

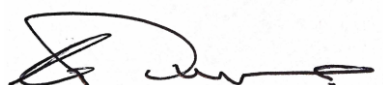
**INTERNATIONAL CYANIDE MANAGEMENT
INSTITUTE**

**Summary Transportation
Recertification Audit Report**

**Wesbank Transport (Pty) Ltd
Walvis Bay, Namibia**

30 September to 03 October 2024

**For The
International Cyanide Management Code**



Name of Operation: Wesbank Transport
Name of Operation Owner: FP Du Toit Transport (Pty) Ltd
Name of Operation Operator: Wesbank Transport (Pty) Ltd
Name of Responsible Manager: Mr Kai Kutzner, SHEQ Manager
Wesbank Transport
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Walvis Bay
PO Box2916, Walvis Bay
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E-Mail: sheq@wesbanktransport.com

Location detail and description of operation:

Wesbank Transport, a division of FP Du Toit Transport, is a transport company that supplies international, normal & abnormal, and dangerous goods transport, cargo handling and hiring of lifting equipment services to the commercial, industrial, mining, and agriculture industries in Southern Africa.

Wesbank Transport's operation is located in Walvis Bay, Namibia, and there are premises for container & bulk goods storage and warehousing & bonded storage facilities.

Wesbank has been transporting various dangerous goods to various mines since 1995 and started transporting Sodium Cyanide when Navachab Gold Mine started its operation in 2006.

Wesbank Transport is proud to have a "ZERO Incident" history regarding Sodium Cyanide transport thus far.

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: 30 September to 03 October 2024

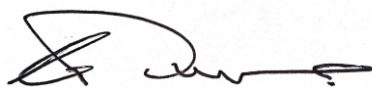
Richard Durrant
Name



Signature

05 December 2024
Date

Wesbank Transport (Pty) Ltd



Signature Lead Auditor

05 December 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:

Hazard Identification and Risk Assessment (HIRA) Risk Assessment of Cyanide Container handling/transport from Arrival at Walvis Bay to delivery to mine site assessed have been conducted in June 2022, June 2023, January 2024 and June 2024. Procedure for selection of preferred route for the shipment of cyanide to mine sites is in place and includes alternative routes, where feasible.

HIRA considers population density (urban/rural), presence of pedestrians and cyclists, animals (wildlife and domestic) along the route. The procedure prompts identification of risks such as population density. Transport Routes and Road Conditions such as dust, tarmac, road surface, road orientation; also considers railway crossings and tracks specifically. Also reviews condition of infrastructure of harbour facilities and customs areas with reference to transport of cyanide. Includes new road and intersection behind the dunes. Procedure for selection of preferred route for the shipment of cyanide to mine site is in place. The procedure include reference to pitch and grade (e.g., steep rise, blind rise).

Prevalence and proximity of water bodies and fog are included in HIRA with reference to fog and sandstorms, wind, misty conditions, poor visibility, overcast but not raining.

Procedure for selection of preferred route for the shipment of cyanide to mine sites is in place dated June 2024. The HIRA includes mitigating measures to manage risks identified. Considers alternate routes if primary routes are problematic. The HIRA makes specific reference to alternate routes available. Alternate routes are not always available. New road upgrades have improved the safety of the transport.

HIRAs are re-evaluated, when necessary, through additional updated information, or at least annually. The HIRA includes specific recommendations to mitigate risks such as speed reduction, more driver caution to be exercised, additional cautionary actions by convoy leaders, delayed departures in inclement weather conditions and to avoid peak traffic conditions.

The Namibian Government does not dictate routes for chemical transport. In consultation with the Roads authority, it has been clarified that there are no controls on the size of a convoy and speed is limited to 80 km/hour, being the national speed limit and following distance of 3 seconds. The Mine has an on-going dialogue programme that includes reference to transporters such as Wesbank. Plans are in place to revise the programme and include additional information, as relevant. Mine Cyanide Champion consults widely with National and Local Authorities and medical facilities on route travelled. Wesbank transports cyanide in convoys which include an escort vehicle and emergency trailer. Convoys do not travel at night. Convoy leader sets the pace of convoy and adjusts convoy movement based upon risks and changes that may occur on the journey. Convoy departures are at times delayed due to traffic, fog and other conditions which are deemed to be unsafe for travel.

