INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary Recertification Audit Report

UNTIED MINING SUPPLY
CONAKRY GUINEA

10th – 15th October 2021

For

International Cyanide Management Institute

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Name of Operation:	United Mining Supply
Name of Operation Owner:	United Mining Supply
Name of Operation Operator:	United Mining Supply
Name of Responsible Manager:	Mrs Sylvie Pelletier, QHSE Director
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Location detail and description of operation:
United Mining Supply are contracted as a cyanide transporter for Hebei or any other supplier in Guinea, solid cyanide (briquettes) transported by road from Conakry to Mandiana (Loila) mine .
UMS cyanide operations is based in Conakry, UMS have 4 yards each dedicated for specific service the yard audited is the yard that receive and dispatch Cyanide, is located 6 kilometers from Conakry main port Immeuble Wazni Tombo 1, Kaloum BP 2162 – Conakry
.
Cyanide is received at the port of Conakry by sea in containers, which each hold 20 one-ton boxes of solid briquette cyanide. The containers are offloaded at the ports by Stevedores and segregated from other containers. A due diligence has been done on the port by ORICA and AGR to be part of supply chain of the cyanide producers and consignors bringing the cyanide in that is done every 3 years . For the purposes of Cyanide Code transportation compliance, UMS responsibilities commence on collection of the containers from port.
Containers are delivered from the Quay to the stevedores where they are stacked and stored separately.
Control and monitoring of the containers is undertaken by stevedores who subscribe to the IMDG& IMO DG Code. UMS Cyanide Code responsibilities commence once they take the containers from the stevedores storage area.
UMS vehicles collect the containers with the documentation and manage them under a Transport Management Plan (jointly agreed between the supplier and the mine).
The containers are transported in escorted convoy to the mine sites.
Each truck has a driver, who is accompanied by an assistant.
Each convoy is made of 2 escort vehicles and 2 safety officers

The safety officer manages communications between the trucks, the escort vehicles and the convoy manager, and monitors the driver.
The convoy consist of a convoy manager, assistant convoy manager, a cyanide first aid, safety officers, a mechanic, cyanide emergency response equipment for spills and releases and medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations and ingestion).
The convoys include an armed police escort, Military, customs and officials from the ministry of mines and environment.

UMS have vehicles dedicated for he cyanides transport also acquired 2 planes beach craft for the evacuation of casualties during emergencies

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

Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

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

Audit Company: Crown Transport & Logistics
Audit Team Leader: Ghassan Husseini
E-mail: ghass@ctllwa.com

Name and Signature of Lead & Technical Transport Auditor:

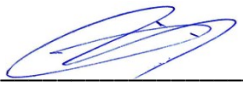
Name Ghassan Husseini Signature Date 25-10-2021

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Date of audit: 10th -15th October 2021

Ghassan Husseini Lead Auditor Date 25-10-2021



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.

X in full compliance

The operation is ☐ in substantial compliance **with Transport Practice 1.1**

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS bases the route selection on the following road survey , road risk assessment, journey plan and road hazard mapping.
Road Survey is a set of directions providing details on when and how often to conduct a road survey, who is responsible, preparation of the materials and convoy, identify the points that will be identified, linked to hazard map and the risk assessment including the population density, bridges, water bodies, black points, road infrastructure slippery roads and black outs. This incorporates detailed route and rest stops, customs and police points and needed controls.
Hazard mapping is a summary of the risk assessment
Journey management is the most frequent source to update the risk assessment as after every trip all new identified hazards are registered and inserted into the risk assessment.
The Road risk assessment procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step.
The Convoy Manager is responsible for identifying and responding to unforeseen risks during transport and perform an update on the road hazard, changing risks. Those updates are inserted into the road risk assessment.
Journey plan indicated where authorized rests & stop points to be used along transport routes were also departure time rest time and arrival speed barriers, road construction, cyclists, traffic congestion, standard caution, heavy rain, cattle crossing, children, bridge and other relevant trip planning issues.
UMS OBC tracking trend are analyze per every trip.
Due to the nature of the cargo, a permit is issued by the authority for the transport of cyanide.
These permits are given by the government.
UMS Department of Transport has specified all approved routes to transport cyanide in Guinea to serve various mines in Guinea. Customs also escort the cargo due to the exemption enjoyed by the mines.
also Routes are selected and approved by the authority of the Ministry of Transport a permit is issued to that effect Sighted Route Risk Assessment from Conakry to Mandiana Loila mine Guinea , a745,8 km distance highlighting black spots, warnings of hazards .
Every year the Survey team is reviewing the road survey to complete Road risk assessment for the roads that UMS uses to transport cyanide.
Road Survey which states the factors that need to be considered when doing the route risk assessment includes the symbols that should be used in the route risk assessment.
The process involves using maps and other data sources to identify likely routes considering population areas along a route, road condition, areas of potential difficulty or danger, proximity to hospitals and police, communication reception, gradient, water, road works, river crossing infrastructure etc.
Once a potential route has been chosen. The Control Department undertakes a survey of the proposed route to assess additional potential issues and possible controls.
The survey team also meets and discusses issues or concerns with the client and drivers.
A risk assessment is then undertaken of the proposed route.
This includes implementing controls to reduce potential risks to a defined acceptable level before the route can be utilized.

