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ICMC RECERTIFICATION – SUMMARY REPORT

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary Recertification Audit Report

MOVIS LOGISTICS LIMITED, GHANA

Date of Audit: 6th to 8th October, 2025

For the

International Cyanide Management Institute
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INTRODUCTION

1.1 Operational information.

Name of Transport Company	:	Movis Logistics Limited
Name of Transport owner	:	Movis Logistics Limited
Name of facility operator.	:	Movis Logistics Limited
Name of Responsible Manager	:	Joshua Gbloe
Address	:	No. 1 Movis Bureau
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	:	Heavy Industrial Area, Community 9
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Acronyms and Abbreviations

MLL……. Movis Logistics Limited

ERP…… Emergency Response Plan

ICMC…… International Cyanide Management Code

ICMI……. International Cyanide Management Institute

QHSE…….. Quality, Health, Safety & Environment

IMDG……International Maritime Dangerous Goods

RRA……Route Risk Assessment

IBC……..Intermediate Bulk Container

SDS……. Safety Data Sheet

ECOWAS……Economic Community of West African State

TMP……. Transport Management Plan

HP ---------- Horsepower

1.1 BACKGROUND OF THE OPERATION

MOVIS Logistics Ltd was formed out of MOVIS Ghana Ltd in 2017 to meet the Local Content Laws of the Republic of Ghana. MOVIS Logistics is one of the top 5 vibrant wholly owned logistics company in Ghana.
MOVIS Logistics has subsidiaries in Cote d'Ivoire, Nigeria, United Kingdom, South Africa, Namibia and Burkina Faso. Movis Logistics Limited, Ghana has an employee strength of about 77 professionals providing various kinds of support to its customers.
The main office is at the heavy industrial Area, Tema Community 9, Ghana whiles its Airfreight branch is at the Kotoka International Airport area, Accra, Ghana.

MOVIS Logistics 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, freight forwarding and transportation of different chemicals including sodium cyanide to mine site destinations in Ghana and Burkina Faso.

Transportation of cyanide

Movis Logistics Limited (MLL) was first certified in January 2023.

The company is involved in the transportation of sodium cyanide from the port of Tema to mining companies in Ghana namely, Tarkwa Goldfields, Abosso Goldfields Damang mine, Cardinal Namdini mine, Golden Star Resources (Chifeng Gold) and Perseus Ayanfuri mine. In Burkina Faso, the company transport cyanide from Tema port to Endeavour Hounde, Orezone Bombore mine and Manna mines. MLL has carried out delivery activities to the aforementioned mining companies in the past years. MLL has been contracted by Samsung C & T and Hebei China to carry out delivery activities to the aforementioned mining companies in the past years.

MLL has been issued with a Ghana Environmental Protection Authority Permit (EPA/CCMC/GAR/LTHC-77/25 dated 16th April 2025) to carry out transportation of hazardous chemical including sodium cyanide to the mines. The permit is renewed annually. Also, the Inspectorate Division of the Ghana Minerals Commission has issued a permit (permit # IDMC/MS 0000653/25) to MLL to provide complete logistics services and deliveries of cyanide and other hazardous chemicals to mining companies in Ghana.

In the past 3 years there has not been any changes to the consigner, or individual components of the supply chain, such as the shipping line and ports since the previous audit.

Audit Scope

The recertification audit covers the transportation of cyanide by road from the port of Tema, Ghana to mining companies within Ghana and Burkina Faso. The auditor used the International Cyanide Code Protocols to confirm compliance. During the audit, procedures were scrutinized, interview were conducted, equipment were inspected and records were thoroughly evaluated.

Audit Schedule

The recertification Audit was conducted from 6th October to 8th October 2025.

Auditor's Finding.

Movis Logistics Limited is in

X in full compliance

in substantial compliance

not in compliance

with the International Cyanide Management Code.

No significant cyanide incidents or cyanide exposure and releases were noted as occurring during the recertification audit period.

Compliance Statement

This operation has been found to be in full compliance with the requirements of the ICMI Cyanide transportation re-certification audit requirements. This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

Auditor Information.

Audit Company: **BAM Consultancy Services Limited**

Lead Auditor & Technical Expert Auditor: **Benjamin Amoo-Mensah**

Lead Auditor E-mail: **csbpghana@ghana.com**

Names and signatures of other Auditors: **None.**

Auditor 1: _____ _____

Name (Print / Type Signature

Auditor 2: _____ _____

Name (Print / Type Signature

Auditor 3: _____ _____

Name (Print / Type Signature

Dates of Audit: This audit was conducted in the period of 6th to 8th October 2025.

