



**Investor Solutions Limited**

P.O Box 67562

Nairobi

Kenya

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## ICMI CERTIFICATION – SUMMARY REPORT

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### 1.0 INTRODUCTION

#### 1.1 Operational information.

Name of production facility	:	Movis Logistics Limited
Name of facility owner	:	Movis Logistics Limited
Name of facility operator.	:	Movis Logistics Limited
Name of responsible manager	:	Joshua Gbloe
Address	:	Movis Logistics Limited
	:	No. 1 MovisBereau
	:	Plot No. WD/A/36/2B
	:	Off Harbour Road, Heavy Industrial Area
	:	Community 9, Tema
State / Province	:	Tema
Country.	:	Ghana
Telephone.	:	+233204721652
E-mail.	:	<a href="http://www.movislogistics.com">www.movislogistics.com</a>



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### 1.2 Description of Operation – Movis Logistics Ltd. (MLL)

#### 1.2.1 Company Profile.

MOVIS Logistics Ltd was birthed out of MOVIS Ghana Ltd in 2017 to meet the Strategic Intent of the Visionary to venture into the Mining Projects and Oil and Gas space and also to meet the Local Content Laws of the Republic of Ghana. MOVIS Logistics is one of the top 5 vibrant wholly owned Logistics Companies in the Country.

MLL operates 3 offices between Ghana and Burkina Faso with an employee strength of about 37 Professionals providing various kinds of support to its customers.

The main office is at Tema Community 9, Ghana whiles its Airfreight branch is at the Kotoka International Airport area, Accra.

MLL as a Brand in the Logistics Space in Ghana has seen significant growth and successes from its inception in 2017 till date.

The company serves clients who are mainly in Projects, Mining and Oil & Gas Sectors. Movis Logistics Limited is involved in customs clearing and freight forwarding of different chemicals including sodium cyanide and its transportation to mine site destinations.

MLL has an Environmental Protection Agency (EPA) permit number EPA/CCMC/GAR/LHCT-70/22 dated 19th October 2022 and expiring on 20th October 2023 signed by the Executive Director of the agency mandating them to transport sodium cyanide and other hazardous chemicals. MLL transport sodium cyanide from Samsung C&T to IAM Gold, Wagnion Gold mine and Orezone Bombore mine all in Burkina Faso.

Movis Logistics Limited is contracted as a cyanide transporter for Samsung C & T an ICMC certified supplier from Tema harbour to the aforementioned mining companies in Burkina Faso.

Cyanide is received at the port of Tema by sea, in sea containers each holding 20 one-ton boxes of solid sodium cyanide briquette. Upon arrival of a shipping vessel in the port, the containers are offloaded from the vessel by Meridian Port Services into their terminal (MPS) and stored at their facility for MLL to pick them from there. MPS is responsible for loading sea containers on to MLL trucks at the MPS Terminal. MPS has been contracted by Ghana Ports and Harbours Authority to handle all hazardous chemicals in their terminal. For Cyanide Code transportation compliance purposes, MLL responsibilities commences when they collect the containers from MPS terminal.

#### 1.2.2 Audit scope.

The audit covers the road transportation of cyanide from the port of Tema, Ghana to three mining companies in Burkina Faso. The mining companies are Iam Gold Essakane mine, Orezone Bombore mine and Teranga Wagnion mine.

### 1.3 Sodium Cyanide Transportation.

Movis Logistics Limited (MLL) transport cyanide from Samsung by road to mining companies in Ghana and Burkina Faso. MLL transports cyanide to IAM Gold Essakane mine, Teranga Wagnion mine and Orezone Bombore mine all in Burkina Faso. Prior to the arrival of shipments for each of the mine in the port of Tema, Ghana, MLL commences the clearing process through customs to ensure that there are no delays in clearing the containers of cyanide from the port. Shipments are unloaded from vessels upon arrival, into the terminal of Meridian Port Services (MPS).



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MPS subscribes to the International Maritime Dangerous Good Code (IMDG Code) and segregate cyanide containers from incompatible chemicals. MLL sends trucks to the port when customs documentation have been completed to load the containers on their trucks. The trucks are dispatched in convoy from the port to the respective mines. The route used are as follows.

- ❖ Tema port - Anyinam - Nkawkaw – Konongo – Techiman – Paga - Dakola - Pissi - Ouagadougou - Iam Gold Essakane
- ❖ Tema port – Anyinam - Nkawkaw- Konongo -Techiman-Paga - Dakola - Pissi - Ouagadougou - Orezone Bombore mine
- ❖ Tema port - Anyinam - Nkawkaw-Konongo - Wenchi - Bamboi -Bole - Sola - Wa - Hamile - QuessaPissi - Bobo Dioulasso - Teranga Wahgnion Mine

Containers are delivered from the quay to the MPS Container terminal where they are stacked and stored separately. Control and monitoring of the containers is undertaken at the port by MPS, who subscribes to the IMDG Code. MLL Cyanide Code responsibilities commences once the containers are placed on the transport vehicles in the MPS terminal.

MLL complete all customs clearing documentation. Trucks are sent to the port to collect the containers and are dispatched in convoy to the mine destinations under escort in accordance to the company's Transport Management Plan.

The convoys include an armed police escort whilst travelling through Ghana and armed gendarme in the case of Burkina Faso. An escort leader manages the convoy with his team and manages communication between the drivers in each truck, his head office and the mine.

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### SUMMARY AUDIT REPORT AUDITORS' FINDINGS

Movis Logistics Ltd 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 Singh Degon, Lead Auditor  
**Email:** kuldip@isglobal.net

### NAME OF OTHER AUDITORS

Benjamin Amoo- Mensah – Technical Auditor: Transportation.

