4 transit and Storage
The scope of the audit do not cover interim storage or storage
LYNX operation is to transport from port to mine site within west africa
LYNX trucks passes through the yard just to fuel and do final check before departure

5 Auditor's Finding

This operation is

X in full compliance
□in substantial compliance *(see below)
□not in compliance

with the International Cyanide Management Code.

This operation has not experienced compliance problems during the previous three year audit cycle.

Audit Company: Crown Transport & Logistics

Audit Team Leader: Ghassan Husseini
E-mail: ghass@ctllwa.com

Name and Signature of Lead & Technical Transport Auditor:

Name Ghassan Husseini Signature: Date 28-10-2025

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. Date of audit: 13th -17th October 2025

Ghassan Husseini Lead Auditor Date 28-10-2025

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

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

The operation is **X in full compliance** with Transport Practice 1.1
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX conducts detailed route surveys to identify all potential routes to its destinations.
Based on these surveys, the company selects the most suitable route and carries out a Road Risk Assessment (RRA) and a Journey Plan.
The Road Survey outlines how and when surveys are to be conducted, including the identification and classification of hazards along the route.
The Journey Plan, which is the most frequently updated document, serves as a live record used to continuously improve the RRA after each trip by documenting new hazards or changes in road conditions, It includes details such as authorized rest and stop points, departure and arrival times, speed limits, road construction zones, rail way crossing , traffic congestion, cyclist and pedestrian activity, schools , hospitals , barriers, heavy rain, cattle crossings, and other relevant trip planning considerations.
The Road Risk Assessment Procedure specifies the steps to be taken when assessing transport routes and identifies the personnel responsible for each task.
The assessment evaluates various risk factors including population density, bridges, water bodies, accident-prone areas (black spots), slippery surfaces, poor infrastructure, and communication blackouts, It also integrates control measures and identifies SPECIAC/CIAPOL and gendarmerie checkpoints.
The Convoy Manager is responsible for identifying and responding to unforeseen risks during transport, updating the RRA with any new information.
The data from the onboard tracking system is analyzed after every trip to identify patterns or new hazards.
Due to the hazardous nature of cyanide, permits for transportation are issued by the Ivorian government through the Ministry of Transport.
LYNX has a defined list of approved routes for cyanide transport in Côte d'Ivoire, each of which is reviewed annually and reassessed every five years.
These routes are formally approved by the authorities and accompanied by an official permit.
The RRA highlights black spots and specific warnings, while the Survey Team, composed of transport and safety specialists, conducts field surveys to verify road conditions and risks.
Lynx also engage with clients and drivers to discuss concerns before finalizing the assessment.
Once a proposed route is reviewed, controls are implemented to reduce risks to acceptable levels.
If the risk remains high, additional controls are introduced or an alternative route is sought.
The outcomes of these assessments are compiled into a list of authorized routes approved by the HSE Manager and validated annually.

All convoy personnel, including the Convoy Manager, retain copies of the RRA, Emergency Response Plan (ERP), and relevant contact lists.
The RRA addresses a wide range of factors, including population centers, schools, pedestrian activity, cyclists, animals, road surface conditions (tarred or rough), bridge infrastructure, gradients, proximity to hospitals, gendarmerie posts, communication zones, water bodies, and construction areas.
Seasonal risks are also considered particularly during the Harmattan season, when visibility is reduced due to dust and dry winds.
LYNX adheres strictly to government-approved routes, with any deviation requiring authorization from the Ministry of Transport.
All routes are verified annually through updated surveys and field inspections.
Real-time monitoring and risk management are conducted by the Convoy Manager during each trip, and feedback is documented in the End of Mission Report after every journey.
This feedback, which includes details on delays, hazards, and road conditions, is analyzed to track risk trends and inform future assessments.
Communication and coordination with clients, local authorities, and emergency responders are maintained throughout the process.
The Ministries of Health, Public Health, and Defense, along with SPECIAC/CIAPOL, are all consulted during route planning and emergency preparedness.
Communities located along the routes are informed through awareness flyers explaining cyanide hazards and safety protocols, emphasizing the need to avoid contaminated water sources during incidents until clearance is given by authorities.
Each convoy operates with two 4x4 escort vehicles, one leading and one trailing, forming a secure formation.
The SPECIAC/CIAPOL escort team, composed of eight personnel (two from the Fire Service Chemical Division, two from the Gendarmerie, two from SPECIAC, and two from CIAPOL), provides security and oversight under the Ministry of Defense. Drivers maintain visual spacing and communicate via mobile phones, radios, horns, and headlights.
All containers are locked, sealed, and inspected before departure and at designated intervals.
Deliveries are conducted exclusively via convoy under escort by SPECIAC/CIAPOL, gendarmerie, and other relevant authorities.
Each convoy also carries a full Emergency Response Team, including a mechanic, safety officers, and personnel trained in spill containment and first aid (with antidote kits).
LYNX does not subcontract any part of the transport process other than port-related activities, such as stevedoring, which are covered under due diligence audits.
The company retains full operational responsibility for the transport of cyanide from port to mine, ensuring compliance with all regulatory and safety standards.