Auditor Attestation.

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 Cyanide Code 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: 26 October 2025

Principle 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:

✓ in full compliance with Transport Practice 1.1

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

MLL has a Route Selection & Route Risk Assessment procedure which is followed in the selection of the routes to the various mining destinations. The procedures define the risk assessment process and the selection of the route for safe transportation of cyanide and other mining items to the mining companies they serve.
Before the beginning of a new contract a formal communication is sent to the client via email to inquire and confirm the official route from the delivery port to the client site and risk assess the potential risks on the road. The QHSE department is responsible for the selection of the route. The QHSE Manager drives through the route and takes into consideration population density in towns and villages along the route, proximity to rivers and other water bodies and fog, proximity to schools, locations of hospitals and clinics, pitch and grade, infrastructure such as number of bridges, its conditions and suitability, steep gradients and sharp curves and environmental conditions.

The QHSE Manager drives on the route to assess all the aforementioned before the route is selected as the suitable route. The QHSE Manager does the following in choosing the suitable route to a mine.

- Checking the route for road restrictions
- Recording of distance covered and taking of photos of all hazards on the route
- Checking of condition of bridges (level of deterioration)
- Identifying any alternative bypassed routes (if available) when a particular road is undergoing repairs

The mining clients is notified after the route has been selected. Records and interviews with the QHSE personnel were used to confirm that all necessary considerations were made during the determination of all cyanide transportation routes.

MLL has implemented processes to evaluate risks in the routes used for cyanide transportation. It was evident that the company performed a risk evaluation for road transportation of solid cyanide, in accordance with the procedures. The Route Risk Assessment procedure stipulates that the route is reviewed once/year and as when necessary.

The following RRAs were sighted;

- Tema port to Golden Star Wassa mine (Chifeng Gold)
- Tema port to Goldfields Tarkwa mine
- Tema port to Abosso Goldfields (Damang) mine
- Tema port to Cardinal Namdini Mine
- Tema port Endeavour Hounde Mine
- Tema port to Endeavour Mana mine, Burkina Faso
- Tema port to Orezone Bombore mine, Burkina Faso

The risks identified on the route have been evaluated and documented. The Route Risk Assessment covered all the risks along the route such as high vehicular activity, narrow roads, pedestrian crossing, slopes and market areas. Control measures and other preventative actions to mitigate or eradicate the risks on the selected routes are included in RRA assessment documents for each RRA for the routes to the different mine site destinations. The control measures include, planning ahead of every operation, reducing speed and exercising caution, adhering to speed limits, convoy management, using higher gears on hills driving in daylight hours and driving defensively. When any significant risk is identified on a particular route the risks are noted on the Convoy leader's Route Advice Adjustment Form 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.

MLL has implemented processes to periodically re-evaluate risks in the routes used for cyanide transportation and has a process of getting feedback on the risks noted by drivers / convoy leaders during journeys to the mines that they deliver cyanide to. The transporter has a Transport Management Plan which stipulates that routes are to be evaluated periodically and TMP revised when necessary. The routes to the mine sites are evaluated annually.

MLL also 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 risks. The transporter has an End of

Journey Report Form (Feedback reports) which is completed with the feedback on the condition of the road after each trip. Sampled records of feedback reports on the routes from the port to the various mining sites, were scrutinized and noted during the audit. The feedback reports are used to update the RRAs. The feedback on the road conditions are discussed at Tools box meetings. The transporter conducts tools box meeting on the feedback on a regular basis prior to the of commencement of a journey. Participants sign attendance register to indicate their presence. Copies of Tools box meetings showing the discussions about the feedback on the road condition were sighted. The QHSE department is responsible for organizing the toolbox meetings. The meetings are attended by the drivers, escort team and the police.

MLL has documented the measures taken to address risks identified on the selected routes within the Route Risk Assessments. Measures to address the risks identified on the routes (namely sharp curves, slopes, areas of high population and other risks) to all the mines sites have been documented. Existing controls and other control measures have been documented in the RRAs. Records of RRAs were noted by auditor.