### DATES OF AUDIT

The certification audit of the Movis Logistics Limited was conducted 19<sup>th</sup> to 20th October 2022

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

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

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

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

Movis Logistics Limited (MLL) has a Route Assessment procedure (doc. number MLL-HSE-OPS-SOP-001) dated 20th June 2022. The procedure outlines the process for developing and selecting routes used for the transportation of sodium cyanide and other related mining chemicals.

The selection of transport route primarily takes into consideration the following;

- ❖ Towns and villages
- ❖ distance and condition of road
- ❖ Areas of High pedestrian activity
- ❖ Schools and other educational facilities
- ❖ Population density
- ❖ Pitch and grade of the roads
- ❖ Quality and general condition of roads
- ❖ Weather condition such a fog
- ❖ Bridges
- ❖ Waterways
- ❖ Regional and national road black spots(accident sites),

Clause 4 of the Procedure for route assessment states that the HSE Manager is responsible for conducting the route assessment. The procedure titled "Performing Road Survey" requires routes to be assessed and risks identified along the route noted and management measures are to be documented in accordance with the operations Transport Management Plan.

The Ghana Environmental Protection Agency (EPA) has approved the selected routes in Ghana based upon the broader ability to provide emergency response support. There are limited alternative routes owing to the topography, poor road infrastructure or opposition from communities.

Population density in towns and villages have been considered in conducting the route assessment. The operation has an RRA (MLL-QHSE-OPS-SOP-001-R004 dated 1st July 2022) which has taken into consideration population density of towns and villages along the transportation route right from the port of Tema to the mine site destinations.

The Route Surveys have taken into consideration, the infrastructure of the roadway, construction activities on the selected route and general condition of the road. Clause 1.2 of the RRA takes into consideration the road infrastructure such as bridges, road condition, schools along the road, market areas and different hazard types. Road markings on tarred road, edges of tarred roads, slopes, adjoining roads, pitch and grade, rivers, water sources nearby and weather conditions have all been captured in the Route Selection Procedure and in the RRA.

Clause 5.1 of MLL's Route Assessment Procedure took into consideration weather conditions such as fog. Water bodies along the selected route were considered and noted during the route survey. It is also catered for in the RRA.

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MLL has implemented processes to periodically evaluate risks in the routes used for cyanide transportation and has a process of getting feedback on the risks noted by drivers / escort leaders during deliveries to the three mines.

The company's RRA(MLL-QHSE-OPS-SOP-001-R004) dated 1st July 2022 done for the route from Tema to Orezone Bombore mine in Burkina Faso addresses evaluation of risks of the selected cyanide transport route.

The RRA's for IAM Gold Essakane mine and Teranga Wahgnion Gold mines were noted by auditors. RRA's for the route to Teranga Wahgnion mine (doc. number MLL-HSE-OPS-SOP-001R001) dated 15/6/22 and IAM Gold Essakane mine (document number MLL-HSE-OPS-001-R006) dated 20/5/22 are evident that risk assessments have been conducted for all the roads to the three mine sites.

The Route Risk Assessment covered all the risks along the route such as high vehicular activity, narrow roads, pedestrian crossing, slopes and market areas and controls have been put in place to minimize or eliminate the risk. Any risk identified on the road during delivery to the mine sites are reported back to the QHSE Manager and also noted in feedback reports.

A "Convoy leaders Route Advice Adjustment Form(MLL-HSE-OPS-SOP-009-F001) which indicates the nature of risk, is completed and approved by top management of MLL and mining clients. The hazards identified are risk assessed and if necessary an alternative route is selected and used. Drivers are given the opportunity to comment on areas of concern on the route or areas which are found unsafe to travel during de-briefing session after each delivery to the mine. The risk identified on the route are discussed at Tools box meetings prior to departure of a convoy. The QHSE department is responsible for organizing the tools box meetings. Records of tools box meetings held on 9/7/22, 7/7/22 and 8/7/22 were verified and noted.

The operation has a Transport Management Plan (MLL-HSE-OPS-SOP-017) dated 10th April 2022 that stipulates that routes are to be evaluated periodically and TMP revised when necessary. Clause 7.0 of the Transport Management Plan mentions a process of continuously evaluating the transportation route will be as a result of lessons gathered from emergency response exercises and mock drills, incidents or additional information obtained from other sources and feedbacks obtained on the road condition after each trip. Samples of feedback reports dated 10th August 2022, 12th August 2022 and 14th August 2022 were verified.

MLL has a system of getting feedback on the road conditions and addressing the risk identified on the route and have put in controls to eliminate or reduce the risk. RRA details the risk identified and control measures put in place. Clause 1.8 of the RRA for the road from Tema to Orezone Bombore mine, have considered measures to address or eliminate risks which includes mandatory overnight stops for rest, limitation on hours of driving and speed limits when driving on rough roads.

The transporter's Route Risk Assessment Procedure outlines the category of risks to be identified when conducting a route assessment, risk ratings, and the necessary controls to prevent any incidence. Control measures to the hazards identified on the route are captured in the RRA and feedback reports. Route Surveys have been conducted by the QHSE Manager. All records were noted.

MLL has notified all stakeholders including government agencies namely, Ghana police, hospitals, Ghana Health Service, Ghana Water Co. Ltd and Ghana Environmental Protection Agency, Ministry of Environment affairs in Burkina Faso Civil Protection Agency, National Ambulance Service and Police in Burkina Faso.. Notification letters to Ghana Fire Service, Ghana Health Service, Ghana Water Company and Ghana Police Service dated 10/6/22, 13/6/22, 16/6/22 and 22/6/22 respectively were verified. Ghana Environmental Agency is responsible for notifying communities along the route in consultation with MLL and have notified them as such. EPA certificate (number EPA/CCMC/GAR/LHCT-70/22) was verified and noted by auditors.