If controls cannot be implemented to achieve this, an alternative route must be found for consistency purposes of the Survey.
The list is produced as an outcome of the route assessment process.
Each year the HSE Manager produces a list of authorized routes & roads that UMS is able to use for cyanide transport and other Hazmat cargo (such as fuel for TOTAL & SHELL) the transport department are the custodian of these information.
The Road Survey procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step.
TMP considers the risks and the assessment of the risks as well insuring that the route has been analyzed in order to minimize the potential and impacts for accidents and releases each delivery is undertaken via convoy.
UMS have a list of authorized rest & stop points that can be used along transport routes approved by the authority.
The road risk assessment highlights areas of significant population density as well as concentrations of children(schools), pedestrian activity, cyclists and animals and the control measures needed to address the potential for accidents and releases or the potential impacts of accidents and releases including the road condition and the hazards associated with it that were picked up during escort.
the risk assessment describes the infrastructure , construction and the approved routes, the condition of the roads in terms of quality, drive-ability and safety that is also discussed by the pre-trip briefing
.
It also address the road condition tarred or rough road, distance of the rough road and the recommended speed to be used , areas of potential difficulty or danger, proximity to hospitals and police, communication reception, gradient, water, road works, river crossing infrastructure.
This reviewed every time there is a risk assessment and updated on the journey plan on each convoy.
Guinea have 2 season raining and dry (Harmattan dry and dusty wind) during the dry season which reduces visibility.
UMS evaluate risk and elaborate on measures on how to manage risks during transport routes.
UMS also communicate all significant hazards with the client on road hazard or the changes on road.
Bearing in mind UMS adhere to the strict regulations by the Ministry on the road use as the cargo is escorted by customs military, police and other authorities.
The convoy is obliged to pass through a specific road defined by the Ministry and diversion is only allowed after the consent of the Ministry.
Risk are Identified, evaluated –Analyzed –Monitor, review, Communicate and consult.
UMS requires risks to be reduced to a deemed acceptable level before the route can be utilized.
If the risk level is still high more controls are implemented to achieve the acceptable level.
prior of departure, UMS communicate client and stakeholders per detailed in the Emergency Response Plan (ERP).
Any additional issues with the proposed route are addressed at this stage and it includes seeking consent from the mine on current river levels and road conditions.
UMS ERP and Transport Management Plan (TMP) require that routes are reassessed in case of risks increasing reported during the road trips/survey or in case of changes.
During the convoy the Convoy Manager provides real time risk management on the route condition.
All Feedback on the route condition is documented at the End of Mission Report produced by the Convoy Manager following each voyage
These feedbacks are used as an awareness tool for convoy personnel and discussed during the pre-trip briefing in the next convoy.
The feedback is documented on road conditions, population, time of transit, where delay came from and possible solution to expedite the delivery.
The information from the feedback is collected, analyzed to reviewed and revise the level of risk on the road and if the risk or the number of hazards is increasing or reducing.
Route risk assessments are currently reviewed yearly.
All feedback is documented by Convoy Managers in the journey plan and transferred into the risk assessment during the yearly review.
Full road surveys are reviewed once a year although no alternative route is available
Convoy Managers have copies of the full route risk assessments, emergency response plan and emergency response

plan annex contact list.
the Convoy Manager's one of his duties on the convoy is to alert direct/inform the driver assistant on board of the trucks of all incoming hazards to be communicated to the drivers, including when to overtake, any on coming vehicles or if there is a barrier ahead.
The authority are responsible of the cargo security to destination.
Police, soldiers and customs officers are aware of the dangers of cyanide and its implication.

Upon completion of the route risk assessment and acceptance of the route by the Client and Authorities.
and controls are also documented in the ERP for emergency situations.
the OBC tracking addresses the driver log and work hours and risks area
UMS seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.
.
The survey team meet to discuss issues or concerns with the client and drivers.
On completion, copies of the Survey Report are sent to the mine site and external responders for comment and advice.
Prior to any voyage departure, the ERP contains a list of contacts including the client that positive communication must be checked with any additional issues with the proposed route can be addressed at this stage.

The Ministry for Health and the Public Health and High Command of the National Police have also been consulted by UMS.
• The community is consulted and involved limiting their role to crowd control and not to use any water during emergency until approved by the authority.
UMS have sent letters to all communities that falls within UMS operation, explaining the dangers of cyanide emphasizing the core responsibility of the community is not to get close during an incident and not to use any ground or surface water until it is declared safe to do so by the authority.
Furthermore, the Minister of the Environment of Guinea are consulted on routes, especially considering the emergency response support issues.
UMS uses convoys as a means of managing the risks of road transportation and responding to emergencies.
Each convoy consists of
2- 4x4 escort cars one leading and one at the end forming aa closed convoy.
2-police officers that are used for cargo protection one armed in the leading escort car and one at the end.
1-customs official escort the convoy occasionally
2-military officers The primary role of military is to direct traffic and control crowds in the event of an emergency
1 official from the ministry of Environment
1- ministry of mines.
The police major role is to protect the products.
During transportation, drivers maintain a suitable gap between the vehicles in front whilst retaining visual contact.
Mobile phones, radios, horns and flashing of headlights are used to communicate between vehicles.
In addition to convoys and armed escorts, additional security measures are implemented including GPS monitoring of the progress of the convoy along the route.
All containers are locked and sealed, and the trucks & containers are inspected prior to departure and at regular intervals throughout the convoy.
All cyanide deliveries are conducted using a convoy system with customs escort, police and other authorities.
Custom official is sent along to ensure the cargo arrives at its destination and is not diverted.
Furthermore, the Emergency Response Team on the convoy has spill kits, first aid, a mechanic and safety officers. (Complete emergency response team).
UMS does not contract nor subcontract any of its activities unless covered by due diligence as port operation.
UMS does not manage the loading, unloading or DE stuffing of containers.
UMS retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring

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.

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

Summarize the basis for this Finding/Deficiencies Identified:
UMS only uses trained and competent team to drive its trucks, escort vehicles and emergency response team.
All truck drivers have a permit C1 that allows the driver to drive trucks above the weight of 19 tons and hold at least a Middle School Leaving Certificate and they should be able to read and write.
Vehicle licenses are valid in Guinea for three years and truck drivers are required to have a Category C1 license for vehicles that transports goods greater than 19 tons . which includes articulated trucks.
The Control and transport department check licenses before trip and the matrix that highlights the permits due to expire.
The Human Resources Assistant also keeps copies of original licenses using a matrix and provides a four and three month warning to drivers prior to the license expiry.
UMS do implement cyanide awareness training, incorporating elements of dangerous goods training is provided by UMS.
All the drivers are trained in defensive driving and on the 16 SOPAF modules.
UMS training control system uses a matrix that highlights every person required training and shows the attendees matrix of the annual training done. UMS basic training are: firefighting, transportation of hazardous materials training, cyanide awareness transport training, and first aid training, defensive driving course.
Minimum training requirements for cyanide drivers are:
• First aid • Training on cyanide awareness, DDC • Site induction • Chemical response • Responding to accidents or incidents • Crowd control
The cyanide awareness training module is developed by a cyanide manufacture.
The module contains information on product awareness and emergency response actions.
Prior to each convoy, a module of the cyanide awareness training is used as a refresher.
Tool box or during briefing held prior to departure to discuss issues and responses Emergency simulations drill.
mock drill is planed once where specific aspects of the emergency plan are evaluated, is to assess the simulation drill. Records of this training are kept for future reference.
Transport management plan which ensures that all drivers should be trained in defensive driving.
Scenario drill was performed in order to check the effectiveness of the escort team.
After basic training, new driver is partnered with an experienced driver to observe and learn the appropriate level of driver quality.
Then the one passes the test to become a driver,
UMS has critical task and critical position is part of the emergency response procedure that gives each person his role and responsibility
The containers which contain the cyanide boxes are sealed and loaded on other truck at the port by the stevedores. They remain on the truck until unloaded at the mine by the mine staff.
Truck drivers receive cyanide hazard training and any cyanide incidents that occur on the journey are handled by the accompanying convoy emergency team who have specialist training, according to the training matrix.
The convoy carries all the necessary cyanide emergency equipment (cyanide releases and medical) with them and they are under armed customs escort.
UMS does not contract nor subcontract any of its activities unless covered by due diligence as port operation.
UMS does not manage the loading, unloading or DE stuffing of containers.
UMS retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence.