MLL has sought input from various stakeholders and applicable governmental agencies as necessary in the selection of routes and development of cyanide management measures. The transporter has sought input from Ghana Environmental Protection Authority and the Ghana Minerals Commission. Evidence of notification letters to hospitals, police and the Ghana National Fire Service and acknowledgement letters from the government agencies were sighted by auditor. The community have no direct role in selection of the routes. In Burkina Faso, the military(gendarme) and the mining client clearance agencies have been notified on the selected route from the Ghana-Burkina Faso border to the mine sites. Notification letters to the gendarmerie and selected hospitals in Burkina Faso were sighted. No government permits are required in that country for transportation of cyanide.

The transporter does deliveries in convoy using escorts to the mine site destinations. Convoy Management section of the Transport Management Plan states that all vehicles delivering sodium cyanide to the end user destinations in Ghana and within the West Africa regions must go in convoy.

The convoy consists of the following;

- Four (4) trucks with one (1) escort vehicle
- More than 4 trucks and a maximum of 8 trucks are accompanied by two (2) escort vehicles
- 1 Convoy leader (QHSE Officer)
- 1 police
- 1 or 2 escort drivers
- Gendarmerie in Burkina Faso (maximum of 10)

As per the transporter's TMP, the transportation of cyanide is strictly prohibited during the night. The allowed convoy hours are from 6am to 6pm with scheduled breaks of 15 minutes to 30 minutes. The Convoy leader is responsible for the convoy.

Movis Logistics Limited does not subcontract any of its cyanide transportation business.

Transport Practice 1.2:

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

The operation is:

✓ in full compliance with Transport Practice 1.2

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified

MLL uses trained, qualified, and licensed operators in handling and operating its transport vehicles. The transporter has employed qualified drivers with Class F licenses to do deliveries to the mines. A driving license is valid for 5 years but renewable every 2 years.

MLL has a Recruitment procedure. The Recruitment procedure specifies a process of selecting a driver for employment. First, application is invited from qualified drivers after which a pre-selection of candidates is done based on a set criterion. Prospective employees go through a rigorous selection process for the transporter to pick very competent drivers and escort team.

Drivers and escort team undergo initial and refresher training in the following training programs.

- Incident Management Training (Emergency response)- Annually
- Defensive driving - Annually
- Basic Fire Fighting - Biennially
- First Aid Training - Biennially
- Cyanide Awareness Training - Annually

The above training programs are listed on the transporters training matrix. The training matrix has the names of the participants, frequencies of the training and the next training dates. Selected drivers and escort team member were interviewed on training programs that they participated and they were found to be knowledgeable in cyanide and emergency response, defensive driving, First Aid and other training programs they have attended. The drivers and escort team who have not completed the

training programs are prevented from driving. Internal training records namely training attendance registers for personnel were reviewed and found to be acceptable by auditor. The training programs are held by competent third-party hazardous chemicals training company and the QHSE Manager. Records of training attendance registers were scrutinized by auditor.

MLL does not subcontract Transport Practice 1.2.

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

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified

Movis Logistics Limited uses equipment designed and maintained to operate within loads it will be handling. MLL uses Scania (460 HP), Daewoo Novus (400HP), Chenlong brand of trucks (420 HP and 460HP) with flatbed trailer brands from China and Europe in the transportation of cyanide.

The truck configuration used are 6x4 prime movers with 4 axle flatbed trailers**.** The tare weight of the tractor unit and the trailer is 18t. The design of the vehicles can load 2x20ft containers of cyanide.

The transporter does both Preventive and Corrective maintenance which includes the following;

- Inspection and detection and repair of vehicles
- Routine Servicing
- Tyre maintenance
- Trailer maintenance

The trucks are maintained by agents of Scania (Scania West Africa, Ghana branch) and agents of Daewoo (TATA Africa Ghana Ltd) and agents of Chenlong (Eagle Motors Ghana Ltd). Trucks are serviced at the following mileage intervals as per the manufacturers' specifications;

Scania – Every 20,000Km intervals

Daewoo Novus- Every 10,000Km intervals

Chenlong -Every 8,000-10,000Km intervals

Daily inspections are carried out on each truck each day and respective agents come and fix the truck which is faulty following a specific outlined procedure. Defects on trailer are also rectified using the same the same outlined process. Tyre maintenance is outsourced to Rana Motors agents of Goodyear tyres in Ghana. Rana Motors perform regular tyre inspections. All vehicle pressures are checked monthly or at least the same inspection frequency as requested by MLL. Tyres are replaced when the reach a minimum tread depth of the tyres is 3mm. A review of maintenance records and site inspection confirmed that equipment is maintained in line with manufacturers specifications.