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The transporter uses escorts for convoys in delivering of cyanide to its mining clients. Clause 2 of the Convoy Management Procedure (MLL-HSE-OPS-SOP-002 dated 20th July 2022) mentions that all deliveries of sodium cyanide to all the mine sites are carried out in convoy with escort. Cyanide deliveries to the mines consists of four trucks(4) trucks. Convoys of four(4) trucks move with one escort vehicle. The composition of the escort team are 1 escort driver, 1 escort leader and 1 police for all convoy movements. The convoy is escorted by the company's own emergency response team with an escort vehicle.

MLL has an agreement with Satellite Trans Ghana Ltd. MLL has subcontracted the transportation to Satellite Trans Ghana Ltd who provides vehicles and trained drivers for the transportation of the cyanide to the various mine destination. The agreement spells out the roles and responsibilities of both parties. Custom Clearing of the shipment of cyanide from the port, escorts and documentations are the responsibilities of MLL.

The subcontractor only provides trucks and trained drivers. All deliveries to the mines are carried out in accordance with the procedures of Movis Logistics Limited.

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

The operation is **X in full compliance with** Transport Practice 1.2

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

MLL has a Recruitment and Selection Standard Operating Procedure MOV/QMS/ADM/SOP/0010) dated 09/08/22 which outlines the processes for recruitment of drivers including escort team.

The processes involve the following.

- 1, Pre-selection stage which includes vacancy approval, internal/External advertisement
2. Selection Stage which includes Ability testing and Interviews
3. Post Selection stage which includes identity and Criminal record check, medical examination followed by appointment.

The subcontractor Satellite Trans also has a recruitment policy. The following criteria are followed.

- 1, Drivers must write applications
2. Prospective applicant should be between 35-45 years
3. The Driver goes through an interview with a pass mark 75%
4. Drivers are required to have valid license 'F' to drive a heavy-duty vehicle.
5. Must have a guarantor

Drivers have been trained in:

1. Cyanide awareness
2. Defensive driving
3. Route risk assessment
4. First Aid and emergency response.

Training records were verified during the audit.

Before drivers are selected, they undergo theoretical and practical test. Appointed drivers are taken through training and mentoring. Evidence of training such as Training Attendance register, training matrix and tools box meetings sighted by auditors. These records are also in the custody of Movis Logistics.

Selected drivers interviewed proved that they are knowledgeable in cyanide awareness and emergency response.

MLL as well as its subcontractor Satellite Trans have Training matrices which capture the following training requirements for drivers and other personnel. The matrix is updated anytime training is conducted.

The transporter's training matrix show the following training program.

1. Defensive driving
2. Cyanide Awareness
3. Emergency response training
4. First Aid
5. Convoy Management
6. Route Risk Assessment Training

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### 7. Fire Fighting training

All the above training are held annually except First Aid training that is organized biannually.

Records of all the training programs were verified and noted. RRA training was held on 5th August 2022. Training Attendance register dated 5th August 2022 was verified. Certificates issued for participants for Basic First Aid dated 15th September 2021, Defensive driving dated 29/05/22 were noted. Training attendance register for cyanide awareness training dated 22nd February 2022 were sighted.

The subcontractor Satellite Trans Limited provide the required trucks for cyanide delivery. The agreement between MLL and Satellite specifies that Satellite trains its own drivers including Movis Logistics Limited escort team in accordance with their procedures.

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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** Transport Practice 1.3

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

MLL requires that the subcontractor uses Renault and Scania brand of vehicles with HP 440 and 480 respectively. The subcontractor uses 6x4 vehicles with flatbed trailers with twist locks to carry 2x20ft containers. The acceptable weight should not exceed 70tons as per the Ghana regulation. The same axle load regulation pertains in Burkina Faso and other West African countries.

Fourteen trucks have been allocated for cyanide deliveries by the subcontractor (Satellite Trans). No jumbo tires are permitted. The trucks are designed and are appropriate for the transportation of cyanide. The capacity of the trucks as well as the configuration indicates that the trucks can take the load that they can carry. Both Periodic maintenance and Corrective maintenance are done by the manufacturer's agent (Scania) whilst Renault trucks are serviced by Renault agent in Ghana.

Servicing of the Scania vehicles are carried out at mileage intervals of 20,000Km whilst Renault trucks are serviced mileage intervals of 15,000Km. Inspection all vehicles are done by MLL Escort leader prior to the departure to a mine. When a fault is noticed on a particular truck during pre-departure inspection the escort leader reports it to the Workshop Manager of Satellite Trans and a Service Request form is raised by him to the Scania or Renault agents in the country. A maintenance team is assigned to attend to any faults. After the fault has been rectified the Request Form is closed and signed off by Scania or Renault workshop manager. Maintenance records of vehicle numbers GM 94-16, GN 93-16 and GT9661-16 were seen and noted by auditors.

Each 6x4 truck trailer configuration is loaded with two containers weighing approximately 46.4mt the maximum required load per 6x4 vehicle is 70mt. The total weight of the tractor unit + flatbed trailer + weight of 2x20ft is approximately 64.4mt. The total weight that are carried by the trucks are within the required regulations in Ghana and Burkina Faso.

Procedures are in place to prevent overloading of the transport vehicle being used for handling Cyanide. Vehicles are weighed within the port by the Ghana Port and Harbors Authority to ensure that they are within the acceptable load limits. Weighing tickets are issued to ensure that they are not overloaded. Weighing tickets with numbers 151929, 151930 and 151925 all dated 5/10/22 for vehicles with registration numbers GN1658-22, GN 94-16 and GN95-16 were verified. Records of Bill of Ladings specifying the gross weights of the sodium cyanide were noted.

