



June 2017

INTERNATIONAL CYANIDE MANAGEMENT CODE

FP Du Toit Transport (Pty) Ltd, Transport Re-Certification Audit, Summary Audit Report

Submitted to:

International Cyanide Management Institute
1400 I Street, NW – Suite 550
WASHINGTON, DC 20005
UNITED STATES OF AMERICA

Wesbank Transport Division of FP Du Toit
Transport (Pty) Ltd
11 A Hanna Mupetami Road
Walvis Bay
Namibia

REPORT

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Distribution:

1 Copy – ICMI (+1 Electronic)
1 Copy – Wesbank Transport Division of FP Du
Toit Transport (Pty) Ltd (Electronic)





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APPENDIX A

Important Information



1.0 INTRODUCTION

1.1 Operational information

Name of Transportation Facility:	FP Du Toit Transport (Pty) Ltd
Name of Facility Owner:	FP Du Toit Transport (Pty) Ltd
Name of Facility Operator:	Wesbank Transport as a division of FP Du Toit Transport (Pty) Ltd
Name of Responsible Manager:	Kai Kutzner – SHEQ Manager
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1.2 Audit scope

The scope of the FP Du Toit Transportation Recertification Audit is limited to road transportation of cyanide by Wesbank Transport (Wesbank), as a division of FP Du Toit from the Port of Walvis Bay to customer mine sites in Namibia.

1.3 Description of operation

1.4 Wesbank Transport Division of FP Du Toit Transport (Pty) Ltd

Wesbank was founded in 1968. The company initially transported sand and crushed stone and then diversified into fishmeal and fish products. During this period, Wesbank acquired tractors and trailers to service the short-haul distances between the factories, the harbour and the rail terminal. To service the long-distance transport market, Wesbank gradually acquired appropriate handling, warehousing and transport facilities as the sector developed.

FP Du Toit acquired Wesbank in 2015, as such Wesbank is now a division within the FP Du Toit Transport Group. Wesbank works closely with the mining industry and specialises in long and short-haul service, chemical and hazardous cargo transportation, as well as specialised handling of large (break bulk) cargo types.

Wesbank's operations are located on four hectares of land in Walvis Bay. The facilities incorporate Wesbank's head office, an in-house weighbridge, an integrated synchronised fuel system, a tarpaulin cleaning system, a vehicle satellite tracking office and overnight facilities.

Wesbank transports Australian Gold Reagents (AGR) solid cyanide from the Port of Walvis Bay to the QKR Namibia (Pty) Ltd (QKR) Navachab Gold Mine (Navachab Mine) and B2Gold's Otjikoto Gold Mine (Otkikoto Mine), Namibia.

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1.5 Australian Gold Reagents Pty Ltd

AGR is the management company of the unincorporated joint venture between CSBP Ltd (CSBP) and Coogee Chemicals Pty Ltd. CSBP, a subsidiary of Wesfarmers Ltd, is the major participant in the venture and acts as both plant operator and sales agent.

Coogee Chemicals is a local manufacturer and distributor of industrial chemicals.

The AGR cyanide production facility is located within CSBP's fertiliser and chemicals complex at Kwinana, some 40 km south of Perth within the state of Western Australia. AGR produces and transports two different forms of sodium cyanide from the Kwinana production facility, namely solution and solids. Sodium cyanide solution is produced as a 30% liquid and solid sodium cyanide as a >97%, white briquette.

AGR in its capacity as the sales agent is responsible for the overall management of the sodium cyanide transportation activities including emergency response.

1.6 Sodium cyanide transportation

Wesbank is contracted by AGR to transport solid sodium cyanide, originating from its production facility in Kwinana, Western Australia, from the Port of Walvis Bay in Namibia to the Navachab Mine and Otjikoto Mine. This arrangement has been in place with Wesbank Transport since February 2013. Upon arrival at Walvis Bay Port, the offloading of all containers is performed under the management of Namport (National Port Authority in Namibia). Wesbank collects the containers within 24 hours of arrival and transports the containers to the designated area at Wesbank's Walvis Bay Depot.

