

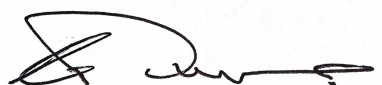
**INTERNATIONAL CYANIDE MANAGEMENT
INSTITUTE**

**Summary Transportation
Recertification Audit Report**

**Vehrad Transport & Haulage
Tema, Ghana**

27 to 28 May 2024

**For The
International Cyanide Management Code**



Name of Operation: Vehrad Transport & Haulage - Transportation
Name of Operation Owner: Vehrad Transport & Haulage
Name of Operation Operator: Vehrad Transport & Haulage
Name of Responsible Manager: Mr. Nazih Husseini,
General Manager
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P O Box GP 2683, Accra
Country: Ghana
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E-Mail: nazih.husseini@vehradtransport.com

Location detail and description of operation:

Vehrad Transport and Haulage Ltd (Vehrad) are contracted as a cyanide transporter for various International Cyanide Management Institute (ICMI) certified manufacturers and suppliers to transport solid cyanide (briquettes) by road from Tema and Takoradi harbours to their depots and client mines in Ghana, Burkina Faso, Ivory Coast, Guinee, Niger and Mali. Vehrad's main operations base is their Tema yard, located at Tema Heavy Industrial Area Plot16/17/18, approximately 4 kms from the Tema harbour, within the Greater Accra region.

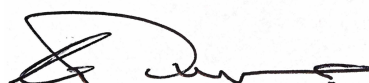
Containers are delivered from the Quay to the Meridian Port Services Stevedores MPS Container Depot, where they are stacked and stored separately. MPS, which subscribes to the IMDG Code, controls and monitors the containers. Vehrad's Cyanide Code responsibilities commence once the containers are placed on the transport vehicles in the MPS storage area.

Vehrad clears the consignment, and Vehrad's vehicles collect the containers with the documentation and manage them under a Transport Management Plan (jointly agreed between the supplier and the mine).

In order to save on container demurrage and provide off-mine storage, most cyanide containers now received from cyanide producers and consignors are de-stuffed and stored in a Vehrad owned and managed Customs-bonded warehouse/s solely containing cyanide boxes, whilst they await repackaging into sparge tanks, or re-stuffing into Vehrad containers, which are then transported to the mines by Vehrad Transport and Haulage. Each consignor's cyanide boxes are stored separately in the warehouse.

The containers of cyanide, either a sparge Isotainer or a repackaged shipping container of boxes of cyanide briquettes, are then transported in escorted convoys to the mine sites. Each truck has a driver, who is accompanied by a safety officer. The safety officer manages communications between the trucks, the escort vehicles, and the convoy manager and monitors the drivers. The convoy includes a convoy manager, an assistant convoy manager, cyanide first aid-competent personnel as appropriate to the size of the convoy), a mechanic, cyanide emergency response equipment for spills and releases and medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations, and ingestions). The convoys include an armed police escort whilst travelling through Ghana.

Vehrad Transport & Haulage



Signature Lead Auditor

29 August 2024

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: Transheq Consulting and Auditing (Pty) Ltd

Lead Auditor and Transport Auditor: Richard Durrant

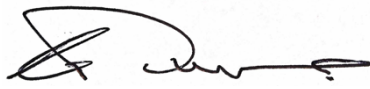
E-mail: richard@transheq.co.za

I attest that I meet the International Cyanide Management Institute's criteria for knowledge, experience, and conflict of interest for Code Verification Audit Team Leader and that all members of the audit team meet the applicable criteria 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: 27 to 28 May 2024

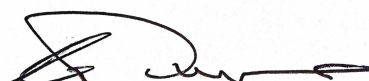
Richard Durrant
Name



Signature

29 August 2024
Date

Vehrad Transport & Haulage



Signature Lead Auditor

29 August 2024

1. TRANSPORT: *Transport cyanide in a manner that minimises 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:

Vehrad Transport and Haulage Company (Vehrad) procedures require route risk assessment (RRA) review every two years with full revision every five years. Approved Routes includes the route listings of routes from Vehrad Tema to include destinations in Ghana, Burkina Faso, Ivory Coast, Guinea, Niger and Mali. Maps of the routes are included in the Route Risk Assessments.