The transporter's trucks have the required capacities and configurations for cyanide transportation. During routine maintenance, the load bearing capacities of the trucks are verified through inspection of the trailers and tractor unit for signs of stress or overloading. As per the manufacturers design, the 6x4 truck configurations with 4 axles flatbed trailers have the capacity to load 2x20ft containers of cyanide having gross weight of approximately 45mt. The manufacturer's manual showing the ratings of the load capacities were verified by auditor.

Procedures are in place to prevent overloading of the transport vehicle used for handling cyanide. A review of equipment specification sheets confirmed the equipment is capable of carrying the load of cyanide and there are loading procedures in place and pre-start checks that prevent overloading. The 460HP 6x4 truck configuration with 4 axle trailers have the capacity to load a maximum of 70 tonnes, 420HP has a load capacity of 65t and 400HP, has a load capacity of 50t. Maximum weight of 2x20ft is 45mt which is less than the load capacities of the trucks. Vehicles are weighed at the port by the Ghana Port and Harbours Authority to ensure that they are within the acceptable load limits (ECOWAS Axle load Regulation which is 10.5t/axle) and weighing tickets are issued for each vehicle weighed. Sampled copies of Axle Load Weighing Certificates is issued for each truck after the trucks are weighed were verified by auditor.

MLL does not subcontract any of the above activities in Transport Practice 1.3

Transport Practice 1.4:

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is:

✓ in full compliance with Transport Practice 1.4

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified

MLL Transport Management Plan gives a vivid description of solid sodium cyanide as packaged in Intermediate Bulk Container with each box containing 1000Kg of product. The solid Sodium cyanide briquettes packaged in sacs with polyethene to prevent moisture and are encased with plywood box with an integral pallet base and is secured with a lid. The packaging conforms to the IMDG code. 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 IBCs are packed in 20ft standard shipping containers and container doors are tagged with security seals with unique security numbers during the entire journey to the mine site. At no time during transport are the containers opened when the trucks are on the road. MLL has a Convoy Log Sheet which is completed prior to a convoy departing to a mine. The form has the container number and seal numbers, vehicle number, the point of delivery (mine) name of the drivers. The form is signed off by the Convoy Leader before the convoy departs. Sampled copies of Convoy Log Sheet were noted. The vehicles are escorted by the police till it reaches the mine sites in Ghana. In case of the mines in Burkina Faso, upon the convoy reaching the Ghana – Burkina Faso border, the convoy is escorted by the military(gendarme) from there to the mine site. Container interchanges issued by the Tema Port Authority also shows the condition of the containers at the time of loading the containers from the port. Sampled records of Container Interchanges were sighted by the auditor.

Before a convoy of cyanide trucks departs from the port of Tema it the convoy Leader checks the conditions of each container and the seals to ensure they are intact on the doors. For deliveries to Burkina Faso, the cyanide is considered as transit goods. Transit containers are fixed with Ghana Customs tracking devices till the vehicles arrive at their destination. Upon arrival at the mine site, the mine site personnel receiving the consignment signs and stamps it to authenticate that the product have been received intact or in good condition.

Placards or other signage are used to identify the shipment as cyanide. The cyanide manufacturers have visibly fixed placards on all four sides of the containers as required by the IMDG Code. Hazard Class 6, Skull & Cross bones, UN number 1689 and Marine Pollutant labels are used. Placards are placed on the front and rear of the trucks and are present on the containers. Placards are verified during pre-departure inspection and a Pre-departure Vehicle Checklist completed. Required placards were verified and noted.

The transporter has implemented a safety program for all the transportation operations.

(a) MLL carries out inspections on the trucks prior to departure which includes;

- Heavy Duty Equipment inspections. This involves the physical inspection of the trucks which includes inspections of Engine oil level, Clutch fluid, Steering system, wheels and fasteners, windscreen etc.
- Vehicle pre-departure inspections
- Escort Equipment inspections

Heavy Duty Equipment inspections are carried out by the Safety Officer, Transport Officer and truck drivers to ensure the truck are mechanically strong to undertake the journey. Records of completed predeparture Heavy duty inspection checklist, Vehicle predeparture and Escort Equipment checklists were noted by auditor.

(b) MLL has a Fleet Maintenance Plan (MLL-HSE-OPS-SOP-012 Revision 003 dated 11th July 2025). The maintenance plan detail Preventive Maintenance and Corrective Maintenance. These includes inspections and detection and repair of vehicles, Routine Servicing, Tyre maintenance and Trailer maintenance. Trucks are serviced at the mileage intervals prescribed by the manufacturers. The transporter has memorandum of understanding with the agents of its vehicles namely Scania, Chenlong and Daewoo to carry out maintenance works on the trucks**.** A visit to the vehicle agents confirmed the arrangement the transporter has with them. Maintenance records were sighted by auditor and noted.

