Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

ICMI RE CERTIFICATION – SUMMARY REPORT

1.0 INTRODUCTION

1.1 Operational information.

Name of Transport facility	:	United Mining Supply Ltd
Name of facility owner	:	United Mining Supply
Name of facility operator.	:	United Mining Supply
Name of responsible manager	:	Fatoumata Binta QSE Director
Address	:	Immeuble Wazni, BP2162 – Tombo 1, Kaloum
State / Province	:	Conakry
Country.	:	Guinea
Telephone.	:	Tel: +224 620711424
Email	:	binta.bah@ums-cky.com

1.2 Description of Operation

1.2.1 Company Profile

United Mining Services founded in 2001 is a pioneering and key player in mining and oil logistics in West Africa.

With over 20 years of experience, UMS provides comprehensive and tailored logistics solutions, covering all the needs of its industrial, mining, and oil partners.

The company is an ICMI signatory since 2008. Employing around 2800 employees

Main activities:

Mining Logistics
Integrated services for the operation and export of mineral resources, supported by a fleet of over 550 trucks.

Oil Logistics
Fuel distribution for individuals through UTS and its network of 30 service stations across Guinea. Also, B2B distribution of large quantities of fuel for all industrial and mining operators in Guinea, including the Transguinean Railway project.

Air Transport
Customized air freight solutions to meet the urgent needs of partner companies through our brand United Aviation Services.

Sodium Cyanide Transport

Solid sodium cyanide is packaged in Intermediate Bulk Containers (IBC's) of 1000kg capacity. The briquettes are stored within a woven polypropylene bag, sealed with a PVC plastic liner, within a wooden crate. Packaging complies with International Maritime Dangerous Goods Code for Group 1 hazardous goods and has been subjected to the relevant tests required by the Code.

The solid sodium cyanide briquettes which are in IBC's are packed in 6-meter freight container and shipped by sea from the Consignor to the Port of Conakry, Guinea. A maximum of 20 wooden fabricated IBC's are packed into a freight container with a maximum gross weight of the product of 20 tons.

It has a workshop in Conakry with all necessary equipment for the maintenance of its fleet.

The company has a team of mechanics, welders, electricians, tires specialist, sheet metal construction workers etc.

1.2.2 Audit scope.

The audit covers the transportation of sodium cyanide by UMS from the port of Conakry to Mandiana mine. The International Cyanide transportation protocols were used as guidelines in conducting the recertification audit.

1.3 Sodium Cyanide Transportation.

UMS has been contracted by Samsung to transport sodium cyanide by road from Port Autonome De Conakry, Guinea to Mandiana mine. Prior to the arrival of a shipping vessel, UMS receives all the documentation covering the shipment from AGR and commences customs clearance processes to enable direct loading of the containers on their trucks.

UMS has a permit from the Ministry of Transport (Ministere De Transport). The permit mandates them to follow all the regulations set out by the Ministry in transporting cyanide. The route to the mine has been approved by the Ministry. The route is the only route available to drive on the mine. The number permit number is 7061/MT/SGG/CAB/2004 dated 1st of July 2004. UMS transport cyanide from the port to Mandiana mine. The distance from the port of Conakry to the mine is about 725Km.

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SUMMARY AUDIT REPORT AUDITORS' FINDINGS

United Mining Supply is:

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

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

THE INTERNATIONAL CYANIDE MANAGEMENT CODE

Audit Company:	Investor Solutions Limited - Kenya
Audit Team Leader:	Kuldip Degon, Lead & Transport Auditor
Email:	kuldip@islglobal.net

DATES OF AUDIT

The Re-certification audit of the United Mining Supply, Guinea was conducted 8th to 10th April 2025

I attest that I meet the criteria for knowledge, experience, and conflict of interest for Cyanide Code Verification Audit Lead Auditor, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.
I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the verification 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.

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

UMS has developed and implemented a procedure to guide the selection of transport routes to minimize the potential for accidents and releases or the potential impacts of accidents and releases.
There is only one national route from the port in Conakry to the mine site. The company has a procedure for selection of the transport route Ref: 01TMP.OP3 – V04 – 18/03/2025

The Road Inspection manager together with his team members are responsible for conducting the route assessment Twice a year and as when necessary. The procedure takes into consideration the following.

- Distance
- Schools & Hospitals
- Proximity to rivers and other water bodies
- Bridges and roads and the required vehicle weights along the route
- Road condition during wet and foggy conditions
- Population Density along the route
- Proximity to rivers and other water bodies
- Road Conditions
- Safe & Proper parking and sleeping areas
- Rest Places

The procedure is reviewed Twice a year or when there are significant changes in the condition of the transport route.

