
ICMI RE - CERTIFICATION – SUMMARY REPORT

1.0 INTRODUCTION

1.1 Operational information.

Name of Transporter facility	:	Suhara Transport Tanzania Limited
Name of facility owner	:	Suhara Transport Tanzania Limited
Name of facility operator.	:	Suhara Transport Tanzania Limited
Name of responsible manager	:	Nikesh Mehta
Address	:	Plot 961/1 Block A, Saku-ilulu, Chamazi, Temeke
State / Province	:	Dar Es Salam
Country	:	Tanzania
Telephone	:	+255 758 772 701
E-mail	:	nikesh.mehta@suhara.com

1.1 Acronyms

ICMC - International Cyanide Management Code
STTL – Suhara Transport Tanzania Ltd
AGR – Australian Gold Reagents
HGV - Heavy Goods Vehicle
QHSE - Quality, Health, Safety & Environment
HSE - Health, Safety & Environment
IMDG - International Maritime Dangerous Goods
RRA - Route Risk Assessments
IBC - Intermediate Bulk Container
GCLA - Government Chemistry Laboratory Agency
NEMC - The National Environment Management Council
ICMI – International Cyanide Management Institute
TMP – Transport Management Plan
ETA – Expected Time of Arrival
BL – Bill of Lading
ERP – Emergency Response Procedures
GM – General Manager

1.2 Description of Operation

1.2.1 Company Profile.

Suhara Transport Tanzania Ltd Previously Primefuels Ltd is a fully integrated logistics company servicing 9 countries across the East Africa region. PFT started with the goal to build strong, enduring relationships and not just meet, but exceed clients' expectations. 25 years on, our goal remains the same. It is one of the largest privately owned African logistics companies employing over 1,000 people and a fleet of over 500 trucks. It transports all types of goods including dangerous goods which includes Sodium cyanide, general cargo as well as machinery and offers a cutting-edge logistics solution. It offers transportation services both in Tanzania and neighbouring countries.

STTL, became a Signatory to the ICMC on 18th August 2021 and Certified on 27th September 2022.

Currently STTL has allocated 30 trucks and trailers for transport of Sodium Cyanide by road from Dar port to Geita Gold Mine site.

STLL operates around 253 trucks and trailers, and they service several countries throughout East Africa and deliver the following:

Hazardous Goods (Cyanide),
General cargo, and
Consolidated cargo loads.

Cyanide Transportation

STTL Yard consists offices and workshop, containers are not off loaded from the trucks no equipment to move cyanide containers is operated in the yard (e.g., forklifts or reach stackers) cyanide IBCs always remain in their containers.

Sodium cyanide in IBC's which are packed in 20ft containers are loaded from the port of Dar Es Salaam, Tanzania and delivered to Geita Gold Mine Site. Covering distance of 1260km from the port to the mine site. The manufacturer of the sodium cyanide is AGR based in Australia.

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 Dar Es Salaam. A maximum of 20 wooden fabricated IBCs is packed into a freight container with a maximum gross weight of the product of 20 tons. Containers are sealed with container seals.

Upon delivery at the port, the containers are offloaded using container handling equipment as required by the Tanzanian International Container Terminal System.

From the port containers are moved to PMM ICD and Galco 025 ICD. STLL then positions trucks at the quay to load the containers. Trucks then exit the port with the required documentation covering the shipment and start the journey to deliver the cyanide to mine sites.

The Tanzanian Government Chemist Laboratory Agency administers the Rules and Regulations and is the national regulator for dangerous goods management. The convoys to the various mines can comprise of up to 10 trucks at a time, each truck carrying only one container load at a time.

They are also accompanied by relevant escort vehicles. They also required to get permission from the GCLA in order to transport any Cyanide.

1.2.2 Audit scope.

The audit covers the transportation of cyanide from the port of Dar Es Salaam to Geita Gold mine sites within Tanzania.

The ICMI protocols were used as guidelines in conducting this certification audit.

SUMMARY AUDIT REPORT AUDITORS' FINDINGS

Suhara Transport Tanzania Ltd 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:

Audit Team Leader:

Email:

Investor Solutions Limited - Kenya

Kuldip Singh Degon, Lead Auditor & Transport Specialist Auditor

kuldip@islglobal.net

NAME OF OTHER AUDITORS

N/A

DATES OF AUDIT

The certification audit of the Suhara Transport Tanzania Limited was conducted 26th to 28th May 2025

Attestation:

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 Detailed 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



Suhara Transport Tanzania Limited
Name of Operation

Signature of Lead Auditor

28/05/25
Date



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:

STTL has selected the appropriate route from Dar Port to mine sites. There is only one approved route to the mine. The company has a Route Assessment & Selection Procedure No. STTL- SOP-ICMI-001 Rev 004 approved on 10th January 2025. The company has a Dangerous Goods Transportation permit issued by the GCLA Permit no. B001-C000507 Dares 13th September 2024 to 12th September 2029.

