



**Investor Solutions Limited**  
P.O Box 67562  
Nairobi  
Kenya

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## **ICMI Re-CERTIFICATION – Summary REPORT**

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**Mainline Carriers Limited - Tanzania**

**ICMI Re-Certification Audit of Mainline Carriers Ltd-  
Summary Report**



**Investor Solutions Limited**

P.O Box 67562

Nairobi

Kenya

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## 1.0 DETAILED AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

<b>Name of Cyanide User Facility:</b>	Mainline Carriers Limited
<b>Name of Cyanide User Facility Owner:</b>	Mainline Carriers Limited
<b>Name of Cyanide User Facility Operator:</b>	Mainline Carriers Limited
<b>Name of Responsible Manager:</b>	Ronald Sawe
<b>Address:</b>	Industrial area Mbagla, Dar-es-Salaam
<b>Country:</b>	Tanzania
<b>Telephone:</b>	+255 712 777 378
<b>E-Mail:</b>	ronald.sawe@mainlinecarriers.co.tz

## 2.0 LOCATION DETAIL AND DESCRIPTION OF OPERATION

Mainline Carriers Ltd (MCL) became a Signatory to the ICMC in Feb 2022.

They are in Industrial Area Mbagala, Dar es Salaam, and utilize the same yard for both their equipment and workshops.

They have their own workshops and an extensive maintenance programme, with the intention of implementing a preventative maintenance approach. In addition to truck engine maintenance, they repair and replace tyres on site and maintain a parts warehouse as needed.

MCL operates around 115 trucks and trailers, and they service several countries throughout East Africa and deliver the following:

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

MCL's Mbagala Yard consists of offices and a workshop. Containers are not offloaded from the trucks. No equipment is used to move cyanide containers in the yard (e.g., forklifts or reach stackers). Cyanide IBCs always remain in their containers.

Sodium cyanide in IBCs, which are packed in 20ft containers, is loaded from the port of Dar Es Salaam, Tanzania, and delivered to North Mara Mine Site, Bulyanhulu Gold Mine Ltd, and New Luaka Mine, Shanta Gold Mine. The operation transports cyanide manufactured by various companies, including Hebei Chengxin Co. Ltd. and Orica Australia PTY Ltd.

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Solid sodium cyanide is packaged in Intermediate Bulk Containers (IBCs) 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 the 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 stored in an IBC, are packed into a 6-meter freight container and shipped by sea from the Consignor to the Port of Dar es Salaam. A maximum of 20 wooden fabricated IBCs is loaded into a freight container with a maximum gross weight of 20 tons.

Sodium cyanide in IBCs, which are packed in 20ft containers, is loaded from the port of Dar Es Salaam.

Upon delivery at the port, the containers are offloaded and loaded directly onto trucks from the vessel using container handling equipment, as required by the Tanzanian International Container Terminal System. Trucks are parked overnight and depart early in the morning in a convoy.

The collection of the containers would be as follows: once all the customs paperwork has been completed, a convoy sets off to collect the containers. A convoy leader and a vehicle accompany the convoy, and the route is strategically planned due to the ongoing roadworks in Dar es Salaam.

The Tanzanian Government Chemist Laboratory Agency administers the Rules and Regulations and serves as the national regulator for the management of dangerous goods. The convoys to the various mines can comprise 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 are also required to get permission from the GCLA to convey any Cyanide.

The operation is approved to transport dangerous cargo under registration number B001-C000407, which is valid for 5 years from September 13, 2024, to September 12, 2029.

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**SUMMARY AUDIT REPORT AUDITORS' FINDINGS**

MCL is:

in full compliance with

in substantial compliance with

:

not in compliance with

**THE INTERNATIONAL CYANIDE MANAGEMENT CODE**

**NAME OF OTHER AUDITORS**

**Audit Company:** Investor Solutions Limited - Kenya  
**Audit Team Leader:** Kuldip Degon, Lead & Transport Auditor  
**Email:** [kuldip@isglobal.net](mailto:kuldip@isglobal.net)

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

**DATES OF AUDIT**

The Re-certification Audit was undertaken from 01<sup>st</sup> October 2025 to 3<sup>rd</sup> October 2025

I attest that I meet the criteria for knowledge, experience, and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, as established by the International Cyanide Management Institute, and that all members of the audit team meet the applicable criteria for Code Certification Auditors, as established by the International Cyanide Management Institute.

