



N.V. VSH TRANSPORT

MOENGO PORT

SUMMARY AUDIT REPORT

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Introduction

This document represents a Summary Audit Report for the Cyanide Code recertification audit of N.V. VSH Transport, a company which conducts stevedoring operations at the Moengo Port owned by N.V. Traymore.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audit is complete, it posts the Summary Audit Report on the Cyanide Code website.

Current Summary Audit Report has been prepared based on the information available at the time of the audit. Every effort has been made to ensure accuracy of the information presented herein with the supporting evidence available where applicable. Information provided by VSH Transport has been taken in good faith and has been verified where possible.

Operation General Information

Name of Transport Operation: N.V. VSH Transport at Moengo Port
Name of Facility Owner: N.V. Traymore
Name of Facility Operator: N.V. VSH Transport
Name of Responsible Manager: Sjoerd Poort, N.V. VSH Transport Managing Director
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Operation Location Detail and Description

N.V. VSH TRANSPORT (hereinafter referred to as “VSH”) performs stevedoring operations at Moengo Port (“Moengo”), handling ISOTainers containing sodium cyanide, among other products.

Moengo Port is a privately owned port approximately 96 nautical miles, or 100km by road from Paramaribo, capital of Suriname, on the tidal Cottica River (Figure A below). The Cottica river is a navigable tributary of the Commewijne, which joins the Suriname river at New Amsterdam in Eastern Suriname. The Cottica river is limited to vessels with a maximum length of 120m, due to sharp bends at several locations, although it is Suriname’s deepest river. Moengo port has a river depth of circa 4.3m at low tide and circa 6.10m at high tide.