- Consideration is given to:
- Reasons for selecting a new route
- Reason for discounting one route over another
- Infrastructure (roadway, rail, port) construction and condition
- Proximity to water bodies and weather conditions
- Population density,
- Pitch and grade,
- Black out areas
- DG spill and potential for impact on the environment and public
- Measures to be taken to minimize impact on the environment and public
- Local laws and regulations that may apply

Route assessment & selection procedure document no. No. STTL- SOP-ICMI-001 Rev 004 which addresses the above. In selecting the route, the Escort Leader and the escort driver drove on the road to identify risks (hazards) on the road, count the number of bridges, railway crossings, rivers and streams and the distance from the port to the mine site destination.

The Road Risk Assessment procedure document No. SOP-STTL-CN-004 Rev01 identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step. The RRAs considers population density, bridges, water bodies, blackout areas, potholes on the road and general condition of the road.

STTL has implemented a process to evaluate the risks on the selected cyanide transport route. Route Surveys have been conducted on the route from the port of Dar Es Salaam, PMM ICD and Galco 025 ICD to Geita mine site.

The road surveys are reviewed and updated annually or when road conditions change based on feedback from convoy leader and Drivers. Route surveys for January 2022, March 2023 & April 2024 were sighted.

- 1) Before resuming operations after suspension of operations for more than 6 months or subsequent to an unusual event (climate, political or social event)
- 2) Following a significant change which has occurred on the road. These include road construction and severe accident.
- 3) Following a significant change of operations performed on the route
- 4) During dry season and another during the rainy season.

Besides being formally reviewed on an annual basis, any immediate changes to the routes, such as road construction or damage by rain are communicated back to the office and changes made to the routes wherever possible. Unfortunately, some cases dictate that the routes do not offer any alternatives so additional precautions need to be taken.

After each delivery to the mine, drivers and convoy leader prepares Cyanide convoy report No. STTL-FO-HSEQ-016 Rev 001 indicating major changes on the road conditions especially major deterioration, ongoing road works to the QHSE Manager.



The transporter implements a process to periodically re-evaluate risks in the routes used for cyanide transportation and has a process to get feedback on the risks noted by drivers and the convoy leaders during deliveries to the mine. Transport Management plan states the cyanide transport route is re-evaluated periodically.

After each delivery to the mine site, a Trip Report is written on the trip Cyanide Post delivery Feedback form ref STTL-FO-HSEQ-136. Route Survey on the selected route is conducted annually to identify any new risks on the path.

Route survey reports show periodic reviews of the road conditions from PMM & Galco 025 ICDs to mine sites. Feedback reports are used to ascertain if there are any changes on the road and controls subsequently put in place to address or minimize the effect of the risk. Changes to road conditions, including those due to construction, road diversions, and potholes, are all noted in the feedback reports. The escort leader is responsible for writing the reports detailing the condition of the road. The report is discussed with the drivers and escort team during toolbox meetings that are held before the next convoy. Records of feedback reports on journeys from the Port of Dar to the Mine Site were noted.

STTL have consulted various stakeholders and applicable governmental agencies as necessary in the selection of routes and development of cyanide management measures.

The Government Chemist Laboratory Authority (GCLA) is the only authority that allows for the transportation of cyanide within Tanzania.

Amongst all the importation documentation that needs to be filed, a permit needs to be applied for from the GCLA and this is valid for 30 days. During this time, the goods to be moved from the Port to the receiving mine.

Once the permit from the GCLA is received, and dates confirmed for when the convoy will move, the GCLA will contact the Police stations. Permit no's B001-C000445-P0736 dated 14.12.2022, B001-C000445-P0965 dated 12.07.2023 & B001-C000445-P1492 dated 20.06.2024 B001-C000507-P00124 dated 26.02.2025 were viewed

The STTL Convoy Leader will contact the local Police to let them know that they are either close by, or in that area.

Inputs have been sought from the Police Service Stations in towns that are along the transportation route for cyanide. In each case, the Police Officers in charge of the various stations have signed and given their approval to assist in case of cyanide incident. Signed sheets also details that the police have been notified and informed about cyanide and have also been supplied with copies of the MSDS of sodium cyanide.

Evidence shows that each of the stakeholders have signed and stamped a document that they have been notified about cyanide and their roles in case of an emergency. Also, hospitals have been notified of their involvement during an emergency. Evidence was also provided showing that stakeholders identified in the Cyanide Procedures regarding emergency response have been involved in the Emergency Response Planning process & that they have been made formally aware of their role in an emergency.

The transporter uses convoys, escorts and additional safety and security measures as appropriate should the selected route(s) present special safety or security concerns.

STTL use convoys for all cyanide shipments. They also notify the police in each region prior to starting each convoy and call the Regional Police at each region as they enter it during the convoy.

A review of convoy records. has shown that convoys include the cyanide trucks (number depending on load being transported to the mine) and two support vehicles, a Pilot pickup at the front and an Emergency Response Truck at the rear of the convoy. Each vehicle and fitted with signs and flags and uses dipped headlights.