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

The operation is **X in full compliance** with Transport Practice 1.2
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX employs only trained and competent personnel to operate its trucks, escort vehicles, and emergency response teams.
All truck drivers possess a Category E license, the highest permit level, which authorizes them to operate vehicles exceeding 19 tons, including articulated trucks.
Drivers are also required to have at least a Middle School Leaving Certificate and must be able to read and write proficiently.
Vehicle licenses are valid for three years, and before each trip, the Control and Transport Department verifies that all licenses are current.
A monitoring matrix is used to identify licenses nearing expiration, while the Human Resources Assistant maintains copies of original licenses and provides three- and four-month advance warnings to drivers whose permits are approaching expiry.
LYNX implements a comprehensive training program that incorporates cyanide awareness, hazardous materials handling, defensive driving, firefighting, and first aid.
Cyanide awareness training, which includes components of dangerous goods transportation, is developed by Orica and provided jointly by Orica and LYNX.
The training module covers product awareness, risk management, and emergency response procedures.
Prior to each convoy, a refresher module of this training is delivered as part of the pre-departure toolbox meeting or briefing, where drivers and escort teams review potential issues, safety precautions, and emergency response steps.
LYNX maintains a training control system and matrix that tracks all employees' required training, completion dates, and upcoming sessions.
Annual mock emergency drills are conducted to test and evaluate the effectiveness of the emergency response plan and the coordination of escort teams.
Records of all training and simulations are retained for future reference and audit verification.
The Transport Management Plan (TMP) mandates that all drivers complete defensive driving courses, and scenario-based drills are organized to assess the readiness and efficiency of escort and emergency response personnel.
The Emergency Response Procedure clearly defines each team member's role and responsibilities in managing incidents.
Cyanide containers are sealed at the port by stevedores and loaded onto LYNX trucks, where they remain secured until unloading by mine staff at the destination.
In the event of a cyanide-related incident during transport, the convoy's trained emergency response team is fully equipped and authorized to manage spills, exposures, or other emergencies.

Each convoy carries complete cyanide response and medical equipment, including antidote kits, and operates under the supervision of armed SPECIAC/CIAPOL escorts for safety and regulatory compliance.
LYNX does not subcontract any part of its transport operations, except for port handling and stevedoring, which are covered under formal due diligence agreements.
The company retains full responsibility for all aspects of cyanide transport operations from the port to the mine, ensuring compliance with the International Cyanide Management Code (ICMC) and national safety regulations.

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

The operation is **X in full compliance** with Transport Practice 1.3
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX exclusively utilizes equipment specifically designed, rated, and maintained to safely handle the loads involved in cyanide transportation.
The company maintains a comprehensive register of all trucks and trailers used for cyanide transport, including their design specifications and load capacities.
All equipment conforms to ECOWAS (Economic Community of West African States) and UMOA (West African Monetary and Economic Union) transport regulations, particularly regarding axle load limits of 10 tons, as stipulated by the ECOWAS treaties of 1992 and 2000 and the UMOA treaty of 1996.
The Emergency Response Plan (ERP) and Transport Management Plan (TMP) both include calculations verifying that each truck and trailer configuration is suitable for its assigned load.
Preventative maintenance procedures are rigorously applied to all vehicles, especially those used for cyanide transport. Before every convoy, equipment undergoes a detailed inspection using the Cyanide Equipment Checklist, which includes checks on kingpins, twist locks, tires, brakes, lights, suspension, and coupling mechanisms.
Each convoy is accompanied by maintenance personnel who can respond immediately in the event of mechanical issues or breakdowns.
The TMP explicitly states that LYNX employs only equipment designed to operate within its load limits and ensures that axle loads remain within ECOWAS transport standards.
All equipment used in cyanide transport follows a preventative maintenance program based on time or mileage intervals, with additional reactive maintenance as needed, determined through collaboration between drivers and mechanics.
At the conclusion of every journey, vehicles undergo a post-trip inspection and servicing at the LYNX workshop.
The company maintains detailed maintenance logs and service histories for each vehicle and trailer, including specifications, repair records, and maintenance schedules.
Each truck transports two 20-foot containers of solid cyanide briquettes, in accordance with International Maritime Dangerous Goods (IMDG) regulations.
The transport configuration consists of a tractor head with three axles and a trailer with four axles, providing a total of seven axles.
This setup allows a gross vehicle weight (GVW) of up to 70 tons, equivalent to 10 tons per axle, as required under ECOWAS law.
The typical weight breakdown per unit is as follows:
Cyanide briquettes per container: 20 tons (total 40 tons)
Container tare weight: 2.3 tons each (total 4.6 tons)
Trailer weight: 6 tons
Tractor head (prime mover) weight: 8.3 tons
Total gross weight: approximately 60 tons, including fuel and accessories

This configuration ensures that the total weight remains well below the 70-ton legal limit, averaging around 8 tons per axle, providing an additional safety margin.
The truck-mounted onboard computer (OBC) system provides real-time diagnostics and maintenance alerts, ensuring that mechanical servicing is performed as required.
Tractor heads are serviced by authorized manufacturer representatives, while trailers are maintained by LYNX technicians in accordance with the company's internal maintenance plan.
Cyanide is transported as solid briquettes, sealed in bulker bags, placed within Intermediate Bulk Containers (IBCs), and packed into 20-foot sea containers.
No loading, unloading, or de-stuffing occurs under LYNX's control, the containers remain sealed from the port of origin until arrival at the mine site, where mine personnel handle offloading.
The Bill of Lading records container weights, ensuring conformity with IMDG regulations, and confirming that all containers are seaworthy and inspected prior to dispatch.
It is not possible to overload the trailers since each container is filled by the manufacturer with a predefined quantity of cyanide boxes, maintaining a consistent load weight.
All containers and transport equipment are regularly verified for compliance with international and regional dangerous goods transport standards.
LYNX does not subcontract any aspect of its transport operations except for port stevedoring, which is carried out under strict due diligence agreements.
The company retains full operational responsibility for all aspects of cyanide transport between the Port of Abidjan and the mine sites, ensuring continuous compliance with the International Cyanide Management Code (ICMC) and national safety regulations.