The procedure considers population densities of villages, towns and schools along the road from the port to the mine site. The procedure has taken into consideration the infrastructure of the route namely road conditions, bridges and construction activities on the selected route. Slopes, adjoining roads, pitch and grade, rivers, water sources along the transportation route and weather conditions have all been considered in the route selection procedure. Pitch and grade, prevalence and proximity to water body and fog have been considered in the Route Selection Procedure.

The company has implemented a system to evaluate the risk on the cyanide transport route. There is evidence of evaluation of the risks twice a year. Hazards on the transportation routes have all been risk evaluated. Records of these evaluations conducted were sighted by auditor. The Risk evaluations were conducted by the Route Survey Officer and were reviewed and approved by the Road inspection Manager of the company. Records of RRA's conducted on 03/02/25, 28/09/2024 and 02/05/2023 and 22/01/2023 were verified.

The Transport Management Plan Ref: 01TMP.OP3 – V04 – 18/03/2025 makes provision periodically reviewing the routes and getting feedback on the route condition. The plan mentions that feedback are received from the Escort leader after delivery of cyanide to the mine. Records of Feedback reports (Feuille de Report dated 13/11/22, 18/11/21 and 25/05/2020 and signed by the Escort leader were sighted. The escort leader also completes Feuille De route forms which states the times that the convoy stopped, times of departure and their locations. The 2021, 2022 and 2023 Feuille De report were sighted. Upon arrival of the convoy at the mine site, debriefing is organize by the escort leader. The debriefing involves the escort team, Guinea police and mine site representative to discuss about the issues the convoy encountered on the road, the road condition and any other changes on the road.

Hazards identified during the route survey are risk assessed using the risk assessment process described in the Route Assessment Procedure. Documented risk assessments covering each of the routes were available for review and it includes measure to control the identified risks. Risks identified during RRA, preventative measures to

mitigate the risks, feedback from the Escort Leader and truck drivers are discussed with the escort team in subsequent convoys of cyanide trucks before they depart from port to the mine.

UMS has sought input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. UMS has notified the Ministry of Transport and has secured a permit number 7061/MT/SGG/CAB/2004 dated 1st of July 2004 to enable them to transport sodium cyanide in Guinea. For each convoy of trucks doing delivery of cyanide to the mine, the ministry allocates two policemen to accompany the convoy. In addition, the "Ministre De La Securite Et De La Protection Civile" (Ministry of Security and Civil Protection), issues permit (Ordre de Mission) any time there are deliveries to the mine. These permits are issued by the Ministry for each convoy. Copies of permits and the respective dates they were issued were sighted. The permits are signed by the Controleur General de Police (General Police Officer).

A sample request letter of notification from UMS reference number DG/UMS/11/11/2022 dated 11th November 2022 to the "Ministry of Security and Civile Protection" was sighted. The Ministry of Transport is responsible for community consultation in conjunction with UMS. Evidence of letters written to government agencies and copies of permits from the Ministry of Transport and copies of permits from the Ministry of Security and Civil Protection were sighted and noted.

The company uses escorts to accompany convoys in delivering of cyanide to the mine site destination. A convoy consists of upto 10 trucks and maximum of 12 trucks. The escort team consist of the following

Up to 10 trucks.	Up to 12 Trucks
• 1 Escort Leader	1 Escort Leader
• 1 Escort Driver	2 Escort Driver
• 1 HSE Personnel	2 HSE Personnel
• 2 Policemen	2 Policemen
• 10 Assistant Drivers	12 Assistant Drivers
• 10 Truck drivers	12 Truck Drivers
• 1 Escort drivers	2 Escort Drivers
• 1 ER Vehicle Driver	2 ER Vehicle Drivers

The Escort leader is the one in charge of the convoy. The leading escort vehicle is manned by one escort driver, one armed policeman and the Escort leader who is in charge of the convoy.

UMS does not subcontract any of the cyanide transportation business.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

UMS recruitment is subject to a recruitment procedure called "recruitment procedure" ref no.01Pr.RH1. General recruitment of drivers is specified in work instruction 03IT.RH1, entitled IT driver recruitment.
The mandatory criteria are:
- Have a complete application file.
- Possess a driving license for the category concerned by the recruitment request.
- 3 years of driving experience in the category concerned by the recruitment request.
- Have a score of 10 on the literacy test and 40 in theory to access the practical test.
- Have a score above 80 on the practical test.
- Knowledge of the use of an on-board electronic device (OBC, GPS) would be a plus.
- A medical examination with excellent results, certifying aptitude for professional driving. Apart from a good general physical condition (visual acuity, poor hearing, history of heart disease) the candidate cannot be retained.