I attest that this Detailed Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted professionally, in accordance with the International Cyanide Management Code's Cyanide Transportation Verification Protocol, and in accordance with standard and accepted health, safety, and environmental auditing practices.

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**Name of Facility:**  
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Lead & Transport Auditor

Date: 03.10.2025

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**PRINCIPLE 1 – TRANSPORT**

***Transport Cyanide in a Manner that Minimizes the Potential for Accidents and Releases***

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

**The operation is:**

- in full compliance with **Transport Practice 1**  
 in substantial compliance with  
 not in compliance with

**Details for this Finding/Deficiencies Identified:**

**The operation is in full compliance with Transport Practice 1.1, select cyanide transport routes to minimize the potential for accidents and releases.**

MCL 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 Transport Selection Procedure no., MCL-QHSE-SOP-026. The company has a Dangerous Goods Transportation permit issued by the GCLA.

Consideration is given to population density, infrastructure, pitch and grade, environmental condition, water fog and proximity to water bodies.

Route selection procedure document no. MCL-QHSE-SOP-026 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.

These assessments cover the following:

- Infrastructure
- Population Density
- Pitch & Grade
- Prevalence and proximity of water bodies and fog

MCL 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 to mine sites.

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

- Bulyanhulu Gold Mine Limited
- North Mara Gold Mine Limited
- Shanta Gold Mine
- New Luika Gold Mine

The road surveys are reviewed and updated annually.

- 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.

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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 escort leader reports major changes on the road conditions especially major deterioration, ongoing road works to the QHSE Manager. The operation has a Route Survey Procedure.

MCL 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 to mine sites.

- Dar es Salaam to Bulyanhulu Gold Mine Limited -
- Dar es Salaam to North Mara Gold Mine Limited -
- Dar es Salaam to Shanta Gold Mine -
- Dar es Salaam to New Luika Gold Mine -

The road surveys are reviewed and updated annually.

- 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 escort leader reports major changes on the road conditions especially major deterioration, ongoing road works to the QHSE Manager. The operation has a Route Survey Procedure. The TMP is reviewed every 2 years. The transporter periodically re-evaluates risks on routes used for cyanide transport and collects feedback on risks identified by drivers and 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 on Journey Feedback Report. Route Survey on the selected route is conducted annually to identify any new risks on the route as per the transporter's TMP. Route survey reports show periodic reviews of the road conditions from Dar Es Salaam Port 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, changes due to construction, road diversions, potholes on the roads 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 next convoy. Records of feedback reports on journeys from Port of Dar to Mine Site were noted

MCL 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

in each town to inform them of the ETA and then when the convoy either stops at, or is close to the town, the MCL 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 which 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 sheet 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.

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Evidence shows that each stakeholder has signed and stamped a document notifying them of cyanide and their roles in 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.

MCL 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 (convoy reports, etc.) 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 use dipped headlights.

MCL 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, the use of angle plates, and GPS tracking.

As per MCL procedures, the transportation of cyanide is strictly prohibited during the night. The allowed convoy hours are from 05:00 in the morning to 18:30 in the evening. The rest stops are respected, and the convoy follows the required speed limits and correct traveling distances.

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

Operations Convoy procedure outlines specific responsibilities of personnel in convoy as below

Convoy Leader: - Coordination of the convoy, communication with control room, decision-making, and use of a gas detector to assess air quality after an emergency or suspected cyanide release.

Drivers: - Ensure vehicle safety, cargo integrity, and compliance with speed/distance rules

Security/Escort: - Maintain route security, monitor for threats, and assist in emergencies

Dispatcher/Control: - Real-time tracking, updates, route planning, and incident coordination

Police: - Escort convoy when required, manage traffic and road closures, respond to threats or incidents, and provide scene security in case of emergencies

MCL does not subcontract the activities in transport Practice 1.1

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**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:

in full compliance with

in substantial compliance with

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

MCL uses only trained and qualified staff. The transporter has a recruitment process that outlines the procedures and criteria for hiring drivers and other staff. The company uses only trained, competent, and licensed drivers to operate its transport vehicles.

Pre-selection of candidates for driving and other staff roles is conducted in accordance with the following criteria and processes.

- Prospective applicants should be 18 years of age or above.
- The prospective employee should be in good physical and mental condition
- GCLA Certificate for transporting dangerous goods
- Be of good moral character
- Have no criminal records
- Have a driving license category "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.