All transport loading of grounded containers and offloading of cyanide containers is conducted by Wesbank. No subcontracting is conducted. Loading of all containers in the Port of Walvis Bay is conducted by the Namibian Ports Authority (Namport)

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

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

Minimum Training Requirement Procedure states that drivers must be licensed to transport dangerous goods (Wesbank uses an independent, accredited trainer for the Dangerous Goods by Road Training) and have annual related training. Drivers must have relevant licence codes (EC, plus D + G) according to the Transport Management Plan (TMP). The transport company use only trained, qualified and licensed operators to operate its transport vehicles. Sighted drivers licences and Dangerous Goods training certificates for cyanide trained drivers. There are three trained side loader drivers who also have Transport of Dangerous Goods training. These include both Namibian and South African licences. Within the SADC (Southern African Development Countries) region, all member country drivers licences are acceptable in all SADC countries. Sighted driver training matrix, which includes PrDP (Professional Driving Permit) /Licence Dangerous Goods training certificate, Cyanide training, medical certificate, Side Loader operator training, as applicable. All documents are current, with most expiring in 2026. Sighted Competency Certificates in terms of Driven Machinery Legislation 18.11 of the Occupational & Safety Act to operate 45 ton Reach Stacker for two operators both expiring on 15/04/2026.

AGR (Australian Gold Reagents), provide cyanide training to Wesbank Transport on a regular basis. Sighted training registers for training conducted by Technical Support Africa representative for AGR dated 12 August 2023 and 24 August 2024. Fifteen and fourteen Wesbank staff were trained respectively at these sessions. Training conducted was on Product Knowledge, Emergency Response and Convey Procedures.

Convey Toolbox Talks are conducted before every cyanide delivery covering the top six potential transit risks of the transport of cyanide.

No sub-contracting of transport is undertaken by Wesbank Transport

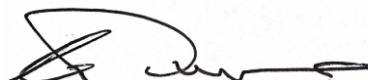
Transport Practice 1.3: Ensure that transport equipment is suitable for the cyanide shipment.

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:

Vehicle combinations operated to transport cyanide are 6x4 truck tractors drawing 12.5m three axle flat deck semi-trailers with centre mount container twist locks fitted. The vehicle's total axle mass load capacity would be 36.3 tons; however, due to other restrictions such as vehicle power to mass ratio, the



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allowable payload on a vehicle combination would be approximately 30 tons. A loaded shipping container mass is approximately 24.0 tons

One side-loader trailer will be included in each convey to offload the containers at the mine. Side loader load lifting capacity is 35 tons and transport payload capacity is 28.0 tons both of which are within the rated and legal capacity of the equipment.

Certificate of conformity sighted for Container Side loader in terms of Driven Machinery legislation Section 18 of the Occupational & Safety Act for Fleet no 473 (Serial No SB9918) was tested on 30 September 2024 and Fleet No 475 (Serial No SB 9320) - expiry dates 12 June 2025 respectively. Certified for 35 tons and tested to 38 tons. The cyanide shipping containers will be a maximum of 24 tons gross mass. At Wesbank 2 Yard, which is the Wesbank Head Office and primary depot, overnight convoys would be offloaded by one of three reach stacker cranes stationed in the yard. Sighted two reach stacker test certificates:

- Serial No 540501352 test date 27 May 2024 at 45,000kg capacity with 32.1 ton capacity at 3.3m reach
- Serial No A11300014 test date 25 July 2024 at 45,000 kg capacity with 31.9 ton capacity at 3.5m reach

In the Transport Emergency Plan (TMP), it states, only one 6m sea container with a weight of approximately, 24 tons will be loaded onto a three axle trailer. This will ensure that the vehicle will be well within the maximum allowable payload of 30 tons. The TMP further states that the vehicle and trailer, on departure from Wesbank 2 yard, will pass over the Roads Authority weighbridge before proceeding on the route to the mine. If the vehicle and trailers travel from the port directly, they will pass over the Government weighbridge.

There is a calibrated, certified weighbridge at Wesbank 2 Yard where spot weighting of containers is conducted. Weighbridges are calibrated once per year. The onsite weighbridge was last calibrated on 08/08/2024 by SA Scale Company and verified by the Namibia National Metrology Laboratory with Approval Number SA 1480.