Vehrad Transport and Haulage Company Driver Handbook includes Occupational Health and safety, Mobile phone, seat belt, First aid and Fire Extinguisher, alcohol and drugs, PPE, and Parking policies. It also includes a list of approved routes. The Ghana EPA (Environmental Protection Agency) approved selected routes in Ghana based on their broader ability to provide emergency response support. A Transport Management Plan is developed and provided for all Mines with longer-term delivery agreements in place.

A review of the RRAs showed that they contain details of population densities and concentrations, problematic infrastructure, road pitch and grade (climbing hills turnings and curves), and water courses, bodies and fog. Measures to address identified risks are documented in existing risk assessments or journey plans.

Vehrad uses flyers and small scale presentations to raise awareness. Convoy Leaders also hand out small promotional gifts, such as colouring crayons, pens, T-shirts, cooler bags, and peaked caps at rest stops to start a dialogue and warn adults and children about the risks associated with the convoy.

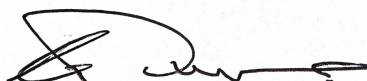
All cyanide deliveries are conducted using a convoy system with an armed police escort for the Ghana component of the trip, and include support vehicles containing spill kits, medical oxygen, first aid kit, cyanide antidote kit, cyanide gas monitor, ferrous sulphate, mechanic and safety officers.

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

Vehrad prepares a "Training passport" that includes all the training requirements for transporting cyanide and proof of training. "Training passports" are kept by the Convoy Leader and are made available to the Mine Safety Manager at point of delivery as proof of cyanide training. Truck Drivers, Convey Drivers and Mechanics on conveys will have these documents. Passports include cyanide awareness training, defensive driving training, firefighting, emergency response, and first aid.



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The Vehrad requirement for heavy-duty Drivers must be at least 32 to 49 years of age. Drivers must possess a valid professional driving licence, code "F", and submit to a literacy and numeracy test, road signs test, driving test and medical examination. Furthermore, a basic requirement in road sign comprehension is required. Windex Road Safety Ltd, a registered external training provider, Defensive Driving Heavy Goods Vehicle Training, was presented, and all Vehrad drivers attended the training course, of which some 50% were cyanide drivers.

A police report is required to prove that the new driver applicant has no record of offences. This is stated in the OR12(2) Employment Criteria requirements. Forklift and stacker operators are trained in their equipment operation and cyanide awareness by the Vehrad HSSE department and undergo annual medical examinations. 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. In addition, the convoy carries all the necessary cyanide emergency equipment (cyanide releases and medical) with them.

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:

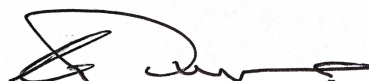
The mass of cyanide briquettes in a 20-foot container is 20.0 or 22.7 tons, depending on the supplier. Two containers are carried on each trailer. The mass of the container is 2.3 tons, and the mass of the trailer is 6 tons. The mass of the truck tractor is 8.3 tons. Thus, the total mass of the trailer and load is 58.9 or 64.3 tons. The truck and trailer are a seven-axle vehicle (three axles on the tractor and four on the trailer), meaning that the mass on each axle is 8.41 or 9.18 tons per axle. The Ghanaian legal maximum axle mass is 10 tons, meaning that the loading of axles is within the legal maximum. Vehrad has 18 cyanide-specific truck and trailer combinations, all of which meet the above-mentioned specifications. Vehrad has two, 45-ton capacity, Reach Stackers for moving containers in the yard. There is a planned maintenance programme in place for the trucks, trailers and lifting equipment.