The subcontractor provides trucks which are within load limits. The subcontractor abides by the servicing mileage of the vehicles.

The TMP states that cyanide containers must be checked to ensure that the correct container has been loaded on the vehicles.

Sodium cyanide briquette is package in 1ton bulk bags encased in plywood box with a pallet before packed into a standard shipping container. Twenty boxes (IBC's) are packed in a 20ft container. The manufacturer has sealed the containers prior to shipping. The containers are inspected by the convoy leader and a Convoy log sheet (number MLL-HSE-OPS-SOP-010) is completed. The convoy log sheet has the Container Identification Numbers, Seal numbers, Vehicle registration numbers, driver's name and date of departure. The log sheets are signed by the escort leader and the shipping Officer. Completed convoy log sheets dated 3/4/22, 6/7/2022 and 20/09/2022 were sighted by auditors.

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Waybills issued by MLL has the container numbers, Bill of Lading numbers, quantity of cyanide and the vehicle registration numbers. Waybills numbers 0001615, 0001612, 0001617 and 0001613 all dated 18/10/22 were scrutinized and noted. The copies were signed and dated by IAM Gold personnel as evidence that the containers have been received in good condition. The Bill of Ladings received also have details of container numbers, seal numbers and weight of product. BL numbers MAEU 914203473 dated 18/5/2, MAEU914090009 dated 8/4/22 were sighted by auditors. At the mine site, a mine representative receives the containers after inspecting and signs the waybills.

The subcontractor Satellite Trans Limited provides the required trucks for cyanide delivery. The agreement between MLL and Satellite Trans specifies the requirements of practice 1.3.

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

The operation is **X in full compliance with** Transport Practice 1.4

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

MLL has a procedure to ensure that cyanide is transported safely to mine site intact. Cyanide briquettes are packaged within a woven polypropylene bag with a PVC (plastic) liner and encased in wooden Intermediate Bulk Containers (IBC's). The bag is sealed to prevent moisture. The quantity of cyanide in each bag is 1000Kg. The packaging complies with the International Maritime Dangerous Goods Code (IMDG Code). As extra support the IBC's (ply-wood boxes) are strapped around with steel strapping which further support the packaging. The box is placed on a pallet to provide further protection during transit and to allow easy lifting and movement from one place to another. The IBC's are then packed into a 6 meter (20 foot) sea freight containers.

Twenty (20) boxes are in each 1x20ft container. The sea container doors are secured with a seal with a unique seal number. The quantity of cyanide, container number and packing list are stated on the shipping documents prepared by the shipping company to cover the consignment.

MLL has a "Convoy Identification Transport Units and Loading form" which is completed prior to a convoy departing to a mine. The form details the vehicle number, trailer number seal numbers of the cyanide containers and name of the drivers. The form is signed off by the Escort leader, Police and Gendarme (in Burkina Faso).

Waybills are issued for each load that a vehicle carries. The waybills have seal numbers on them. Personnel at the designated mine receiving the consignment signs and stamps it to authenticate that the product have been received intact or in good condition.

Trailers are fitted with eight twist locks to secure the containers. Before the shipment departs from the port, it is the responsibility of the Escort Leader and the driver to check the condition of each container as well as whether the seals are still intact on the doors.

En-route to the mine, the Escort Leader checks the condition of the containers as well as whether they are still properly secured to the trailers any time the convoy stops for a brief rest. The gendarme from Burkina Faso, takes over from the Ghana police and joins the convoy at the Burkina Faso side of the border." A Trailer Trip Checklist for Transport of Containerized Solid Sodium Cyanide form" is completed daily whilst the convoy is on the road to the mine. Ghana Customs tracking devices are fixed on the containers to track them and ensure that the containers have crossed the borders of Ghana.

The cyanide supplier has visibly placarded all four sides of the container as required by the International Maritime Dangerous Goods Code (IMDG code). Clause 1.1 of MLL's TMP mentions that every sodium cyanide container is to have the required placard. Cyanide placards are displayed on all four sides of the freight container. The placards are Hazard class 6 skull and cross bones, UN number 1689, and Marine Pollutant labels are used. In addition, the required placards namely marine pollutant and hazard class 6 and cross bones are displayed in front and at the rear of the trucks.

The operations have implemented a safety program that includes Vehicle Inspections prior to departure of a convoy. MLL conducts inspection and completes a form called "Tractor Head Semi-Trailer Pre Trip Inspection Form". Inspection is carried out by the convoy leader and signed off by him and the driver of the vehicle. Copies of completed Tractor Head Semi-trailer inspection forms for vehicle numbers GT9667-12, GT7908-20 dated 18/08/22 noted. A pre-departure inspection is carried out on the trucks before the trucks depart for the mines. Copies of pre-departure checklists for vehicle numbers GN1657-22 and GN1659-22 all dated on 7/7/22 and GT9667-16 dated

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18/08/22 sighted. Once faults have been picked up during inspection, the Workshop Manager of subcontractor is informed, and a work order is raised, and fault rectified. Samples of records of inspection were noted by auditors.

Both MLL and its subcontractor (Satellite Trans) have maintenance procedures. MLL Maintenance Procedure number MLL-HSE-OPS-SOP-12 states that preventive maintenance and corrective maintenance should be done on the cyanide trucks & trailers. Vehicles are serviced at 20,000km intervals for Renault and 15,000km for Scania vehicles as per the manufacturer's specifications. There is an arrangement with Scania and Renault agents in Ghana to carry out all works on the company's vehicles. Scania and Renault agents conduct servicing on the Scania and Renault trucks respectively. Work orders which are raised are sent to the workshop manager of the subcontractor who assigns the work to a mechanic. The fault is worked on, and vehicle goes through quality test. Work is then signed off by the mechanic who worked on it and countersigned by the Workshop Manager.