There is no sub-contracting of transport undertaken by Wesbank Transport

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

X in full compliance with

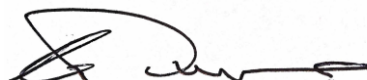
The operation is in substantial compliance **with Transport Practice 1.4**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The packaging for the cyanide conforms to the IMDG (International Maritime Dangerous Goods) Code and is packed at source by the producer/consignor. 20 x IBC plywood boxes of cyanide briquettes are loaded into each 6.0m sea container by the producer/consignor. The mass of each IBC box varies between 1.0 to 1.2 tons depending on supplier. The boxes fit snugly into the sea container reducing possible moment in transit.

Convoy leader will ensure that the IMDG Code split placarding on the containers is visible on four sides on collection at the Walvis Bay port. This requirement is included in the Emergency Management Plan. Transporter safety program for cyanide transport forms a part of the Transport Management Plan (TMP) for the Transport of Cyanide from Wesbank 2 to the mine sites.

TMP Section 2.1.4 details the required Driver, pre-trip checks, Truck Tractor Pre-Trip List, and Trailer Pre-trip list requirements. All vehicles are subjected to a detailed and documented pre-trip inspection. Any defects identified would be reported to the workshop and repairs would be undertaken prior to any departure.



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Maintenance and inspection of trucks and trailers - Truck and Trailer PMS (Planned Maintenance System) uses SAP accounting software system to manage maintenance planning and maintenance records.

The Wesbank Transport a division of FP Du Toit Transport, Walvis Bay vehicle workshops are accredited by Daimler Truck Southern Africa: Mercedes Benz to carry out periodic maintenance on their own Mercedes Benz truck fleet.

Sighted maintenance record sample for truck tractors that would be used for transporting cyanide. Various service records for trailers and side loader trailers were also examined and found to be in good order and the PMS system well managed. Records include tyre condition and pressure test records, maintenance and fitting and removal details.

Driver Hours and Fatigue Management procedure, dated April 2024 is in place. Wesbank Convoy leader is responsible for compliance. Maximum driving period is 5 hours continuous, maximum total driving time of 14 hours in a 24 hour period. Resting period is minimum 15 minutes, with 30 minutes accumulated during a period of 5.5 hours and a minimum continuous rest period of 9 hours in every 24 hours. However cyanide convey travel and cyanide delivery is only conducted during daylight hours. Loaded convoys typically departed Wesbank Transport yard at 09h00 arrived at the mine at 12h30. Empty vehicles departed mine at 15h00 and arrive back in the yard at 17h00. At times empty convey may arrive at yard as late as 20h30.

Procedures to prevent loads from shifting - 20 boxes are packed into a 6.0m sea container which gives a tight fit and prevents load shifting. The sea container is sealed at producer source, and the Transporter cannot affect any inspection or change to the load configuration. Container twist locks on the trailers are checked on loading and on-route that they are all engaged in the locked position.

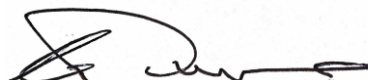
Transport Modification Procedure after Convoy has left depot details circumstances that may trigger modification including: - inclement weather, civil unrest, road closure or road works. The responsibility of the convoy leader is to ensure the safety of the convoy. The leader will liaise and communicate with the mine and the National and/or SHEQ Manager at Wesbank Transport. If severe weather conditions or other unsafe conditions prevail, the Convoy leader may halt the convoy at a safe place and proceed ahead to check conditions.

Drug and Alcohol Policy and Alcohol Test Forms are used to record any incident of alcohol being detected. Used in conjunction with the Company Disciplinary Policy. Sighted FP Du Toit Transport (parent company) Employee Rule Book, which includes a section on Alcohol and Drug-related offences in the company, which has a zero-tolerance policy. Alcohol breath testing is conducted on all persons on entry to the at the depot entrance gate by security officers. Drivers that overnight in the depot are also tested on exit from the depot.

Drug testing is conducted during annual Occupational Health medical checks.

Drug and alcohol test records are kept on personnel files for life of employment plus a minimum of 5 years. Medical records are kept for 30 years, financial records are kept for 5 years, vehicle records are kept throughout the life of the equipment. In practical terms, records have been kept as long as there is storage space and since the original company inception.

No sub-contracting of transport is undertaken by Wesbank Transport.