Maintenance carried out on site is based upon kilometres travelled. This is 15,000 kms for the Mercedes Benz trucks and 10,000 kms for the Sinotruk vehicles. Trucks under warranty are serviced by the manufacturer's agents in Ghana. Specific truck and trailer maintenance records were sampled and checked. Reviewed truck tractor and trailer service records. Vehrad monitors distance travelled using the Vehicle Fleet Manager computer-based program to ensure that trucks are brought in for maintenance in advance of the service limits. The workshops also inspect trailers twice per year.

Tyre maintenance records were also checked and verified. Tyres on cyanide vehicles and trailers are replaced when they reach 4mm tread depth or show signs of damage, and quarterly tyre survey records are in place. Only new tyres are used on cyanide vehicles, and no recaps tyres are used. Cyanide vehicles are replaced after every five years in service. Convoy escort vehicle maintenance records are also in place.

The trailers are consistently operated at load levels below their legal and design maximums. The truck capacity for China National Heavy Duty Truck Group Co Ltd vehicles are, front steering axle 9.0 tons, and the rear-drive axles are 2 X 16 tons with a gross vehicle axle capacity of 41.0 tons and a Gross Vehicle Mass (GVW) of 25.0 tons.

Trailer load specifications – Vehrad operates four-axle skeletal semi-trailers. The design load maximum capacity of the trailers with a 6x4 truck tractor is 80 tons, as per the manufacturer's plate. The actual mass of loaded cyanide containers transported is, well below the permissible and the manufacturer's specifications. The cyanide is delivered in standard 6m sea containers, which are fitted on custom trailer designs. It is not possible to overload the trailers because the containers are loaded by the producer with a set number of boxes (20) with a set mass of 1.0 or 1.135 tons.



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The sparge containers are loaded with 18 x 1.0 or 1.135 ton boxes of cyanide briquettes. The boxes are prepared before sparging and counted into the sparge hopper. Two Isotainers are loaded on each vehicle – 18 to 20.43 tons per isotainer x 2 per trailer = 36 to 40.86 tons + empty mass of Isotainers is 3.7 tons each = 43.4 to 48.26 tons gross mass. The permissible gross mass/payload is 70 tons.

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**

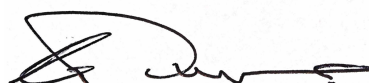
not in compliance with

The producer's packaging consists of woven polypropylene sacks of cyanide briquettes in plastic-lined, sealed wooden boxes, packed into 6 m sea containers and security sealed. The sea containers are delivered from the port and are de-stuffed if (applicable) in the Vehrad cyanide yard, and the boxes are inspected before being stored in the bonded warehouse.

Isotanks are subjected to a Preload Inspection where pipes, valves, internal cleanliness, external structure, hatches and hatches seals are inspected. A Pre-Trip Inspection is then conducted once briquettes are loaded which inspects the structure, placarding, Pressure Relief Valve (PSV), valves closed and sealed, hatches tightened, torqued and sealed. Annual hydrostatic pressure testing is conducted by an independent inspection company.