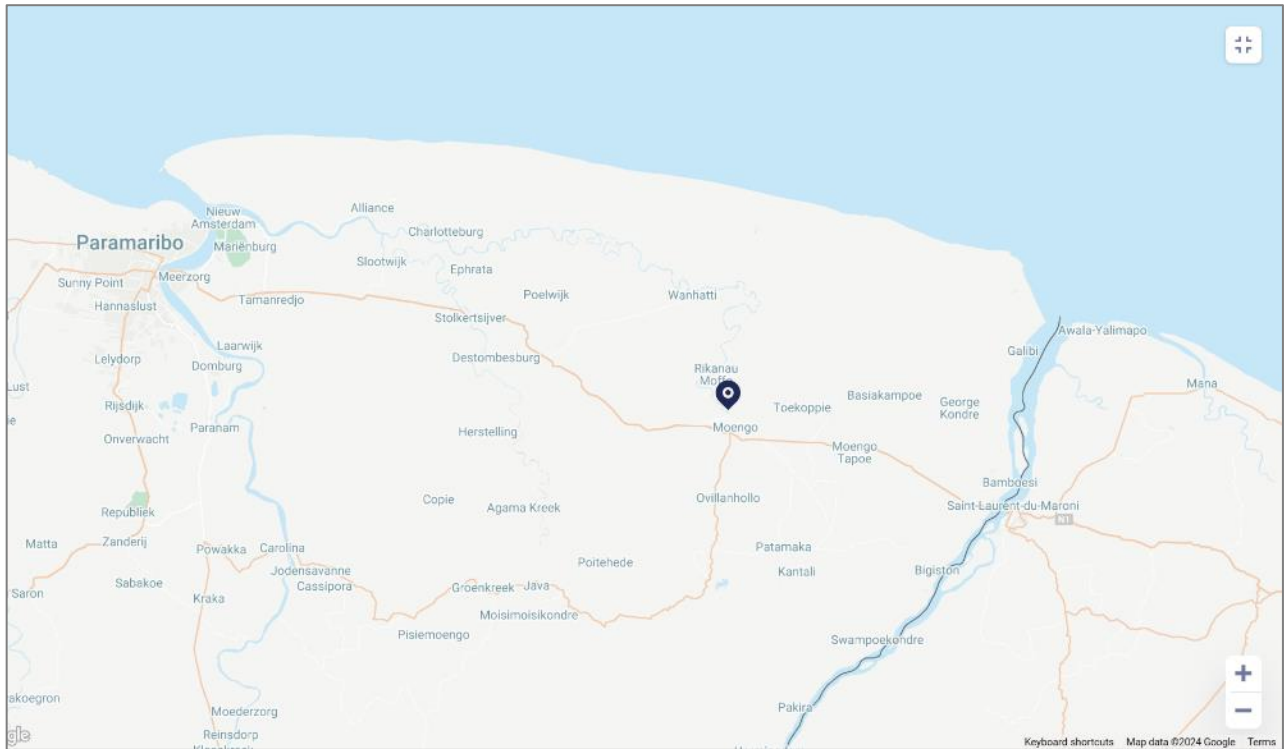


Figure A: Moengo Port Location in Relation to Paramaribo

The Port is 100% owned by Traymore N.V, and was officially re-opened on April 19, 2008. Since the reopening of Moengo Port, actions have been taken to transform this former bauxite port into general cargo. The port is ISO-9001 certified and is in possession of the International Ship and Port Facility Security Code (ISPS). Traymore N.V. leases out facilities for cargo and container handling.

The port is completely fenced, and has 24/7 surveillance cameras, security guards, parking area, loading and unloading of equipment and bunkering services. The Port has 2 docks to accommodate vessels up to 130m long, Cyanide ISOtainers are offloaded on the General Dock (Figure B).



Figure B: Moengo Port Layout (General Dock Highlighted Light Blue)

The docking areas have concrete slabs which are well maintained (Figure C). There are no portside cranes at Moengo, therefore ships cranes are used. The stevedoring equipment is either brought to site by VSH or Moengo equipment is used.

For the purposes of this report, it is only VSH stevedoring activities that are being assessed for compliance to the ICMI Code (the Code). All other elements concerning the supply chain is being undertaken by others. N.V. VSH Transport leases the dock area at Moengo Port to perform stevedoring operations.



Figure C: Moengo General Dock, 2024

Cyanide is delivered by ship to Moengo Port approximately once a month, VSH stevedores are deployed to Moengo Port from Paramaribo Port (“Paramaribo”) to undertake the off-loading tasks. VSH also deploys their own equipment, this equipment is then returned to Paramaribo. The ship containing the cyanide travels past Paramaribo and continues further up river for 1hr escorted by tug boats front and rear before berthing at Moengo.

Auditor's Finding

This operation is

- in full compliance**
- in substantial compliance**
- not in compliance**

with the International Cyanide Management Code.

Compliance Statement

“This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.”

Auditor Information

Audit Company: Blackmore & Associates, UK
Lead Auditor: Julia Kennedy
Lead Auditor Email: juliakennedy@kennedy-global.com

Names and Signatures of Other Auditors:

Auditor 1:	<u>Christine Blackmore Lead and Technical</u>	
	Name (Print/Type)	Signature

Date(s) of Audit: 15 April 2014

Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

Select cyanide transport routes to minimize the potential for accidents and releases.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

The audit summary is relevant only to the stevedore operations for the off-loading of cyanide, onward transportation and movement within the port is provided by Haukes Transport (Haukes), who are a signatory of the ICMI Cyanide Code (“the Code”).

The ISOtainers are all offloaded from the ship by VSH and transported by Haukes either direct to the Newmont Merian mine (Merian) site or to the Dangerous Goods (DGs) transit area at the port, where they are held for less than 24 hours. A convoy of circa 6 Haukes vehicles collects the ISOtainers and drives in convoys to Merian. Merian is located approximately 70km south of Moengo Port. The operation is coordinated between VSH, Traymore, Haukes and Merian in order to minimise any risks. Moengo port is responsible for the cyanide until the shipping documents and loading of the cyanide containers are complete.

Moengo has limited roads and indeed it is the main circular road (1km) from the port entry/exit that is used for the carriage of cyanide isotainers. The road surface is a combination of black top and compacted hard core and relatively flat without any pitch and grade that would affect vehicle movements. An off shoot (max 100m) from the main circular route leads to the DGs transit area. No other roads are used by cyanide traffic in the port.

VSH has developed and implemented the guidelines “Transport Driving and Road Safety Tips”, to minimize the potential for accidents and releases and considers the presence of workers in the area, the port infrastructure, access road to the docking area and the proximity of the river.