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

The operation is **X in full compliance** with Transport Practice 1.4
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX has established comprehensive procedures and controls to ensure that cyanide is transported in a manner that preserves the integrity of the producer's packaging throughout the entire journey.
According to the Transport Management Plan (TMP), all containers are inspected at the port prior to loading to verify that seals are intact, labels and hazard markings are correctly applied, and container identification numbers are accurate.
Containers remain sealed from the point of origin to the mine site, ensuring their integrity is never compromised.
The Bill of Lading, stamped by the Port Authority, confirms that containers have been delivered undamaged and with seals intact as originally applied by the producer.
Upon arrival at the mine, mine personnel re-inspect the containers to verify seal integrity and overall condition.
The Emergency Response Plan (ERP) specifies that cyanide is shipped in plastic-lined wooden boxes placed within sealed 20-foot shipping containers, effectively preventing exposure to external elements.
Packaging integrity may only be compromised by physical damage or liquid ingress in the event of an accident.
Due to the hazardous nature of cyanide, all convoys are escorted by security forces including the gendarmerie, SPECIAC/CIAPOL, military, and other relevant authorities ensuring that containers remain sealed and intact throughout the journey.
A Container Interchange Report is completed at the port and co-signed by representatives of both the shipper and LYNX to document any visible damage. Upon arrival at the mine, a Vehicle Trip Checklist is completed and countersigned by a mine representative, confirming that the seals, labels, and overall container condition are satisfactory.
Safety officers also perform intermediate inspections during rest stops and overnight halts to ensure seal integrity.
All cyanide shipments are clearly marked and placarded in full compliance with IMDG Code and ADR requirements.
Containers display the following information on all four sides:
UN Number: 1689
Class: 6 (Toxic Substance)
Packing Group: I
Proper Shipping Name: Sodium Cyanide, Solid
Placards are affixed before departure and removed only after final delivery at the mine site.
These measures ensure full compliance with international standards for the transport of dangerous goods.

Prior to each convoy, comprehensive equipment inspections are conducted using the Cyanide Equipment Checklist, which includes verification of twist locks, tires, brakes, and other critical components.
Containers are secured with eight twist locks per trailer, checked before departure to prevent load shifting.
The cyanide wooden boxes dimensions and loading configuration ensure a tight fit within the container, minimizing movement during transit.
LYNX implements a robust Preventive Maintenance Program for all tractors and trailers, ensuring vehicles are serviced after each trip, every two months, or based on mileage whichever occurs first.
Maintenance records, including work orders and inspection reports, are retained for all vehicles.
Minor repairs are performed in-house, while major repairs are handled by authorized service agents.
In the event of a breakdown during transport, a replacement truck is dispatched immediately to minimize risk to the cargo.
LYNX manages driver working hours through detailed convoy planning and route scheduling.
Convoys operate strictly between 6:00 a.m. and 6:00 p.m. Any exceptions require written authorization and additional safety measures.
Key operational limits are as follows:
Maximum available hours per day: 12 hours
Maximum driving hours per day: 9 hours
Continuous driving limit: 3 hours (followed by a 30-minute rest)
Minimum daily rest period: 3 hours
Maximum weekly driving hours: 48 hours
Maximum working days per week: 6 consecutive days
The Convoy Manager is responsible for enforcing these limits and ensuring all drivers comply with rest and safety requirements.
The LYNX Health, Safety, and Environment (HSE) Policy strictly prohibits the use of drugs and alcohol.
The policy requires pre-departure alcohol testing using a breath analyzer, with random checks conducted daily during transport.
Any positive result results in immediate suspension, followed by confirmation testing at an accredited hospital.
The company also performs random testing.
Violations result in disciplinary action or termination.
All drivers sign a declaration acknowledging these rules and consenting to testing as a condition of employment.
All inspection, testing, and maintenance activities are fully documented and retained for a minimum of three years, as verified during audits.
LYNX operates under ISO 9001 certification, ensuring consistent record keeping and quality management across all operations.
LYNX retains full responsibility for the safe transportation of cyanide from the port to the mine.
The company does not subcontract any part of its transport operations, except for port stevedoring, which is governed by strict due diligence agreements.

All other aspects including inspection, convoy management, escort coordination, and emergency response are managed directly by LYNX to ensure continuous compliance with the International Cyanide Management Code (ICMC) and national transport safety standards.

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

The operation is **X in full compliance / X Not applicable** with Transport Practice 1.5
□in substantial compliance
□not in compliance

X not applicable

Summarize the basis for this Finding/Deficiencies Identified:

LYNX is not responsible nor contracted to manage cyanide consignments by sea.
The scope of this audit covers only land transportation of cyanide from the Port of Abidjan to the designated mine destinations. LYNX's role begins once the sealed containers are officially released from the port and ends upon delivery at the mine gate.
The company does not handle sea transport activities, including loading, unloading, container de-stuffing, or stevedoring. These operations fall under the responsibility of the shipping line, port stevedores, and supplier, and have been verified through a due diligence assessment conducted by ICMI auditors.
Each container carrying sodium cyanide is visibly and properly marked on all four sides with the following hazard labels in accordance with IMDG and IMO Dangerous Goods Code requirements:
UN Number 1689
Marine Pollutant Placard
Class 6 (Toxic Substance) Placard
LYNX ensures that, upon collection at the port, all required placards and markings are intact and comply with international transport standards. Although the responsibility for placarding rests with the manufacturer or supplier, LYNX maintains a stock of replacement placards (supplied by Orica) to replace any that may become damaged during sea transport.
The Emergency Response Plan (ERP) and Transport Management Plan (TMP) clearly specify that Intermediate Bulk Containers (IBCs) used in cyanide transport must be placarded on all four sides. These documents also detail the proper labeling requirements:
UN Number: 1689
Proper Shipping Name: Sodium Cyanide, Solid
Class: 6 (Poison)
Packing Group: I
Placards are removed only after delivery to the mine, once containers have been emptied and decontaminated for return.
Compliance with IMDG Code Requirements
The operation complies with all applicable IMDG Code provisions, including:
Ensuring containers are clean, dry, and fit for the goods;
Verifying that only sound, undamaged packages are loaded;
Maintaining upright stowage and proper bracing;
Confirming that all goods are properly segregated and labeled;
Ensuring even distribution of bulk loads; and
Retaining signed Dangerous Goods Transport Documents for each consignment.

A Container/Vehicle Packing Certificate accompanies each shipment, either as a standalone document or integrated within the transport documentation. These certificates include a declaration confirming that the packing of goods has been carried out according to applicable IMDG requirements.

Chain of Custody and Documentation

LYNX implements a rigorous chain of custody process to prevent any loss, tampering, or unauthorized handling of cyanide during land transport.

The Bill of Lading (BL) is stamped by the Port Authority, confirming that containers were received undamaged and with original seals intact.