The subcontractor also has an agreement with Rana Motors Ltd which has stationed in their tire expert in their workshop to do inspection and service tires. The personnel check all the tires of the vehicles every morning and issue Daily Tire reports to them. Worn out tires are replaced immediately. Minimum tire depth is at which tires are replaced is 3mm. No retreaded tires are used.

The company has a Fatigue Management Policy (number MLL-HSE-OPS-SOP-015 dated 28th July 2022). The policy stipulates that drivers must drive for 2hours and take 15 minutes rest. Driving hours is from 6am to 6pm. Journey plans are used to regulate the driving of the drivers. GPS tracking system showed that drivers abide by the driving hours. The operation has mandatory rest stops along the transport route. Journey Plans verified conforms to the operations fatigue management plan. The TMP states that it is prohibited for cyanide trucks to drive in the night. Completed journey plans were scrutinized by auditors.

The Transport Management Plan (MLL-HSE-OPS-SOP-017) indicates in clause 4.8 that containers are secured firmly with twist locks. Twist locks are used to secure containers on the trailer to prevent the containers from shifting. The condition of the twist locks is noted on the pre-departure checklist.

The operation has a Convoy Modification procedure MLL-HSE-OPS-SOP-009 dated 28th June 2022 which mentions that in unforeseen circumstances such as inclement weather, civil unrest or road works the convoy will suspend the journey. If the trucks are on the road, the convoy will stop in a safe place until the situation is over. The RRA also addresses civil unrest and severe weather conditions.

The company has a Drug and Alcohol policy (Doc# MLL-HSE-POL-004) dated 21st June 2022) that prohibits the use of drugs and alcohol during working hours. It also prohibits the possession and sale of drug and alcohol. High frequency spot test is carried on workers on probation. Alcohol testing are periodically done on all workers including drivers. The company has a breathalyzer which is used to conduct the testing. Test results should be 0.0. Copies of completed alcohol test reports for some drivers dated 6/10/22 were noted. A Drager Alcotest 5000 machine is the type of breathalyzer used to carry out the test. Calibration of the Alcotest 5000 as was done on 5th October 2022. The convoy leader is responsible for conducting random alcohol test on drivers and other staff.

Records have been retained. MLL has a Document Control procedure no. MLL-HSE-OPS-SOP-025.

The following documents are acceptable records that are retained:

1. Forms
2. Reports
3. Minutes of meetings
4. Computer files
5. Training records.
7. Procedures

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The documents control procedure states that the Archival documents and data are retained for legal or knowledge preservation purposes. All records must contain sufficient data to attest to satisfactory completion of the recorded activity and at minimum, must be signed and dated by the individual responsible for completing the record.

The retention period for operational records and all other documents is 10 years. It is also determined by contractual requirements, warranty periods, product life cycles, legal considerations.

MLL ensures that its subcontractor has met all the requirements aforementioned clauses. These requirements are captured in the agreement.

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

The operation is **X in full compliance with** Transport Practice 1.5

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

Not applicable to this operation as no shipment of cyanide is done by sea.

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

The operation is **X in full compliance with** Transport Practice 1.6

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

Movis Logistics have implemented a process to enable them track the cyanide shipments to prevent losses during transport.

Communication is by means of mobile phones and via email communication. Clause 2 of the Communication Procedure(MLL-HSE-OPS-SOP-023 dated 15th July 2022) mentions that mobile phones are used to communicate with the mining companies, emergency responders and cyanide supplier(Samsung). There is a WhatsApp platform that is also used to communicate with the mining companies and cyanide producer. The WhatsApp platform has all the contact phone numbers of the relevant people in the mines and cyanide supplier, MLL staff and the subcontractor's top management staff.

The locations of the convoy as well as the date and time of departure from the port are communicated to all those on the WhatsApp platform. Copies of email communications dated 23/1/22, 20/6/22 and 10/11/22 between MLL, supplier(Samsung) and the mining companies notifying them about the departure of a cyanide convoy as well as the convoys locations were sighted. The Operation Manager of MLL is responsible for sending such emails.

A minimum of 5 WhatsApp messages indicating the locations of the convoy are sent within a day till the convoy reaches the mine site destination. It is the responsibility of the escort Leader to check all mobile phones and record the findings on the Pre-departure checklist. Prior to departure of the convoy, all mobile phones are inspected to ensure that they are fully charged and are working properly.

The escort Leader is responsible to ensure that adequate communication equipment(mobile phones) are carried by the vehicles. GPS tracking system also monitors the movement of the vehicles. The GPS is monitored by the Transport Manager and the QSHE Manager of the subcontractor on the other hand by the QSHE Manager of MLL until the convoy stops for the night. Real time tracking of vehicles were sighted on the GPS Tracking system. GPS reports noted by auditors.

The GPS tracking system is monitored by the QSHE Manager and the Managing Director of the subcontractor. The QHSE Manager of Movis Logistics also has access to the GPS password to enable him to track the convoy on the road. Ghana Customs tracking devices which are affixed to the containers also tracks the progress of the trucks on the road.

There are no black out areas identified on the cyanide transport route from Tema, Ghana to the mines in Burkina Faso. Clause 2 of the communication procedure mentions that different communication network lines namely MTN, Vodafone, Airtel Tigo and Orange(in the case of Burkina Faso) are used to communicate with all stakeholders.