By nature, the port is on the water front (River Cottica), so it is important that before any unloading takes place weather conditions are taken into consideration (torrential rain, wind and visibility (fog/mist), this is evaluated before work commences and should weather conditions persist or

deteriorate during the unloading all operations are stopped. VSH has prepared an “Operations Manual” Ref: VSH TRANSPORT- Terminal Operations Handling Guideline dated 2023 which includes adverse weather conditions and operational advice.

Road conditions within the port form part of the pre-unloading toolbox talks, as well as VSH holding periodically meetings with the Traymore N.V (port operator), and Haukers (designated transport company), to discuss opportunities to improve the road, route, signage and mitigate any unforeseen risks.

The selection of routes external of the port is undertaken by others and is not the responsibility of VSH. However, VSH works closely with their colleagues to co-ordinate the offloading of cyanide on to vehicles and the road use within the port boundary.

Moengo port comes under the authority of Suriname Government, who have the right to enter the port at any time to comment on any aspects of the port: road infrastructure, quayside and facilities to ensure a safe environment for local stakeholders, civil defense and emergency response access.

The port is bounded by a fence with barbed wire strands across the top. Security staff patrol the fence every 4 hours 24/7 and CCTV is in operation, this is connected to the control room at the main gate. There is one vehicle access gate, which also has a pedestrian gate, all visitors and vehicles are signed in and out.

Outside of the port gate the cyanide is the responsibility of others (Haukes and Merian).

Standard of Practice 1.2

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.2

Summarize the basis for this Finding/Deficiencies Identified:

VSH deploys staff from Paramaribo Port to undertake the stevedoring at Moengo, the staff are qualified (licensed) and trained in operation of stevedoring and have several years of experience. The Auditors reviewed qualifications, licenses, interviewed staff and reviewed training records to confirm this. Refresher training is on a rolling program for all VSH staff.

The off-loading of the cyanide (ISOtainers) is the sole responsibility of VSH. Procedures for the unloading can be found in “operations Manual” Ref: VSH TRANSPORT- Terminal Operations Handling Guideline dated 2023. All other parties involved in port activities, including the port owner Traymore N.V., trucking companies, mooring and tugging contractors and ship’s crew must comply with the port authority requirements.

Following all training and refresher training for VSH staff, competency observation monitoring is undertaken to ensure the safe operation and manual work is undertaken safely and risk free.

The Auditor also reviewed Traymore Port personnel for appropriate qualifications and training to operate its equipment and port the infrastructure. Training and certification of personnel handling ISOtankers and containers designed for transportation of dangerous goods are conducted by a special organization (CHEEK) based in Paramaribo.

Standard of Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 1.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

There are no Quayside cranes at Moengo. The ships crane will offload cargo from the ship to the quay under the supervision of VSH. From the quay two “Reachers” at Traymore (Tyrex (40 ton) and Libberman (45 ton)) upload to a Haukes vehicles, who will take the ISOtainers either to the DGs transit area or straight out of the port area. The vehicles provided by Haukes are appropriate for the weight of ISOtainers and road worthy, this also forms part of VSH checking procedures prior to unloading.

The locking system to “grab” the ISOtainers is automatically controlled by the driver. The auditors inspected the “Reachers”, reviewed the preventative maintenance schedules and discussed the equipment performance. The auditors also taken through the vehicle daily checks and recording.

VSH only allows the use of equipment designed and maintained to operate within the capability loads it will be handling. The risk analysis they perform at Moengo port before the stevedoring activities includes checking the vessel’s crane load capacity with the MV (Motor Vessel) Inspection List, which includes equipment for rigging, loads lifting and cables. Ships cranes are checked by VSH

before unloading begins, ships cranes are in general capable of lifting between 25-50 tons, a loaded isotainer’s approximate weight is 22 ton, therefore well within the limits to lift an isotainer loaded.