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

Summarize the basis for this Finding/Deficiencies Identified:

This section is Not Applicable as Wesbank Transport is not involved in managing 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

Summarize the basis for this Finding/Deficiencies Identified:

The TMP, Section 1.3, states that all vehicles are fitted with vehicle tracking. Vehicles are fitted with DriveCam forward facing and in cab cameras. All drivers are in possession of a cell (mobile) phone, and the company provides airtime credits for the phones. DriveCam cameras are monitored by operations department.

Communications equipment is checked at the beginning of the trip (Drivers must have a cell phone, and it must be charged). The Convoy Leader and Support vehicle driver have company-issued cell phones. The vehicle tracking system uses GSM cell phone technology. The Briefing checklist asks, are you in possession of a cell phone and is the phone in working order?

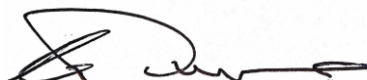
No blackout areas are experienced on the current routes. There are no special arrangements for communications back up.

In TMP, Section 1.3. All vehicles are fitted with GSM cell-based vehicle tracking and recording events such as harsh braking, collisions, and violent steering. Vehicles are fitted with DriveCam dashcam tracking and recording equipment. All drivers are in possession of a cell phone. The Convoy Leader reports progress at set points, particularly when close to mine. The WhatsApp mobile application is also being used to communicate with and between convoy leader, operations control and mine as to convoy progress.

Convoy Leader Checklist – includes container numbers, twist locks, and container seals and are checked against the Bill of Lading and Customs and clearance documentation. The TMP confirms that containers must have intact seals and not be tampered with. Seals are inspected during loading and during the journey. There is also an Overnight Storage and Pre-delivery checklist, should the containers be released too late for direct transport and have to be stored overnight at the Wesbank 2 Yard.

Safety Data Sheets (SDSs) are held by Wesbank Transport. Shipping records include the number of containers and serial numbers, which indicate the quantity of cyanide being transported. Briefing Checklist for Cyanide Drivers checks if SDS are in driver's possession.

No sub-contracting of transport takes place by Wesbank Transport.



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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:

The cyanide containers are not always cleared through the port by Customs with time enough to commence the journey to the mine (No cyanide transport occurs after dark) in one day. In that situation, the cyanide containers are taken to Wesbank Depot 2 and stored overnight, leaving after 09:00 the following day. Container Collection procedure is in place. The temporary storage of containers will be done at Wesbank 2 site and in a pre-determined area away from foodstuffs, animal products, and other containers. Cyanide must be stored separately from acid, corrosives and strong oxidisers. The storage area will be barricaded off, and applicable safety signage will be displayed. Access to the area will be limited. On-site security services will be notified of the temporary storage of the containers, and that special care has to be taken concerning these containers.

When loaded containers are stored overnight, warning signs are put up (no entry, no smoking and no open flames, no eating and drinking) around the cyanide containers, and the containers are encircled with hazard warning tape.

The containers are stored inside a secure area, patrolled by security staff (24/7). Containers are still sealed, and doors are stacked door-to-door to prevent access and containers are stacked three high, where applicable and depending on the number of containers in a consignment.

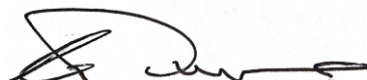
Separation from incompatible materials is spelt out in Section 7 of Container Collection Procedure.

The storage site is in dry desert conditions, and there is a low risk of water impacts. Storage time is very short (overnight), reducing the potential risk.

Cyanide containers are stored in the open air. The local climate is very windy (coastal area), causing good circulation and dilution effects.

There is a Cyanide Emergency Spills procedure, whose scope is to handle a controlled or uncontrolled cyanide spillage in all areas and processes during the delivery of cyanide to the mine is in progress.

Section 6.3 of the procedure makes reference to uncontrolled cyanide spillage during storage and as well as loading and offloading in the Wesbank 2 premises when cyanide containers are handled and stored overnight at Wesbank 2 before delivery. The containers are inspected before being left in Westbank 2 overnight to ensure that there is no visible leakage or spillage.



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

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.1**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

A Sodium Cyanide Emergency Response Plan is in place and the HIRA is aligned with the Emergency Response Plan. Mitigating measures are in place to minimise the risk of a cyanide emergency.

The Response Plan considers the transporting of solid cyanide briquettes in secure packaging.

Road transport is the only method of transport practised by Wesbank Transport.