(c) The transporter has a Fatigue Management Policy (number MLL-HSE-POL-006 Revision 002 dated 20/06/25). 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. As much as possible drivers have 7hours rest over 24-hour period of continuous work. GPS tracking system showed that drivers abide by the driving hours. The operation has mandatory rest stops along the transport route. Journey Plans verified conform to the operations fatigue management plan. The TMP states that it is prohibited for cyanide trucks to drive in the night. Records of completed journey plans were scrutinized and noted.

(d) Solid sodium cyanide is transported in shipping containers that are secured to the trailers using twist locks which prevent loads from shifting. The twist locks are checked prior to departure and again at the rest stops along the route. The vehicles predeparture checklist makes provision for the checking that the twist locks are firmly in place prior to the convoy's departure. Drivers and the convoy leader ensure that the twist locks securing the containers to the trailers are properly engaged. The transporter also have a Loading and Offloading procedure which states that all containers must be secured on the trailers by twist locks and that it is the responsibility of the drivers and the Convoy leader to ensure that it is done to prevent the load from slipping off the trailer during a journey.

(e) The transporter has a Convoy Modification procedure in place to suspend the transportation operations during civil arrest or inclement weather conditions. Clause 4.9 of the of the procedure states that in the event of civil unrest or severe weather conditions, the Convoy leader must stop the convoy and park the trucks at a convenient place and notify the General Manager of the company of such conditions and changes to the trip plan. The decision to continue the trip will be made after the convoy leader has made consultation with the mining client and the General Manager of the company. The General Manager of the company will notify the mine about the situations and revise the Expected Time of Arrival (ETA) of the trucks on site when the situation is over.

(f) The company has a Drug and Alcohol policy 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 of every employee should be 0.0. Test are performed by the QHSE Manager using Drager Alcotest 5000 Breathalyzer. The Breathalyzer has been calibrated by a company called Reiss & Co. Ghana Ltd and a calibration certificate issued on 29/09/25 with the next calibration date of 29/09/26. Sampled records of completed alcohol test checklists were noted by auditor.

(g) MLL has a Document Control procedure. The Document Control Procedure states that the Archival documents and data are retained for legal, auditing 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. Records were available and were reviewed to confirm that all Cyanide Code safety program requirements are met. 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 and legal considerations.

MLL does not subcontract above activity in Transport Practice 1.4.

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

The operation is:

✓ in full compliance with Transport Practice 1.5

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

MLL does not transport cyanide by sea. This protocol does not apply to the transportation of cyanide by road. The shipper is responsible for ocean freight.

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

The operation is:

✓ in full compliance with Transport Practice 1.6

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The medium of communication with the mining company, producer and external and internal responders is by cell phones, WhatsApp, Walkie Talkies, GPS tracking devices and email communication. Walkie Talkies are used to communicate between the drivers in the convoy and the escort team. All mobile phones are inspected to ensure that they fully charged and are working properly prior to departure. Prior to the departure of delivery to a particular mine, emails are sent by the Customer Care officer to the mining client and supplier of the cyanide indicating the number of containers of cyanide and the Expected Time of Arrival of the trucks at the mine site. Records of emails sent at different dates were sighted. The Convoy leader is responsible to ensure that the communication equipment is working properly at any given time.

All communication equipment is periodically inspected and tested by the Convoy Leader. Walkie Talkie are fully charged by the Convoy leader to ensure it functions very well. The Convoy leader is responsible to ensure that all the required equipment is tested. Equipment checklist is completed and signed after an inspection. It is the responsibility of the Convoy Leader to check the communication equipment and record the findings on the Equipment Checklist. Prior to departure of the convoy, all mobile phones and Walkie Talkies are inspected and fully charged. The trucks are installed with Korfleet and TrackPro GPS (Global Positioning System) which are also checked to ensure that they are working perfectly.

No communication black out areas have been identified on route to current end user destinations within Ghana and surrounding countries. MTN cell phone network works throughout the routes to the mining destinations. In case of loss of MTN phone network reception, different communication network lines such as Telecel and Airtel Tigo are used.