The acceptable lifting tonnages are clearly marked on the two Reachers (40t and 45t) and also the weight is automatically shown in the driving cab when starting to lift. A Standard Operational Procedure (SOP) is in place for the vehicles and their usage. ISOtainers are c22t loaded, therefore well within the lifting capacity of the Reachers. The tare weights are clearly marked on the ISOtainers, lifting weights on the ships crane and the two Reaches at the Moengo port.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.4

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide received at Moengo port are purpose-built ISOtainers or 20feet shipping containers. The unloading procedure states that the ISOtainers are inspected by VSH stevedores before unloading begins, this includes the structure of the ISO tank cage and tank. Containers are checked for integrity. If any damage is detected the ISOtainer/container is rejected and stays on the ship.

At the time of the visit to the port only empty ISOtainers were present. As a precautionary measure, all empty ISOtainers are still classed as DG, therefore the UN 3414 classification 6 placards were in place and on all sides of the ISOtainers. The ISOtainers also had the marine pollutant and toxic placards in place and on all sides. Shipping containers use UN1689.

VSH carries out a vehicle inspection on Haukes vehicles, the ships cranes and the equipment (reach stackers) to ensure that they are adequate and appropriate for unloading and loading of the cyanide to Haukes vehicles. All equipment used by VSH, including the reach stackers used at Moengo, are on a rolling program of maintenance. The maintenance is on a fixed program unless working hours of the equipment have been exceeded. Rolling maintenance system is kept in electronically and has been demonstrated to the auditors during the site visit. All certificates are electronic.

VSH also checks the maintenance records of the ships cranes before unloading begins.

As part of VSH inspection before off-loading commences they inspect Haukes vehicles to ensure that they are adequate and appropriate for loading the cyanide to the vehicles. Checks are made on the trailer locking systems to ensure the load doesn’t move in transit and general condition of

the vehicles e.g. tyres, lights and maintenance. It falls within the remit of the transportation auditing of Haukes to ensure all other categories e.g. drivers' hours, rolling program of maintenance etc. is compliant to the Code.

VSH does have a policy that limits crane driver hours (4 hours) before the driver is changed. This is logged and overseen by the port manager. Documents and written records have been supplied to the auditors for review. The auditors have no reason to challenge any entry. This was also confirmed by interviews with VSH crane operators.

In addition, VSH has a drug and alcohol abuse policy in place, stating that if any employee is suspected of abuse, they stop work and formal testing is done by an independent laboratory, with results submitted to VSH for action.

Abnormal working conditions are discussed in the Operations Manual, these include adverse weather conditions and civil unrest where the manager of the operations can postpone/delay or suspend operations.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 1.5
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide received at Moengo is packaged in accordance with Part 4 of IMO. ISOtainers are listed as an acceptable packaging for cyanide solution. The ISOtainers are clearly marked with the UN code of 3414 class 6.

The ships manifest is provided to VSH for review, where it is checked for compatibility stowage and is in accordance with IMO regulations for shipping DGs and cyanide.

VSH checks the integrity of the ISOtainers before unloading, any defects are recorded. Any damaged or suspect defect the cargo stays on the ship for returning to the manufacturer.

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.6

Summarize the basis for this Finding/Deficiencies Identified:

During unloading, communication is undertaken by two-way radio using a designated radio channel. This is tested by VSH/Traymore. The radios used are maintained and distributed to all operators (VSH, Haukes, Traymore and Merian) before unloading begins. Two-way radios are also provided to the emergency response team during the off-loading activity. Two-way radios are used to ensure that there are no blackout spots.

Approximately a week prior to cyanide arriving at Moengo, VSH are notified so they can prepare their equipment and staff ready to be mobilized to the Moengo Port. Unloading of the cyanide is coordinated between VSH and Haukes. VSH has their signal man and the operators on the quay and coordinate the stevedoring while Haukes coordinates the sequence of the trucking.

When the cyanide exits the port, VSH receive a notification, on exit of the port the cyanide becomes the responsibility of the transporters. The cyanide cargo is also monitored by the Suriname Port Authorities while it is in Surinamese waters. When its landed, the VSH share the responsibility by ensuring that the condition of the vessel and the cargo is being checked in pre-manifestation to make sure that everything that is being received is according to the specified information, if the documentation (consignment notes) is in order the cargo is released. If there are any defaults the cargo documentation it remains on the ship.