Cyanide Transport manual specifies that for any driver to join a cyanide transport convoy, the following are required:
- Be a licensed driver already hired by UMS
- Have a minimum of 3 years of seniority
- Be at least 30 years old
- Hold a Category C (Heavy Goods Vehicle) driving license for HGV truck drivers
- Hold a Category B (Light Vehicle) driving license for LV drivers
- Have completed at least 3 hazardous material (Hydrocarbon) transport trips

Before any member of the cyanide transport convoy is accepted, a rigorous check must be conducted by the transport manager or the QSE director, in collaboration with human resources. This check aims to ensure that each member has the required qualifications, has completed the necessary training, and meets the safety and compliance criteria required for this type of mission.

Recruitment is based on qualification and competency test. A driver who qualifies is appointed. The competency test is carried out by one or more managers in collaboration with Human Resource department. The candidate is notified within a reasonable time after the test. The required driver's license is Category C to drive in Guinea. Before an employee is confirmed for employment, he/she undergoes medical examination and when he or she passes he is given a fixed contract 2 years which is renewable after its expiration. Selected drivers undergo the following mandatory training.

- Route Survey Training
- Defensive driving
- First Aid
- Convoy Management
- Cyanide Awareness
- Cyanide Drill
- Use of PPE
- Emergency Response
- Role & Responsibilities of HSE Truck checklist
- Fatigue Management
- Checklist before departure
- Dangerous good awareness

- Incident Investigations
- Fire Safety

Drivers and escort leader were interviewed and were found to be knowledgeable in cyanide handling and emergency response. The operation has a training matrix which show all the training program listed above. The training matrix has the date training was organized, next training date and names of participants for each of the training programs.

UMS do not subcontract any aspect of its cyanide transportation

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

The operation is **in full compliance with** Transport Practice 1.3

Summarize the basis for this Finding/Deficiencies Identified:

UMS only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide.

UMS uses Mercedez Actros Model no. 3340 & Renault Model no. SK400 trucks of appropriate power ratings to transport cyanide to the mine. The Horsepower of Actros vehicles are 400. The Renault trucks SK400 with HP 400 are 6x4 axle configurations. UMS carries one container 20ft container on one truck. The trucks are coupled with flatbed trailers that have the capacities to load two container loads of cyanide.
Servicing and repairs of the vehicles are done by UMS workshop. Workshop services all the vehicles and also work on faults that may arise on the vehicles. There is a servicing program for servicing both Actros and Renault diesel trucks. UMS has a maintenance procedure for trucks and trailers. Servicing of the vehicles are done in accordance with the manufacturer's specification. Preventive maintenance is done at 8,000Km intervals.

Corrective maintenance is carried out immediately when a fault is identified on any the trucks. Records of maintenance history of the trucks were sighted. Tyres are checked prior to departure and again when they return to their base in Conakry. A tyre management procedure "Verification of tyre structure " indicates that the minimum tread depth at which a tire is replaced is 3mm. Only brand-new tyres are used to replace obsolete ones.

UMS uses Mercedez Actros 3340 & Renault trucks of appropriate power ratings to transport cyanide to the mine. The Horsepower of the vehicles are 400. The trucks are coupled with Flatbed trailers that have the capacities to load two container loads of cyanide.

One (1) 20ft container of cyanide are loaded on 6x4 configuration of vehicles. One container of cyanide weighs 20 tons (product). The maximum gross weight (product weight + container weight) of each container is about 23.3 tons. Maximum weight of 1x20ft containers load of cyanide loaded onto a truck tractor is 23.3 tons. The load capacities of the trucks used are 56 tons 6x4 truck configuration respectively. The weight they bear are within the Guinea axle load regulations and CEDEAO limit for public roads of 11.5 tonnes per axle. The Port Authority issues a Bon de Retour (container interchange document) which shows the condition of the containers and the net weight of the containers. The shipping documents such as the Bill of loadings covering the shipment also has the gross weight of the containers on them. Sampled copies of Bill ladings of shipments were noted.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide. One (1) 20ft container of cyanide are loaded on both 6x4 and 8x4 configuration of vehicles. One container of cyanide weighs 20tons(product). The maximum gross weight (product weight + container weight) of each container is about 23.3 tons. Maximum weight of 1x2ft containers load of cyanide loaded onto a truck tractor is 23.3 tons. The load capacities of the trucks used are 56 for the 6x4 truck configuration. The weight they bear are within the Guinea axle load regulations and CEDEAO limit for public roads of 11.5 tonnes per axle. The Port Authority issues a Bon de Retour (container interchange document) which shows the condition of the containers and the net weight of the containers. The shipping documents such as the Bill of loadings covering the shipment also has the gross weight of the containers on them.