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

X in full compliance with

The operation is ☐ in substantial compliance with Transport Practice 1.3

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide.
The Company maintains a register of trucks and trailers and their design specifications used for the transport of cyanide.
the axle loads for trucks and trailers used is 10 tons conform with ECOWAS treaty signed 1992 and 2000 & UMOA TREATY SIGNED 1996 respectively and the ERP includes the calculation for determining whether the truck and trailer is appropriate for the load:
A Preventative Maintenance procedure exists for all equipment, specifically for trucks used in the transportation of cyanide.
Prior to every convoy, equipment is checked using the Cyanide Equipment Checklist, these include inspections of the king pins and twist locks.
Maintenance personnel also travel with the convoy in the event of equipment failure.
Transport management plan that indicates UMS uses only equipment designed to operate within the loads.
It is ensured that the axle loads are within the ECOWAS transport standards. All the equipment used for cyanide transport have a preventative maintenance plan that is recorded.
The work conducted on the vehicles is based on the preventative maintenance schedule (time based or mileage base) and a discussion between the mechanic and the vehicle driver (reactive maintenance).
At the completion of every journey the vehicles are sent to the workshop to do post trip maintenance.
UMS maintains records of vehicle and trailer specifications and maintenance history.
UMS transport only one 20 Ft. container per truck
the truck consist of tractor head with 3 axels and 2 axel trailer
The weight of cyanide briquettes in a 20 foot container is 20 tons.
only one container is carried on each trailer.
The weight of the container is 2.3 tons approved by port inspection
the weight of the trailer is 6 tons seen trailer manufacturer specification.
The weight of the tractor or prime mover is 8.3 tons per truck manufacturer specification
Thus the total weight of the trailer and load is 38 tons, including fuel.
The truck & trailer is a 5 axel unit (3 axles on the tractor prime mover and 2 on the trailer), thus the weight on each axle is 8 tons per axle.
The Guinean legal maximum axle weight is 11.5 tons as based on the UMEOA and ECOWAS agreement signed 1992, meaning that the loading of axles is well within the legal limits.
UMS has 10 cyanide specific trailers, all trailers selected for the cyanide transportations meet the above mentioned specifications.
There is a planned maintenance program in place for the tractors, trailers done by agent.
The lifting equipment is inspected annually by BIVAC International.
Maintenance carried for the tractor head is by the agent (the vehicle manufacturer representative) and trailer are maintained by UMS per maintenance plan on UMS site.
The on-board computer on the truck dictates the maintenance needed, form and type of service required.

UMS has procedures to verify the adequacy of the equipment for the load it must bear.
Transport management plan and ERP ensures that the trucks and trailers conform to the ECOWAS & UMOA treaty.
UMS maintains a register of trucks and trailers used for the transport of cyanide and Conformities.

Prior to every convoy, equipment is checked using the Cyanide Equipment Checklist this product based checklist is only for cyanide transport.
The trailers are consistently operated at load levels below their legal and maximum load design.
The design load maximum capacity of the trailer is 60 ton.
The net load of cyanide shipments is 24 tons.
Trailer load specifications of 2 axle skeleton semi-trailer.
UMS has processes to prevent overloading of its transport vehicles.
And trailers used for cyanide transport are capable of transporting single 20 foot trailers.
Cyanide is delivered as solid in bulker bags put into IBC box into a 20ft container. No offload or loading is done.
The container weights are stated on the Bill of Lading that conforms to IMDG regulation.
Weights and equipment are checked to ensure that the transport equipment allocated is suitable for the task.
The cyanide is delivered in standard sea containers which are fitted on a skeleton trailer with twist locks.
It is not possible to overload the trailers because the containers are loaded by the producer with a set number of boxes with a set weight of 20 ton by the manufacturer, with the total weight of container and product being 24 tons.
The containers are sea worthy with inspection approval all containers comply with the IMDG
UMS does not contract nor subcontract any of its activities unless covered by due diligence as port operation.
UMS does not manage the loading, unloading or DE stuffing of containers.
UMS retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 1.4**

 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging.
The TMP outlines that containers must be inspected prior to loading from port to ensure that all seals are intact and warning labels and registration numbers are in place.
Transport management plan indicates UMS procedure to ensure the cyanide integrity never compromised.
Outlines the containers must be inspected before loading in order to ensure that proper labels and seals are in place.
Container is not opened for loading or offloading so it stays intact till it reaches the site.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the same seals installed by the producers.
The container is also checked at the Mine, upon arrival at the mine site based on the delivery.
The ERP explains how the transport is done with packaging consisting of plastic lined wooden boxes packed into 20 foot containers and sealed.
The integrity of the boxes and containers can only be compromised if they are damaged during handling or if moisture/water/liquids enter the containers or the boxes in case of an accident on road.

The container is sealed by the producer and only opened at the mine.
due to the nature of the cargo and the danger associated with it, the cargo is escorted by police, customs, military and other authority to ensure the cargo integrity and packing is never changed and the containers is never opened till destination.
Furthermore, a Container Interchange Report is completed and jointly signed by the shipper's representatives and the cyanide transporter's representatives to agree on any damage that may be sighted on the container.