STTL use convoys when transporting cyanide. Convoys are used as a means of helping to manage the risks of the road conditions (traffic, congested areas and poor roads) and responding to emergencies.

In addition to convoys, additional security measures are implemented including the use of locked and sealed containers and GPS tracking.

As per STTL procedures, the transportation of cyanide is strictly prohibited during the night. The allowed convoy hours are from 06:00 in the morning to 18:30 in the evening. The rest stops are respected, and that convoy follow the required speed limits and correct travelling distances.

During stops of short duration, the Escort leader ensures that the trucks are free from any defect. General inspections are carried. The twist locks, tires are inspected during stops.

STTL does not subcontract the activities in transport Practice 1.1

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:

STTL use only trained and qualified staff. The transporter has a recruitment policy STTL-PO-HR-008 & procedure STTL-PO-HR-009 that details the processes and criteria for employing drivers and other staff. The company uses only trained, qualified and licensed drivers to operate its transport vehicles.

Pre-selection of candidates for driving and other staff are done according to the following criteria and processes

- Prospective applicant should be between 25 to 45 years of age and above.
- The prospective employee should be in good physical and mental condition
- GCLA Certificate for transporting dangerous good
- Be of good moral character
- Have no criminal records
- Have a driving license categories "E" license
- Have at least 5 years' experience
- Have a team spirit
- Be professional
- Oral interviews are conducted
- Drivers who pass the interview are taken through practical test of truck driving
- Background checks are done on all prospective drivers
- Selected drivers are made to undergo medical examination.
- Selected drivers undergo training

A driver is employed when he or she satisfies all the above conditions. Copies of valid driving license were sighted by auditors.

STTL offers the following training to their employees and this training is done as per the Matrix requirements:

- Driver Induction – where relevant,
- Lifesaving rules
- Ethics and compliance
- Defensive driving course
- GCLA (Dangerous goods transportation training
- Cyanide Awareness,
- Cyanide Convoys Procedure
- Cyanide First Response.
- First Aid (General)
- Firefighting Awareness
- AGR Cyanide Transporter Training

Certificates of defensive driving training for drivers by names of some selected drivers were sighted. The defensive driving training records organized were sighted. Records of cyanide awareness training held were verified and noted. Records of training attendance records for Fire Training and Basic First Aid training were noted. Selected drivers were interviewed to find out their knowledge about cyanide and were found to be knowledgeable in properties of cyanide, precaution to take when driving and how to respond to cyanide incidents. Escort leader and his assistant namely were also interviewed by auditors and were found to be competent. AGR Cyanide Transporter Training was also carried out.

The transporter has a training matrix, specifying the type of training and the frequencies at which the training are held. The training covers Cyanide Awareness (including Use of Personal Protective Equipment), Defensive Driving Training, First Aid and

Fire Fighting. New drivers are trained before being allowed to drive. New drivers drive with senior drivers for two trips. The drivers are trained in the procedure for cyanide transportation including convoy management.

Records of training attendance registers were sighted. Participants have signed the attendance sheets to prove their presence in the training. Defensive driving training is conducted. The QHSE Manager is responsible for conducting Cyanide Awareness training, Emergency response training and Fire Fighting Training. The QHSE Manager and his assistant have attended training for trainers. Copies of their training certificates were sighted.

STTL Logistics does not subcontract any of the activities above.

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:

The procedure specifies the design of trucks & trailers used for the transportation of cyanide. The company has records documenting the load-bearing capacities of its transport equipment and their maximum operating weights. The company uses Mercedes trucks MP4 2545 tractor units of HP 450 equipped 6x4 axels with GPS tracking system. The weights of the truck tractor unit are approximately 7 tons, with a pulling capacity of 30 Tons.

Three-axle flatbed trailers approximately weigh 8 tons. One 20ft container is carried on one trailer.

A 1x20ft container full load of cyanide weighs 23.2 tons. The company has an approved vehicle maintenance procedure. Maintenance on vehicles is done as per the manufacturer's specification and in accordance with the company's maintenance procedure. Both Preventive Maintenance and Corrective Maintenance are carried out on all vehicles at the company's workshop. Problems on vehicles picked up during inspections are attended to immediately. Tires are changed when the tread depth reaches 4mm.

The operation has a procedure to verify the adequacy of the equipment. STTL has allocated 10 trucks for cyanide transportation. The trucks have the required capacities to do deliveries of cyanide shipments to the mine. The total weight per axle for the 6x4 vehicles with 3 axle trailers is 9.68tons/axle.

The company has an approved vehicle maintenance procedure ref no. STTL-PR-HSEQ-023 Ver 14 effective 10th January 2025. Maintenance on vehicles is done as per the manufacturer's specification and in accordance with the company's maintenance procedure. Both Preventive Maintenance and Corrective Maintenance are carried out on all vehicles and trailers at the company's workshop. Problems on vehicles picked up during inspections are attended to immediately.