Movis Logistics handles the clearing of cyanide shipments from the port. All customs documentation are executed by the company. A Chain of Custody procedure (MLL-HSE-OPS-SOP-019Rev 00) dated 11th July 2022 spell out the process of implementing inventory control and /or chain of custody documentation(Waybills, BL's etc.)

All cyanide containers are to;

- Be checked for the correct container seals
- Be cross checked against collection documentation to ensure the right container is being loaded onto the truck.

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- Be signed for by the QHSE manager of MLL and the subcontractor representative

Shipping documents which includes the Bill of Lading, Customs declaration and Waybills are all kept on record. Copies of Bill of Lading # MAEU94090009 dated 8/04/22 and MAEU914203473 dated 18/05/22 were noted. Records of the aforementioned Bill of Ladings specifying the gross weight of sodium cyanide were reviewed. Container Numbers, seal numbers, the gross weights of each freight container, Shipper's information, Consignee's information, description of packaging & chemical details of shipment are specified on the Bill of Ladings. Waybills are submitted to the mine site representative who signs it to ensure that the containers have been received in good condition and copies retained by the mine. Container interchange issued by the port authority are also kept on record by MLL's clearing department. Container Interchange indicates the condition of the containers at the time of loading them from the port.

Movis is Logistics is responsible communication between the mine and supplier, reporting of incidents, customs clearance from the port and records keeping as spelt out in their agreement.

MSDS from the supplier is available and noted. The escort leader has the MSDS as part of his documents he carries with him to the mines. MSDS are also captured on the MLL pre-departure checklist and this is checked before the convoy departs.

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

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

The operation is **X in full compliance with** Transport Practice 2.1

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

Movis Logistics Ltd is in full compliance with Transport Practice 2.1, based on the finding that the transport operation does not store any cyanide. Movis Logistics does not have a cyanide trans-shipment depot or interim storage of Sodium Cyanide.

Within the scope of this audit, there are no transshipment depots or interim storage sites as defined in the audit protocol.

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

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

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

The operation is **X in full compliance with** Transport Practice 3.1

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

The transporter has developed an Emergency Response Plan (ERP) that guides responses to potential cyanide emergencies.

The operation has an Emergency Response Procedure(ERP) document number MLL-HSE-OPS-SOP-006 Version 003 dated 18/5/22. The ERP outlines response actions during an incident. The plan summarizes the actions to be taken in the event of a cyanide incident whilst transporting sodium cyanide from the port of Tema to the respective mines that the company serves in Burkina Faso. The ER plan addresses different scenarios of incidents and their respective response actions.

The ERP also details the roles and responsibilities of outside emergency responders and medical facilities in the event of an emergency situation. External stakeholders include emergency response organisations and government authorities / departments. External responders identified in the documents, are aware of their roles during an emergency.

Emergency contact telephone numbers for internal and external emergency entities are provided in both the ER Plan as well as the TMP.

The ERP mentions two phases of an incidents when handling a cyanide incident i.e. Emergency phase and Recovery Phase and addresses what actions to take.

The ERP contains the following.

- Incident types in Clause 2.8 of ERP
- Remediation and descriptions of response actions as appropriate for anticipated emergency situation (in Clause 2.8.2)
- Physical and Chemical form of cyanide transported.
- First Aid and toxicology
- Neutralization processes
- Roles of emergency responders namely police, Ambulance, Fire Service hospitals and EPA.
- PPE requirements

Auditors verified the contents of the plan and its validity. The contents of the ERP were found to be appropriate to the company's cyanide transportation operations.

The plan is appropriate for the selected transportation route. The ERP details the routes to all the three mine sites that the company serves. The transportation routes covered are.

- Tema port-Nsawam-Anyinam-Konongo-Ejisu-Kumasi-Techiman-Tamale-Bolga-Navrongo-Paga-Dakola-Po-Pissi-Ouagadougou-Boudtinga- Orezone Bombore mine



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- Tema port - Nsawam - Anyinam-Konongo - Ejisu -Kumasi -Techiman-Wenchi-Bole Bamboi-Bole-Sawla-Tuna - Wa - Hamile - Ouessa - Bobo Dioulasso - Bamfora - Wahgnion Gold Mine
- Tema port - Nsawam - Anyinam - Konongo - Ejisu - Kumasi - Techiman -Tamale - Bolga-Navrongo-Paga - Dakola -Po - Pissi - Kombissiri - Kaya - Taparko - Dori - lam Gold Essakane mine.

In the case of remote site incidents, arrangements have been made in the ERP to establish contact with local emergency responders along the route to assist in responding to incidents.

Clause 2.2 of the ERP describes the physical and chemical properties of the sodium cyanide as white solid briquettes which when in contact with water, acids or other incompatible chemicals will release toxic Hydrogen Cyanide gas. The packaging complies with the IMDG Code with IBC's having placards, UN No. 1689, toxic six and Marine pollutant labels.

In Clause 1.8(Mode of Transport) of the ERP states the method of transport is by road. Route Risk Assessments have been conducted on the roads to the mine site. Road condition from the port to the mine sites have been captured in the ERP clause 1.8. All aspects of infrastructure which includes bridges, hospitals, markets, asphalts road, curves, slopes etc. have been considered in the ERP. The ERP was reviewed by auditors and found to have covered all aspects of the transport infrastructure.

The ERP addresses the design of transport vehicles. MLL's subcontractor uses Renault and Scania brand of vehicles with HP 440 and HP480 respectively. The subcontractor uses 6x4 vehicles with flatbed trailers with twist locks to carry 2x20ft containers. No jumbo and rethreaded tires are permitted on the trucks.