Container weights, seal numbers, and identification details are verified against shipping documentation before departure.

At the mine site, containers are rechecked upon arrival to confirm that seals and weights match those listed on the delivery note.

A scanner system is used at the port to verify that the correct container is loaded onto the designated trailer.

Copies of all transport and emergency documents, including the MSDS, ERP, and TMP, are carried in the convoy and kept by the Convoy Manager and escort authorities.

Convoy Operations and Tracking

Cyanide is transported exclusively by convoy, under the continuous escort of trained personnel and Ivorian authorities (SPECIAC/CIAPOL) due to the highly hazardous nature of the cargo.

Each convoy is GPS-tracked through a live monitoring system managed at the LYNX depot.

Communication blackout zones are identified in the Route Risk Assessment. When entering these zones, the Convoy Leader contacts the LYNX depot before and after to confirm convoy status.

The Convoy Manager communicates with LYNX headquarters every 60 minutes, and the head office updates the mine every two hours on convoy progress.

All prime movers and escort vehicles are equipped with real-time tracking devices. This ensures continuous visibility and control of each shipment throughout its journey from port to mine site.

Cargo Security and Escort

The cyanide remains under strict government control for the entire duration of transport. The SPECIAC/CIAPOL escort team, operating under the Ministry of Defense, is mandated to accompany all hazardous materials shipments. The escort ensures the security, integrity, and proper handling of the cargo until it reaches its final destination.

Recordkeeping and Documentation

LYNX maintains comprehensive shipping and transport records, including:

Bills of Lading

Delivery Notes

Seal Logs

Container Checklists

Convoy Tracking Reports

Maintenance and Communication Logs

These documents are kept on file for a minimum of three years, in accordance with ISO 9001 requirements and ICMI Code standards, to demonstrate full traceability of each cyanide shipment.

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

The operation is **X in full compliance** with Transport Practice 1.6
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX employs a comprehensive communication and tracking system to ensure full operational control, safety, and traceability during the transport of cyanide from the port to the mine site.
Communication between the convoy, LYNX head office, and emergency responders is maintained through multiple, redundant systems.
Each convoy is equipped with mobile phones, VHF BAOFENG radios, and a GPS tracking system (EASYTRACK), enabling continuous contact and real-time monitoring throughout the journey.
Every convoy carries a dedicated mobile phone, which is used for direct communication with the LYNX head office and external emergency services.
The safety officer, driver, or driver's assistant in each truck can use the communication equipment to maintain contact with the convoy leader and escort vehicles.
The Convoy Manager is responsible for maintaining regular contact with LYNX headquarters and is provided with all relevant emergency contact numbers, as listed in the Emergency Response Plan (ERP).
The Convoy Manager must call the LYNX office every 60 minutes, and the head office, in turn, updates the client and authorities every two hours.
LYNX headquarters manages all convoy-related communications with the mine site, government agencies, the cyanide producer, and ICMI.
This structured communication protocol ensures that all stakeholders are continuously informed of the convoy's progress and condition.
Where mobile reception is unavailable, the Convoy Manager is required to contact the LYNX depot before and after entering a blackout zone.
The ERP and the Route Risk Assessment (RRA) include maps of low-reception areas, ensuring all teams are aware of where such communication interruptions may occur.
Additionally, the GPRS tracking system automatically sends an alert if any truck remains idle for more than three minutes, providing an added layer of oversight.
All prime movers and escort vehicles are equipped with tracking devices, which are continuously monitored at the LYNX head office.
Within the convoy, short-range communication is maintained through VHF BAOFENG radios, headlights, and horn signals. This closed communication system allows vehicles experiencing mechanical issues or emergencies to alert the escort team immediately.
If one truck encounters a problem, the entire convoy halts until the issue is resolved.
The Transport Management Plan (TMP) mandates that all communication equipment GPS, radios, and mobile phones be tested, verified, and confirmed functional before each convoy departure.
These systems are also tested during annual mock drills, ensuring reliability under simulated emergency conditions.

The GPS tracking system remains in continuous use and is regularly checked for performance accuracy.
Communication blackout areas are documented in the Abidjan–Tongon (Sissigue) Road Survey Report, which forms part of the route assessment process.
LYNX maintains a strict chain of custody over cyanide shipments to prevent loss or tampering during transport.
The Bill of Lading (BL), stamped by the Port Authority, confirms that containers were delivered undamaged and with original seals intact.
Container weights are detailed on both the Bill of Lading and delivery note.
A scanner system at the port verifies that each container is loaded onto the correct trailer.
Upon arrival at the mine, mine personnel inspect the containers to confirm seal integrity and match records.
Each convoy carries the ERP, TMP, Material Safety Data Sheets (MSDS) for sodium cyanide, and a list of emergency contacts covering the route between the port and mine site.
All documents are available both in the convoy and with the escort authority.
LYNX utilizes convoys as an integrated risk management system to ensure safety, enable rapid emergency response, and maintain shipment integrity.
All cyanide containers are sealed, tracked, and delivered under the control of government authorities (SPECIAC/CIAPOL), due to the cargo’s hazardous nature.
The company does not subcontract any aspect of cyanide transportation except for port stevedoring, which is covered under due diligence verification conducted by ICMI auditors.
LYNX retains full responsibility and accountability for all land-based cyanide transport operations, ensuring complete compliance with international safety and regulatory standards.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

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

The operation is **X in full compliance** with Transport Practice 2.1
□in substantial compliance
□not in compliance