The Vehicle Trip Checklist is completed and signed at the mine confirming the condition, on delivery of the container and a section reports on container seals, labelling and general container condition.
This checklist is counter signed by the mine representative confirming no irregularities on container, seal and vehicle checklist inspections are carried out when the convoy stops during the day and overnight done by the safety officer.
Placards are used to identify cyanide shipment, as required by international standards.
The ERP and TMP outlines the requirement for placarding to be placed on the 4 sides of the sea containers used in the transport of cyanide.
As a control measure, the cyanide is trucked in convoy under the escort of persons who have received training in cyanide emergency response and dangerous goods training.
Cyanide to have the following markings:
• Number UNO: 1689
• Principal class: 6 Poison
• Group packing: 1
• Exact designation of the dispatched product: sodium cyanide, Solid.
The shipping container containing the IBC's is marked with Hazchem labels on all sides
Transport management plan indicates that placards are used to identify cyanide shipments.
the container check list identifies the placarding to be on all sides of the container during transport full to mine site and to be removed on the journey back after discharge.
The procedure refers specifically to placarding as per the IMDG Code requirements and ADR emergency response.

In addition, the last truck in the convoy at the back also has a large sign which states "Dangerous Convoy "
Prior to every convoy, vehicles and equipment are checked using the cyanide Equipment Checklist.
Completed checks form part of the convoy documentation.
A Preventative Maintenance procedure exists for equipment used in the transportation of cyanide.
Prior of every trip inspection is done.
At the completion of every journey the vehicles journey plan and the post trip inspection are sent to the workshop.
The work conducted on the vehicles is based on the preventative maintenance schedule (time and mileage based).
Work orders are raised for all work conducted for any issue the agent is contacted and the vehicle is sent there.
UMS maintains records of vehicle and trailer maintenance history.
Once every vehicle returns, if any issues are found it is sent to the workshop or to the agent .
The work is based on driver input, as well as kilometer and hours.

Fleet Preventative Maintenance Procedures states that preventative maintenance is performed after every trip if the vehicle don't move then is done every 2 month on each vehicle indicating that the maintenance plan is trip ,mileage and time based any that comes first eliminating any vehicle skipping the maintenance net.
Preventative maintenance tasks are identified as broadly: - Inspection, preventative maintenance, oil changes and tune-ups.

It includes detailed maintenance requirements (preventative and breakdown maintenance) for tractors and for trailers though the tractor maintenance is managed by the Agent minor repair on road is done by UMS
however for any major repair on road a replacement head (from the cyanide transportation truck) is sent to complete the task and the agent is contacted to send his engineers to repair the broken-down vehicle (the replacement process is captured in the operation risk assessment).
The trailer maintenance is done BEFORE AND AFTER every trip.

Limitations on operator hours are managed through the convoy planning stage.
The routes have been appropriately planned with set breaks and designated overnight stops.
Convoys can only move between 6:00 am and 06:00 pm after that time the convoy need to have a prior written permission and accompanying HSE measures in place.
the policy specifies the maximum available hours within any 24 hour period is (12 hours);
maximum driving hours in any 24 hour period is (9 hours);
driving hours from 6 am to 6 pm
maximum allowed for continuous driving (2.5 hours) with 30 minutes break;
minimum daily rest time 180 minutes per driving hours
availability is 12hrs /day
maximum weekly driving hours (54),
working week maximum of 6 consecutive days.

UMS dose analysis of previous trip record between the convoy manager trip record and the GPRS tracking device record and close out is done and if any variance noticed an investigation is triggered to identify the reason of variation
however there was no significant variance between the journey plan and the GPRS download.
Also the convoy manager controls the driving and operating hours.
UMS's procedures require twist locks to be engaged and checked for the transportation of cyanide containers.
At the Port, containers are secured using four twist locks.
The engagement of the twist locks is checked prior departure using the cyanide inspection checklist.

Transport management plan ensures load does not shift.
Trailers are equipped with twist locks that are engaged and checked when transporting cyanide.
4 Twist locks are used to secure the container.
Cyanide boxes come from the producers and the containers are not opened.
The box sizes are such that the boxes fit tightly in the container and do not move.

The container matches the trailer size.
Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered.
In the event of demonstrations or accidents or natural hazards being encountered during transportation.
The Execution of Transport Procedure directs instructions the convoy to stop and the Convoy manager to contact senior management as per TMP
Transport management plan requires the mine site to be contacted before the departure of the convoy.
Other security related issues are covered in detail in the ERP (copies carried by convoy leaders) which would be used by the convoy leaders, in consultation with UMS management, to make appropriate decisions, depending upon circumstances in consultation with Guinea Authorities.
UMS has a HSE policy that commits to training staff HSE matters, misuse of drugs and alcohol and preventative actions relating to drug and alcohol.
The policy also notes that UMS will carry out testing (random and for cause) for use of drugs and alcohol and in the event of a positive test will result in actions including further preventative training.
the policy ensures that drugs and alcohol are controlled.
There is a briefing before every trip on the use of alcohol and drugs and this is also a part of the risk assessment of the pre-trip inspection clearly stating alcohol and drugs are prohibited (includes a section on Drug and alcohol policy).
before every trip an alcohol test is carried out also during the trip every morning an alcohol test is carried out using a breath analyzer.
Policy includes use of drugs and alcohol on the company premises or whilst driving and the consequences of positive test results.
The driver also signs that he accepts the results in case there is a test for alcohol or a drug test.
The policy and company recognize risks related to alcohol and drug consumption and will provide appropriate support and awareness within the bounds of the policy.

Retention of records documenting that the above activities have been conducted.
Records are maintained and were inspected for relevant parts of this element as indicated adjacent to each finding.
If the reading is positive, it is sent to the hospital to confirm the reading.
UMS has ISO 9001 Certificate, keeping records is mandatory for all the activities.
UMS does not contract nor subcontract any of its activities unless covered by due diligence as port operation.
UMS does not manage the loading, unloading or DE stuffing of containers.
UMS retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence.