There are weighing bridges along the transportation route managed by the government authority Tanzanian National Road Agency. The trucks are weighed when a convoy reaches such a weighing bridges location along the transportation route. Weighing bridge tickets are issued for each truck after it is weighed. Sampled copies of weighing bridge tickets for vehicles with registration numbers T423EEW/T523DPA Ticket no. TLA0HD577KEA dated 10.04.2025, T421EEW/T539DPA Ticket no. TLA96YACXLDA dated 17.09.2024, Truck no T405EEW/T342DMT Ticket no. TLA95LNKDQ3A dated 24.08.2023 were sighted. The weighing bridge tickets is a proof that the trucks are not overloaded. The truck weights displayed on these tickets show that the trucks are not overloaded. The gross weight of the cyanide containers is also on the BLs of each shipment of cyanide which also guides the transporter from overloading the transport vehicle.

STTL does not subcontract above activities stated in Transport Practice 1.3.

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 Cyanide Handling Manual (CHM) Ref no. STTL-SOP-ICMI-018 Dated 06.01.2025 outlines processes to ensure the integrity of the producer packaging. The CHM describes how the cyanide from the supplier AGR is packaged. The cyanide from the supplier is packaged in 1ton PVC bags with a polyethylene lining and encased in plywood boxes (IBC's). Twenty (20) IBCs of sodium cyanide are in each 20ft sea container. The gross weight of the containers and the product combined is approximately 24tons. Containers are sealed with container seals. The seals have unique numbers on them and are also on the Bill Ladings. The cyanide shipment is transported by road to the mine.

The shipping line in the port issues a container interchanges a report which states the condition of the containers prior to loading from the port. The TMP states that the driver and escort leader inspect the container to ensure that it is intact, container numbers are noted, seals are in place and the containers is in good condition. The drivers and Escort leader ensure that all the required shipping documents are complete. The above activity is done in the loading area in the port where the trucks are loaded. After exiting the loading area in the port to the parking area within the port, the Escort leader inspects the container and completes a Truck and Container Inspection form

Copies of container interchange for cyanide shipment bearing Upon arrival at the mine site waybills covering each container is signed and stamped by the mine personnel indicating that the cyanide containers were received in good condition and the contents intact. Records of waybills for delivery to mine site were sighted and noted. The transporter also has developed a checklist for Transport of containerized cargo which also specifies checks on the container, and this includes seals, correct labelling and general condition of the containers. The seals on the container doors are only broken at the mine site when the mine is about to commence offloading of the boxes.

The manufacturer has placards on all sides of the container as required by the IMDG Code. CHM describes the placards on containers and on the trucks. These are Toxic 6 labels and Marine Pollutant labels as well the UN number 1689 for solid sodium cyanide. The Toxic 6 labels, UN number 1689 and Marine Pollutant labels are the required placards fixed in front and in the rear of the trucks in accordance with the IMDG Code as well as in local language signs reading "Hatari Sumu meaning Danger Poison". The placards and signage on the containers identify the contents of the containers as solid sodium cyanide

STTL has implemented a safety program that includes.

- Cyanide handling procedure
- Vehicle Inspections prior to departure
- Preventive and Corrective maintenance
- Drug and Alcohol policy
- Fatigue management policy. Drivers drive 4hrs and takes 30 minutes break. The maximum number of hours that a driver drive is 10hrs/day and 60 hours/week.
- Procedure to modify or suspend transport activities.
- Procedures for loading and offloading

STTL ensures that vehicles are inspected prior to departure of the trucks to the mine site and upon return to their base. The transporter has a CHM which requires inspections to be carried out prior to the trucks departing for the port for loading. The inspection is carried out by the driver together with the Local Fleet Coordinator, HSE Manager, Maintenance Manager. All of them sign the inspection checklist ref no. STTL-FO-HSEQ-135 Rev 1 after the completion of the inspection. The inspection checklist detailed what is to be inspected. Records of vehicle inspections checklists were sighted. Defects picked up during the

inspections are rectified immediately by a mechanic at the company's workshop. Selected vehicles were physically inspected by auditors and found to be in good condition.

STTL has a preventive and corrective maintenance procedure STTL-PR-HSEQ-23 to ensure that the truck tractor unit and trailers are always in a good working condition to do deliveries of cyanide safely. The company has a Maintenance procedure. Periodic maintenances are done at every 30,000Km intervals as per the trucks manufacturers specification and in accordance with the transporter's maintenance procedure. Drivers also report faults using Drivers Job card whenever they encounter any issues with the trucks

The odometer readings are taken and the predeparture inspection is conducted. A pre-inspection checklist is completed when inspections are carried out. During inspection, any time a defect on the tractor and/or trailer is picked up, that vehicle is withdrawn from service and defect repaired. The Escort leader informs the workshop Manager of the fault. The Logistics Manager then informs the maintenance Manager about the fault and completes a Job Card. The work is then completed by a mechanical supervisor who signs off that the fault has been rectified. The job Card is then countersigned by the Logistics Manager. Once the repair(s) is done, the truck is tested and put back into use. tires are changed when the tread depth reaches 3mm. Maintenance records for trucks & trailers were sighted. The Shipping containers are maintained by shipping lines.