If cyanide is spilled, Vehrad will activate their emergency response plan to manage the spilled cyanide. In the Procedure for Cyanide Convoy - Load Placarding - Containers transporting solid sodium cyanide must be marked with placarding in accordance with the IMDG (International Maritime Dangerous Goods Code). The Transport Management Plan (TMP) also contains placarding requirements: The Plan refers specifically to placarding as per the IMDG Code requirements. Vehicle Pre-trip checklists are used prior to each trip and then daily during the trip. The pre-trip checklists include the Trip Safety Equipment and Truck pre-trip checklist. These lists show that the vehicle, load and emergency equipment are in place and in serviceable condition. The Truck pre-trip list includes: - driver licensing (Ghana), driver licensing (International), insurance, roadworthiness of the vehicle, first aid kit, fire extinguishers, seat belts, chocks for securing the vehicle, TREM card (Transport Emergency Card), signs, lights, horn, loading capacity, and vehicle safety measures/equipment. For the Trip Safety Equipment, the inspection includes antidote kits (including expiry date), PPE, safety cones, oxygen, HCN gas detectors, radios and cell phones, traffic signalling flags, and cordoning off equipment. There is a planned maintenance programme for the trucks, trailers, and lifting equipment. Vehrad monitors the distance travelled on the Vehicle Fleet Manager 4.0 program to ensure that trucks are brought in for maintenance before the service limits are reached. Maintenance is carried out on-site based on kilometres travelled. This is 15,000 kms for the Mercedes Benz Actros trucks and 10,000 kms for the Sinotruk trucks. Trucks under warranty are serviced by the manufacturer's agents in Ghana. Cyanide vehicles are replaced after every five years of service. Tyre maintenance records were also checked and verified. Tyres surveys are in place. Tyres on cyanide transport vehicles and trailers are replaced when they reach 4mm tread depth or show signs of damage. Only new tyres are used on cyanide vehicles, and no recap tyres are used. The Driver Fatigue Management procedure specifies the maximum hours of duty during any 24 hour period (12 hours duty); not more than an aggregated period of 10.5 hours driving in any 24 hours or 500kms, whichever comes first in adverse security situations and with the approval of Management; maximum period of continuous driving (4 hours) with a break of 30 minutes. Maximum weekly on-duty hours (72 hours), maximum weekly driving hours (56 hours). Each TMP specifies the expected Total Driving Hours /day. Actual hours are recorded and managed from the Journey Plan / Journey Planning Document.

Cyanide box sizes are such that the boxes fit snugly in the container and do not move. The containers match the trailer sizes, and additional lugs have been welded onto the trailers to provide additional support to prevent movement in transit.



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During the transport, the Container / Isotank is secured by twist-locks onto a road trailer. These twist-locks are inspected during vehicle maintenance processes, during pre-trip inspections and on-route inspections as part of the Convey Requirements.

Procedure for Cyanide Handling and Convoy Movement, Rules for Convoy Movement, it is stated: "...In case of bad weather or unsafe conditions, and unsafe acts, the convoy manager should find a good, hard standing, and safe parking place, park and inform base controller, and wait for instruction."

The Vehrad Driver Handbook states, "... in case of bad weather or unsafe conditions and unsafe acts, the convoy must park at a safe place." The Vehrad Transport Emergency Plan mentions Other Threats, such as Hijacks, Bomb Threats, Civil Disturbances, and Natural Disturbances. Specific instructions are listed for the convoy manager and the drivers.

Procedure for Alcohol and Illegal Drugs – Includes a policy of no alcohol or illegal drugs permitted on the premises or in the company's vehicles. In appropriate circumstances, there is a counselling and guidance programme for drug and alcohol dependence. The procedure also covers random testing, post-accident testing, pre-dispatch testing and reasonable cause testing.

Alcohol Test Register is completed as part of the Journey Plan documentation.

Records were confirmed for vehicle maintenance histories, checklists, driving hours, and drug and alcohol testing.

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

This section is not applicable, as Vehrad is not involved in managing air or sea shipments of cyanide.

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

X in full compliance with

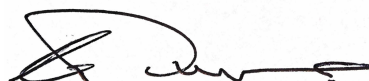
The operation is in substantial compliance **with Transport Practice 1.6**

not in compliance with

Procedure for cyanide handling and convoy movement – Convoy Communication Procedure. This dictates communication etiquette. Communication with vehicles in the cyanide convoy is undertaken using mobile phones and two-way radios. The drivers do not use the communications equipment. The accompanying safety officer in each truck communicates with the convoy manager and support vehicles. Convoy managers have all the appropriate telephone numbers to communicate with Vehrad's head office. Vehrad Head Office will contact the appropriate emergency responders and emergency services on the convoy route. The Vehrad head office manages all associated communications with the mine and the cyanide producer.

Two-way radios and cell phones are tested prior to departure of the convoy - a requirement in convoy Procedure for cyanide handling and convoy movement – Convoy Preparation Procedure, and in the pre-trip checks.

The GSM Positioning system (cell phone technology is used instead of satellites) functions continuously and is monitored by the Vehrad Road Transport Department and various Vehrad staff members on their cell phones. The system can be programmed to send reports on vehicle positioning and over speeding automatically.



