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ICMC TRANSPORTATION CERTIFICATION

SUMMARY REPORT

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

TRANSPORTATION RECERTIFICATION AUDIT SUMMARY REPORT

SATELLITE TRANS GHANA LIMITED

Date of Audit: 8th to 10th September, 2026

For the

International Cyanide Management Institute
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1.0 INTRODUCTION

1.1 Operational information.

Name of Transport Company	:	Satellite Trans Limited
Name of Transport owner	:	Satellite Trans Limited
Name of facility operator.	:	Satellite Trans Limited
Name of responsible manager	:	Samuel Apreku
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1.2 Acronyms and Abbreviation

AGA…… AngloGold Ashanti

ERP…… Emergency Response Plan

ICMC .....……International Cyanide Management Code

ICMI…… International Cyanide Management Institute

HP…… Horsepower

HSE……. Health, Safety & Environment

IMDG……. International Maritime Dangerous Goods

IBC……..... Intermediate Bulk Container

ECOWAS..... Economic Community of West African States

GPS……...Global Positioning System

1.3 PROFILE OF COMPANY AND TRANSPORTATION OPERATIONS

Satellite Trans Services Limited is privately owned Ghanaian transport company that established their first Ghana office in 2002 to provide freight forwarding and logistics services. The transporter specializes in providing transport and logistics services to mining industries in Ghana and the West African sub-region. The Company started with six-trucks, general cargo transporter with emphasis on mining products.

Today, Satellite Trans has grown into a full-service logistics company with its own trucks, warehouses and office structures. Satellite Trans has 23 years of experience in all aspects of the logistics industry and aspires to be among the best logistics players in the West African Sub-region. Satellite Trans assists in the management of the supply chain of several mining companies operating in Ghana, Burkina Faso, Liberia, Ivory Coast, Niger, Guinea, Sierra Leone and Mali.

Currently Satellite Trans operates a fleet of 71 Heavy-Duty trucks. The vision of the Company is to be a key partner in integrated logistics in Ghana and the West-African sub region, offering higher quality of service. With a mission to be the preferred transportation and logistics provider for their chosen market area. Satellite Trans is committed to delivering the highest standards of safety and actively contribute towards reducing adverse effects on the natural environment. The company provides the necessary financial support to sustain its transportation activities and its employees, and to meet its clients' requirements through high quality service, cost control and the development of its human capital.

Satellite Trans has an agreement with Orica Pty Ltd and does the transportation of cyanide to Barbex warehouse located in Tarkwa (AngloGold Ashanti Iduapriem premises) and Carnal Namidini mine. The transporter was last recertified by ICMI on 30th October 2023.

1.4 Audit Scope

The audit covers the transportation of solid sodium cyanide from the port of Tema to Cardinal Namidini mine and Orica's warehouse in Tarkwa AGA Iduapriem premises. The ICMI Transportation verification protocols were used as guidelines in conducting this recertification audit.

1.5 Audit Schedule

This Transportation Recertification Audit was conducted from 8 to 10 September, 2026.

1.6 Auditor Finding,

This operation is

X in full compliance

in substantial compliance

not in compliance

with the International Cyanide Management Code.

1.7 Compliance Statement

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

1.8 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 8 to 10 September, 2026.

1.7 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.



Signature of Lead Auditor

Date: 26th September 2026

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:

Satellite Trans has established and implemented a Route Selection Procedure to ensure that routes to mine sites are systematically selected based on safety, risk, and operational considerations. The process involves identifying available routes using maps, consulting relevant regulators such as the Ghana EPA and Ghana Highway Authority, and conducting route surveys on each route before selecting the best route. The route selection considers key factors including route distance, settlements and population density, schools, pitch and grade, proximity to rivers and fog-prone areas, road surface conditions, bridges and railway crossings, overhead structures, vehicle load suitability, and general road conditions such as bends, steep gradients, narrow sections and potholes. Overall, the procedure provides a structured and risk-based approach to route selection, ensuring that potential hazards and road conditions are evaluated before a cyanide transportation route is approved for use.

Satellite Trans has established and implemented a systematic process for identifying, assessing and managing risks associated with cyanide transportation routes. The Transport Route Selection Procedure requires the HSE Officer to assess route hazards and establish controls to eliminate or reduce the identified risks. The HSE Officer, Escort leader and Escort driver conduct pre-use route assessments by travelling on the route to identify and evaluate potential risks before the routes are used for cyanide transportation. Route Risk Assessments (RRAs) are conducted annually and whenever significant changes occur on a transportation route. The company's Risk Assessment Procedure follows a structured process of hazard identification, risk analysis and evaluation, identification and implementation of controls, risk re-evaluation, and ongoing monitoring and review.