As per the Journey management procedure ref no. STTL-PR-HSEQ-022 drivers drive for 4hrs and takes 1hr rest. A maximum of 12 hours per day is required for a driver to drive. Drivers are allowed to drive only during day light hours (6am - 6.00pm). No night driving is permitted. The company completes a Journey Plan before a trip. The journey plan has the consignment number, time of departure, stopping times and name of locations that the convoy stopped. The Journey Plan completed is also used as a measure to check limitation of driving hours. Records of Journey plans for deliveries to Mine were verified and noted. GPS reports were verified and noted. The GPS reports show the driving hours and stopping times.

The transporter has a procedure to prevent load from shifting, Cyanide Handling Manual states that all containers are to be secured safely on the trailer. No chains or straps are permitted to secure the containers. Containers are secured with twist locks. The inspection includes inspection of twist locks. It is the responsibility of the Escort leader to ensure that twist locks are firmly in place when conducting the pre-departure checks. The twist locks are further checked anytime the convoy parks for a brief rest to prevent container from shifting. The cyanide trucks have four (4) twist locks and hold one container.

The transporters CHM clearly mentions that in case of the following conditions or situation the convoy will suspend deliveries to the mine site until the situation is over.

- Severe weather condition (floods etc.)
- Riots or civil unrest

The Convoy Leader will take a decision and stop or suspend movement of the convoy and inform his office about the situation. The time of stopping and resumption of the movement of the convoy are recorded on the journey plan by the Escort Leader. The decision to continue the journey is made with the HSEQ Manager in consultation with mine.

STTL has a Drug and alcohol policy ref no. STTL-PO-HSEQ-009 Rev 14. The policy stresses that the use of drugs and alcohol whilst working is strictly prohibited and has serious consequences. A person found drunk, or abuse drug is sanctioned by management. Employees who flout this policy risk losing his job. Alcohol tests are carried out randomly on selected drivers and escort team. A checklist form is completed with names of the employee and test results. Records of alcohol tests conducted on selected drivers were noted. Anyone found to have failed the test is reported to management and sanctioned appropriately. A breathalyzer (Breathalyzer Alcohol Tester) is used for conducting the testing. The Breathalyzer Alcohol tester was calibrated in Sep 2024. The next calibration date is Sep 2025.

Procedure for Control of documented Information ref no STTL-SOP-HSEQ-013 Ver 12 mentions that all records are retained for a maximum of 4 years before being disposed of. Records of documents and journey plans, checklists, policies and procedures have been retained.

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:

STTL trucks and escort vehicles have means by which they communicate with their head office, mining operation, the supplier and emergency responders. Communication between the drivers and Escort leader is by the use of cell phones. Emails and WhatsApp communication are used to communicate with the client and the supplier. Electrical chargers are available in the vehicles to fully charge the cell phones. Contact phone numbers of all the emergency responders on the transport route is available with each of the escort vehicles. All communication equipment is inspected on a regular basis apart from the pre-departure inspections. The transporter also has megaphones to communicate to people in case of a cyanide incident. Auditors carried out physical inspections of the communication equipment and were all found to be in good condition.

The communication equipment is inspected Inventory Checklist is completed with the observations. Records of completed checklists were noted. The Communication equipment such as, cell phones are inspected and tested prior to the departure of the convoy. The GPS device is also tested to ascertain whether they are functioning properly or not. It is the responsibility of the Escort leader to ensure that the communication equipment's are working effectively. Copies of completed escort equipment checklist showing the communication equipment are tested were noted.

There are no blackout areas on the road from port to mine site. Route Survey and RRAs conducted show that there are no blackout areas on the road from the port to the mine. cell phone networks are active right from the port to the mine site.

GPS tracking System is used to track the trucks from the time of departure from the ICD until the time of arrival at the mine. The GPS is monitored by the Tracking Analyst whenever there is a convoy on the road. The tracking is done when the convoy is on the road. The journey plan is completed anytime the convoy stops for a break or stops to spend the night. The time the convoy departs after break and overnight stops are noted on the journey plan. At each stop, the escort leader informs the Cyanide Manager via phone notifying him of the convoy's location. Sampled copies of journey plans which indicates the time of stopping and departure of the trucks were sighted. Also, sighted were WhatsApp messages. A journey report is issued by the Escort leader to management after each trip. Sampled records of GPS were verified and noted.