Clause 2.8 of the ERP outlines the following anticipated emergency situations.

- Scenario A: Roll over of shipping container without spillage
- Scenario B: Rollover of shipping container with spillage on to dry ground.
- Scenario C: Rollover of shipping container with spillage into waterway
- Fire close to Sodium cyanide due to truck breakdown and other offsite impacts
- Natural events
- Contact with other incompatible chemicals in a transport incident.

The various response actions for each of the above emergency scenarios of incidents were noted.

ERP outlines the roles of emergency responders in clause 2.7 namely, police, Fire Service, St John's Ambulance, EPA, Ghana Water Resources Commission, Nation-wide Towing Service, and hospitals. The Ghana EPA is responsible for advising the communities in case of an incident.

Communities will not have direct involvement during an incident. The Escort Leader is responsible for informing MLL management about the incident. Management will then inform the supplier and the mine. The convoy leader will activate a response immediately by contacting all external responders i.e., Fire Service, Police, EPA, Hospital, Ambulance Service.

The Civil Protection Agency, National Ambulance Service and police in Burkina Faso have been notified and will be called upon to assist in case of an incident. The police accompany the convoy from Burkina Faso side of the border to the mine site. The contact phone no's of all these stake holders are detailed in the ER contact list. No special transport permit is required in Burkina Faso.



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The ER team will then cordon off the area and move people upwind. Cleaning and shovelling of the cyanide will be done by the escort team.

The role of the police is to assist in traffic management and keeping people away from the incident scene. The Fire Service will assist in case of fire and rescue of injured person. Ambulance Service responsibility is to handle injured persons or possible cyanide poisoned persons and convey them to the hospital. The hospital will undertake treatment of a poisoned or injured person. The administration of 100% oxygen is the responsibility of the escort leader. The overall coordination and management of an incident is the responsibility of the Escort Leader in consultation with the QHSE Manager of Movis.

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

The operation is **X in full compliance with** Transport Practice 3.2

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

MLL& Subcontractor provides emergency response training to appropriate employees as specified in the ER Plan. Training matrix shows that annual refresher ER training are conducted for the employees. The company has a training program for all its workers. The operation has a training matrix (MLL-HSE-OPS-SOP-007) which show the following training programs;

1. Defensive driving
2. Cyanide Awareness
3. Emergency response training
4. First Aid
5. Convoy Management
6. Route Risk Assessment Training
7. Mock drill

Emergency response training are organized annually when conducting cyanide awareness training. The company has planned training programs for drivers, escort team and other staff. Cyanide Awareness training and mock drills are covered in the ERP. Training records dated 20/7/21 and 22/2/22 were verified. Training attendance register were verified.

Clause 2.7of the ERP gives details of the duties and responsibilities of the escort team and each emergency responder. The Escort Leader will be in charge of the overall management of an incident. He will take the appropriate measures for the management of any emergency in consultation with the emergency responders.

Emergency responders in Ghana and Burkina Faso have been notified of their roles in case of any Cyanide incident

The Ghana Environmental Protection Agency will provide specialist advise and technical and regulatory advice. The escort leader will be responsible for administering 100% oxygen to a victim of cyanide poisoning. The Ghana Ambulance Service will be responsible for the transportation of a patient to the hospital as well as administration of oxygen to a person while on the way to the hospital. The hospital is responsible for the treatment and the administration of cyanide antidote to the patient in conjunction with oxygen.

MLL has notified Ministry of Environment Affairs in Burkina Faso about its activities. The ministry will assist in providing technical advice in case of significant incident. No special transport permit is required in Burkina Faso.

The Civil Protection Agency, National Ambulance Service and police in Burkina Faso have been notified and will be called upon to assist in case of an incident. The police accompany the convoy from Burkina Faso side of the border to the mine site. The contact phone no's of all these stake holders are detailed in the ER contact list.

The convoy leader carries the Antidote with him in case of any emergency antidote will be given to the hospital.

The escort leader will activate the emergency response team immediately by contacting all external responders i.e. Fire service, police, EPA, Hospital, Ambulance Service and Gendarme (in the case of Burkina Faso).The ER team will then cordon off the area and move people upwind. Cleaning and shoveling of the cyanide will be done by the escort team.



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The convoy leader responsible for administration of oxygen to a cyanide poisoned person. The role of the police is to assist in traffic management and keeping people away from the scene. The Fire Service will assist in case of fire and rescue of injured person. Ambulance Service handles injured persons or possible poisoned person and convey them to the hospital.

The hospital will undertake treatment of a poisoned or injured person and the administration of 100% oxygen to a victim. The hospitals are responsible for the treatment or administration of antidote to a victim. The EPA will give expert advice and also advice on remediation measures.

Appendix 7(Emergency Response Equipment List document number MLL-HSE-OPS-SOP-018) of the ERP details the following list of equipment's:

- ❖ First Aid Kits
- ❖ Oxygen Cylinder
- ❖ Tyvek Overalls
- ❖ Antidote kits
- ❖ Full face respirator and filter
- ❖ HCN Detector
- ❖ Filters
- ❖ PVC gauntlet gloves/overalls
- ❖ Rubber boots
- ❖ Safety triangles
- ❖ Caution tape
- ❖ Cones
- ❖ Shovels
- ❖ Mattock
- ❖ Broom
- ❖ Tarpaulin
- ❖ Empty sacs
- ❖ Plastic bucket
- ❖ Spray pack
- ❖ Reflector tape
- ❖ Ferrous sulphate (25Kg)
- ❖ Touch light
- ❖ Danger flags (Red and Green)
- ❖ Bucket with lid
- ❖ Cyanide antidote (Cyanokit)
- ❖ 6Kg Fire extinguishers
- ❖ Helmets
- ❖ Spray pack

Cyanokit is stored according to manufacturer's recommendations. Oxygen gas cylinder is periodically checked for Oxygen levels.