Procedure for Road Transport GPS Tracking. Manages the tracking system and includes the requirement to download journey history at the end of the delivery. This is used to monitor routes against the Journey Plan and check for violations, such as over-speeding or varying from the route plan. Geofencing is in place at all offloading sites and along transport routes. An automated alarm will triggered if a vehicle deviates more than 5km from the designated route. Vehicle speeds can be and are monitored live.

There are no blackout areas on the routes in Ghana and surrounding and neighbouring countries. All main routes are covered by the primary cell phone service providers. There are no tunnels on the routes in Ghana. If the signal is temporarily lost, when it returns, data covering the period can be recovered. Satellite handheld phones are also available as backups should there be a potential communication blackout. Due to the cost of satellite communication, these phones are only used in emergencies.

The GSM Positioning system (cell phone technology is used instead of satellites) functions continuously. It is monitored by the Vehrad Road Transport Department and various Vehrad staff members on their cell phones. The system is programmed to send reports on the positioning of vehicles and over-speeding automatically. The service provider has rarely had its system go down, and recovery was quick thereafter. Convoys report periodically to Vehrad head office. Convoys report in from various rest stops. There is also a panic button on the system, which can be activated by the driver.

Vehrad transports and delivers sealed containers and sealed sparge isotainers. A waybill accompanies the convoy, including chain of custody data such as container numbers, shipping documentation, packing list, Bill of Lading, customs declarations, and producer invoice. Checks are carried out at customs posts and borders and at the mine site. Convoy stops have checklists that include the inspection of container seals.

The Procedure For Cyanide Handling & Convoy Movement, Transport Management Plan (TMP), Bill of Lading, and data are included in the waybill documentation pack, which also includes the TREM card and the SDS (Safety Data Sheet) as part of the shipping records.

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.

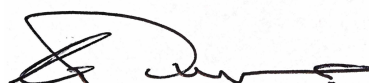
X in full compliance with

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

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Bonded warehouses are used to store cyanide boxes that are unpacked from sea containers. Cyanide containers for different mines are stored on behalf of consignors. This storage is not deemed "interim storage" (It is not storage between a change of transport modes and a period of 24 hours or less.) and does not form part of the scope of this audit. However, it is covered in a separate ICMI Production Facility audit.



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

Vehrad Transport Emergency Response Plan (The Plan) is in place. The Plan covers different scenarios and emergencies at the Vehrad transport workshop(depot)), as well as different routes in Ghana, Mali, Ivory Coast, and Burkina Faso. As all cyanide deliveries are made in the convoy, the Emergency Response Team will implement the Emergency Response Plan. The Plan deals with the physical and chemical forms of all the hazardous chemicals transported by Vehrad, including Sodium Cyanide in briquette form. Vehrad only undertakes road transport, and all risk assessments cover road transport. Route risk assessments are reviewed every two years and fully revised every five years. The Plan considers all aspects of road transport, which also links to the route risk assessment detail.

Vehrad only uses custom-designed flatbed and skeletal trailers to transport sea containers containing boxes of cyanide briquettes. It also only uses custom-designed and adapted stainless steel sparging Isotainers. Sparging Isotainers are only sparged when they are on the mines site otherwise they are transported dry.

The Plan includes a series of likely scenarios. Responses in the Plan are based on the identified scenarios. The plan includes Emergency Actions (Safety Response Crew, Emergency Communication System, and Isolation Distance), Emergency Equipment and Logistics, Emergency Medical Services, Security, and Reporting incidents. It also includes follow-up Actions in the event of a serious incident.

The convoy's dedicated emergency response team will respond to the majority of emergency scenarios. After consulting with the incident controller, any additional outside assistance would be requested or coordinated through the Vehrad Base Controller (Convoy Manager/HSSE Manager).

The Ghana Red Cross is committed to assisting with medical response for personal evacuation, first aid, and application of cyanide antidote (hydroxocobalamin). This was verified in an interview during the last audit with Mr Yeboah from the Ghana Red Cross on 20-04-2021. This arrangement is still in place.