The auditor reviewed RRAs for routes from the Port of Tema to Cardinal Namdini Mine and AngloGold Ashanti Iduapriem Mine, covering assessments conducted between 2024 and 2026. Identified hazards included poor road conditions, road construction and diversions, sharp bends and

blind curves, steep inclines and declines, narrow roads and bridges, increased pedestrian and traffic activity, and livestock or stray animals crossing the roads. The RRAs classify risks as high, medium and low and specify preventive controls. These include speed reduction at sharp bends, defensive driving, appropriate gear selection, compliance with road signs and speed limits, journey planning, toolbox meetings, convoy management and driving during daylight hours. Before each convoy departs, the Escort Lead conducts a toolbox meeting with drivers and escort personnel, during which hazards observed during previous journeys are discussed and appropriate controls reinforced.

Satellite Trans has established a periodic route re-evaluation and feedback process to identify and manage changing risks associated with cyanide transportation. Under Section 4.2 of the Transport Management Plan, routes are re-evaluated and risk assessed at least annually and whenever necessary, with route surveys conducted on the same basis. The company also obtains feedback from drivers and Escort Leaders after each delivery through debriefing sessions and Journey Plans. The Journey Plan provides a specific section for recording road-condition feedback, with identified concerns including road construction, heavy traffic, dusty roads and potholes**.** The identified risks are addressed through controls such as speed reduction, journey management, maintaining safe following distances and complying with road signs**.** The feedback received after each trip is reviewed during the toolbox meeting before the next cyanide delivery, allowing newly identified hazards to be communicated and appropriate controls implemented. The auditor verified Journey Plan records confirming that the process is being implemented.

Satellite Trans has documented measures to address risks identified along selected cyanide transportation routes through its Route Risk Assessments (RRAs)**.** The controls and mitigation measures are clearly captured in tabular form within the RRAs. Records reviewed included RRAs for the routes from the Port of Tema to various mine sites for as well as Journey Plans, Route Survey Reports, and Toolbox Meeting records. These records demonstrated that feedback on road conditions including construction works, potholes, sharp diversions, and other changes is collected and used to identify, assess, and control risks.

Satellite Trans has engaged relevant stakeholders and government agencies in the selection of cyanide transportation routes and the development of appropriate cyanide management measures. Consultations have been undertaken with the Ghana EPA, Minerals Commission, Ghana Police Service, Ghana Fire Service, hospitals, and Ghana Ambulance Service**,** while community engagement is coordinated by the Ghana EPA in consultation with Satellite Trans. The audit reviewed valid EPA and Minerals Commission permits, as well as notification/reminder letters to the Police, Fire Service, Ambulance Service, and designated hospitals. The notifications identify the transportation routes, mine-site destinations, and the specific support expected from each agency in the event of an emergency. The EPA and Minerals Commission permits are renewed annually, demonstrating ongoing regulatory engagement and compliance.

Satellite Trans has established a Convoy Management Plan requiring all cyanide deliveries to mine sites to be conducted in convoys with escorts to enhance safety and security.

The plan limits each convoy to a maximum of eight trucks, travelling in a chain formation with specified separation distances of 50 m under normal conditions, 25 m in towns and villages, and 100 m on dusty roads**.** Each convoy is supported by two 4×4 escort vehicles, positioned at the front and rear, with the escort leader in the front vehicle. Cyanide transportation is restricted to daylight hours, from 6:00 a.m. to 6:00 p.m. The escort team comprises one escort leader, one escort assistant, two escort vehicle drivers, and the required number of truck drivers, depending on the convoy size.

Satellite Trans does not subcontract any of its cyanide transportation activities**;** all transportation operations are carried out directly by the company.

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

Satellite Trans employs only trained, qualified, and licensed drivers for cyanide transportation. Drivers hold Class F licenses and are required to have at least three years of driving experience. The company's Recruitment Procedure includes screening, interviews, theoretical and practical driving tests, and assessment of knowledge of road signs before appointment. Newly appointed drivers undergo training and mentoring covering Cyanide Awareness, Emergency Response, Basic Fire Fighting, Basic First Aid, and Defensive Driving. Cyanide Awareness, Emergency Response, and Defensive Driving training are conducted annually, while Basic First Aid is provided every three years and Basic Fire Fighting every two years.