X Not applicable

Summarize the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, no trans-shipping depots or interim storage sites exist as defined in the audit protocol. Once cyanide containers are collected from the Port of Abidjan, they are immediately dispatched to the client's mine site without any intermediate storage or transfer. At no point during the journey is cyanide removed, opened, or offloaded from the trucks or containers prior to unloading at the mine.
The cargo remains under the custody and direct supervision of the Ivorian authorities (SPECIAC/CIAPOL), who strictly prohibit any unscheduled stops, parking, or deviation from the approved route. These measures ensure full security, prevent unauthorized handling, and maintain the integrity of the shipment throughout transit.
LYNX is not responsible for, nor engaged in, any activities related to loading, unloading, de-stuffing of containers, or stevedoring operations at the port. These functions are performed under port control and verified through due diligence processes.
All containers carrying cyanide are clearly placarded and labeled on all four sides in accordance with IMDG and ADR requirements, displaying:
UN Number 1689
Marine Pollutant Placard
Class 6 (Toxic Substance) Placard
Dangerous Goods Banner on the final escort vehicle in the convoy
LYNX maintains and enforces a strict procedure that prohibits eating, drinking, or smoking near cyanide containers, and ensures that all personnel use appropriate personal protective equipment (PPE) during any handling or inspection.
Comprehensive shipping documentation is maintained throughout the transportation process, including:
The Bill of Lading (BL) indicating the amount of cyanide in transit,
Delivery notes listing container numbers, weights, and seal numbers, and
Material Safety Data Sheets (MSDS) carried in each convoy.
Both the Emergency Response Plan (ERP) and Transport Management Plan (TMP) are kept in the convoy vehicles, along with an emergency contact list covering the full route between the port and the mine.

LYNX applies a chain of custody system to ensure full traceability and prevent loss or tampering of cyanide during transport. Each movement is monitored, documented, and verified by both LYNX and the supervising authorities.

The SPECIAC/CIAPOL escort agency, established by the Ivorian government following the hydrogen peroxide incident nine years ago, is responsible for overseeing all hazardous materials (HAZMAT) transport within Côte d'Ivoire. This agency operates under the Ministry of Defense and includes eight personnel:

2 from the Fire Service (Chemical Division)
2 Gendarmerie officers
2 from CIAPOL (Centre Ivoirien Antipollution)
2 from SPECIAC

Their escort is mandatory for all cyanide shipments, whether involving one truck or multiple units, and the number of escort personnel remains constant regardless of convoy size. This ensures consistent oversight, regulatory compliance, and the highest level of safety and security for cyanide transport across the Ivorian territory.

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

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

The operation is **X in full compliance** with Transport Practice 3.1
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX has developed a comprehensive Emergency Response Plan (ERP) that provides detailed guidance for managing potential cyanide-related emergencies during transport operations. The ERP is designed to ensure preparedness, rapid response, and coordination between LYNX, external agencies, and relevant authorities to prevent or mitigate harm to personnel, communities, and the environment.
The ERP is structured as follows:
Introduction
Scope
Road Transport Emergency Response System Flowchart
Emergency Organization Members & Contact Numbers
Organization and Communication
Communication protocols
Emergency Control Center functions
Key responsibilities for:
Base Controller
Press Focal Point
Incident Controller
General Procedures & Likely Scenarios, including:
Truck Breakdown
Truck Accident (No Spill)
Truck Accident (Spill)
Truck Accident with Fire
Truck Driver Injury
Security Risk (Armed Robbery)
Communication procedures during incidents
Emergency Exercise & Training Best Practice
Includes Annex A (Serious Vehicle Accident Form)
Annex B (Items Required for Emergency Response)
Each convoy carries copies of the ERP, Material Safety Data Sheet (MSDS), Road Risk Assessment, and Transport Management Plan (TMP).
The ERP emphasizes immediate response actions for cyanide incidents, including first aid procedures, containment, neutralization, and communication with external responders.
The ERP is reviewed and updated annually, or immediately following any activation or drill feedback that identifies improvement needs.

During operations, if a cyanide-related emergency occurs, the Emergency Response Team (ERT) accompanying the convoy implements the ERP.
If additional support is required, the team notifies the LYNX head office or external responders, including the supplier, mine, and ICMI, as required for significant incidents.

The ERP is fully aligned with the selected transport routes and the risk environment between the Port of Abidjan and the mines in Tongon, Sissigue, and Karta.
It integrates the results of the Route Risk Assessment (RRA) and considers all potential hazards along the road infrastructure. LYNX manages risks by applying principles of prevention, protection, and intervention, including convoy formation, speed limitation (maximum 60 km/h), and trained escorts.
The ERP provides detailed procedures for:
Accidents with and without sodium cyanide release
Cyanide discharge into water
Fire or explosion
Security incidents (e.g., armed robbery, civil unrest, or blocked roads)
In such events, personnel must contact LYNX senior management before proceeding.
Convoys operate as closed units, enabling quick and coordinated implementation of the emergency plan.
Nature of Cyanide Transported
The ERP and TMP clearly describe the physical and chemical forms of cyanide handled solid sodium cyanide briquettes packaged in IBCs within 20-foot sealed sea containers.
No liquid cyanide or ISO tanks are used.
Response procedures are tailored to solid cyanide, including neutralization and cleanup methods for spills on land or water.
Contaminated soils or materials are collected and sent to the mine site for disposal or neutralization, in accordance with manufacturer guidelines.
Consideration of Transport Method and Vehicle Design
The ERP and TMP were developed specifically for road transport and are based on route assessments that analyze infrastructure, hazards, and communication blackspots.
LYNX only uses semi-trailers with skeleton or flatbed configurations capable of carrying 2 x 20-foot containers.
All equipment used exceeds the load capacity requirements for cyanide transport.
The ERP accounts for prime mover and trailer configurations, reflecting realistic emergency scenarios for 20-foot container transport.
Route risk assessments are reviewed annually and fully updated every five years, with ongoing trip feedback incorporated into subsequent reviews.
The ERP defines the specific roles and responsibilities of all personnel involved in emergency response, including:
Escort Leader
Escort Vehicle 1 Driver
HSE Officer
Gendarmerie
Driver and Assistant Drivers
Escort Vehicle 2 Driver