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

X in full compliance with

The operation is ☐ in substantial compliance **with Transport Practice 1.5**

☐ not in compliance with

X Not applicable

Summarize the basis for this Finding/Deficiencies Identified:

UMS are not responsible nor contracted to manage cyanide consignments by sea
the scope of this audit is only land transport from port to destination..
UMS is not involved in managing sea nor ensuring compliance with IMO and IMDG
UMS is responsible for cyanide, land transport only.
UMS does not manage the loading, unloading or DE stuffing of containers.
or stevedoring .
however this requirement is covered by the due diligence done by
diligence done by ICMI AUDITOR.
and it is visible on the container on all the 4 sides the following
1- 1689 placard
2-marine pollutant placard
3-class 6 toxic placard
UMS ensure that upon collection of container from port has the needed placarding for land transport

Placards are used to identify cyanide shipment, as required by international standards IMDG and IMO DG code requirement.
the responsibility of placarding falls on the supplier or the manufacturer UMS are not responsible for placarding since they do not open or swap containers
however UMS has a stock of placard they keep in case one of the placard is damage during sea transport
the placard are supplied by the manufacturer that meets the an international standard
The ERP and TMP outlines the requirement for IBC containers used in the transport of cyanide to be placard on the four sides.
As a control measure, the cyanide is trucked in convoy under the escort of persons
who have received training in cyanide emergency response and dangerous goods training.
Cyanide to have the following markings:
• Number UNO: 1689
• Principal class: 6 Poison
• Group packing: 1
• Exact designation of the dispatched product: cyanide of sodium, Solid
The shipping container containing the IBC's is marked with Hazchem labels on all
Transport management plan indicates that placards are used to identify cyanide shipments.
the container check list identifies the placarding to be on all sides of the container during transport full to mine site and to be removed on the journey back after discharge.
The procedure refers specifically to placarding as per the IMDG Code requirements and ADR emergency response.
In addition, the last truck in the convoy at the back also has a large sign which states "Dangerous Convoy "

the operation has been carried out in accordance with the following conditions:
.1 The container was clean, dry and apparently fit to receive the goods;
.2 Packages, which need to be segregated in accordance with applicable segregation requirements, have not been

packed together onto or in the container/vehicle [unless approved by the competent authority concerned in accordance with 7.3.4.1 (of the IMDG Code)];
.3 All packages have been externally inspected for damage, and only sound packages have been loaded;
.4 Drums have been stowed in an upright position, unless otherwise authorized by the competent authority, and all goods have been properly loaded, and, where necessary, adequately braced with securing material to suit the mode(s) of transport for the intended journey;
.5 Goods loaded in bulk have been evenly distributed within the container/vehicle;
.6 For consignments including goods of class 1, other than division 1.4, the container/vehicle is structurally serviceable
in accordance with 7.1.2 (of the IMDG Code);
.7 The container/vehicle and packages are properly marked, labelled, and placarded, as appropriate;
.8 When substances presenting a risk of asphyxiation are used for cooling or conditioning purposes (such as dry ice (UN 1845) or nitrogen, refrigerated liquid (UN 1977) or argon, refrigerated liquid (UN 1951)), the container/vehicle is externally marked in accordance with 5.5.3.6 (of the IMDG Code); and
.9 A dangerous goods transport document, as indicated in 5.4.1 (of the IMDG Code) has been received for each dangerous goods consignment loaded in the container/vehicle.
NOTE: The container/vehicle packing certificate is not required for portable tanks
5.4.2.2 The information required in the dangerous goods transport document and the container/vehicle packing certificate may be incorporated into a single document; if not, these documents shall be attached one to the other. If the
information is incorporated into a single document, the document shall include a signed declaration such as “It is declared
that the packing of the goods into the container/vehicle has been carried out in accordance with the applicable provisions”.
This declaration shall be dated and the person signing this declaration shall be identified on the document. Facsimile signatures are acceptable where applicable laws and regulations recognize the legal validity of facsimile signatures.
5.4.2.3 If the container/vehicle packing certificate is presented to the carrier by means of EDP or EDI transmission techniques, the signature(s) may be electronic signature(s) or may be replaced by the name(s) (in capitals) of the person
authorized to sign.
5.4.2.4 When the container/vehicle packing certificate is given to a carrier by EDP or EDI techniques and subsequently
the dangerous goods are transferred to a carrier that requires a paper container/vehicle packing certificate, the carrier shall
ensure that the paper document indicates "Original received electronically" and the name of the signatory shall be shown in
capital letters.
Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
UMS implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The container weights are also detailed on the Bill of Lading.
The declared weight of the container is appearing on the delivery note.
The container seals are checked by the Mine upon arrival at the mine site to confirm.
UMS manages the supply custody using the TMP The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
A copy of the documents are also kept with the convoy manager during transit and the escorting by authority

Communication blackout areas are identified during the route assessment process
Where no reception exists, the Convoy Leader calls the UMS Depot before and after the reception black spot as detailed in the TMP.
All prime movers and escort vehicles are equipped with satellite tracking which is monitored at the UMS depot.
Road survey report Conakry (Km 745) –Mandiana (Loila) Compte Rendu Road Survey (accont of the road survey report)
UMS track the progress of cyanide shipments through the use of the satellite tracking system fitted to prime movers and escort vehicles.
Transport management plan indicates that cyanide shipments are tracked through using satellite tracking system.
GPS tracking is implemented for all convoys .
Convoys periodically phone UMS lead office every 60 minutes.

UMS implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The container weights are also detailed on the Bill of Lading.
A scanner is used at the Port to verify that the correct container has been placed on the selected trailer.
The container seals are checked by the mine upon arrival at the mine site to confirm.

UMS uses convoys as a means of managing the risks of road transportation, responding to emergencies and to prevent product loss.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
UMS transports and delivers cyanide sealed containers

shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
UMS implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The container weights are also detailed on the Bill of Lading.
The declared weight of the container is appearing on the delivery note.
The container seals are checked by the Mine upon arrival at the mine site to confirm.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.

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

X in full compliance with

The operation is ☐ in substantial compliance **with Transport Practice 1.6**

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS uses cell phone to communicate directly with the UMS office and emergency responders.
Vehicles are equipped with GPS satellite tracking monitored by UMS.
VHF radio used to communicate within the convoy and head office.
UMS has a mobile phone that goes on every convoy.
Communication with vehicles in the cyanide convoy is undertaken using mobile phones, and short-wave radio.
Vehicle tracking system (Galooli)
The drivers do not use the communications equipment.
The accompanying assistant driver in each truck communicates with the convoy leader and support vehicles.
The convoy manager has mobile phone and cell phone so that can call UMS head office.
Convoy managers have all the appropriate telephone numbers to communicate with UMS head office and appropriate emergency responders and emergency services during trip.
The convoy manager is obliged to call UMS every 60 minutes and a monitoring is reported daily to the client by the headquarter.
The UMS head office manages all associated communications with the mine and the cyanide producer and ICMI .