UMS do not subcontract any aspect of its cyanide transportation.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The company has a procedure to ensure they maintain the integrity of the producers packaging. This evident in Cyanide procedures which describes the producers packaging. Solid sodium cyanide briquettes from various suppliers are packaged in bulk bags with polyethylene linings and encased in Intermediate Bulk Containers (IBC's). One (1) ton of cyanide briquettes are in each IBC. The IBC's are then packed into 20ft containers and sealed with container seals before shipping the product. The shipping containers are sealed for the entire duration of shipping by sea and transport of the product to the mine site destination. UMS has a process for inspecting the containers to ensure that all seals are in place and the containers are in good condition and intact till the convoy reaches the mine site. The inspection is carried out by the Escort Leader who completes a vehicle pre-departure checklist. A Container Checklist form is also completed. The seal numbers, container numbers and placards which are affixed on the containers by the manufacturer are inspected. Copies of Container Interchanges were sighted. The Container interchange is issued by the Guinea Port Authority, and it shows the condition of each container at the time of loading from the port.

At stopping points along the route, the escort leader inspects the containers and the trucks to ensure that all are containers are intact. Also, the seal numbers on the containers are written on the Ordre de Mission. Upon receipt of the containers at the mine site, the mine supervisor receives the consignment and checks the overall condition of the containers and their seals to ensure that all are intact and the signs off the Ordre de Mission and the container checklist and stamp them to prove that everything about the containers are intact. Copies of signed and stamped delivery notes were sighted and noted during the audit

The cyanide supplier has visibly placard on all four sides of the container as required by the International Maritime Dangerous Goods Code (IMDG code). Clause 3.3 (Signalisation) of the cyanide procedure manual states that solid sodium cyanide trucks and containers are placard with the required labels in accordance with the IMDG Code. Placards are displayed on all four sides of the freight container. The required placards namely Marine pollutant and Hazard Class 6 and Cross bones, UN number 1689 are displayed in front and at the rear of the trucks and the shipping containers. Pictures of these placards are also in the Container Checklist and are inspected prior to the departure of the convoy.

UMS has implemented a safety program that includes Vehicle Inspections prior to departure of a convoy. The trucks & trailers are inspected prior to departure. Pre-departure inspections are carried out on the trucks before the trucks depart for the mine. The trucks are also inspected any time the convoys stop for a brief rest or stop for the night. The escort leader conducts vehicle inspections and completes a pre-departure checklist. The pre-departure checklist is signed off by the Escort leader and the driver. Copies of completed pre-departure checklists were noted. Any defects identified during pre-departure inspections are fixed immediately by the workshop mechanics before departure of the convoy by raising a work order.

UMS uses Mercedez Actros Model no. 3340 & Renault Model no. SK400 trucks of appropriate power ratings to transport cyanide to the mine. The Horsepower of Actros vehicles are 400. The Renault trucks SK400 with HP 400 are 6x4 axle configurations. UMS carries one container 20ft container on one truck. The trucks are coupled with flatbed trailers that have the capacities to load two container loads of cyanide.

Servicing and repairs of the vehicles are done by UMS workshop. Workshop services all the vehicles and also work on faults that may arise on the vehicles. There is a servicing program for servicing both Actros and Renault diesel trucks. UMS has a maintenance procedure for trucks and trailers. Servicing of the vehicles are done in accordance with the manufacturer's specification. Preventive maintenance is done at 8,000Km intervals.

Corrective maintenance is carried out immediately when a fault is identified on the trucks. Records of maintenance history of the trucks were sighted. Tyres are checked prior to departure and again when they return to their base in Conakry. A tyre management procedure "Verification of tyre structure " indicates that the minimum tread depth at which a tire is replaced is 3mm. Only brand-new tyres are used to replace obsolete ones.

The operation has a Fatigue Management policy. The policy stipulates that the maximum driving hours are 2hrs 30 mins and 30 minutes rest. The maximum driving time during a 24hrs is 9hrs. Off duty hours for 7 rolling days a minimum break of 2days is required for each driver. All staff undertake a mandatory annual leave. Journey plans which show the times a convoy stops for a brief rest and refreshment break, prove that UMS strictly adhere to the Fatigue Management Policy. The stopping points for rest and nights stops are stated. Copies of journey plans were noted. GPS tracking system mixtelematic is installed on the trucks also indicate that drivers abide by the driving hours. The operation has a mandatory designated rest stops along the transport route. The TMP states that it is prohibited for cyanide trucks to drive in the night. This is evident by the times the convoy stopped which are recorded on the journey plans and records of GPS reports. Records of journey plans were sighted by auditors. Twist locks are used to secure the shipping containers on the trailer to prevent load from shifting. The twist locks are inspected and noted on the pre-departure checklist. Both flatbed and skeletal trailers are equipped with eight (8) twist locks for the purposes of securing the freight container to the trailer. No trailers with defective twist locks are used for loading. The checking and servicing of twist locks are included in trailer maintenance program. Twist locks are inspected prior to departure of vehicles to the port as well as whilst on road during stops. The outcome of vehicle inspections including twist locks are noted on the pre-departure checklist.