A flow diagram outlines the sequence of communication and actions in the event of a cyanide-related incident.
Scenarios covered include road accidents, fires, explosions, health emergencies, robberies, social unrest, and floods.
During any incident, SPECIAC and CIAPOL personnel, who are always part of the convoy, take charge of chemical hazard control and coordinate with the Ministry of Defense.
Communication and reporting chains extend to suppliers, mine management, local authorities, and ICMI, ensuring full transparency and regulatory compliance.
External Responders and Coordination
The ERP defines collaboration with external entities:
Mine sites provide logistical support (e.g., cranes, security, heavy equipment) for incidents near their premises.
Gendarmerie, Fire Brigade, and Hospitals perform their statutory roles.
SPECIAC, which oversees all hazardous materials transport, conducts annual joint training exercises and mock drills with LYNX.
The gendarmerie is responsible for product security and crowd control, while fire service personnel handle chemical emergencies. The Ministry of Security oversees coordination of any additional external response.
Communities along the transport route are informed of cyanide risks through awareness campaigns and flyers, advising them not to approach accident scenes or use nearby water sources until clearance is given by authorities.
Reporting Obligations
LYNX management is required to notify ICMI and relevant stakeholders of:
a) Any human exposure incidents;
b) Any cyanide release or containment failure;
c) Any wildlife fatalities attributed to cyanide;
d) Any theft or loss of cyanide.
Escort and Oversight
The Ivorian government's SPECIAC agency established under the Ministry of Defense is responsible for escorting all HAZMAT cargo nationwide.
Each escort unit includes eight trained personnel:
2 Fire Service officers (Chemical Division)
2 Gendarmerie officers
2 CIAPOL agents
2 SPECIAC agents
Their presence is mandatory for every cyanide shipment, regardless of convoy size.
Their fixed personnel structure ensures consistent monitoring, safety enforcement, and rapid intervention capabilities during cyanide transport.

LYNX Emergency Response Plan is compliant with both ICMI Code and Ivorian national regulations.

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

The operation is **X in full compliance** with Transport Practice 3.2
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX has established a comprehensive emergency response training program to ensure that all personnel involved in the transport of cyanide are fully competent, properly equipped, and capable of responding effectively to any incident that may arise during transport operations.
This program extends to both internal staff and external stakeholders, ensuring seamless coordination during emergencies.
LYNX provides mandatory emergency response training for all personnel engaged in cyanide transport operations.
A detailed training matrix has been developed to define the minimum and specialized training requirements for each role within the transport operation including drivers, assistants, safety officers, and escort personnel.
Core Training Requirements:
First Aid and Oxygen Administration
Cyanide Awareness (Product and Hazard Knowledge)
Site Induction and Orientation
Chemical Response and Spill Management
Responding to Accidents and Incidents
Crowd Control and Public Safety
Defensive Driving and Vehicle Control under Hazardous Conditions
Specialized Emergency Response Training:
Additional training modules are provided for personnel directly involved in emergency response operations:
Sodium Cyanide Safety and Handling Procedures
Use of Personal Protective Equipment (PPE)
Emergency Fire and Evacuation Procedures
MSDS Familiarization and Chemical Identification
Roles and Responsibilities during Emergency Response
Incident Communication and Coordination
Initial Response and Oxygen Administration Techniques
LYNX's training program also integrates modules developed by ORICA, one of the cyanide suppliers.
ORICA's materials are used as standardized training tools to ensure personnel are trained according to international cyanide management and emergency response standards.
LYNX emergency response simulations are conducted yearly.
These involve both internal staff and external responders (SPECIAC, CIAPOL, Gendarmerie, and Fire Service).
Each mock drill tests a specific section of the ERP for example:

Cyanide spill response
Vehicle accident (with or without spill)
Fire involving cyanide cargo
Driver or crew medical emergency
Road closure, robbery, or social unrest scenarios
The drills aim to evaluate:
Response time and decision-making under pressure
Communication effectiveness between convoy members and headquarters
Coordination with external responders and authorities
Efficiency of equipment use and deployment
Need for procedural updates or retraining
Records of all drills and training sessions are retained for at least three years and reviewed during audits to verify compliance and improvement actions.

The Emergency Response Plan (ERP) provides detailed descriptions of the roles and responsibilities of all individuals during emergencies.
The following positions are covered explicitly:
Escort Leader
Escort Vehicle Drivers (1 and 2)
HSE Officer
Gendarmerie Representatives
Truck Drivers and Assistants
Reserve Drivers
Each role is trained on:
Their specific duties during an incident (containment, communication, isolation, coordination)
Appropriate PPE to use in different incident scenarios
Understanding and preventing role overlap or interference during an emergency
A flow diagram within the ERP outlines the information flow and decision hierarchy during emergencies from the convoy leader to LYNX head office, external agencies, and ultimately to suppliers, mine sites, and ICMI in case of significant incidents.

LYNX maintains strict procedures for the inspection, availability, and readiness of all emergency response equipment.
Equipment Verification and Checklists
Equipment checklists are detailed in Appendix 3 of the ERP and cross-referenced with the Transport Management Plan (TMP).
Each convoy escort vehicle is equipped with emergency response equipment, which must be inspected and approved before departure.
The convoy cannot depart unless all equipment has been verified to be in good condition.
Equipment condition (“good” or “bad”) is recorded on inspection forms, which are retained as part of LYNX’s compliance documentation.
Equipment Types Include:
Spill containment kits
Neutralization agents (as per manufacturer instructions)
Shovels, sandbags, and absorbents

Portable fire extinguishers
PPE kits (respirators, gloves, goggles, coveralls, boots)
Warning signs and barricade materials
First aid kits and oxygen units
Cyanide antidote kits (to be administered only by trained medical personnel at designated hospitals)
HCN detectors (Dräger units) tested and calibrated annually or replaced if calibration is not feasible
Equipment Control and Storage
LYNX maintains a central emergency equipment inventory at its Abidjan yard.
All convoy equipment is checked before each trip and monthly for expiry or wear.
Copies of all completed equipment checklists are filed at the main yard and carried by the convoy manager.