STTL have chain of custody documentation namely Bill of Lading, Customs declaration documents, container interchange, Packing list, Waybills, and Pre-departure checklists. Bill Lading MEDUGT464435 dated 09.11.22 and MAEU230847035 dated 09.10.23, MECU237638827 dated 01.0524, MAEU248870003 dated 23.02.2025 were noted. Waybill shows the sea container numbers and seal numbers. Copies of waybills numbers 0000320 (dated 28/6/2023), 0000321 (dated 27/10/23) and 000322 (dated 22/09/2022) were noted. Copies of container interchange covering container numbers MSCU 2023315438 dated 8th April 2023 and container number 13742113 dated 2nd September 2023 were sighted by auditors. Prior to loading containers at the port, the shipping line issues interchange document which states the condition of the containers.

Shipping records such as Bill of Ladings, waybills and packing list indicates the quantity of cyanide containers per shipment. The Bill of Ladings MEDUGT464435 dated 09.11.22 and MAEU230847035 dated 09.10.23, MECU237638827 dated 01.0524, MAEU248870003 dated 23.02.2025 specifies the quantity of shipments, date shipped, container numbers and gross weights of the containers. Each truck and escort vehicles have copies of MSDS from the AGR which is the supplier. The MSDS is part of the required document prior to a trip, and it is specified on the Inventory sheet which is completed during pre-departure inspection.

The transporter does not subcontract the activities in Transport Practice 1.6

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:

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

Within the scope of this audit, there are no transshipment 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:

STTL has developed and implemented an Emergency Response Plan Cyanide Emergency Procedures Ref STTL-STTL-ICMI-018 Rev 6 dated 06.01.2025

The plan details the following.

- Signs and symptoms of cyanide poisoning
- Modes of exposition of cyanide
- Toxicology, First Aid and medical treatment
- Measures to take during a transportation incident.
- Emergency Communication with stakeholders
- Procedure for neutralization of cyanide solid briquettes and dissolved cyanide
- Incident scenarios
- Roles and responsibilities of emergency responders in the event of spill
- Roles and responsibilities of drivers, escort team and escort leader.

The contents of the ERP were found to contain all the required information to handle cyanide incidents. The plan is appropriate for cyanide emergency situation.

The ERP is appropriate for the selected transportation route. The ERP addresses issues regarding road transportation of cyanide. RRAs and Route Surveys have been conducted on the road from port mine site. Route Surveys and RRAs captured bridges, potholes rivers, slopes, curves, fog, population density, and general condition of the selected transport route from the port to the mine site. The plan was reviewed and was found to be appropriate for the cyanide transportation.

There is no interim storage facility. STTL does not store cyanide.

The ERP describes the physical and chemical properties of sodium cyanide. It describes the nature of cyanide and its packaging and chemical properties. The MSDS for Sodium Cyanide is available from the supplier and also gives information about the product. The ERP describes sodium cyanide as a white solid briquette which are in sacks with polyethylene lining and encased in plywood boxes. The packaging is in accordance with the IMDG Code. Twenty (20) IBCs are in one container each with a gross weight of approximately 24tons. The ERP covers the outcome of reactions when solid sodium cyanide comes into on contact with acids and other incompatible chemicals and when exposed to moisture. The resultant effect being the evolution of HCN gas It has a vivid description of the physical and chemical properties of the sodium cyanide, including the required placards identifying the product solid sodium cyanide. These placards are UN No. 1689, Toxic 6 and Marine pollutant labels.

This ER Plan considers road transportation of cyanide from the port of Dar Es Salaam to mines. The method of transport is described in the introductory section of the ERP. The plan was developed only for the transportation of cyanide by road using 6x4 trucks and 6x2 trucks. RRA's and route surveys have been conducted on the road from Dar Es salaam Port to the mine site. Vehicles of the required specification are used to do the transportation.

The Emergency Plan is developed from the Route Surveys and Route Risk Assessments that were conducted which took into consideration all aspects of transport infrastructure. On development of the Emergency Response Plan the actual conditions of road, bridges, slopes, water bodies, markets, slopes, untarred and tarred roads were taken into account. RRA's and Route survey reports captures pictorial view of the infrastructure on the road from the port Dar Es Salaam to the mine.

The ERP considered the design of the transport vehicles. The design of the transport vehicles is described in the ERP which mentions the design of the vehicles as follows:

1. 6x4 vehicles with 3 axle trailers with configuration equipped with GPS tracking system
2. Skeleton trailers equipped twist locks.

The 6x4 with skeleton trailers and dual trailers equipped with twist locks is designed to carry 1x20ft containers, with a total weight of 23 tons. The Company uses Mercedes trucks MP4 2545 tractor units of HP 450 equipped 6x4 axels.

There is no interim storage facility. STTL does not store cyanide.

The ERP gives a vivid description of the various incident scenarios.

The ER Plan have addressed the following 5 incident scenarios on the route.

- Scenario 1: Accident/Incident without a spill, no damage to container and no victim.
- Scenario 2: Accident without a spill but resulting in injury of a person(s)

Scenario3: Accident resulting in rollover of a vehicle with the container on the ground but no spill and no injured or poisoned person

- (s)
- Scenario 4: Accident resulting in a spill on a dry ground and injury and poisoned person(s)
- Scenario 5: Rollover of container resulting in spill into a water body.