Transport from Walvis Bay Port to Navachab Mine takes approximately 0.5 day. At the Navachab Mine, the containers are offloaded by the mining company. Wesbank will transport 2-5 containers per consignment, with four consignments per year.

Transport from Walvis Bay Port to Otjikoto Mine takes about one day. At the Otjikoto Mine, the containers are offloaded by the mining company. Wesbank will transport 12-15 containers per consignment, with six consignments per year.

The containers go straight to customer mine site unless there is inclement weather, in which the containers will be stored at Wesbank's Transport Depot No. 2 for 1-2 days.

1.7 Transit storage

Wesbank does not operate cyanide trans-shipping depots or interim storage sites. During normal operations, cyanide containers collected from the Port of Walvis Bay are delivered directly to the customer mine site. In the event of inclement weather such as a sandstorm, containers can be diverted from the Port of Walvis Bay to Wesbank Transport Depot No. 2 (Transport Depot 2) until conditions improve. At the Transport Depot 2 the containers are not opened and they remain on the trucks.

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1.8 Auditors findings and attestation

in full compliance with **The International Cyanide Management Code**

The operation is in substantial compliance with

not in compliance with

The operation has maintained full compliance with the International Cyanide Management Code throughout the previous three-year audit cycle. No cyanide incidents or releases were noted as occurring during the audit period.

Audit Company: Golder Associates Pty Ltd
Audit Team Leader: Edward Clerk – Exemplar Global (105995)
Email: eclerk@golder.com.au
Dates of Audit: The Audit was conducted between 22 and 24 November 2016.

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

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

Name and Signatures of Auditors:

Name	Position	Signature	Date
Edward Clerk	Lead Auditor and Technical Specialist		21 March 2017

2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

2.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

in full compliance with **Transport Practice 1.1**

The operation is in substantial compliance with

not in compliance with

FP Du Toit Transport (Pty) Ltd 6 June 2017
 Name of Facility Signature of Lead Auditor Date



Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes are selected to minimise the potential for accidents and releases. Wesbank has implemented a procedure for the selection of transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases.

The *Procedure for the Selection of a Preferred Route* outlines the process for the development and subsequent maintenance of route risk assessments. The procedure requires routes to be risk assessed prior to deliver to any new end user site, with routes being selected by Wesbank in conjunction with AGR. The route selection procedure states that Wesbank shall annually revise the route survey and a risk assessment shall be conducted.

Wesbank implements a procedure to regularly evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks. In accordance with the Transport Management Plan and the Procedure for the selection of a Preferred Route, Wesbank has conducted a route risk assessment. The risk assessment process applies an assessment ranking of low to extremely high risk for identified risks along the route.

Wesbank has implemented a procedure to periodically re-evaluate routes used for cyanide deliveries. The procedure states route surveys must be revised on an annual basis and a risk assessment has to be developed. The document must be approved by the cyanide supplier and the contents discussed.

During the convoy the Convoy Leader communicates information through use of lights, signals and radio about road conditions so that information on risks is kept current. The route is discussed at pre-start tool box safety meetings. The meeting provides a forum where potential changes in route conditions and hazards can be discussed.

Measures to manage the risks are documented in the route risk assessment are included in the *Transport Management Plan* and associated procedures. The risk assessment also includes measures to reduce the risks to acceptable levels.

Wesbank has sought input from other stakeholders and applicable governmental agencies as necessary in the selection of routes. Wesbank has consulted with AGR and mine sites regarding the selection of routes for the transportation of cyanide. Transportation routes have been assessed and risk management measures deemed appropriate.

Routes do not present special safety or security concerns, but convoys are used as a means of managing the identified issues (traffic, people and road workers) and responding to emergencies. The convoys do not proceed if unusual safety risks are present on the road.

There are both escort and emergency vehicles present in the transportation convoys. The escort vehicle is responsible for the supervision of the convoy and in the event of an emergency for communications between parties and implementing the emergency response.