The TMP notes that in the event of civil unrest, severe weather conditions the convoy will stop at a safer place along the route, inform its head office and wait till the situation is under control. The process of taking this action to suspend the movement of the convoy is initiated by the escort leader. The Escort leader through his head office will communicate to the mine. When the weather condition or civil unrest is over, the green light for them to continue with the journey is given by the head office in conjunction with advice from the mine site. The RRA also addresses conditions such as severe weather (heavy rains, storms etc.) and civil unrest. All evidence verified and noted by auditors.

The company has a Drug and Alcohol policy that prohibits the use of drugs and alcohol during working hours. The policy prohibits the use of alcohol during working hours. It also prohibits the possession and sale of drugs and alcohol. Random spot tests are carried out on workers on probation. Alcohol & Drug testing is also carried out periodically on workers including drivers. The Breathlyzer AlcoBlow Rapid Test is the instrument used to carry out the test. The equipment shows "Pass" or "Fail". The convoy leader is responsible for conducting the random alcohol test on drivers and other staff. Records of Alcohol tests results conducted were verified.

The operation has a Retention of Records procedure. Documents are retained for a maximum of 5 years before being destroyed. Contents of procedure was scrutinized and found to be appropriate.

UMS has implemented a safety program that includes Vehicle Inspections prior to departure of a convoy. The trucks & trailers are inspected prior to departure. Pre-departure inspections are carried out on the trucks before the trucks depart for the mine. The trucks are also inspected any time the convoys stop for a brief rest or stop for the night. The escort leader conducts vehicle inspections and completes a pre-departure checklist. The pre-departure checklist is signed off by the Escort leader and the driver. Copies of completed pre-departure checklists were noted. Any defects identified during pre-departure inspections are fixed immediately by the workshop mechanics before departure of the convoy by raising a work order.

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Corrective maintenance is carried out immediately when a fault is identified on any the trucks. Records of maintenance history of the trucks were sighted. Tyres are checked prior to departure and again when they return to their base in Conakry. A tyre management procedure "Verification of tyre structure " indicates that the minimum tread depth at which a tire is replaced is 3mm. Only brand-new tyres are used to replace obsolete ones.

The operation has a Fatigue Management policy. The policy stipulates that the maximum driving hours are 2hrs 30 mins and 30 minutes rest. The maximum driving time during a 24hrs is 9hrs. Off duty hours for 7 rolling days a minimum break of 2days is required for each driver. All staff undertake a mandatory annual leave. Journey plans which show the times a convoy stops for a brief rest and refreshment break, prove that UMS strictly adhere to the Fatigue Management Policy. The stopping points for rest and nights stops are stated. Copies of journey plans were noted. GPS tracking system mixtelematic is installed on the trucks also indicate that drivers abide by the driving hours. The operation has a mandatory designated rest stops along the transport route. The TMP states that it is prohibited for cyanide trucks to drive in the night. This is evident by the times the convoy stopped which are recorded on the journey plans and records of GPS reports. Records of journey plans were sighted by auditors. Twist locks are used to secure the shipping containers on the trailer to prevent load from shifting. The twist locks are inspected and noted on the pre-departure checklist. Both flatbed and skeletal trailers are equipped with eight (8) twist locks for the purposes of securing the freight container to the trailer. No trailers with defective twist locks are used for loading. The checking and servicing of twist locks are included in trailer maintenance program. Twist locks are inspected prior to departure of vehicles to the port as well as whilst on road during stops. The outcome of vehicle inspections including twist locks are noted on the pre-departure checklist.

The TMP notes that in the event of civil unrest, severe weather conditions the convoy will stop at a safer place along the route, inform its head office and wait till the situation is under control. The process of taking this action to suspend the movement of the convoy is initiated by the escort leader. The Escort leader through his head office will communicate to the mine. When the weather condition or civil unrest is over, the green light for them to continue with the journey is given by the head office in conjunction with advice from the mine site. The RRA also addresses conditions such as severe weather (heavy rains, storms etc.) and civil unrest. All evidence verified and noted by auditors.

The company has a Drug and Alcohol policy that prohibits the use of drugs and alcohol during working hours. The policy prohibits the use of alcohol during working hours. It also prohibits the possession and sale of drugs and alcohol. Random spot tests are carried out on workers

UMS do not subcontract any aspect of its cyanide transportation.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

UMS vehicles have means to communicate with the head office, mine, cyanide producer and emergency responders.
Communication is by means of mobile phones and via email communication with the cyanide producer and the mines. Prior to departure of the trucks the mine and the manufacturer are informed via emails as well as cellular phones. Two sim cards from two network service providers i.e., Orange and MTN are used to communicate with the head office and all emergency responders. Contact phone numbers of all the emergency responders, mine site, cyanide supplier and the company's head office are captured in the TMP.