Where no reception exists, the convoy commander calls before and after the reception black spot.
The ERP contains a map showing areas without telephone reception.
Also, the GPRS tracking send alert if the trucks is parked idling for 3 minutes.
All prime movers and escort vehicles are equipped with satellite tracking which is monitored at the UMS depot.
VHF radio, headlights and horns are used to communicate incidents between vehicles in the same convoy.
The closed nature of the convoy allows trucks experiencing troubles to communicate with at least one escort vehicle and this vehicle communicates with the other.
In the event of a problem with one truck, the entire convoy stops.
The TMP indicates that communication equipment shall be tested, reviewed and confirmed before convoy departure.
All communication equipment are tested prior to departure of convoy.
Also, they are used regularly and tested during the simulation or mock drill that is done 1 time in a year.
Communication equipment (GPS, mobile phone, radio,) is periodically tested to ensure it functions properly.
The GPS tracking system is checked though is in continuous use.
Communication blackout areas are identified during the route assessment process
The Road survey report Conakry (Km 745) –Mandiana (Loila) Compte Rendu Road Survey (account of the road survey report)
UMS implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The container weights are also detailed on the Bill of Lading.
A scanner is used at the Port to verify that the correct container has been placed on the selected trailer.
The container seals are checked by the mine upon arrival at the mine site to confirm.

UMS uses convoys as a means of managing the risks of road transportation, responding to emergencies and to prevent product loss.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.

UMS transports and delivers cyanide sealed containers
Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
UMS implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seals intact.
The container weights are also detailed on the Bill of Lading.
The declared weight of the container is appearing on the delivery note.
The container seals are checked by the Mine upon arrival at the mine site to confirm.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
A copy of the documents are also kept with the convoy manager during transit and the escorting by authority
UMS does not contract not subcontract any of its activities unless covered by due diligence as port operation.
UMS does not manage the loading, unloading or DE stuffing of containers.
UMS retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence done by ICMI AUDITOR.

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

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

X in full compliance with

The operation is ☐ in substantial compliance **with Transport Practice 2.1**

☐ not in compliance with

X Not applicable

Summarize the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, there are no trans-shipping depots or Interim storage sites, as defined in the audit protocol.

Following collection from the Port, the containers are sent to client site.
At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.
and since the cargo is under the custody of the authority , the authority doesn't allow the cargo to park or be sent anywhere apart from the approved route.
UMS does not manage the loading, unloading or DE stuffing of containers or stevedoring .
placarding is visible on the container on all the 4 sides the following
1- 1689 placard
2-marine polutant placard
3-class 6 toxic placard
4- last conoy vahicle has banner indicating dangerous goods
UMS has a procedure that prohibits eating or drinking near the cyanide and needed PPE
The Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
UMS implement chain of custody processes to prevent loss of cyanide during shipment.

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.

X in full compliance with

The operation is ☐ in substantial compliance **with Transport Practice 3.1**

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS ER plan covers :
• Emergency Response Plan.Part 1: General information
• Introduction • General information - Storage at the Port • Identification • Toxicological data
• Broad outlines • Priorities • Personal protection • Emergency equipment
Part 2: Transport
• Emergency contacts • Authority and mobilization of resources • External notifications
• Transport routes • Escort • Principal prime mover • Trailers • Convoys • Formation
• Abnormal operations • Safety during transport • Arrival at mine • Completion 01 unloading
Part 3: Incident / accident
• Emergency actions • Procedures • Goal • Priority 01 actions • Initial response • Communications
• Logistic support • Equipment and materials
• Part 4: Emergency response
Accident without sodium cyanide discharge Accident with sodium cyanide discharge Accident with sodium cyanide discharge in water
Fire Emergency response equipment
. Part 5: Evaluation
• Investigation • Environmental control • Cleaning and decontamination
• Appendices
• PPSU (plan de preparation des situations d'urgences) including several scenarios (storm,
Each convoy carries along the ER plan that contain a copy of the MSDS the road risk assessment the TMP the MSDS for cyanide and a list of emergency contacts between the port and site.
the ER plan emphasizes on what to do during cyanide accident from first aid to neutralization to external responders.
This plan gets updated yearly or when the ER plan is activated or in case of a drill feedback that needs to amended.
Further UMS has dedicated 5 ambulances and 2 planes Beach craft for emergency evacuation of casualties or injuries.
convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan.
If more support is needed in which case they will report to head office or external responders
include reporting to Suppliers, Mine and ICMI for any significant incident

The ERP is appropriate for the selected transport route.
UMS manages the risks on road by protection, prevention and intervention before and during transport.
UMS control convoy using the convoy formation and reduced speeds (max 50 km / h)
The ERP details instructions in the event of emergency situations:
addresses the roles and responsibility of the convoy personnel during the below scenarios
• Accident without sodium cyanide discharge
• Accident with sodium cyanide discharge
• Accident with sodium cyanide discharge in water
• Fire ERP also lists the following abnormal operations that have been identified as potential risks along the transport route:

• The temporary closing of a road due to floods on the road
• The closing temporary of the road due to an accident/incidental along the road
• The temporary closing of the road due to civil disorders
• Access to the mine site is refused
• Container rupture
• A breakdown of the vehicles of escort
• The escort vehicle is involved in an incident/accident on the route
• The driver falls ill.