The Response Plan consider the transport infrastructure and the HIRA is aligned with the Emergency Response Plan. Mitigating measures are in place to minimise the risk of a cyanide emergency. Response actions are geared to the type of incident that might be expected. Sighted Route Risk Assessments for travel routes from Walvis Bay to B2Gold and Navachab gold mines.

The vehicle and trailer design take into account the transport of a single container on a trailer within the load capabilities of the truck tractor and trailer combination.

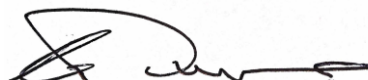
Emergency Response Plan, point 14 - Flow diagram, describes who is responsible for what activities.

Convoy Leader will determine the extent of the incident, the remainder of drivers and escort vehicle team to don PPE, monitor for any gas present, barricade area and exclude bystanders, tend to injured, cover any spilt product if raining. Navachab Gold Mine representative provides technical assistance, as appropriate and it was confirmed in an interview during the audit that the Navachab representative will provide assistance for on road cyanide incidents whether the cyanide is enroute to either Navachab or B2Gold mine sites.

The communities have no role to play in any emergency except to obey instructions to keep safe. The roles of outside responders are identified. This includes: - hospitals, ambulances, police and traffic officers, private security companies who can be called upon to provide assistance, including government agencies (Environmental Affairs, Water Affairs and Transport).

The Navachab Gold Mine is an integral part of cyanide emergency response. There is a cross-referenced in both the mine's and Transport's procedures, and in the Cyanide Transport Contract.

SpillTech Namibia contact details are available – SpillTech would provide cyanide recovery support services to the Navachab Gold Mine cyanide emergency team. Hollard Insurance Company - Pollution Liability Cover - iTOO EnviroCare and Hazkem Namibia are additional spill response companies that have an association with Hollard insurance/ iTOO.



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:

Minimum Training Requirement Procedure dated June 2024. Procedures cover all training, including emergency response, product awareness, convoy procedures, transport of dangerous goods, and SDS training. Mine training is included in this training.

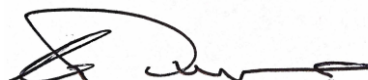
In the procedure, Minimum Requirements of Convoy Operations Sections 6.1 Convoy Leader, and 6.2 During Transport Operations, detail the duties and responsibilities of the Convoy Leader from before the convoy commences, until the end of the journey. The procedure also details the responsibilities of the drivers and the emergency vehicle driver. Section 6.4B Emergency vehicle driver taking over duties of Convoy Leader, details the Emergency Driver's responsibility to take over the role of Convoy Leader, if the Convoy Leader is incapacitated or unable to continue as the Convoy Leader.

The drivers have also received emergency response training from the AGR Cyanide Emergency trainer. Sodium Cyanide Emergency Response Plan, Section 12, Emergency Response Equipment, containing a complete inventory list of all emergency equipment accompanying every cyanide convoy. The list is checked prior to departure on every shipment. Inventory - Cyanide Emergency Response Trailer. Cyanide PPE included in the emergency trailer includes: - 4 sets x PVC chemical suits with hoods marked cyanide, 4 pairs x 11 cm Mapa gloves, 4 x respirators and cannisters, 4 x pairs of nitrile boots, 2 x sets of SCBA equipment. Drivers only have overalls (with reflective strips), hard hats, earplugs, safety glasses and safety boots.

The list is checked against the Inventory monthly and prior to departure on every shipment.

In an interview with the Navachab Mine Cyanide Champion it was confirmed that the mine would at all time take control of any cyanide related incident and ensure that any spilt cyanide would be recovered and/or neutralised by the mine emergency team. Wesbank would only be responsible for securing the scene prior to the arrival of the Navachab Mine team and the recovery of the container and the truck once the incident scene was declared safe of cyanide.

SpillTech Namibia an independent emergency spill response company is contract to Hollard Insurance as a spill responder. SpillTech would only act as a support for the Navachab Mine response team at a cyanide spill.



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:

Sodium Cyanide Emergency Response procedure, Annexure 1, Medical Support and Emergency Contacts. Clause 14 - basic incident Response Plan - Flow diagram indicates convoy leader will contact and inform gold mine, Wesbank Transport, and the emergency services, if required. SHEQ Manager will notify the relevant government agencies, depending upon the type of incident.

SHEQ Manager personally reviews contacts lists annually, or updates as and when required.