The Response actions for above anticipated emergency situation for the various scenarios as well as the responsibilities of all the responders (external and internal) have been captured in the ERP. Scenarios and response actions were noted by auditors.

The ERP identifies the roles and responsibilities of both internal and external responders. Emergency response Plan defines the roles of the Escort leader and his Assistant, escort team, drivers, GCLA, NEMC, Police, Ambulance service, hospitals, Fire Dept.

GCLA is the regulatory authority for dangerous goods, NEMC will assist matters of environmental issues

The overall coordination of an incident is the responsibility of the escort leader. The assistant escort leader will assist the escort leader in his role.

The procedure specifies that, the Escort team will cordon off the area and move people upwind. Cleaning and shovelling of the solid sodium cyanide briquettes is the responsibility of the escort team. The Escort leader is responsible for administration of oxygen to a cyanide poisoned person and hands the victim over to the Ambulance when they arrive at the incident site.

The role of the Fire Service is to assist in case of fire and rescue of injured person. Ambulance Service will handle injured persons or possible cyanide poisoned person and transport him/her to the hospital. The convoy leader carries the antidote as per manufacturers recommendation. The hospital will undertake treatment of a poisoned or injured person and the administration of pure oxygen to a victim in conjunction with cyanide antidote. The cyanide poisoned persons will be conveyed to the hospital with the cyanide antidote. The antidote will be administered by a doctor or a qualified paramedic. The QHSE Manager at the base (head office) will brief top management of the incident, coordinate equipment for recovery of the container in consultation with the logistics manager.

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:

All Drivers have to go through mandatory dangerous goods training every 5 years carried out by GCLA. STTL has a training matrix which details the various training programs for drivers, escort team and other staff. ER training is organized twice annually for all cyanide drivers and escort team. The ER training is presented by QHSE Manager who is qualified and authorized to conduct training. Records of ER training attendance registers dated 13 & 14th June 2023, 27th & 28th July 2024, and 15th January 2025 were verified and noted. Contents of ER training was verified. Assessments are conducted on the participants after the training. Drivers are assessed verbally by questioning and answering. The theoretical training is followed by practical training (mock drill).

Emergency response training certificates awarded to participants were verified and noted by auditors.

Emergency response Plan defines the roles The ERP identifies the emergency response duties and responsibilities of both internal and external responders. The Emergency Response Plan defines the duties and responsibilities of the Escort leader and his Assistant, escort team, drivers, Police, Fire Service, Ambulance services and hospitals.

STTL has list of cyanide emergency response equipment which are kept in one of the escort vehicles that escorts the convoy to the mine site. Below are the list of ER equipment.

- Tyvek overalls
- Rubber boots
- PVC Gloves
- HCN Gas detector
- Full face respirator and Cartridges (ABEKP3)
- Beacons
- Safety triangles
- Caution tape
- Cones
- Shovels
- Stretcher
- Brooms
- Tarpaulin
- Empty sacs
- Plastic bucket
- Spray pack
- Reflector tape
- Sodium hypochlorite
- Danger flags (Red and Green)
- Bucket with lid
- Torch light
- 6Kg Fire extinguishers
- Helmets
- Megaphone

- Oxygen
- First Aid Kit
- Antidote Cyanokit

When there are no deliveries of cyanide to the mine, the escort equipment is kept in the lockable container store. Amount of oxygen in the oxygen tank is verified during the inspection of the emergency response equipment. Prior to departure of a convoy, the escort equipment is inspected, and an escort equipment checklist completed. The HCN gas detector was calibrated by manufacturers on purchase and its still in validity period, All the escort equipment were inspected by auditors and the quantities compared with the transporters inventory checklist. Antidot was found to be within expiry period and stored as per manufacturer's instructions.

The transporter has the necessary emergency equipment and Personal Protective Equipment which are available and forms part of the escort equipment. PPEs are part of the ER equipment checklist. Personal protective equipment, namely, disposable tyvek overalls, rubber boots, PVC gloves, full face respirator with canisters and helmets are available. Auditors carried out thorough inspection of all the PPEs and found them available. The quantity of each PPE was checked with the equipment checklist. Cyanide Antidote is carried by escort leader as per manufacturers specifications.

Emergency Response Equipment are inspected to ensure availability, good working condition and functionality. Prior to each convoy and upon return, the quantity of each ER equipment is inspected, and the equipment checklist is completed with the findings after the inspection and checklist signed. Inspection is carried out by the Escort Leader. The ER equipment is kept in a lock-up container to prevent unauthorized entrance and for safe keeping.

STTL does not sub-contract any of its cyanide transportation and the activities in Transport Practice 3.2.