VSH also check the ships manifest (bill of lading) to ensure that cyanide has not been stored with any incompatible chemicals. This comes with the consignment, typically this will contain the number of ISOtainers, individual identifier, MSDS sheets, tare weight and contents (in this case sodium cyanide). All valves are sealed and have a tag registration, these are checked by the stevedores for integrity. If all is in order VSH starts discharging.

VSH confirms that Materials Safety Data Sheets (MSDS) form part of the documentation arriving for chemical and other substances cargo. VSH personnel are aware of the importance of MSDS and the information it provides. The MSDS is provided in English and is understood by the VSH workforce who deal with the cyanide.

Principle 2 | INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Standard of Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental releases.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

In general, approximately 20 ISOTainers arrive at Moengo for offloading, where possible ISOTainers are taken off site straight away, however, some ISOTainers are held on site for less than 24 hours to await the returning vehicles, the auditors understand that the mine site is circa 2hrs away. Moengo has 4 portable signs that they use during unloading and also in the DG holding area. These signs include: cyanide present, no smoking, drinking, eating and that PPE should be worn. Lockouts also form part of the cargo inspection before unloading. The auditors have no reason to challenge this activity.

VSH and Traymore are aware of the need to segregate cyanide from all other goods including such as acids (in compatible). This is also a direction in the IMO DG handling and written in the operations manual. The DG transit area is in an isolated part of the port site about 100m from the main circulate route. As with the structure of ISOTainers the tanks are not in direct contact with the ground (circa 8 inches) above and in the open air. The DG holding area at Moengo is open space therefore properly ventilated.

Principle 3 | EMERGENCY RESPONSE

Protect communities and the environment through the development of emergency response strategies and capabilities.

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

VSH Transport has the Emergency Response Plan that has been developed for its stevedoring

operations. The Plan is called “Emergency Response Plan Guidelines” and covers the main aspects applicable to the emergency situations that may arise during the stevedoring. The Plan is applicable to the Moengo Port.

At the time of the site visit, VSH and Traymore personnel demonstrated excellent knowledge of the emergency response procedures that may be required in case of fire, cyanide exposures or other emergency situations.

The Plan is appropriate for the stevedoring operations – offloading the ISOTainers from the ship and loading them directly on to the trucks provided by Haukes, ICMI-certified cyanide trucking company. This would be implemented on the impermeable quay side.

The Plan considers the physical and chemical form of cyanide specifying that the solid cyanide may be transported in ISOTainers or 20-ft containers. Cyanico’s SDS specifies cyanide physical form as solid; VSH keeps the SDS current as part of the continuous improvement processes. Physical properties include Form, Color, Odor, pH and others.

Machinery and equipment that is intended for the use during the cyanide handling at Moengo is similar to one used at the Paramaribo terminal and includes cranes. The Plan provides a description of these items as does of the ISOTainers (Figure D below).