The communication equipment is periodically tested. The HSE dept & escort leader is responsible for ensuring that all communication equipment is tested and fully charged and carried in the vehicles at all times. The transporter's vehicles are fitted with mixtelematic GPS tracking devices. The GPS tracking system also monitors the movement of the vehicles. It is the responsibility of the escort leader to check all mobile phones and record the findings on the Equipment Checklist. Prior to departure of each convoy, all mobile phones are inspected to ensure that they are fully charged and functional. The communication equipment is inspected and tested once every week when not in use and every day when the convoy is on the road. A Convoy communication checklist is filled out with the dates, times call was made, name of the escort leader and his signature.

There are black out areas identified on the cyanide transport route. This is indicated in the RRA. Two different phone networks (Orange and MTN) service providers are used for any eventualities.

“Furthermore, when the convoy enters an area where network coverage by Orange or MTN is absent, the Escort Leader must inform headquarters immediately so that enhanced surveillance can be implemented until the signal is restored.
When the convoy leaves a network coverage area, the Escort Leader is required to immediately notify headquarters to ensure effective monitoring of the transport. This communication is intended to inform the supervisory teams of the entry into an area without coverage and to anticipate potential difficulties related to the lack of traditional means of communication. By providing an accurate status report prior to signal loss, the convoy leader ensures that headquarters remains informed of the transport's progress and road conditions, thus strengthening risk management and decision-making in the event of an incident. Upon leaving the dead zone, the convoy leader must also organize a briefing with headquarters.

GPS tracking is monitored by the information system operator when the trucks are on the road till, they reach their destination. The GPS system is monitored 24hrs. The Logistics Manager observes the tracking system from the office in Conakry. The convoy is tracked till it reaches the mine. The escort leader also calls or send text messages to the Transport manager every 30 mins notifying him of the locations of the convoy as well as the stopping points of the convoy along the route.

All stakeholders including the cyanide manufacturers, and the mine are informed of the locations of the convoy at any given time. The logistics manager sends emails to update all managers of UMS, the mine and the manufacturer of the cyanide of the locations of the trucks.

UMS has a chain of custody documentation which includes the Bill of Ladings, Customs clearing documents, Ordre de Mission bearing the container numbers, container interchange, escort equipment checklist, vehicle pre-departure checklist and MSDS of the cyanide which are sent with the convoy to the mine. Sampled copies of Ordre de mission, Bill of Ladings and pre-departure checklists were sighted.

Manufacturers MSDS is available and noted. MSDS are kept in the cabin of the vehicles and are inspected prior to departure of the convoy. Shipping records were verified.

UMS does not subcontract any aspect of its cyanide transportation

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

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

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

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

UMS has an Emergency Response Plan document no. 01PR.OP3 version 4. The ERP outlines various response actions during an incident. The plan summarizes the actions to be taken in the event of a cyanide incident whilst transporting sodium cyanide from the port of Conakry to the mine.

The ERP discusses the following.

- Emergency and contact information
- Nature of operation
- Hazard information namely physical and Chemical form of cyanide transported.
- Security provisions
- Emergency resources
- Neutralization processes
- Spill management and clean up
- Communication
- Notification of authorities
- Termination of emergency response and debriefing
- Incident investigation
- Exercises training and review
- Emergency scenarios and role and responsibilities of emergency responders

Auditors reviewed the contents of the plan and found the plan to be comprehensive and appropriate for cyanide transportation operations.

The ERP is ref no. 01pr.OP3 isappropriate for the selected transportation route. Transportation of cyanide is by road.
The distance from the port to Mandiana mine is 725Km. The ERP contains a map showing detailed route plan of the road from the port of Conakry to mine site. There is no interim storage facility.

The ERP gives a vivid description of the physical and chemical properties of cyanide. Material Safety Data Sheets that detail the chemical form of cyanide are readily available. Sodium cyanide briquettes is described in the plan as white solid briquettes. It absorbs moisture from the atmosphere. Upon contact with water sodium cyanide dissolves. When it reacts with incompatible chemicals such as acid, acid salts and other chemicals it produces HCN gas. The procedure was reviewed, and the contents found to consider the physical and chemical form of cyanide. The description was noted in the ERP.

The ERP was found to be suitable for the method of transportation. Method of transport is by usage of the appropriate vehicles with the required configurations. Transportation of cyanide is by road using trucks. The Emergency response procedure is based on the road transportation of solid cyanide in IBCs within a shipping container. The Route Risk Assessments conducted considered the following risk areas. i.e., road surfaces, rivers, bridges, population density and rail crossing. The ERP scenarios discussed in the plan are all evident that the transportation of cyanide is by road using trucks.

The emergency response procedures consider all aspects of the transport infrastructure as they were developed using the route evaluation process and hazard and risk assessment process. The ERP contains pictorial view of the

infrastructure on the road. All aspects of infrastructure which includes bridges, markets, asphalts road, curves, slopes sharp curves etc. have been considered in the ERP. The ERP was reviewed by auditors and found to have covered all aspects of the transport infrastructure.