Satellite Trans has established a comprehensive mandatory training program for all personnel involved in cyanide handling and transportation, covering the aforementioned training. These requirements are documented in the Training Matrix and are delivered by qualified internal and external trainers.

Training content was reviewed and found to address relevant operational risks, including cyanide exposure prevention, emergency response, road-sign recognition, and convoy management. The auditor sighted training attendance records, assessment results, and certificates covering 2023–2026. A review of driver and escort-team records against the training matrix confirmed that personnel involved in cyanide transportation had completed the required training. Interviews with selected drivers and escort personnel confirmed their knowledge and understanding of cyanide handling and transportation requirements.

Satellite Trans does not subcontract any activities covered under Transport Practice 1.2**;** all relevant transportation activities are carried out directly by the company.

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

Satellite Trans operates appropriately configured and rated vehicles for cyanide transportation, including Scania XT G Series, DAF, and MAN TGA/TGX trucks. The transport fleet comprises 6×4 trucks with four-axle flatbed trailer**s**, designed to carry two 20-ft cyanide containers with a total load of approximately 45.4 tons**,** while escort vehicles consist of Mitsubishi L200 and Toyota Hilux pickups. Vehicle load capacities range from 70–76 tons, with Gross Vehicle Weight Rating (GVWR), Gross Combined Weight Rating (GCWR), and axle-load limits observed. The company has a documented Maintenance Procedure covering both corrective and preventive maintenance. Trucks undergo scheduled servicing every 15,000 km ±1,000 km, including inspection and servicing of trailers and chassis. Maintenance is conducted at the company's workshop, with Scania West Africa servicing applicable Scania vehicles.

Tyre maintenance is outsourced to Rana Motors, the Goodyear tyre agent in Ghana**,** under an agreement dated 1 April 2026. Tyres are replaced when tread depth reaches 4mm, with Rana Motors' vulcanizers operating from the transporter's workshop.

Satellite Trans operates 6×4 trucks with four-axle flatbed trailers that are appropriately configured and rated to transport two 20-ft containers of cyanide, with an approximate gross load of 45.4 tons for Orica's product. The manufacturer's manual and vehicle load-capacity markings were verified by the auditor.

The transporter also conducts brake performance testing to confirm that vehicles can safely stop when loaded and to help verify that they are not overloaded. Brake performance is checked during vehicle servicing, and relevant test records were sighted by the auditor.

Satellite Trans has established procedures to prevent overloading of cyanide transportation vehicles**.** Bill of Lading information showing the net and gross weights of each cyanide container is used to select vehicles with adequate load capacity. Vehicles are weighed at government-designated weighing bridges when exiting the port, with sampled weighing tickets reviewed by the auditor. The maximum axle load for the 6×4 trucks with quadruple-axle trailers is 9.3 tons per axle, which is below the ECOWAS permissible limit of 10.5 tons per axle**.** The reviewed records confirmed that the vehicles operate within their specified load capacities and applicable axle-load limits.

Satellite Trans does not subcontract any activities covered under 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

The transporter has established controls to maintain the integrity and security of cyanide packaging throughout transportation. Solid sodium cyanide is packaged in 1,000 kg Intermediate Bulk Containers (IBCs), with briquettes contained in sealed polypropylene bags with polyethylene liners, enclosed in secured plywood boxes with pallet bases. The packaging complies with IMDG requirements for Group 1 hazardous goods and is transported in sealed 20-foot shipping containers secured with twist locks throughout the journey.

Before departure, containers are inspected using the Container Inspection Checklist to verify their physical condition, seals, doors, corrosion, and required hazardous-goods signage. Container and seal numbers are recorded on waybills and verified by mine representatives upon delivery, with signed and

stamped documentation confirming receipt in an intact condition. Container interchange records from shipping companies are also maintained as evidence of container condition at loading.