Controls during the rainy season.
In the event of abnormal operations, personnel are instructed to contact senior management before proceeding.
As all cyanide deliveries are made in closed convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan.
If more support is needed in which case they will report to head office or external responders

Physical and chemical forms of cyanide are described ln the ERP and TMP.
ERP contains response information for identified likely emergency scenarios.
The emergency response instructions developed are relevant to solid cyanide and its packaging in IBCs within 20 foot sea containers.
UMS only transport solid cyanide. The ERP has detailed the steps to be taken to neutralize and clean up residual cyanide in the event of a spill.
Collection of contaminated soil or spilled product will be sent to mine for disposal, use or neutralization
Copies of the MSDS are also carried on the convoy is part of the TMP and the ER plan.
Plan only deals with solid cyanide (cyanide briquettes), and if they are spilled into water and in case there is an accident with ACID truck.
However, currently the only form of cyanide that is transported is solid in a sealed sea containers.
The TMP and ERP consider the method of transport.
The documents are based on road transportation between the Port and Mandiana (Loila)-Karta Mine in Northern Guinea.
The documents were developed as an outcome of the route assessment process and consequently consider risks of the transport infrastructure and the method of transport.
UMS only undertakes road transport and all risk assessments cover road transport.
Route risk assessments are fully reviewed every year and redone every 5 years.
But feedback is done on every trip.
The TMP and ERP consider the aspects of the transport infrastructure.
The documents were developed on the outcomes of the route assessment process and
consequently consider risks of the transport infrastructure and the method of transport
The plan considers all aspects of road transport only since sea, air and railway are not part of the scope though UMS has dedicated 2 planes Beach craft s for emergency evacuation of casualties or injuries
these planes are not meant for cyanide transport but victims only.
The TMP and ERP consider the design of the transport vehicles as it is specifically drafted around the transport of solid cyanide in shipping containers on semi-trailers.
the vehicles load capacity and ability is much higher than required.
The emergency situations described in the ERP are based on prime mover and trailer configurations with 20 foot containers.
Transport management plan, considers the design of the transport vehicles which it was specifically made for transporting the 20ft containers.
UMS only uses skeleton and Flatbed trailers to transport containers containing boxes of cyanide briquettes in sea worthy container.
They do not use ISO tanks and transport only solid briquette.
there is no Interim storage reference to principle 2
The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situation.
The ERP contains emergency response guides to be followed in the event of an incident involving cyanide:

• Accident without sodium cyanide release/spill
• Accident with sodium cyanide discharge
• Accident with sodium cyanide discharge in water
• Fire The ERP details the specific actions to be taken by UMS members in the event of an emergency:
emergency response team include:
Escort Leader
Escort Vehicle 1 Driver
HSE Officer
Police
Driver
Assistants Drivers
Escort Vehicle 2 Driver
A flow diagram is included in the ERP that outlines
The flow of information in the event of a cyanide incident during transport.
general likely Scenario
Accident road -Thunder fire-Road accident with dangerous material-Health of staff during driving
Robbery and attack or social unrest, stealing, and strikes.
Products spill –Fire-Explosion-Floods-Heat stress-Storms .
Earthquake - mud slide
In case of cyanide accident ministry of environment
Security of chemicals with the help of the police.
Ministry of health
roles and responsibility and the communication flow are in the ERP including reporting to suppliers, end user , local authority and ICMI
permit from authority to transport HAZARDOUS goods.
The mine site primarily provides logistical support in the event of an emergency (crane, security etc.) in case the incident is within vicinity or close by.
The roles of the Police, Fire Brigade and Hospitals are in accordance with their duties.
As noted in 1.1.7 external responders were advised of their roles during an emergency response through letters and training coordinated by UMS and mock drills that they participated.
Police undergo training and mock drill before participating in convoys.
In the event of an emergency, police are responsible for security of product and the military for crowd control functions which is not outside the scope of their normal roles also because the police are trained on cyanide by UMS.
External agencies including police, fireman, hospital etc. are also involved with incident scenario training simulations or mock drill at least once per year.
The communities have not been allocated a major role during an emergency only crowd control and disseminate information not to use water until approved by authority, however the communities are informed and trained and consulted with all details.
The majority of scenarios will be responded to by the convoy's own dedicated emergency response team.
Any outside additional assistance would be requested or coordinated through UMS head office and the Ministry of Security
The possibility of using outside medical responders has been considered and a communication through letters and brochures
UMS management inform ICMI of the following incidents
a) any Human exposure ;
b) any cyanide release or loss of containment or loss of control;
c) any wildlife fatalities by cyanide
d) Theft of cyanide.

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

X in full compliance with

The operation is ☐ in substantial compliance **with Transport Practice 3.2**

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

UMS provides emergency response training for all staff
UMS has developed a training matrix for transport personnel.
This matrix identifies the minimum training requirements for escort personnel and convoy drivers:
First aid
Training on cyanide awareness
Site induction
Chemical response
Responding to accidents to incidents
Crowd control
Defensive driving
Additional training is provided to personnel involved in responding to an emergency:
• Initial response and oxygen administration
• PPE
• Sodium cyanide safety
• Emergency response
• MSDS
• Emergency fire and evacuation brochure
• Roles and responsibilities

Emergency simulations are carried out 2 per year where specific aspects of the emergency plan are evaluated.
A training simulation involving external responders is conducted at least once per year.
Records of this training are kept for future reference.
Transport management plan states that involvement and training of stakeholders in case of emergency.
Personnel are trained on the SAMSUNG & Orica training module and using their presentation.
Critical task and critical position procedure indicates the training and competency needed for all jobs includes emergency response.
Convoy team members are trained in emergency response.

Further UMS has dedicated 5 ambulances and 2 planes Beach craft s for emergency evacuation of casualties or injuries.
There are descriptions of the roles and responsibilities in the ERP.
the ERP contains four critical emergency response guides to be followed in the event applicable in case of an incident involving cyanide:
• Accident without sodium cyanide discharge
• Accident with sodium cyanide discharge
• Accident with sodium cyanide discharge in water
• Fire

Other scenarios'
Accident road -Thunder fire-Road accident with dangerous material-Health of staff during driving
Robbery and attack or social unrest, stealing, and strikes.

Products spill –Fire-Explosion-Floods-Heat stress-Storms .
Earthquake - mud slide

The ERP details the specific actions to be taken by UMS members in the event of an emergency:
• Escort Leader
• Escort Vehicle Driver
• HSE Officer
Police
Driver
Reserve Drivers
Assistant Drivers
Escort Vehicle 2 Driver
A flow diagram is included in the ERP that outlines the flow of information in the event of a cyanide incident during transport.
The ERP also outlines key commitments of the cyanide manufacturer.
UMS personnel are trained on roles and responsibility in relation to what their role is during a spill incident and what PPE they should use and if there is an overlapping roles.