GPS tracking system is used to track and monitor the location and progress of the cyanide shipment. The system is monitored 24/7 by the Transport Officer. The procedure covers a process for tracking the

vehicles using the GPS tracking and monitoring the live feed. Emails communications sighted by auditor shows the number of containers, the Expected Time of Arrival to site (ETA), the registration numbers of the trucks and escort vehicles which are sent to the client and all the stakeholders prior to the commencement of a journey. Ghana Customs also fix tracking devices on the containers for cyanide shipments leaving Tema port to Burkina Faso. The progress of the shipments is tracked till the containers of cyanide leave the Ghana territory. Records of Bill of Ladings specifying the gross weight of the sodium cyanide, were sighted and noted. Container Numbers, seal numbers, the gross weights of each freight container, shipper's information, consignee's information, description of cyanide and its packaging are specified on the Bill of Ladings.

A Chain of Custody Procedure spells out the process of implementing inventory controls and /or chain of custody documentation. Shipping documents which include the Bill of Lading, Customs declaration, packing list and waybills which accompanies each shipment are all kept on record. Copies of Bill Ladings were noted. Records of Bill of Ladings specifying the gross weight of sodium cyanide were noted during the audit. Waybills covering each container are given to the mine site representative upon arrival and he signs it to ensure that the containers have all been received. SDS from the suppliers namely Hebei China and Samsung were sighted and scrutinized by the auditor.

MLL does not sub-contract any of activities specified in Transport Practice 1.6

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

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

The operation is:

✓ in full compliance with Transport Practice 2.0

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, there are no transhipment depots or interim storage sites as defined in the audit protocol. MLL does not have a cyanide trans-shipment depot or interim storage for cyanide.

Transport Principle 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:

✓ in full compliance with Transport Practice 3.1

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

MLL has developed and implemented an Emergency Response Plan (# MLL-HSE-OPS-SOP-006 Revision 5 dated 18th June 2025) for the transportation of sodium cyanide.

The Emergency Response Plan addresses the following topics;

- Procedure for incident management and evacuation
- Notification to external responders
- Roles and responsibilities of responders
- The Physical and Chemical Properties of Sodium cyanide
- Reporting and investigation of incidents
- Neutralization procedures
- Use of cyanide neutralization chemicals
- Incident types (Scenarios and description of response actions)
- First Aid and treatment

The contents of the transporter's ERP were scrutinized by auditor and were found to contain all the relevant information to handle cyanide emergency situations. The plan is appropriate for the transportation route from Tema port to Goldfields Tarkwa mine, Abosso Damang mine, Golden Star Wassa (Chifeng Gold) all in Ghana and from the port Tema to Endeavour Hounde mine, Endeavour Mana mine and Orezone Bombore mine in Burkina Faso. RRAs for the routes from the port of Tema, Ghana to the mines have been considered in the ERP.

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 and containers have signage(s), UN No. 1689, Toxic 6 labels and Marine pollutant labels.

Clause 1.8(Mode of Transport) states that road transportation remains the only means of transporting cyanide in Ghana and in West Africa. The Emergency response procedures are based on the road transportation of solid cyanide in IBCs within a 20ft shipping container using vehicles of the required configurations. All aspects of infrastructure which includes bridges, hospitals, markets, asphalts road, curves and slopes have been considered in the ERP.

The ERP mentions the designs of the vehicles used by the transporter. MLL fleet comprises of Scania (460 HP), Daewoo Novus (400HP) and Chenlong (420 HP) brands with the following configurations;

- 6x4 tractor head coupled with 4 axle flatbed trailers to carry 2x20ft containers.
- Maximum load capacities of the Scania and Chenlong trucks are 65t and 70t respectively whilst the Daewoo Novus have a load capacity of 50t.

The ERP includes descriptions of response actions for anticipated emergency situation. The plan summarizes the actions to be taken in the event of a cyanide incident on the routes to the respective mines in Ghana and Burkina Faso. Response actions of different incidents scenarios have been described comprehensively in the ERP.

The ERP outlines the following anticipated emergency situations.

1. Scenario A: Roll over of shipping container without spillage
2. Scenario B: Roll over of shipping container with spillage on to dry ground.
3. Scenario C: Roll over of shipping container with spillage into waterway
4. Scenario D: Fire close to Sodium cyanide due to truck breakdown and other offsite impacts
5. Scenario E: Natural events

The ERP describes the various response actions including the possible neutralization processes of each above anticipated emergency situations. The ERP outlines the roles of emergency responders namely Convoy leader and his team, Ghana Police, Ambulance Service, Environmental Protection Authority, hospitals, Water Resources Commission, Nationwide Towing Services, Ghana Fire Service, military (in Burkina Faso).