In addition, the Escort Leader inspects the containers during convoy stops to ensure they remain intact and secure until arrival at the mine site. Sampled waybills and container interchange records for deliveries to Anglogold Ashanti Iduapriem and Cardinal Namdini were sighted and verified

The Transport Management Plan requires all cyanide containers to display the appropriate hazardous-goods signage in accordance with the IMDG Code. The manufacturer has placarded all four sides of the cyanide containers with the required Class 6 toxic substance, skull and crossbones, UN 1689, and Marine Pollutant labels. In addition, the transporter displays the required cyanide placards, including the Marine Pollutant, Toxic Class 6, and skull and crossbones labels, at the front and rear of the trucks. The required signage was verified and found to be in place by the auditor.

The transporter has established comprehensive systems for vehicle, escort equipment, container inspection, maintenance, and driver fatigue management to ensure safe cyanide transportation.

Vehicles, escort equipment, and containers are inspected using approved checklists before departure. The vehicle pre-trip checklist is completed and signed by both the driver and Escort Leader, while escort equipment inspections are signed off by the Escort Leader. Sampled inspection records were reviewed and found appropriately completed.

A documented Maintenance Procedure covers both corrective and preventive maintenance. Corrective maintenance involves reporting defects, assigning repairs, documenting work and spare parts, and testing the vehicle with the driver before completion. Preventive maintenance is conducted every 15,000 km ±1,000 km, including servicing of trucks, trailers, and chassis. Maintenance records reviewed confirmed implementation of the procedure. Tyre inspection records are shared with relevant personnel by Rana Motors. Shipping containers are maintained by the respective shipping companies.

Servicing dates are displayed on vehicle windscreen stickers, while odometer readings are recorded during pre-trip inspections to ensure servicing is not missed. Vehicles due for servicing are removed from service and maintained before departure.

The transporter has a Fatigue Management Policy limiting drivers to 4 hours of continuous driving followed by a maximum of 30 minutes of rest, a maximum of 10 driving hours in 24 hours, and 70 hours within a rolling 7-day period. Drivers are also required to have at least 24 continuous hours off-duty after the 7-day period, and night driving is prohibited, with driving restricted to 6:00 a.m.–6:00 p.m. Sampled journey plans and GPS records confirmed compliance with the prescribed driving and rest-hour requirements.

During pre-departure inspections, the Convoy Leader checks the condition and proper engagement of twist locks to ensure containers are securely fastened to trailers. The TMP requires containers to be secured immediately after loading using twist locks and additional container belts. Twist locks and

containers are also inspected at every rest or refreshment stop, with the inspections documented. The auditor verified sampled inspection records.

The TMP establishes controls for severe weather and civil unrest. During severe weather, the convoy parks at a safe location and remains stationary until conditions improve, while the mine site and company office are notified. In cases of civil unrest or armed confrontation, the convoy will stop at a safe location, notifies the Ghana Police Service, mine and company office, and either waits for the situation to subside or returns to base. The Escort Leader coordinates with relevant parties before the journey resumes.

Satellite Trans has a Drug and Alcohol Policy prohibiting the use of alcohol and drugs during working hours. Random alcohol testing is conducted on drivers and staff by the HSE Officer, with disciplinary action, including dismissal, for violations. The auditor verified sampled alcohol-testing records. The breathalyzer used for testing was calibrated on 4 September 2026, with a calibration certificate sighted and servicing due on 4 May 2027.

Satellite Trans maintains documented evidence of inspections, alcohol testing, policies and procedures under its Document Control Procedure. Records are maintained in both hard-copy and electronic formats and retained for a minimum of five years. The auditor verified the availability of the relevant records.

Satellite Trans 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:

This Standard of Practice 1.5 is not applicable. Satellite Trans Ghana Ltd does not transport cyanide by sea.

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 transporter uses emails, WhatsApp, telephone calls, and walkie-talkies to communicate with the mining companies, cyanide producer, and internal and external emergency responders. Walkie-talkies are used for communication within the convoy, while phone calls and WhatsApp are used to communicate with mines, suppliers, and emergency responders. All communication equipment is listed on the Escort Equipment Checklist and inspected before convoy departure. The escort leader carries both MTN and Airtel Tigo SIM cards to ensure reliable mobile communication and network coverage.

The transporter has established a system for regular testing and inspection of communication and tracking equipment to ensure they remain functional. Cell phones and GPS devices installed in the tractor units are inspected before convoy departure, while GPS functionality and real-time vehicle tracking are monitored by the Logistics Manager with support from the HSE team. The auditor verified real-time GPS tracking of selected vehicles. Mobile phones and walkie-talkies are checked for proper operation and adequate charge before each trip and recorded on the Escort Equipment Checklist. The Convoy Leader is responsible for ensuring that all communication equipment functions effectively, with completed emergency equipment checklists reviewed and verified by the auditor.