Sodium Cyanide Emergency Response Plan, Clause 13 details Responsibilities of Wesbank Transport management to inform ICMI of any significant cyanide incidents are detailed.

No significant cyanide incidents have occurred since the Wesbank Transport last certification audit conducted in May 2021.

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:

Sodium Cyanide Emergency Response Plan, dated 12, October 2024, under Section 13,

Responsibilities, states "...Gold Mine Emergency Response Teams

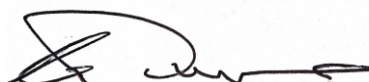
> If available, shall support first aid to victims of accidents in the absence of medical facilities and Ambulances

> Shall supervise the remediation and recovery process with the assistance of the Wesbank personnel, if required..."

Sighted Navachab Mine Cyanide Spillages Procedure, dated October 2022, which includes Cyanide Code compliant remediation procedures for Controlled and Uncontrolled liquid and solid cyanide spillages, including recovery, neutralisation of liquids and solids and decontamination of soils.

Cyanide Emergency Spills procedure, dated June 2024 whose scope is to handle a controlled or uncontrolled cyanide spillage in all areas and processes during delivery of cyanide to the mine. The procedure will also apply to the designated delivery team while cyanide containers are stored at Wesbank 2 before delivery.

Navachab Mine Cyanide Spillages Procedure states the Mine only used Ferrous Sulphate for neutralisation and identification purposes. Under 6.1.3 Uncontrolled Liquid Spillages, sub-section 11, it states, "...Ferrous sulphate (or any other neutralizing agent) should never be used to neutralise cyanide spillage into clean-water rivers or dams..."



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The Wesbank Cyanide Emergency Spills procedure, dated June 2024, states: Uncontrolled Liquid Spillages sub-clause 13; 6.2 Uncontrolled Solid Cyanide Spillage sub-clause 15; 6.3 Uncontrolled Cyanide Spillage during Storage at Wesbank Yard sub-clause 14; all state that "The recommended neutralisation reagent to be used for uncontrolled cyanide spillage, decontamination and neutralisation procedures is ferrous sulphate (FeSO4). The ferrous sulphate will, however only be used under the strict guidance and supervision of the Navachab Mine Emergency Team..."

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:

Routes travelled, transport equipment types used and cyanide form had remained unchanged for many years.

A Desk Top Emergency Exercise was conducted on 15/01/2024. Scenario – load truck transporting cyanide briquettes left the road and fell onto its side. Container was dislodged from the trailer and skidded to a stop some 12m from the truck. Driver had no visible injuries and container was visually intact. No cyanide was spilt. Five experience operational and safety personnel were included in the exercise. Exercise was documented and input received from all participants. The procedures and responses were deemed to be adequate.

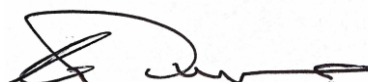
Infrequent cyanide shipments are undertaken currently however a combined on road mock emergency drill was conducted on 25 November 2024 on the Navachab Mine Access Road. Scenario was a Wesbank Transport cyanide delivery truck hit a goat on the access road. The driver lost control of the truck leading to a cyanide spillage. The drill included Wesbank Transport, Navachab Mine Security and Emergency personnel, Navachab Mine Cyanide Champion, G4S Security, Paramedics, Ambulance personnel and E-Med Doctor on telephonic standby.

The mock drill highlighted a number of shortcomings relating to all parties involved in the exercise and these were documented in various reports compiled by three of the parties involved. Under the circumstances the Emergency drill was a declared as success however More frequent planned and unplanned drills, engaging all stakeholders.

No cyanide incidents have occurred in the recent past. A combined on road mock emergency drill was conducted on 25 November 2024 with a list of required actions to be addressed by all parties to the drill.

In an interview with the Navachab Mine Cyanide Champion held on 03 October 2024 it was confirmed that the mine would at all times take control of any cyanide related incident and ensure that any spilt cyanide would be recovered and/or neutralised by the mine emergency team. Wesbank Transport would only be responsible for securing the scene prior to the arrival of the Navachab Mine team and the recovery of the container and the truck once the incident scene was declared safe of cyanide. This would include on road cyanide incidents relating to Navachab and B2Gold mines. B2Gold cyanide deliveries are seldom conducted by Wesbank Transport .

END OF REPORT



Wesbank Transport (Pty) Ltd

Signature Lead Auditor

05 December 2024