Wesbank had advised external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response. Consultation with external responders, medical facilities and communities is primarily conducted by AGR, Navachab Mine and Otjikoto Mine, with Wesbank involved as required. AGR and Wesbank consulted with the Walvis Bay Municipality and Welwitschia Hospital. The community has not been allocated a role during an emergency response.

Wesbank does not subcontract any of the cyanide handling or transport.

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2.1.2 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.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Standard of Practice 1.2 requiring that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Wesbank only uses trained, qualified and licensed (where required) operators to operate its transport vehicles. Prior to employment, the licence categories and currency are checked as part of the employee pre-employment checks.

Wesbank trains personnel operating cyanide handling and transport equipment to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. Prior to any driver commencing deliveries and on an annual basis thereafter, drivers undertake mandatory training in sodium cyanide product awareness, convoy procedures and emergency response requirements.

A review of training records and interviews with drivers indicated that training is undertaken as planned.

Wesbank does not subcontract any of the cyanide handling or transport.

2.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Standard of Practice 1.3 requiring that transport equipment is suitable for the cyanide shipment.

Wesbank only uses equipment designed and maintained to operate within the cyanide loads it will be handling. Equipment consists of a minimum of ten dedicated road vehicles (prime mover) that were purchased to a design specification appropriate for the cyanide transport task. Vehicle power, axle loadings and other parameters are set by the manufacturer and the loads are within the legal capacities of the public roads. Side loaders and chains are tested annually by a third party for load testing.

On an annual basis the Namibian Government requires a certificate of Fitness (CoF) to be issued for all prime movers and trailers. The CoF is completed by the government department NaTIS (a subdivision of Transport Information and Regulatory Services) as part of the vehicle registration renewal.

Wesbank has established procedures to verify the adequacy of the equipment for the load it must bear. In addition to the preventative and breakdown maintenance, Wesbank Drivers are required to undertake visual

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inspections of prime movers and trailers every day and prior to departure. Checklists are signed by the driver and checked by the Convoy Leader.

Wesbank has established procedures to prevent overloading of the transport vehicle being used for handling cyanide. Wesbank equipment was purchased to a design specification and maintained to for the load it must bear. Only one 6 m container is loaded onto a three axle flatbed or skeletal trailer.

On completion of loading the vehicle must be weighed at the weighbridge prior to departure to ensue legality with the National Road Traffic Act regarding axle weight limitations and gross mass. Wesbank also weighs prior to departure from Transport Depot 2.

Wesbank does not subcontract any of the cyanide handling or transport.

2.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is **in full compliance with** **Transport Practice 1.4**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety programme for transport of cyanide.

Wesbank has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging and Placards are used to identify the shipment as cyanide. There is a provision to check the containers prior to loading at the Port to ensure the seals are intact, warning placarding is in place, numbers are recorded and the container is in a fit state to be transported.

The Dangerous Goods Transport laws in Namibia require that an orange coloured diamond denoting dangerous goods is on the front of the prime mover and an emergency information panel is on the rear of the prime mover. As all cyanide is delivered by sea, containers arrive placarded by AGR in Australia, in accordance with the International Maritime Dangerous Goods (IMDG) Code. These placards remain on the containers until the containers are unpacked and decontaminated.

Wesbank implements a safety program for cyanide transport that includes (where appropriate or applicable) the following:

- a) Pre-trip vehicle inspection checks are performed prior to the commencement of each journey and checklists completed.
- b) Wesbank operates a preventative and breakdown maintenance program.
- c) Wesbank has limitations on driver hours in accordance with Namibian legislation, which requires no more than 14 hours of driving in a 24-hour period. Currently a 15-minute rest is taken approximately every hour.
- d) Sodium cyanide is stowed into the sea containers by AGR in Australia. Sodium cyanide briquettes are packed in one-tonne Intermediate Bulk Containers (IBC) for storage and transport. Each IBC consists of a waterproof polyethylene bag that has been heat sealed to provide a moisture barrier. This is enclosed in a woven polypropylene bag that is encased in a custom-designed, strong wooden box on a pallet base to provide further protection during storage and transit. At the transport depot, freight containers are secured using twist locks, which are designed and constructed to international transport standards.