UMS's ERP considers the design of the vehicles used for the transportation of cyanide. The company Actros and Renault trucks to transport cyanide to the mine. The Horsepower is 420 with load capacities of 55tons. 6x4 truck configurations are used with each truck carry 1x20ft containers of cyanide. The capacities of the trucks can accommodate the weights of two containers of cyanide.

The ERP outlines the following anticipated emergency situations.

- Accidents without truck rollover and spills
- Accidents with truck rollover and spills
- Accidents without rollover and spills on the ground
- Accidents with rollover and spills on the ground
- Accidents with spills on the ground and contact with water
- Accidents with spills and victims
- Fire

The various response actions and the responsibilities of all the emergency responders have all been addressed in the scenarios.

ERP spell out the roles and responsibilities of all external responders such as police, Fire Department, medical, Ambulance service and the Ministry of Environment.

Roles and responsibilities of the Escort team and outside responders namely Police, Fire service, Ambulance, hospitals and mine have been identified in the ERP. The Escort leader is responsible for the overall coordination and management of the incident. The role of the police is to assist in traffic management and keeping people away from the scene. The ERP states that UMS in conjunction with the police will notify the relevant authorities such as the Guinea Ministry of Environment. The escort leader will activate the emergency response team immediately by contacting all external responders i.e. Fire service, Hospital and Ambulance Service. The Escort team will then cordon off the area and move people upwind. Cleaning and shovelling of the solid sodium cyanide solid briquettes is the responsibility of the escort team.

The procedure further states that the escort leader is responsible for administration of oxygen to a cyanide poisoned person and hand victim over to the Ambulance when it arrives. The role of the Fire Service is to assist in case of fire and rescue of injured person. Ambulance Service handles injured persons or possible poisoned persons and transports them to the hospital. The hospital will undertake treatment of a poisoned or injured person and the administration of 100% oxygen to a victim in conjunction with cyanide antidote (Hydroxyobalamine). The Ministry of Transport and Civil Protection will advise other road users about possible roads that vehicles can pass. The Ministry of Environment responsibility is to give expert advice on remediation measures and supervise clean-up of spill.

Mine will be responsible for receiving the recovered container and contaminated soils and properly neutralize. The mine will be fully involved in the recovery of the container and its contents in case the incident occurs close to the mine site. These above role and responsibilities are stated clearly in the plan. The aforementioned roles and responsibilities as spelt out in ERP were noted. Letters of notification to hospitals in towns along the route and all other external emergency responders were sighted.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

UMS has a training program for all drivers and escort team. The transporter has a training matrix which includes Emergency response training and mock drills. Emergency response training is organized annually. The training covers Symptoms of cyanide poisoning, Correct use of individual protective equipment and Decontamination. Training was conducted by a qualified trainer. Selected drivers and escort personnel were interviewed to test their knowledge about cyanide and were found to be knowledgeable in cyanide and emergency response. Copies of training records were verified and noted

Specific duties and responsibilities have been assigned to personnel in case of an incident. Roles and responsibilities for UMS employees are spelt out in the Emergency Plan under various scenarios of incidents. Drivers' roles in an incident are to park at safer place off the road and switch off the engines of their vehicle and assist the police in directing and moving people away from gathering at the incident site. Escort team will be responsible for keeping people away from the incident scene, cleaning and shovelling the cyanide briquettes into a sealable container and transport it to the mine. The Escort leader is responsible for the overall management of the incident in conjunction with relevant government agencies.

UMS maintains a list of all of the emergency response equipment that should be available during the transport of cyanide. The ERP has a list of equipment titled Materiel de Securite de Cyanure (Escort equipment).

- Tyvek Overalls
- Full face respirator with canisters
- Spare Cartridges (A2B2E2K2B3)
- Gloves
- Rubber boots
- Safety triangles
- Tarpaulin
- Cyanide Antidote – Cyanokit
- First Aid Kit
- Safety triangles
- Caution tape
- Machete
- Pickaxe
- Breathalyzer (Alco Blow brand)
- HCN Gas detector (Draeger)
- Empty big sacs
- Danger signs
- 200 litres drum of water
- water
- Ferrous sulphate monohydrate
- Safety pins
- Stretcher
- Spill kit
- 100% Oxygen
- Shovels
- Brooms

Prior to departure of the convoy the above equipment's are checked and a Escort equipment checklist form completed by the Escort leader. The escort equipment's are kept in the escort vehicle which accompanies cyanide convoys to mine site destination. The equipment is kept in the office of the Logistics Manager when not in use. The HCN detector was calibrated as per manufacturers recommendations. The cyanide antidote is in good condition to be used. Oxygen cylinder is checked regularly. Cyanide Antidote is kept as per manufacturers recommendations and expiry date is checked regularly. All the equipment were inspected and were found to match with the quantities of each item on the equipment inventory list.