LYNX maintains full operational responsibility for transport, external emergency agencies are actively involved in preparedness and training.
The Ivorian government's SPECIAC and CIAPOL agencies, mandated under the Ministry of Defense, oversee all hazardous materials (HAZMAT) transport within Côte d'Ivoire. Each escort team includes:
2 Fire Service Personnel (Chemical Division)
2 Gendarmerie Officers
2 CIAPOL Representatives
2 SPECIAC Officers
Participation of these trained responders ensures that chemical emergencies can be contained immediately and managed in compliance with national defense and environmental protection protocols.
LYNX does not subcontract any emergency response activities to external entities, except for port stevedoring operations, which are covered under due diligence verified by ICMI auditors.

Training effectiveness and emergency preparedness are continuously evaluated through:
Post-drill debriefings and improvement plans
Equipment condition tracking and maintenance logs
Annual ERP review and updates based on observed gaps
Regular refresher courses for convoy members and responders

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

The operation is **X in full compliance** with Transport Practice 3.3
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX maintains a comprehensive and up-to-date emergency contact and notification system within its Emergency Response Plan (ERP) to ensure that, in the event of any cyanide-related emergency, all relevant stakeholders can be notified promptly and communication can flow efficiently between the field, management, and external responders.

The ERP contains a detailed contact list of all relevant internal and external parties to be informed in the event of an emergency.
Each entry includes the organization name, position, direct phone number, and alternative contact channel (mobile, satellite phone, or email).
The contact list covers the following stakeholder categories:
Internal LYNX contacts: convoy leaders, HSE officers, operations managers, and senior management
Client contacts: mine management and site emergency response teams
Shipper and supplier contacts: including ORICA and any cyanide manufacturer involved
Service providers: shipping line, stevedores, and clearing agents
Government authorities and regulators: Ministry of Transport, Ministry of Defense, and Ministry of Environment
External emergency responders: CIAPOL (Centre Ivoirien Anti-Pollution), SPECIAC (hazardous materials escort agency), Fire Service (chemical division), and National Gendarmerie
Medical facilities: designated hospitals along the route trained to respond to cyanide exposure
ICMI (International Cyanide Management Institute) for statutory reporting of incidents.
The ERP also contains a communication flow diagram that visually represents the information hierarchy during an emergency.
This ensures rapid, coordinated notifications and actions from the convoy level up to external authorities and the ICMI.

LYNX's ERP, the escort leader is the first point of communication during an emergency.
Upon occurrence of an incident or accident ,
the escort leader:
Informs LYNX Headquarters immediately via phone or radio.
LYNX Headquarters then notifies all relevant internal and external contacts listed in the ERP according to the communication hierarchy.
External responders (SPECIAC, CIAPOL, Fire Service, hospitals, and local authorities) are contacted through their reps on the convoy , if the situation requires immediate intervention.
The mine site and cyanide supplier are informed without delay to ensure coordination of support and containment measures.

As part of its ICMI commitments, LYNX management is required to inform ICMI in the following situations:
Any human exposure requiring emergency response (decontamination or treatment)
Any release that enters natural surface waters
Any transport incident requiring emergency response for cyanide release
Any multiple wildlife fatalities known or suspected to result from cyanide
Any theft or loss of cyanide

LYNX has a systematic process to ensure all emergency contact information remains current and valid:
The ERP contact list is reviewed and validated prior to each convoy departure by the HSE Officer or Convoy Leader as part of the Transport Preparation Procedure.
The ERP is formally reviewed and updated annually, incorporating any changes in contact information, organizational structure, or external responder details.
Whenever the ERP is activated during an incident or tested during drills, the effectiveness and accuracy of contact information are reassessed.
Any deficiencies identified are corrected immediately.
Contact numbers and emergency reporting protocols are also verified during annual mock drills, ensuring that all listed numbers are reachable and functional under real conditions.
This continuous review cycle ensures that both internal and external emergency notification and reporting procedures remain current and that all stakeholders can be reached instantly in the event of an emergency.

LYNX evaluates the effectiveness of its emergency communication system through:
Drill performance assessments: Each drill includes a communication test to confirm the speed and accuracy of notifications.
Post-drill debriefings: Observations and lessons learned are documented in evaluation reports, which feed into the ERP revision process.
Periodic audits: Internal audits and external ICMI reviews verify that contact lists and notification procedures comply with international cyanide transport standards.
Although no significant cyanide incidents have occurred in the past three years, LYNX continues to strengthen and update its systems proactively to maintain full compliance with ICMI

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

The operation is **X in full compliance** with Transport Practice 3.4
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan (ERP) and Transport Management Plan (TMP) developed by LYNX provide comprehensive and detailed procedures for managing spills and cyanide-related releases during transport.
These documents outline every stage of the spill management process from initial containment to neutralization, recovery, decontamination, and final waste disposal in accordance with ICMI Code requirements and national regulations.
Both the ERP and TMP describe the step-by-step process to be followed in the event of a cyanide spill or release. The procedures emphasize rapid containment, environmental protection, and safe remediation using manufacturer-approved neutralization methods.
In the event of a spill:
Immediate Containment:
Personnel must first isolate and contain the spill area to prevent cyanide migration or further contamination of soil and water. Barriers, sandbags, and absorbent materials are deployed to block runoff paths.
Assessment and Communication:
The Escort Leader or HSE Officer assesses the severity of the spill, initiates communication with LYNX management, and alerts relevant emergency responders following the ERP communication flowchart.
Recovery and Neutralization:
Residual cyanide solids or solutions are recovered and neutralized using manufacturer-established procedures.
Recovery and treatment steps include:
Recovery of solids
Neutralization or removal of contaminated soils
Treatment and disposal of impacted soils
Reclamation of usable sodium cyanide, where applicable
Transport of contaminated materials to authorized disposal facilities
Decontamination and Site Restoration:
Once neutralization is confirmed through testing, affected soils and materials are collected and packed for disposal.
Decontamination is conducted to restore the site to safe conditions.
All spill debris and cyanide-contaminated waste are transported to the designated mine site for final disposal or treatment, as per the mine's environmental management system.
No waste or debris is discarded along the transport route.