In the event of an accident the Convoy leader will notify the QHSE Manager who in turn will notify management about it. The Convoy leader is responsible for the overall management of an incident which includes neutralization and decontamination. He will notify the head office and ensure that the incident site is cordoned off. The convoy leader will activate a response immediately by contacting all

external responders i.e. fire service, police, EPA, Hospital, Ambulance Service and Gendarme (in the case of Burkina Faso). The convoy leader is also responsible for administering 100% oxygen to a cyanide poisoned person. The responsibilities of the driver will be to park their vehicles at a safe place and assist the police in directing traffic. The ER team will then cordon off the area and move people upwind. Cleaning and shoveling of the cyanide briquettes will be done by the escort team.
The ERP also details the roles and responsibilities of outside emergency responders and medical facilities in the event of an emergency situation. External responders identified in the documents, are aware of their roles during an emergency. 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 will handle injured persons or possible poisoned person, continue with the administration of 100% oxygen and transport the poisoned person to the hospital. The hospital will undertake treatment of a poisoned or injured person. The responsibility of the Nation-wide Towing service is to assist to recover the container and the vehicle involved in an incident.

The community will have no direct role in case of an incident. The EPA and the Water Resources Commission will give advice to the communities in case cyanide container has fallen into a river which serves as a source of water for the community.
The roles of all the stakeholder contained in the ERP were scrutinized by auditor.

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

The operation is:

✓ in full compliance with Transport Practice 3.2

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

MLL provide initial and refresher emergency response training to appropriate personnel. The transporter's Training matrix shows annual refresher ER training which are organized for all employees namely drivers and escort team. Annually, emergency response training is held with the involvement of the Ghana Police. To ascertain the effectiveness of the training, verbal assessments through questioning and answering verbally by drivers using a Ghanaian local language. The QHSE Manager is responsible for conducting the ER training. Occasionally, a third-party training company is invited to conduct the ER training. Attendance is mandatory for all drivers and escort team. Records were available to demonstrate that this practice has been maintained throughout the recertification period. Records of Training Attendance registers were noted.

The transporters Emergency Response Plan has identified the specific emergency response duties and responsibilities of personnel in case of an incident. The specific emergency response duties and

responsibilities of the Convoy leader, escort team, drivers, police, fire service, Ambulance, hospitals, Ghana EPA Nationwide Towing Services, the Military (in Burkina Faso) are all clearly outlined in the ERP.

The transporter has a list of emergency equipment in clause 7.0(Appendix B: Emergency Equipment List) in the Emergency response procedure. The same list is on their Emergency Equipment Checklist Form (MLL-HSE-OPS-SOP-006-D002).

The following are the list, namely, First Aid kits, Oxygen resuscitator, Full face respirator (ABEK) HCN gas detector, Tyvek disposable overall, PVC gauntlet gloves, Gum boots, Safety triangles Caution tape, Cones, Shovels, Long hard brooms, Poly sheet (0.8 x 1.8m), Bulk bags Bucket with lid, Spray pack, Reflector tape, Red and Green flags, Distress device, Ferrous sulphate monohydrate, megaphone and Walkie Talkie.
MLL has 3 sets of equipment's which are used for separate convoys. Calibration of the HCN gas detector was done by Reiss & Co Ghana Limited on 14th July 2025 and the next calibration date is 13th January 2026. The Oxygen cylinder, its gauge, mask and regulator are periodically inspected by the QHSE Manager to ensure it is always full and perfectly working. The equipment(s) are kept under lock in the QHSE office. The QHSE Manager is responsible for the safe keeping and inspections of all the ER equipment. The Convoy leader is trained in the use of the HCN gas detector and the oxygen resuscitator. MLL does not keep cyanide antidotes. A suspected cyanide poisoned person is administered with 100% oxygen to sustain his/her life and then transported to the mine sites medical facilities or the nearest hospital for treatment.

PPEs are part of the ER equipment checklist. Personal Protective Equipment, namely, Disposable Tyvek overalls, rubber boots, gloves, full face respirator with canisters and helmets were sighted. All personnel have been trained in the correct use of PPEs. Auditor carried out thorough inspection of all the PPEs and found them to be available.