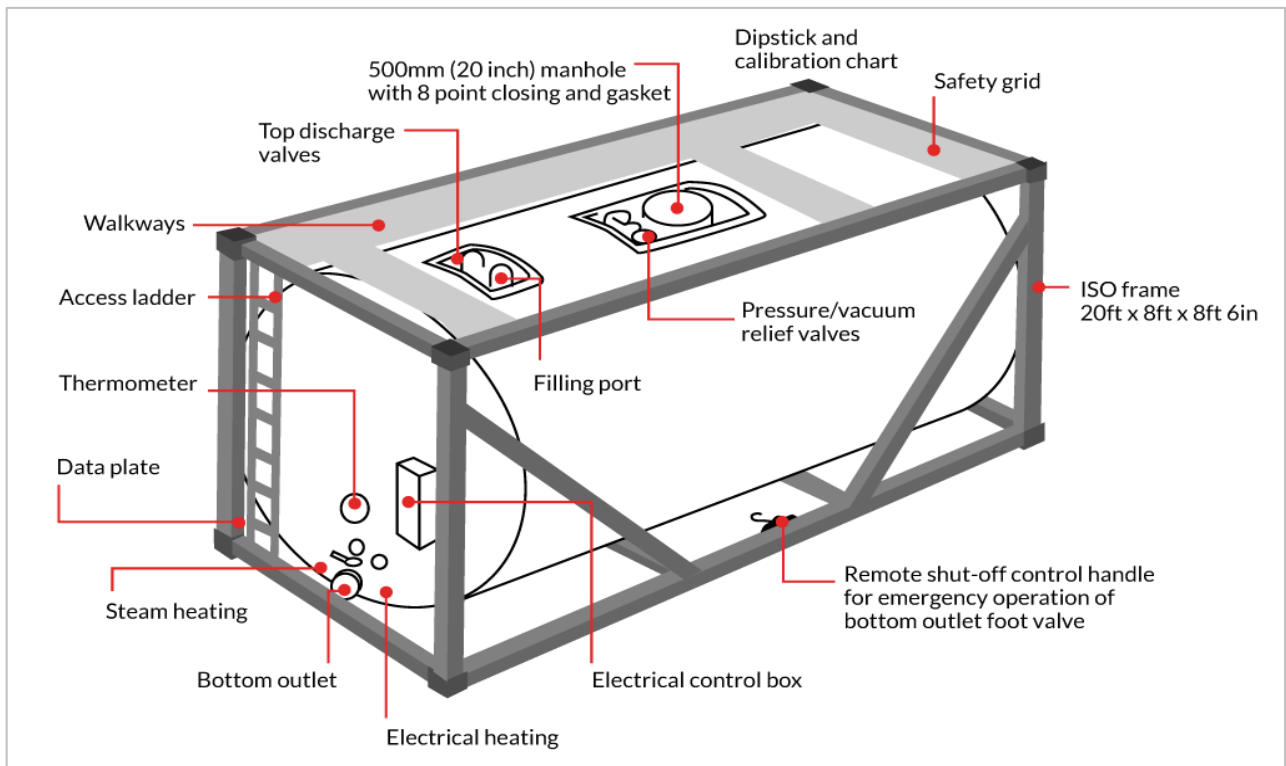


Figure D: Sodium Cyanide Tank with Components Detail

The Plan considers the port infrastructure and provides the evacuation plan for the relevant facilities. The Plan provides description of first aid points and eye wash locations, with the safety and security facilities and cyanide transport route clearly identified (Figure E below).

The Plan considers that the solid cyanide may be transported in ISOtainers or 20-ft containers which VSH will be discharging at the Port. The Plan also mentions the Spill Kit Wagon which is provided by the trucking company during the offloading of cyanide.



Figure E: Moengo Port Safety Facilities and Areas for Sodium Cyanide Transportation and Handling (Pink)

The Plan includes descriptions of response actions, as appropriate for the anticipated emergency situations during the stevedoring operations. Staff responsibilities are described in detail and include measures pertaining to the safe evacuation of people, stakeholder notification protocols, incident investigation procedures and other responsibilities.

The Plan provides sufficient detail on potential emergency scenarios that may occur during the stevedoring operations as well as specific emergency response actions, including the use of the emergency equipment.

The plan identifies the roles of external responders, medical services and the communities during the emergencies. In case of a cyanide spill, VSH emergency response team is to collaborate with the

Haukes HazMat technicians to contain such a spill with the spill kit available at the Haukes ER trailer. There is an emergency water supply at the port. Any cyanide poisoning victim(s) would be taken out of the decontamination area, given first aid, and then transported by the district ambulance to the local Hospital at Moengo. Newmont ensures the availability of the antidotes (Cyanokit) at the local hospital. This type of antidote can be administered by paramedics.

If an emergency arises involving cyanide VSH undertakes to inform Newmont Suriname of such an emergency with Newmont being the consignee of the cargo. Immediate emergency response actions rest with VSH and Haukes. VSH undertakes to inform the Port Authorities as the security operator and, depending on the emergency situation, notify the ambulance, the police or the Fire Brigade. Ultimately, it will be the responsibility of the District Commissioner to inform the nearby communities should a major accident occur.

Standard of Practice 3.2

Designate appropriate response personnel and commit necessary resources for emergency response.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

VSH provides necessary emergency response training to its appropriate personnel. The training includes initial training, inductions, first aid training, refresher training and emergency response drills. Internal training for the VSH is performed by the Health & Safety Department Manager. All other training is performed by the external organizations, such as "CHEEK". CHEEK also provides training to the appropriate personnel of Traymore N.V.