The transportation routes have continuous mobile network coverage, with both MTN and AirtelTigo providing service along the routes. A review of the Route Risk Assessments (RRAs) confirmed that there are no identified communication blackout areas between the Port of Tema and the mine-site destinations.

Satellite Trans vehicles are equipped with SKY LEDGE GPS tracking systems and In-Vehicle Monitoring Systems (IVMS) to monitor vehicle locations, driver behaviour, and road conditions. GPS tracking is monitored every two hours by the Logistics Manager and HSE team, with observations recorded on the GPS Trip Monitoring Sheet. The Logistics Manager also provides regular email updates to the mine site and supplier on the convoy's location until arrival. Pre-departure notifications

include details such as the number of containers, expected time of arrival (ETA), and registration numbers of the trucks and escort vehicles**.** Auditor review confirmed the availability of GPS monitoring records and notification emails.

Shipping and delivery documents, including Bills of Lading, waybills, container interchange documents, and SDSs**,** accompany the cyanide shipment throughout the delivery process. The documents contain key shipment details, including container and seal numbers, gross weights, shipper and consignee information, packaging description, and chemical details**.** Waybills are signed by the Logistics Manager and the mine representative upon receipt, confirming that the containers were received intact and in good condition. The auditor verified Bills of Lading showing the gross weight of the sodium cyanide shipments.

The supplier provides Bills of Lading to the transporter before shipment, detailing the quantity of cyanide contained in each container. Sampled Bills of Lading were verified for shipments dated 19 May 2025, 20 June 2026, and 8 July 2026. The supplier's Safety Data Sheets (SDSs) are carried by the Escort Leader, with copies also maintained in the cabins of each transport vehicle. The auditor verified and reviewed the SDSs.

Satellite Trans does not use subcontractors for any activities covered under 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 2.1

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Satellite Trans does not have any transhipment depots or interim storage sites. Delivery of cyanide is made directly from the port to the mine sites. This Transport Principle is not applicable to this operation.

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:

Satellite Trans has developed a road transportation-specific Emergency Response Plan (ERP), document No. STR-IMS-ERP-001**,** covering key aspects of cyanide emergency management. The plan addresses cyanide properties, potential incident scenarios, emergency roles and responsibilities, cyanide poisoning and first aid, incident investigation and reporting, and the management, containment, and neutralization of minor and major spills**.** The ERP is reviewed and updated annually, and the auditor reviewed the plan and confirmed its applicability to cyanide transportation.

Satellite Trans's ERP adequately addresses the road transportation of sodium cyanide from the Port of Tema to the designated mine sites. Route Risk Assessments (RRAs) have been conducted for the Tema–Barbex (AngloGold Ashanti Iduapriem) and Tema–Cardinal Namdini routes, considering road conditions and infrastructure such as bridges, railway crossings, sharp curves, slopes, traffic lights, water bodies, towns, and villages**.**

The ERP specifies the approved transportation routes and the use of 6×4 tractor units coupled with quadruple-axle flatbed trailers**.** It also describes the physical and chemical properties of solid sodium cyanide**,** its packaging, reactions with water, moisture, acids and incompatible substances, and procedures for managing accidental releases. The supplier's Orica SDS is included as an appendix to the ERP. Overall, the auditor found the ERP and RRAs appropriate and comprehensive for the road transportation activities**.**

The ERP describes the vehicle types, designs, configurations, and load capacities used for cyanide transportation. Satellite Trans operates Scania XT G Series, DAF, MAN TGA, and MAN TGX trucks

with engine power ratings of 460, 510, 410, and 420 HP, respectively. All vehicles are configured as 6×4 tractor units with four-axle flatbed trailers, capable of transporting two 20-foot containers with a combined load of approximately 45.4 tons.

The ERP provides detailed response procedures for anticipated cyanide transportation emergencies. It identifies four key scenarios: container rollover without a spill, rollover with a spill on dry ground, rollover into a water body, and incidents resulting in human exposure to cyanide. For each scenario, the ERP specifies appropriate response, containment, clean-up, and neutralization measures. It also outlines response actions for cyanide-exposed persons, including oxygen administration.