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 ERP outlines the procedure for notifying the mine, all the stakeholders including medical facilities and affected communities. The contact list is part of the Escort leader's documents that he carries with him on a trip. The ERP stipulates the call-out procedure to follow during an incident. STTL has an emergency contact information which include a list of mine and supplier, , for medical facilities, other external responders NEMC, Police, GCLA, Fire Dept. Procedures are in place for notification of appropriate parties in the event of a cyanide release or exposure in the event of an incident. ERP details the list of telephone numbers and contact names is included in driver's / vehicle emergency file which is kept by the escort leader. The contact list is part of the Escort leader's documents he carries with him on a trip to the mine.

The emergency contact list in the ER Plan is revised at least once a year or as and when necessary. During route survey annually, the external responders are contacted to ascertain if any changes have occurred in their telephone numbers. A process is initiated by the QHSE Manager, and the contact phone and email addresses are amended. Contact phone numbers are reviewed and tested regularly by the QHSE Manager to ensure that the phone numbers are still active. Provision is made in the Emergency Response Plan for an annual or more frequent review of the contact phone numbers to ensure they are current. Selected contact phone numbers of the mine, Police, Hospital, Fire Services were called by auditors to ascertain whether they are active. The numbers were all found to be active.

Emergency Response Procedures states that in an event of a significant cyanide incident ICMI will be notified within 48hrs.

In case of a significant incident, an Accident Report Form will be completed by the QHSE Manager with the findings, causes and corrective actions and ICMI notified accordingly.

The ERP details significant incident as defined in the transporter's ERP and ICMI protocol are 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.
- An unauthorized release that occurs off-site or migrates 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

The procedure for notifying ICMI in the event of a significant incident was sighted by auditors. The transporter has recorded no cyanide incidents in the past.

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:

The transporter has developed a procedure for recovery and neutralization of solid sodium cyanide and dissolved cyanide. The following are the details of the remediation measures in the ERP.

- Procedure for recovery and neutralization of Solid sodium cyanide
- Procedure for clean of emergency equipment
- Neutralization and disposal of recovered cyanide
- Neutralization and disposal of contaminated soil
- Proper use of cyanide neutralization chemicals (Clause 5.9 of ERP)

The procedure mentions that in containing a spill, the escort team will ensure the spill is prevented from entering waterways. In case a spill on dry ground the briquettes of cyanide will be swept and shoveled into a sealable container. The residue will be neutralized with sodium hypochlorite. 1litre of Sodium hypochlorite is mixed with 10liters of water and used in neutralization. Any contaminated soil should be taken to the mine and processed there in order to minimize any other chemical reaction into the environment. Also, dry spills and spills into waterways are treated separately so as to not cause a greater environmental issue.

The ERP describes how the sodium hypochlorite, Ferrous sulphate and Hydrogen peroxide should be used correctly. The initial clean-up is the responsibility of the Escort leader and the escort team. The ERP mentions that in case of a spill into surface water no neutralization of the surface water should be done as this action is prohibited. The detailed process of the aforementioned remediation measures was scrutinized and noted by auditors.

The ER Plan states that under no circumstances should sodium hypochlorite, ferrous sulphate and hydrogen peroxide be used to treat or neutralize cyanide that has entered surface water. The procedure strictly prohibits the action of the neutralizing chemicals in surface waters. Auditors noted the relevant clauses in the ERP.

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:

ER Plan makes provision for annual reviewing and evaluating of the adequacy of ERP. The ERP is reviewed when there is a major or critical changes on the road conditions or changes to infrastructure and changes to the transport equipment. Also, after conducting mock drills and accident investigations, lessons learnt are used to review the emergency plan. The ERP has been revised once, in the year 2023.

Mock drills are organized twice in a year. The training matrix captures the dates mock drills were held, next mock drill exercise and the names of all the participants. Mock drills were held on 14th October 2024 & 07th July 2025. For each mock drill a report is written by the QHSE Manager. Mock drills covered both cyanide releases and cyanide exposures. Records of mock drill reports dated were sighted and noted.

The report outlines the simulation performed, issues encountered in the drill and corrective action. Records of mock drill attendance registers signed by the participants were sighted. A review of mock drill reports and interviews conducted on the escort team and drivers confirmed that mock drills have been completed in accordance with the company's commitments. Mock drills covered both cyanide releases and cyanide exposures.

The report outlines the simulation performed, issues encountered in the drill and corrective action. Records of mock drill attendance registers signed by the participants were sighted. A review of mock drill reports and interviews conducted on the escort team and drivers confirmed that mock drills have been completed in accordance with the company's commitments. The ERP stipulates that an evaluation of the plan be done when there are changes to conditions along the transportation routes, lessons learnt after an accident or significant incident or after a mock drill. Generally, evaluation of the plan is done annually. Lessons learnt from the mock drills are also used as the basis to make changes in ERP. After each mock drill debriefings are held with all participants. Participants make inputs as to what went wrong, and the correct actions recommended. Evaluation of the ERP is the responsibility of the QHSE Manager in consultation with management.