Training records for the relevant personnel have been reviewed and are found in good order. In addition, VSH personnel receive cyanide training from Newmont Merian mine and cyanide transporter Haukes N.V.

At the time of the audit, the auditors witnessed first aid training conducted by an external educational organization. The training program was focused on the emergency response aspects pertaining to the cyanide exposures, was thorough and detailed and included training materials permitted by the ICMI.

Descriptions of the specific emergency response duties and responsibilities of appropriate personnel that would be involved in managing the emergency response are provided in the ER Plan.

On-site interviews have demonstrated that the VSH staff are aware of risks relating to the cyanide handling and are capable of responding to the emergencies in a safe and efficient manner.

There is a list of the emergency response equipment that would be available during the stevedoring operations at the Port. The equipment includes fire extinguishers (dry chemicals), HCN gas detector, hand held radios and mobile phones. All equipment is checked on a regular basis and again before being used in attendance for cyanide movement, the equipment is re-calibrated by an external entity (Professional Energy Services N.V.).

Previously, VSH relied on a single gas detector, which went out of service and was replaced by a newly purchased gas detector with scheduled regular calibrations every 90 apropos the manufacturer’s recommendations. The auditors have been provided with the calibration reports and have verified this information.

If required and as a temporary solution, VSH can use HCN monitors that are being carried by the Haukes team.

To further enhance safety and ensure continuous monitoring, VSH is intending to purchase four additional gas detectors for its operations team.

Importantly, Haukes HazMat technicians and the Spill Kit wagon (ER trailer) are always present prior to the discharge of the cyanide cargo from the vessel. The ER trailer is located in Moengo as this is the only location where the cyanide is currently discharged. The ER trailer contains the cyanide spill kit and the first aid kit, including respirators.

The Plan provides sufficient detail in the ERP as to the type of the emergency response equipment and tools that would be deployed during an incident involving cyanide with particular attention given to the contents of the spill kit and the first aid kit that is provided by Haukes in the ER trailer. As noted above, Newmont Merian mine provides the antidotes to the local clinic to treat the victim of a potential cyanide exposure.

Haukes, the cyanide transporter, has available all necessary emergency response and health and safety equipment in the ER trailer and undertakes to provide this during the stevedoring operations in addition to its routine transportation activities. As soon as cyanide is loaded on to the Haukes trucks, VSH carries no responsibility for the onward handling of the cyanide.

Emergency response equipment available at Moengo is inspected regularly. Other emergency response equipment that is provided by Haukes in its ER trailer is inspected and maintained by the Haukes team. This is stated in the public report available on the ICMI website and has been confirmed by the VSH Team during the audit.

VSH does not contract other entities to conduct any of the activities required in Transport Practice 3.2 nor has it designated other entities to conduct emergency response activities.

Standard of Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 3.3
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

There are procedures and current contact information for notifying appropriate entities of an emergency. These entities include but are not limited to the Traymore port authorities, Newmont Suriname, external response providers, such as the Police, designated medical facilities, municipal Fire brigade and the district commissioner. It is the responsibility of the latter, being a governmental representative, to notify the potentially affected communities of an emergency.

Worth noting that it is a routine practice that the nearby communities at Moengo are notified of a large vessel passing, such notifications are published by MAS and are transmitted by radio and/or newspapers (Figure F below provides an example of such a shipping traffic announcement).