The Emergency Response Plan (ERP) clearly defines the roles and responsibilities of the escort team and external responders during cyanide-related incidents. The Escort Leader coordinates the incident response, manages and reports the incident, notifies relevant authorities, secures the incident area, and administers 100% oxygen to cyanide-poisoned persons. The escort team assists with evacuation to a safe upwind location, securing the area, and spill clean-up.

External responders have defined responsibilities: Ghana EPA provides advice on potential waterway contamination; Fire Service conducts rescue, firefighting, and assists with neutralization; Ambulance Service provides first aid and transports suspected cyanide-poisoned persons to hospital; hospitals provide medical treatment; Police control traffic, prevent unauthorized access, and investigate accidents; and Orica Mining Services provides specialist technical advice.

The mine is responsible for receiving and supervising the destuffing of potentially damaged containers, using recovered cyanide as soon as practicable, and managing the recovery and neutralization of contaminated materials. The mine and transporter have a mutual understanding that the mine will support recovery operations following a road incident, regardless of distance, to ensure the safe delivery of cyanide to the mine site. The community follows directions from Ghana EPA and does not have a direct response role. The auditor verified that the relevant external responders had been formally notified of their roles and responsibilities and found the arrangements appropriate and adequate.

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:

Satellite Trans has a well-structured emergency response training program, supported by a training matrix that provides for annual refresher training for personnel. The training covers appropriate

response actions for both minor and major cyanide spills, including the handling of cyanide-exposed persons, and concludes with practical simulations of different emergency scenarios.

The auditor reviewed training attendance records confirming that the training had been conducted. Training effectiveness is assessed through a 20-question knowledge assessment covering spill response and the management of cyanide-exposed persons, with assessment records for selected participants reviewed. The auditor examined the training content and found it appropriate and adequate for the required emergency response responsibilities**.**

The Emergency Response Plan (ERP) clearly defines and documents the specific emergency response duties and responsibilities of personnel. The roles of both internal and external responders are clearly outlined in Table 3.3 of the ERP**,** with further reference provided in Section 3.1**,** ensuring that responsibilities during an incident are clearly understood.

Satellite Trans maintains a comprehensive inventory of cyanide emergency response equipment**,** which is stored in a designated office when there are no cyanide deliveries. The equipment includes first aid kits, oxygen resuscitation equipment, HCN gas detectors, respirators and filters, protective clothing, spill-control materials, communication devices, safety equipment, and Hydroxocobalamin (cyanokit)**.**

The emergency response equipment is inspected by the Escort Leader before cyanide deliveries and monthly thereafter**,** using the designated inspection checklists. The auditor verified the availability and condition of the listed equipment. The Cyanokit was within its validity period, with an expiry date of 10 November 2026, and was stored at the manufacturer's recommended temperature of 25°C.

The portable HCN detector was calibrated on 28 May 2026**,** with the next calibration due on 24 November 2026**.** The oxygen cylinder is regularly checked and undergoes annual third-party inspection; the latest inspection was conducted on 4 September 2026**,** with certificate ER/ST/01/9/2026. The Escort Leader is responsible for the safe custody and inspection of the emergency response equipment and is trained in the use of the HCN detector and oxygen resuscitator**.**

The transporter has adequate emergency response equipment and Personal Protective Equipment (PPE) as part of its escort equipment. PPEs is included in the emergency response equipment checklist and is inspected before convoy departure. Available PPE includes disposable Tyvek overalls, rubber boots, PVC gloves, full-face respirators with canisters, and helmets. The correct selection and use of PPE are covered in emergency response training, and drivers and escort personnel have been trained accordingly. The auditor conducted a thorough inspection and confirmed that the required PPE was available**.**

The transporter's ERP establishes procedures for inspecting and maintaining emergency response equipment to ensure its availability and functionality when required. The Escort Leader inspects the equipment for functionality, cleanliness, calibration, and expiry dates using the designated escort equipment checklist. Defective or obsolete equipment identified during inspections is replaced, and monthly inspections are conducted when the equipment is not in use. The auditor reviewed inspection records confirming that the required inspections were being conducted.