A checklist number MLL-HSE-OPS-SOP-006-D002 is completed after each inspection of the equipment. The aforementioned equipment is kept in the escort vehicle which accompanies cyanide convoys to mine site destinations. The company has 3 sets of equipment's which are used for separate convoys. Calibration of the HCN gas detector was done by Draeger on 5th October 2022.



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The emergency equipment as per Emergency Response Equipment List are available and ready for use should it be required. Three sets of equipment have been procured including Personal Protective Equipment, namely, Disposable tyvek overalls, rubber boots, gloves, full face and respirator with canisters and helmets. Auditors inspected the emergency equipment and matched them with the quantities on their inventory list.

The ER equipment are inspected prior to departure of a convoy by the escort leader. The escort equipment checklist is completed after each inspection. Sampled copies of checklist were verified. The emergency response equipment is also periodically inspected, and equipment checklist completed.

In order to ensure the availability of the ER equipment the company has acquired 3 sets of equipment.

Emergency response training, defensive driving, First Aid, mock drills are done by the subcontractor in accordance with the agreement MLL has with them. All other responsibilities are executed by MLL. The ER equipment(s) were procured by MLL, and the company's escort team uses them to do the escorting of convoys. Escort vehicle and the escort team are Movis Logistics employees. Records were verified by auditors.

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

The operation is **X in full compliance with** Transport Practice 3.3

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

MLL has a procedure and current contact information for notifying the appropriate stakeholders. Clause 6 Appendix A of the ERP has contact information of all the various stakeholders namely mine, EPA, Ghana Police, Ghana Fire Service, Water Resources Commission and hospitals in Ghana and Burkina Faso also The Civil Protection Agency, National Ambulance Service and police in Burkina Faso have been notified and will be called upon to assist in case of an incident. The police accompany the convoy from Burkina Faso side of the border to the mine site. The contact phone no's of all these stake holders are detailed in the ER contact list.

Clause 2 of the Incident Reporting (MLL-HSE-OPS-SOP-024) has a reporting structure to follow in case of a cyanide incident. The QHSE Manager is responsible for checking that the contacts are current. The contact details are checked during annual route surveys and as when it is necessary.

Revision of internal and external notification and reporting procedures are kept current by QHSE Manager. Clause 4 of the ERP states that the QHSE Manager and in some instances his deputy ensures that contact information is kept current by making periodic calls every month and when doing the route risk assessment.

The operation has a procedure for notifying ICMI of any significant cyanide incident. Clause 2.9 of the ERP mentions that all significant incidents will be reported to the ICMI by MLL.

The significant incidents noted in the emergency response plan are as follows.

- Human exposure that requires action by an emergency response team, such as decontamination or treatment.
- An unauthorized discharge that enters natural surface waters, on or off site.
- An unauthorized release that occurs off-site or migrates off-site.
- An on-site release requiring the intervention of an emergency response team.
- A transport incident requiring an emergency response in the event of a release of cyanide.
- A multiple wildlife death event where cyanide is known or credibly suspected to be the cause of death.

No significant cyanide incidents since the company's pre-operational certification.

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

The operation is **X in full compliance with** Transport Practice 3.4

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

The ERP details procedures for remediation of releases, In Clause 3.3 (Neutralization Procedures) of the ERP outlines the following processes of remediation are addressed.

1. Recovery and neutralization of solids and solution.
2. Dry Solid Sodium cyanide recovery and clean up
3. Neutralization and disposal of contaminated soil
4. Neutralization and disposal of recovered solution
5. Neutralization and or disposal of removed top soil.

The neutralization process details description of different methods of neutralization including a discussion on the main neutralization chemicals such as Ferrous sulphate and sodium hypochlorite. Neutralization of contaminated soils is done with the use of Ferrous sulphate. The neutralized soil is scooped and disposed off at the mine site.

The ERP prohibits the use of neutralization chemicals into surface water. Clause 3.3.2 of the ERP states that "MLL prohibits the use of chemicals such as Ferrous sulphate, Hydrogen peroxide and Sodium hypochlorite to treat cyanide that has been released into surface water. Information was noted by auditors.

No significant cyanide incidents since the company's pre-operational certification.

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**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

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

The ERP is reviewed annually when changes occur. The plan is reviewed:

- When there is a change in the contact phone numbers of any of the stake holders.
- After an incident and the resulting investigation and evaluation deems it necessary
- Following simulation exercises or mock drills
- During updates of the RRA's

The ERP was reviewed on 12th June 2022, 29th July 2022 and 20th September 2022.

Mock drills are organized annually. Training matrix has dates that mock drill were organized and the next training date. Mock drill form number MLL-HSE-OPS-F005 describes the mock drills that were conducted. Records show that mock drills were organized on 10th June 2022 and 20th September 2022. Attendance register with the names of the participants were noted.

Clause 5.0 of the ERP (doc. number MLL-HSE-OPS-SOP-006) makes provision for the ERP to be evaluated after its implementation. This ER plan is evaluated within a minimum of quarterly basis within each year or following a significant incident or external contribution from all ER responders. Following mock drills, the ERP is populated with updated precautionary actions.

Stakeholders' involvement is sought during the evaluation of the plan. Some of these stakeholders include.

- The supplier (Samsung C&T) and the three mining companies namely Iam Gold Essakane, Bombore Orezone and Teranga Wahgnion mine.
- The supplier consequently submits these plans to the designated mining companies who also make their recommendations.

No significant cyanide incidents since the company's pre-operational certification.