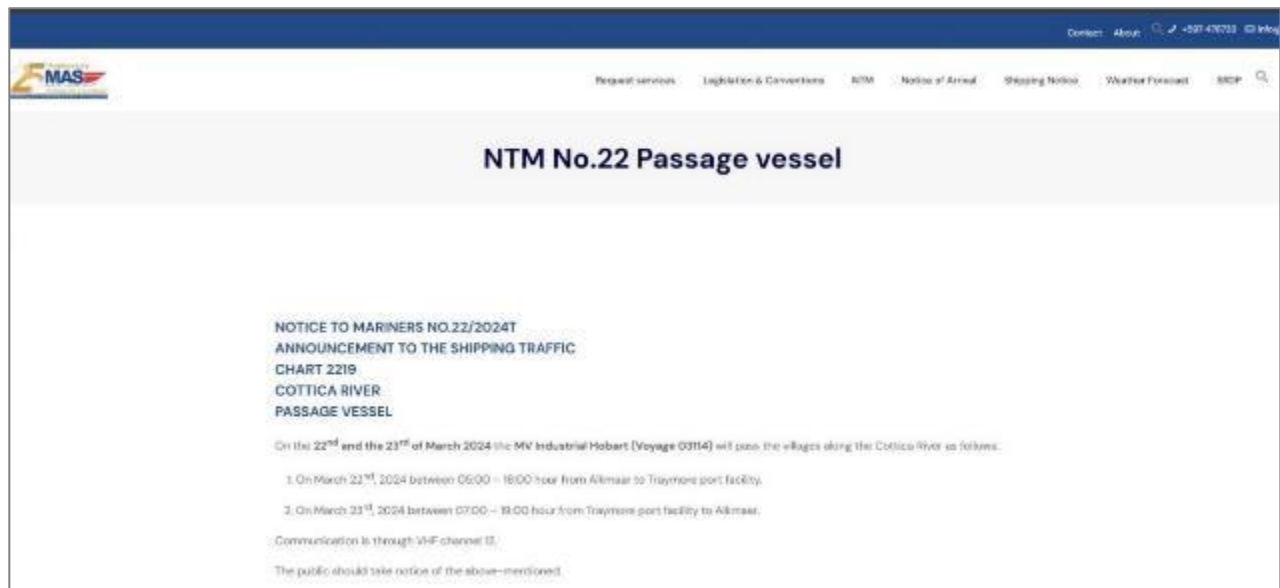


Figure F: Public Notification from MAS on the Shipping Traffic to the Traymore Port Facility

VSH ensures that internal and external emergency notification and reporting procedures are kept current in the Plan. The Plan is reviewed at least annually or when and if required, all stakeholder contacts are updated during such reviews.

To date, there have been no cyanide incidents that have occurred during the port operations.

VSH ERP has been updated to include a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI's Definitions and Acronyms document.

Standard of Practice 3.4

Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.4

Summarize the basis for this Finding/Deficiencies Identified:

Any remediation and decontamination of soils and other contaminated media with sodium cyanide will be performed by VSH with the Haukes HazMat technicians. The Haukes N.V. Emergency Response Plan (as described in the Report available on the ICMI website) includes procedures for recovery of any spilled or released solids, decontamination of any soil or clean-up debris and neutralization of any non-recoverable sodium cyanide.

The ERP strictly prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water.

Standard of Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 3.5

Summarize the basis for this Finding/Deficiencies Identified:

There are provisions for periodically reviewing and evaluating the Plan's adequacy, these are implemented at least annually or on when required basis.

The ERP has provisions for periodically conducting mock emergency drills. Internal Emergency Evacuation Drills are conducted under the supervision of the VSH Transport terminal Operation Manager or his designee. In addition, the emergency mock drills are conducted annually with the trucking company Haukes and Newmont Suriname.

Mock Drill Report from the latest drill held in Q1 2024 has been reviewed by the auditors and found comprehensive and fit for purpose. Companies & stakeholders present during the drill included VSH Transport, Haukes Transport N.V., Newmont Suriname, Traymore Port Facility, Safety & Security Academy Suriname (SSAS), Korps Brandweer Suriname (KBS) and others. Following the drill, a debriefing session was conducted to discuss the effectiveness of response, identifying strengths and highlighting areas for improvement with feedback from participants.

The Emergency Response Plan is reviewed following such mock drills and any important amendments are introduced if deemed necessary.

The VSH Transport terminal reviews and discusses the ERP with staff associated with his or her assigned area periodically. Plan's performance is assessed following the emergency mock drills and any changes to the regulatory guidelines and ICMI principles.

The Moengo Port is the only port where VSH undertakes off-loading of ISOTankers with sodium cyanide and it is kept in good order with relevant emergency procedures in place in line with the requirements of the Cyanide Code, as witnessed by the auditors during the inspection. It is therefore recommended to grant the recertification to N.V. VSH Transport.