Satellite Trans does not sub-contract any of the activities in 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:

Satellite Trans has an established procedure for notifying internal and external stakeholders during an emergency**,** as detailed in Section 3.2.2 of the ERP. The Escort Leader initiates the notification process by informing the Safety Manager, who subsequently notifies the Logistics Manager. The Escort Leader also contacts relevant external responders, including the mine, Orica, Police, Fire Service, medical facilities, and Ghana EPA**,** while potentially affected communities are notified through Ghana EPA. Emergency contact details for internal and external responders are provided in Appendices G1, G2, and G3 of the ERP, with mine and supplier contacts also available on shipping documents. For significant incidents, the Safety Manager is responsible for notifying ICMI. Section 3.2.1 also establishes the incident reporting and investigation process. The auditor reviewed sampled contact numbers and confirmed that they were current and had been recently updated**.**

The transporter has an established procedure for validating and maintaining emergency responder contact information**.** The ERP requires internal and external emergency notification procedures and contact numbers to be reviewed annually and whenever necessary, with contact details also updated during route assessments. The Safety Manager is responsible for keeping the notification and reporting information current. The auditor confirmed that the emergency contact information was complete and up-to-date and tested selected telephone numbers for hospitals, mines, and the Ghana Fire Service, confirming that the numbers were active.

Section 3.2.2 of the ERP requires significant cyanide incidents to be reported to ICMI within 24 hours by the Safety Manager. Significant incidents include human exposure requiring emergency response or treatment, unauthorized cyanide releases to or off-site from natural waters, releases requiring emergency response, cyanide transport incidents involving a release, multiple wildlife deaths suspected to be cyanide-related, and theft of cyanide.

The auditor reviewed and confirmed the procedure for notifying ICMI in the event of a significant incident. No significant cyanide incidents were recorded during the 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:

Satellite Trans has established procedures for the recovery, neutralization, decontamination, and disposal of cyanide-contaminated materials following a spill. The procedures cover recovery of solid sodium cyanide, decontamination and disposal of contaminated soil, neutralization or disposal of recovered solutions, and response to spills entering water bodies. The ERP provides guidance on the safe use of ferrous sulphate monohydrate and sodium hypochlorite. For solid spills, the escort team prevents cyanide from entering waterways, recovers the material into sealed containers, and neutralizes residues with ferrous sulphate. Major spills are escalated to external responders. Contaminated soil is excavated, neutralized, and sent to the mine for appropriate disposal.

For spills affecting water bodies, Ghana EPA and the Water Resources Commission will be notified, downstream communities will be informed and provided with alternative water supplies where necessary, and a water-monitoring program is implemented. Water samples are tested regularly until the affected water body is declared safe. The procedure specifically prohibits the introduction of neutralizing chemicals directly into surface water. The auditor reviewed the procedures and found them appropriate.

Section 4.3.2.3 of the ERP prohibits the use of neutralizing chemicals**,** including ferrous sulphate, hydrogen peroxide, and sodium hypochlorite, to treat cyanide released into surface waters. The auditor verified this requirement and, through interviews, confirmed that the Escort Leader and escort team understand the hazards and risks associated with introducing neutralizing chemicals into surface water**.**

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 ERP requires the Emergency Response Plan to be reviewed and evaluated annually by the Safety Manager. The plan is also updated based on findings from incident investigations, corrective actions, annual mock drills, and any significant or critical changes. The most recent review was conducted on 12 May 2026, and the auditor confirmed that the ERP was current and up-to-date**.**

Satellite Trans conducts annual emergency response mock drills involving the Emergency Response (ER) team, police, Fire Service and drivers. The drills simulate key cyanide emergency scenarios, including container rollovers with or without spills, spills into waterways, and cyanide exposure to personnel. The drills are designed to ensure personnel can identify cyanide emergencies, follow notification and reporting procedures, understand response and neutralization requirements, and effectively perform their roles during an incident**.** Attendance records for drills together with corresponding drill reports, were reviewed by the auditor.

The drills assess the capabilities of drivers and the ER team, with external responders, including Fire Service and Police, participating in the 9 July 2026 drill. Drill reports document identified non-conformities and corrective actions. Interviews with selected drivers and escort personnel confirmed that the mock drills had been conducted as required.

Satellite Trans reviews and updates its Emergency Response Plan (ERP) based on lessons learned from mock drills, changes in route conditions, and corrective actions arising from incidents. Each mock drill is followed by a debriefing and evaluation, during which non-conformities are identified and corrective action plans are developed.

The corrective actions and lessons learned are subsequently used to revise and improve the ERP, ensuring that the plan remains effective and responsive to changing conditions. The latest review of the ERP was conducted on 12 May 2026**.**

END OF REPORT