UMS has a checklist for emergency equipment that is available during transport or along the transportation route.
Equipment lists are provided in the Appendix 3 of the ERP.
Checklists include the presence of equipment required and also check the state (good/ bad) of equipment.
Transport management plan escort vehicles must be equipped with the appropriate equipment and thoroughly checked before the start of the convoy.
UMS retains an inventory of emergency equipment available in the main yard in case of need to mobilize for an incident.
The procedure also states the equipment needed per convoy.
The equipment is checked per trip and monthly expiry and test are done per inspection.
UMS has a checklist for necessary emergency response equipment also health and safety equipment include PPE that is checked before each convoy.
Checklists include the presence of equipment required also check the state equipment condition or status (good bad).
Copies of these completed forms were filed and copy goes with the convoy manager..
The Convoy escort vehicles carry all the necessary emergency response equipment that may be required for cyanide emergencies during the convoy routing.
UMS has procedures to inspect emergency response equipment and assure its availability when required.
The ERP outlines the requirement to check emergency response equipment prior to each convoy departure.
The convoy cannot leave unless all equipment is available and in appropriate condition.
The HCN detector is also tested and sent to the manufacturer when due for calibration every 12 months(drager) when it's not possible to send for calibration new HCN detector is bought
UMS do not contracts nor subcontract other entities to conduct any of the activities required in Transport Practice 3.2 or has designated other entities to conduct emergency response activities,
however external responders roles and responsibilities are defined in 3.1
UMS does not contract nor subcontract any of its activities unless covered by due diligence
UMS retain the full responsibility of the operation and the only function that is subcontracted is the port or stevedoring and this is covered by the due diligence done by ICMI AUDITOR

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.3**

 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ERP has the contacts list that are relevant during an emergency with their appropriate work position.
The ERP and associated documents contain procedures and current contact information for notifying the shipper, client/ receiver/consignee, outside responder, providers, medical facilities and ICMI ,generally stakeholders during an emergency.
.
The ERP includes a contact list of all the staff, companies that must be contacted before each voyage is undertaken. This includes supplier, shipping line, Stevedores, clearing agent, government agencies, client and UMS representatives.
A flow diagram is included in the ERP that outlines the conveying of information in the event of a cyanide incident during transport.
In the event of an emergency incident, it is the escort leader who contacts UMS and UMS contacts the required people outlined in the flow diagram.
UMS ERP procedure section B3 demand UMS management inform ICMI of the following incidents
a) Human exposure that requires an action by an emergency response team, such as decontamination or treatment. ;
b) release which enters natural surface waters, ;
e) A transport incident requiring emergency response for cyanide release;
f) Events of multiple wildlife fatalities where cyanide is known or believed to be the cause of death
g) Theft of cyanide.

UMS has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.
The ERP requires a review of the Contacts List prior to the convoy departure.
nevertheless the ER plan is reviewed every year which include the contact list
also when the ER plan is activated , this to ensures that the list is kept up to date.
The Transport Preparation procedure designates it the responsibility of the Health Safety Security and Environment Officer / Convoy Leader to ensure that contact numbers are checked and validated prior to departure.
Updated annually when all procedures are due for update.
By using the drill, it would assess the effectiveness of the ER plan

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

X in full compliance with

The operation is ☐ in substantial compliance **with Transport Practice 3.4**

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ERP and TMP contain 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.
In the event of a spill, all cleaning will be carried out by UMS personnel are first required to contain the spill
or discharge as soon as possible to avoid greater contamination of the site.
Residual cyanide will be recovered and neutralized according to the procedures for neutralization which were established by the manufacturer.
Recovery and treatment of Spills goes with the following steps :
Recovery of Solids;
Neutralization or removal of soils;
Treatment and or disposal of soils;
reclamation of Sodium Cyanide;
Transport of contaminated materials;
Neutralization; and
Water Resource Treatment.
UMS has emphasis in the ERP not to use chemicals in water bodies.

All debris and waste are sent to the mine for disposal since it contains cyanide.

Both the ERP and TMP have statements prohibiting the use of chemicals such as sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to surface moving or underground water.
The ERP details the negative implications of using sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to surface moving water.
the ER plan roles and responsibility section state "if any spill occurs UMS and the authority will notify affected communities **not** to use or drink water until is safe to do so".
for Surface or stagnant water ferrous sulfate or peroxide can be used , but for moving water or underground water no chemical is used. In the event of a spill, all cleaning will be carried out by UMS. Personnel are first required to contain the spill
or discharge as soon as possible to avoid greater contamination of the site.
Residual cyanide will be recovered and neutralized according to the procedures for neutralization which were established by the manufacturer.
Recovery and treatment of Spills; Recovery of Solids; Neutralization or removal of soils;
Treatment and or disposal of soils; reclamation of Sodium Cyanide; Transport of contaminated materials;
Neutralization; and Water Resource Treatment.
Not to use chemicals in water bodies.
All debris and waste are sent to the mine for disposal since it contains cyanide.

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

X in full compliance with

The operation is ☐ in substantial compliance **with Transport Practice 3.5**

☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The system reviews all procedures include ER plan every year.
Also the management reviews were all recorded.
Incidents are reviewed especially emergency situation and strategic decision that are made.
The internal audit evaluates the effectiveness of the system.
UMS has provisions for periodically reviewing and evaluating the adequacy of its plans.
UMS has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current
The ERP requires a review of the Contacts List prior to the convoy departure.
This ensures that the list is kept up to date.
The ERP has had yearly revision since its development.
Yearly review of the road risk assessment are identified and review of the procedures are updated yearly.
generally the ER plan is reviewed on the following basis
1-yearly review
2-internal audit .
3-after a mock drill .
4-regulation change .
5-after accident or incident .
6-if there is a change in the company policy
7-change in the international standard

UMS conducts at least 1 mock drill per year, cyanide 's mock drill is a as part of the cyanide awareness training.
Drills could be done with client or external responders.
The simulation was done with Shell, cyanide, and lime drill spill.
As discussed in Section 3.2.1, emergency simulations are carried out twice per year where specific aspects of the emergency plan are evaluated.
A training simulation involving external responders is conducted at least once per year.
the drill done by UMS in order to have the escort team to react effectively and professionally in the case of a cyanide incident in workshop.
Evaluation of the Mock drill was done by Dept HSE manager
No cyanide incidents have been reported to date.
In addition the ERP contains the requirement that it is to be reviewed and implemented.
UMS has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.
The ERP requires a review of the contacts list prior to the convoy departure.
This ensures that the list is kept up to date.

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