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- e) The Procedure for transportation modification after convoy has departed from Wesbank Transport Depot No. 2 in Walvis Bay states that the Convoy Leader is responsible for ensuring that diversion from the approved transport route is safe for the convoy to pass.
- f) Wesbank has a drugs and alcohol policy that establishes a zero tolerance policy on the intake of drugs and alcohol by its staff.
- g) Records documenting activities a) to f) are maintained.

Wesbank does not subcontract any of the cyanide handling or transport.

2.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

in full compliance with

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

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air, is NOT APPLICABLE to FP Du Toit.

Transportation of Wesbank’s cyanide does not occur by sea or air within the scope of this audit.

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

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

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Standard of Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

Transport vehicles have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders. All Wesbank vehicles have communications systems that include radios and mobile phones.

Communication equipment is tested to ensure it functions properly. Wesbank use the communication equipment daily, which functions as a test procedure. Communication systems must be checked prior to the convoy departing.

Wesbank advised that no communication blackout areas exist along the transport route resulting in communication being primarily via radio for convoy communication and cell phone for other communication.

Wesbank has a system to track the progress of cyanide shipments. Wesbank uses Netstar, a GPS tracking system to monitor the progress of cyanide shipments remotely. The system tracks convoy progress and logs data relating to position, speeds and harsh braking.

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Wesbank implements inventory controls and chain of custody documentation to prevent loss of cyanide during transport. Cargo documentation must be carried in the transport vehicle. A pre-departure checklist requires checks to be made on the integrity of the producers packaging through a check of the container and container seal numbers. This checklist also includes the date and time of arrival at the mine sites.

Shipping records indicating the amount of cyanide in transit and Safety Data Sheets that indicate the presence of cyanide and describe the necessary handling precautions are available during transport. Shipping documents are included as part of every consignment.

Wesbank does not subcontract any of the cyanide handling or transport.

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2.2 Principle 2 – Interim Storage

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

2.2.1 Transport Practice 2.1

Store cyanide in a manner that minimises the potential for accidental releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 2.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 is NOT APPLICABLE to FP Du Toit, requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Wesbank does not operate cyanide trans-shipping depots or interim storage sites. During normal operations, cyanide containers collected from the Port of Walvis Bay are delivered directly to the customer mine site.

Each freight container must be locked with a security seal for the entire duration of transport. No container is loaded or stored if the seal has been removed or a discrepancy is noted.

In the event of inclement weather, containers can be diverted from the Port of Walvis Bay to Transport Depot 2 and offloaded until conditions improve. At Transport Depot 2 containers are stacked in a dedicated area away from any other products or traffic, and staff are notified to remain clear of the area. The area is barricaded off and appropriate safety signage is displayed and inspected on a daily basis.

The facility is fenced and is manned 24 hours per day by Security, who conduct patrols.

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2.3 Principle 3 – Emergency response

Protect communities and the environment through the development of emergency response strategies and capabilities.

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Standard of Practice 3.1 requiring the operation to prepare detailed Emergency Response Plans for potential cyanide releases.

Wesbank has developed an Emergency Response Plan (ERP) for potential cyanide releases for cyanide transportation within Namibia. The scope of the emergency response plan is to provide information for Wesbank personnel that will be involved in the primary stage of the emergency, with the mine sites in control of the second phase. The ERP is appropriate for the selected transportation routes. The route is on road and the ERP describes the roles in an incident for both internal and external responders.

Wesbank transports only solid sodium cyanide, and the ERP considers and includes details on this form of cyanide. The ERP is based on road transportation between the Walvis Bay Port and the mine sites. Wesbank continually reviews the condition of the routes and associated hazards.

The ERP considers all aspects of transport infrastructure and is appropriate for the selected transportation routes. The route evaluation process and route risk assessment process describes aspects of the transport infrastructure in sufficient detail. The ERP considers the design of the transport vehicles as it is specifically drafted around the transport of solid cyanide on semi-trailers.