The operation has Health and Safety equipment and is available and ready for use should it be required. The equipment travels with the convoy to the mine site and can be used when an incident occurs. The PPEs are Tyvec overalls, Rubber Boots, Gloves, Full Face respirator with canisters and helmets. Auditors inspected each emergency response equipment and checked with the Escort Equipment Checklist. The escort leader is responsible for keeping and maintaining the emergency equipment and PPE's.

The ER equipment are inspected prior to departure of a convoy. The escort equipment checklist are completed after each inspection. The ERP states the emergency equipment are inspected periodically and prior the departure of the convoys. Inspection of the ER equipment is carried out once a week when not in use. Any obsolete ones are immediately replaced. Copies of equipment checklist were verified.

UMS do not subcontract any of the above activities.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has a procedure for current contact for notifying the shipper, regulatory agency and outside responders.

The ERP has contact list of all the stakeholders. The operations ERP has a list of current contact phone numbers of the cyanide producer, the mine, Ministry of Environment, police stations along towns and villages, hospitals and Ambulance services. Even though communities will not have direct role in an incident, the Ministry of Environment has direct consultation with them. The phone numbers and contact people are checked annually and as when necessary and any changes in the contact persons and phone numbers amended. Records sighted are indicative that procedure is adhered to.

The transporter has a system in place to ensure that emergency contact information is kept current ERP addresses the process to ensure that internal and external notification and reporting procedure are kept current. The procedure focuses on the periodic updating of contact information specifically and the testing of each contact number on a regular basis. Confirmation of the implementation of the procedure was done through calling some of telephone numbers. Sampled contact phone numbers were called by auditors to check whether they are valid. All the contacts were found to be current.

UMS's Transport Management plan states clearly that in the event of the following significant incidents the company will notify ICMI accordingly. The significant incidents are listed as follows.

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

Procedure was verified and noted by auditors.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

UMS has a procedure for remediation such as recovery of neutralization of solutions, neutralization and decontamination of soils and other contaminated media, management and/or disposal of clean-up of spills. Various Clauses of the ERP address spills and decontamination, neutralization of solution, neutralization of contaminated soils, control of contaminated pond and water dams, control of large reserve of stored water, Control of contaminated water flowing, Use of neutralizing chemicals such as Ferrous sulphate monohydrate, sodium hypochlorite and Hydrogen peroxide.

The procedure further describes the processes of cleaning up solid spills by shoveling the cyanide briquettes into a sealable container, scooping the topsoil in the area where the spill has occurred and sending it to the mine site for neutralization and proper disposal. The clauses explains that Ferrous sulphate and sodium hypochlorite are to be used with caution on contaminated soil and equipment (PPE's, cleaning equipment) respectively. The procedure mentions that these chemicals are not to be used in rivers or surface waters. The detailed process of the remediation measures was scrutinized by auditors and noted.

The ERP prohibits the use of neutralization chemicals into surface water. The clause states that under no circumstance should Sodium hypochlorite, Ferrous Sulphate and Hydrogen peroxide be used to treat cyanide that has been released into surface water. Statement prohibiting the use of neutralizing chemicals namely Ferrous sulphate, Sodium hypochlorite and hydrogen peroxide noted.

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

The operation is **X in full compliance with** Transport Practice 3.5

Summarize the basis for this Finding/Deficiencies Identified:

There are provisions for periodically reviewing and evaluating emergency procedures adequacy and they are being implemented.

The ERP makes provision for reviewing and evaluating the plan annually or as when changes occur. Evaluation are done after an incident, following emergency response exercises and during annual Route Risk Assessments. When significant or critical changes have been observed or reported, the contents of the ERP and the relevant working documents and forms are reviewed.

The current review of the ERP was on 18th March 2025.

There are provisions for periodically conducting mock emergency drills and they are implemented. Mock drills are organized annually. Mock drills are part of cyanide awareness training. Mock drills covered separate responses to cyanide releases and responses to cyanide. exposures. Records of mock drills organized in 2022, 2023 and 2024 were sighted. Mock drill reports for the were sighted. A review of mock drill reports and interviews of selected participants confirmed that mock drills have been completed in accordance with the company's commitments. Records of training Attendance Register with the names of the participants were noted.

There is a procedure to evaluate the emergency performance after its implementation and revised when necessary. The ER procedure is updated after an incident or if there is a change in process or equipment. No incidents involving cyanide transport have occurred during the past years.

After a mock drill all non-conformances are captured in a mock report with recommendations where required and discussed verbally with the escort team. Following the annual mock drill, a review of the ERP is undertaken and updated as required.