Drivers and escort team were interviewed and confirmation was made that a check of the emergency response equipment is part of the pre-trip inspection process. This is done to ensure availability of the equipment if there is an emergency. The ER equipment are also inspected prior to departure of a convoy. The ER Equipment checklist is used to verify that all the equipment is available prior the convoy's departure. Obsolete equipment is immediately replaced with new ones. The auditor reviewed equipment inspection checklist records verifying that they check the equipment and ensure they are in good working order during transport of cyanide. Records of selected monthly inspections were scrutinized.

MLL does not subcontract any of the activities in clause 3.2.

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

The operation is:

✓ in full compliance with Transport Practice 3.3

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Response Plan contains telephone numbers for contacting the cyanide supplier namely (Hebei China and Samsung), regulatory agencies such as EPA, medical facilities, Ghana Police, Ghana Fire Service, Water Resources Commission, Nationwide Towing Services and hospitals in towns along the designated routes in Ghana and Burkina Faso. Potentially affected communities will not have direct role to play in case of an incident. The Ghana Environmental Protection Authority will do the required community engagement when there is an incident close to towns and villages along the designated routes. Clause 2 of the Incident Reporting Procedure has a reporting structure to follow in case of a cyanide incident.

MLL has a procedure for validating internal and external emergency responders contacts. The external emergency notification and reporting procedures, including telephone numbers, are reviewed at least annually. During annual route surveys the contact details of the external and internal responders are checked to ascertain whether the contact details are active. Apart from reviewing of the contact details of the internal and external responders annually, the QHSE Manager ensures that contact information is also checked by calling each phone contact every month. Information, including external emergency notification numbers, was up-to-date and complete. Revision of internal and external notification and reporting procedures are kept current by the QHSE Manager.

Clause 2.1 of the ERP details a procedure for notifying ICMI, in the event of significant incident as per ICMI definitions. In the event of a significant cyanide incident, the Managing Director of MLL will notify ICMI within 24 hours of the incident. There were no significant cyanide incidents recorded during the past 3 years (recertification period).

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

The operation is:

✓ in full compliance with Transport Practice 3.4

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

MLL has procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. The company has developed neutralization procedure which explains the process of handling spilled cyanide, decontamination and neutralization. The neutralization process details description of different methods of neutralization including a discussion on the neutralization chemicals such as Ferrous sulphate. Neutralization of contaminated soils is done with the use of Ferrous sulphate monohydrate. The neutralized soil is scooped and disposed at the mine site. The procedure states that in containing a cyanide spill, the escort team will ensure the spill is prevented from entering water ways. In case a spill on dry ground the briquettes of cyanide will be shovelled into a sealable container. The residue will be neutralized with Ferrous sulphate monohydrate. The initial clean-up of a spill will be the responsibility of the Convoy leader and the escort team. External responders such EPA and Water Resources Commission will offer technical advice.

In the event of ground contamination, the top soil will be removed during clean-up and sent to the mine site to be disposed properly. In case of a spill into a river, no neutralizing chemical will be introduced into the water body. The EPA in conjunction with MLL will notify the villages along the route to desist from using the water until it is declared safe by the Ghana Water Resources Commission and the villages provided with alternative water supply. The ERP also details how to decontaminate the body when contaminated by cyanide. The procedure was thoroughly reviewed and noted by auditor.

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. The statement clearly stated in the ERP was noted by the auditor.

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

The operation is:

✓ in full compliance with Transport Practice 3.5

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The transporter periodically reviews and evaluate the ERP to ensure its adequacy. Clause 5.0(Procedure to Evaluate the ERP) states that the plan is reviewed and evaluated annually. During annual review, contact details of the external and internal responders are updated. The emergency procedures are also reviewed after emergency response mock drills. The plan has been reviewed 4 times i.e. 2022, 2023. 2024, and 2025. The plan was last fully reviewed in 2025. Information was found to be up to date and complete during the audit.

Clause 2.4 of the ERP states that mock drills are held annually. The Training matrix has made provision for mock drills. The dates that mock drills are held and the next mock drill date are detailed in the mock drill reports. Sampled records of mock drill attendance registers and mock drill reports organized in the last 3 years were sighted and noted.

MLL evaluates the emergency response plan's performance based on lessons learnt from mock drills or when there are changes to the conditions of the routes, corrective actions after a minor or significant incidents or feedback from participants after a mock drill. Mock drills are evaluated through debriefing and corrective action plans put in place to correct any lapses. The corrective action plans are used to revise the ERP to ensure that the plan remains practical, effective and up to date.

END OF REPORT