The ERP includes descriptions of response actions, as appropriate for the anticipated emergency situation. The ERP contains emergency response guides to be followed in the event of an incident involving cyanide and identifies the roles of outside responders and medical facilities in emergency response procedures.

AGR plays a significant advisory and technical role in the emergency response process in the event of a cyanide release.

2.3.2 Transport Practice 3.2

Designate appropriate response personnel and commit necessary resources for emergency response.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Standard of Practice 3.2 requiring the operation to designate appropriate response personnel and commit necessary resources for emergency response.

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Wesbank provides emergency response training of appropriate personnel as specified in the ERP. Cyanide emergency response training is conducted and multiple on-site emergency scenario exercises simulating cyanide releases have been completed.

The ERP does identify the specific emergency response duties and responsibilities of the following personnel:

- Convoy Leader
- Truck Drivers
- Wesbank Transport Emergency Response Number Operator
- Police/Traffic Officials
- Fire services
- Hospital
- Ambulance
- Government Agencies
- Gold Mine Emergency Response Teams
- Communities affected
- Wesbank transport management
- Consignor/manufacturer (AGR).

Wesbank maintains a complete list of all emergency response equipment that should be available during transport or along the transportation route. The ERP includes a complete checklist of emergency response equipment list per convoy. The presence of equipment is checked prior to departure on every shipment and the serviceability of the equipment is checked monthly.

Wesbank has available the necessary emergency response and health and safety equipment, including personal protective equipment during transport.

Wesbank transport vehicle operators receive initial and periodic refresher training in emergency response procedures including implementation of the ERP.

While Wesbank does not subcontract cyanide handling or transport, it does use the Mine Sites as responders during cyanide transport incidents. This is stated in the ERP and agreed to by the mine sites.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

The operation is **in full compliance with** **Transport Practice 3.3**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Standard of Practice 3.3 requiring the operation to develop procedures for internal and external emergency notification and reporting.

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The ERP contains procedures and current contact information for notifying the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

There are provisions to ensure that internal and external emergency notification and reporting procedures are kept current in the ERP. The ERP includes a provision to be revised annually.

2.3.4 Transport Practice 3.4

Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Standard of Practice 3.4 requiring the operation to develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

The ERP includes the physical properties of solid sodium cyanide. The ERP states that the management strategy for a spill is to:

Assist, where require, to clean up any spilled product and remediation of contaminated soil under the supervision of personnel from the Mine Site.

Therefore, the ERP is not required to have procedures for remediation of spills.

The ERP includes the physical properties of solid sodium cyanide. The ERP states that the management strategy for a spill is to:

Assist, where require, to clean up any spilled product and remediation of contaminated soil under the supervision of personnel from the Mine Site.

Therefore, the ERP is not required to have prohibit the use of these chemicals since Wesbank would not undertake the clean-up of the spill. Sodium hypochlorite, ferrous sulfate and hydrogen peroxide are not kept by Wesbank and do not form part of the emergency response equipment.

2.3.5 Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

FP Du Toit is in FULL COMPLIANCE with Standard of Practice 3.5 requiring the operation to periodically evaluate response procedures and capabilities and revise them as needed.

The ERP contain provisions to review and evaluate the Plans' adequacy and implementation. The plan also contains procedure to evaluate the performance after its implementation and revise if needed.

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The ERP requires the plan to be reviewed annually and evaluated following any incident that triggers implementation of plan, training, drills and audits. The ERP has been reviewed three times since 2013.

The ERP contains provisions for conducting mock emergency drills and these are being implemented. Desktop emergency response simulation drills are done annually. Emergency response exercises are held annually in conjunction with the mine site and/or AGR and these mock scenarios simulate a variety of transport related cyanide release incidents.

3.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

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Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'E. Clerk'.

Edward Clerk
ICMI Lead Auditor and Technical Specialist

EV_CC/EWC_JEJ/hn

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APPENDIX A

Important Information



IMPORTANT INFORMATION RELATING TO THIS REPORT

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