The ERP and TMP **clearly prohibit the use of chemicals such as sodium hypochlorite, ferrous sulfate, or hydrogen peroxide to treat cyanide spills in surface or underground water**.
These substances can generate toxic byproducts and worsen environmental impacts.
The ERP explicitly explains the negative consequences of using such chemicals in water bodies, reinforcing that mechanical containment and recovery methods must be prioritized instead.
In particular, LYNX's protocol emphasizes:
No chemical neutralization in natural watercourses.
Immediate notification of authorities (CIAPOL, SPECIAC, Ministry of Environment) in case of water contamination risk.
Deployment of booms, absorbent pads, and pumping systems for controlled recovery if the spill reaches a waterway.
Transfer of recovered water or slurry to the mine's cyanide treatment facility for safe processing.
Spill management operations are led by LYNX-trained emergency personnel.
The ERP defines specific roles for:
Escort Leader: initiates communication and supervises the response.
HSE Officer: evaluates hazards, directs containment, and ensures correct use of PPE and neutralization agents.
Fire Service Chemical Division and CIAPOL Officers: provide technical assistance and oversee chemical safety compliance.
Gendarmerie and SPECIAC: secure the area, control traffic and access, and assist in protecting nearby communities.
The convoy team is trained to handle containment and cleanup for minor to moderate spills, while SPECIAC/CIAPOL manage chemical intervention and environmental control for major spills or multi-truck incidents.
The Ivorian government has established the SPECIAC (Service de Protection et d'Escorte des Cargaisons à Risques Chimiques) agency under the Ministry of Defense to escort all hazardous material (HAZMAT) transports within national borders.
Each escort team includes eight specialized members:
2 Fire Service Personnel (Chemical Division)
2 Gendarmerie Officers
2 CIAPOL Representatives
2 SPECIAC Agents
The use of this agency is mandatory for all cyanide transporters and end users.
Each convoy whether consisting of a single truck or multiple vehicles receives the same level of escort.
The agency provides real-time chemical incident response capability, security, and civil protection coordination, ensuring immediate intervention in case of a spill.
All actions related to spill management including inspections, spill response, neutralization, and cleanup are fully documented in accordance with ISO 9001 requirements.
Completed spill response reports are submitted to management and retained as part of the audit record.
Any incident triggers a review and update of the ERP and TMP to incorporate lessons learned.
Periodic mock drills test the effectiveness of spill procedures, equipment readiness, and coordination with external responders.

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

The operation is **X in full compliance** with Transport Practice 3.5
□in substantial compliance
□not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

LYNX maintains a comprehensive and systematic process for the review, evaluation, and continuous improvement of all its emergency management and operational procedures, including the Emergency Response Plan (ERP) and Transport Management Plan (TMP).
This ensures that all procedures remain current, effective, and aligned with both ICMI Code requirements and evolving operational realities.
LYNX conducts annual reviews of all key operational procedures, including the ERP, TMP, and associated safety and transport protocols.
These reviews ensure that:
The documents reflect current regulatory, operational, and logistical conditions.
Contact lists, responder details, and resource inventories are updated.
Lessons learned from drills, audits, or real events are incorporated promptly.
The ERP and TMP are reviewed at least once per year, and the road risk assessment is reviewed annually to ensure all route information and hazard profiles remain current.
All management reviews are documented, and the records of these reviews are retained as part of the company's audit and compliance history.
The ERP specifically outlines three triggers for formal review and amendment:
Annual scheduled review to confirm the plan's overall adequacy.
Post-incident review following any cyanide-related emergency or operational deviation.
Post-drill review after every emergency simulation to incorporate findings and improvement actions.
This structured approach ensures continuous improvement and the integration of practical feedback from actual operations.
LYNX implements a formal internal audit system to evaluate the effectiveness, adequacy, and compliance of its emergency and transport management systems.
The HSE Department leads internal audits and ensures findings are discussed during management review meetings.
Audit outcomes are used to identify procedural gaps, training needs, or areas requiring update.
Management review meetings include the evaluation of audit results, drill outcomes, and feedback from convoy operations.
All audit and review outcomes are documented in Management Review Reports, which form part of LYNX's continuous improvement and ISO 9001 quality management processes.
LYNX conducts at least one full-scale emergency drill per year, in compliance with ICMI ,
These drills simulate cyanide release, exposure, vehicle accidents, or fire scenarios.
Each drill evaluates the readiness, communication efficiency, and coordination among convoy teams, management, and external responders.

Scenarios are rotated annually to test different aspects of the ERP (spill management, human exposure, communication failures, etc.).
Drills are conducted with participation from clients and/or external responders, including:
SPECIAC (Hazardous Cargo Escort Agency)
CIAPOL (Centre Ivoirien Anti-Pollution)
Fire Service – Chemical Division
Gendarmerie and Ministry of Defense personnel
Following each drill:
An evaluation report is completed by observers, the HSE Department, and participating agencies.
Lessons learned and recommendations are documented.
The findings are used to update relevant procedures, such as the ERP, TMP, and equipment readiness protocols.
This process ensures that the emergency response team remains technically proficient, responsive, and capable of managing real emergencies effectively.
The ERP requires verification of all emergency contact details prior to each convoy departure.
This is performed by the HSE Officer or Convoy Leader and verified during the pre-departure inspection checklist.
This process ensures:
All contact numbers are functional and current.
Emergency communication flow (LYNX → Client → Supplier → Authorities → ICMI) remains intact and reliable.
Additionally:
The contact list is formally reviewed each year during the ERP revision cycle.
Temporary updates are made whenever a staff or external responder's contact information changes.
This proactive approach ensures the accuracy and reliability of emergency notification and reporting systems at all times.
The evaluation of each drill, audit, or incident directly informs the continuous improvement cycle:
Evaluation reports are reviewed by the HSE Department and Management.
Corrective and preventive actions (CAPA) are implemented for identified weaknesses.
Equipment checks, training needs, and procedural clarifications are adjusted accordingly.
Updated versions of the ERP and TMP are reissued to all personnel and convoy managers with confirmation of receipt and understanding.
Although no cyanide incidents have been reported to date, LYNX maintains a proactive improvement culture, using drills and audits to identify and close any potential gaps before they lead to real risks.

This summary report was prepared by:

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