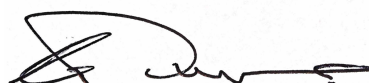
Transport Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

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:

The Procedure for Training and Drills includes emergency response training. Driver Passport indicates if Emergency Response Training has been completed. Convoy team members are trained in emergency response. Various training sessions such as Mine Community Sodium Cyanide Awareness Training, Transport Emergency Response Plan Training, Convey Movement Procedure



Vehrad Transport & Haulage

Signature Lead Auditor

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Training, Cyanide Awareness: Placarding and Cyanide Convoy Movement; Chemistry of Combustion, classification of fires, mode of extinguishing, evacuation, common causes of fires dated. Chemical Awareness & Sodium Cyanide Awareness and Cyanide Awareness and Antidote Kit Training. Driver Passport indicates if Emergency Response Training has been completed. Convoy team members are trained in emergency response. Transport Emergency Response Plan (TERP) details the Roles and Responsibilities of the Emergency Control Centre, Emergency Control Team and External Emergency Responders. The Emergency Response Plan details the Emergency Response Equipment On Board. Vehrad main yard inventory of emergency equipment available, including the emergency 4x4 Emergency Van and Emergency Wagon. The equipment is checked monthly and before each convoy. No equipment is stored on the route - all necessary equipment is carried with the convoys. Convoy checklist indicating emergency equipment, including Pickup Inspection equipment checklists, is in place.

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:

Emergency response information is included in the vehicle TREM (Transport Emergency) card. After consultation with the incident controller, additional outside assistance would be requested or coordinated through the Vehrad Base Controller (Convoy Manager/HSSE Manager). The Emergency Contact List is included in the TMPs and the Driver Handbook. The Emergency Response Plan includes contacts and is included in the TMP. The HSSE Manager updates emergency response information details annually when the Emergency Response Plan is updated. Updates also occur when the TMPs are updated. Notifying ICMI of any significant cyanide incidents is a requirement included in the Emergency Response Plan—Roles and Responsibilities, and the General Manager is responsible for this. No significant cyanide incidents have occurred that required reporting.

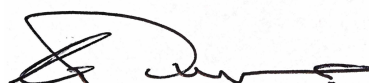
Transport Practice 3.4: Develop procedures for remediation of releases that recognize the additional hazards of cyanide treatment chemicals.

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 Emergency Response Plan - Treatment Neutralisation of Spills. This section contains detailed descriptions of different neutralisation methods and discusses the main treatment chemicals, such as ferrous sulphate and sodium hypochlorite. Under the section, neutralisation scenarios, there are discussions on neutralisation or the removal of soil, treatment and/or disposal of excavated soil;



stabilisation and removal of soil; neutralisation of top-soil in situ; and neutralisation of removed contaminated liquid.

Separate sections on the use and management of Hydrogen Peroxide and Sodium Hydroxide contain detailed information and precautions on the chemicals and their handling and relevant prohibitions to prevent treatment chemicals from entering the standing water of streams to protect aquatic life.

Clean-up and Recovery of Sodium Cyanide Spills specifies that the clean-up operation must only be conducted by trained personnel wearing the appropriate protective equipment. Spill materials are collected and placed into sealed drums or Polypropylene bags, which are then sent to the mine site using a secondary containment vessel for processing where possible. Otherwise, follow the neutralisation process after assessment.

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 Plan is reviewed annually after it is activated, after an accident, or if legal requirements change. It may also be reviewed after drills.

Desktop exercises are conducted at least annually, and the Procedure on Procedures indicates that procedures (including the Emergency Response Plan) can be revised during the annual document review process after a major accident, change, or alteration of any routine operation, post-audit, or legislative changes.

Mock Drill Exercise Overview includes cyanide exposure and release scenarios, emergency response to cyanide poisoning and emergency response to cyanide spill recovery with an evaluation of available equipment and resources and recommended improvements.

There have been no recorded cyanide incidents since the last audit.

END OF REPORT