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

- Induction – where relevant,
- Driver Induction – where relevant,
- Cyanide Awareness,
- Managing and Participating in Cyanide Convoys,
- Cyanide First Response.

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 the properties of cyanide, precautions to take when driving, and how to respond to cyanide incidents. The escort leader and his assistant were also interviewed by auditors and deemed competent. The transporter has a training matrix that specifies the type of training and the frequency at which it is conducted. The training covers Cyanide Awareness (including Use of Personal Protective Equipment), Once a year or when new drivers are recruited. Defensive Driving Training, Once a year or when new drivers are recruited.

First Aid Once a year

Fire Fighting. Once a year

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.

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Training attendance records were reviewed. Participants have signed the attendance sheets to verify their attendance at 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.

MCL Logistics does not subcontract any of the activities above.

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A handwritten signature in black ink, appearing to be 'John', is written over a horizontal line.

Lead & Transport Auditor

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

**The operation is:**

**in full compliance with**

in substantial compliance with

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The procedure specifies the design of trucks 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 the following truck specifications 6x4 truck tractors units of HP 360 equipped with GPS tracking system. The brands of vehicles used are Beiben & Scania Trucks. The weights of truck tractor unit are approximately 6.8 tons. The trailers utilized are 3 axles and 4 axles trailers which carries 60 tons of load. Three axle trailer weighs 6 ton whilst the four-axle trailer weighs 8 tons. A 1x20ft container full load of cyanide weighs 23.2 tons. The company has an approved vehicle maintenance procedure. Vehicle maintenance is performed in accordance with the manufacturer's specifications and the company's maintenance procedures. 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. MCL 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. Vehicle maintenance is performed in accordance with the manufacturer's specifications and the company's maintenance procedures. Both Preventive Maintenance and Corrective Maintenance are carried out on all vehicles and trailers at the company's workshop. Problems with vehicles picked up during inspections are attended to immediately.

There are weighbridges along the transportation route, managed by the government authority, the 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 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 listed on each shipment's BL, which helps the transporter avoid overloading the transport vehicle.

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

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

**The operation is:**

- in full compliance with  
 in substantial compliance with  
 not in compliance with

**The basis for this Finding/Deficiencies Identified:**

The Transport Management Plan outlines processes to ensure the integrity of the producer packaging. The TMP describes how the cyanide supplied by Hebei Chengxin Co., Ltd. is packaged. The cyanide from the supplier is packaged in 1-ton PVC bags with a polyethylene lining and encased in plywood boxes (IBCs). Twenty (20) IBCs of sodium cyanide are in each 20ft sea container. The combined gross weight of the containers and the product is approximately 24 tons. 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 at the port issues a container interchange report that states the condition of the containers before loading at the port. The TMP states that the driver and escort leader inspect the container to ensure it is intact, that container numbers are noted, that seals are in place, and that the container is in good condition. The drivers and the Escort leader ensure that all the required shipping documents are complete. The above activity is performed in the port's loading area, where 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 are 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 has also developed a checklist for the Transport of containerized cargo, which also specifies checks on the container, and this includes seals, correct labelling, and the 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. Clause 5.10(c) of the TMP 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 as per the regulations in Tanzania and in accordance with the IMDG Code. The placards and signage on the containers identify the contents as solid sodium cyanide.

MCL has implemented a safety program that includes.

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

MCL has implemented an inspection regime that vehicles are inspected prior to departure of the trucks to the mine site and upon return to their base. The transporter has a Transport Management Plan which requires inspections to be carried out prior to the trucks departing from the port to the mine. The inspection is carried out by the driver together with the Escort leader. Both sign the inspection checklist 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

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company's workshop. Selected vehicles were physically inspected by auditors and found to be in good condition. Vehicles were inspected by auditors and found to be in good condition to do cyanide transportation.

MCL has a preventive and corrective maintenance program 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 10,000KM intervals as per the trucks manufacturers specification and in accordance with the transporter's maintenance procedure. Operation is not responsible for Maintenance of Sea Containers. Sea Containers maintenance is carried out by mine site.

The odometer readings are taken and the predeparture inspection is conducted. A pre-inspection checklist is completed during inspections. Vehicle inspection is carried out by the Escort leader and the driver. 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 Logistics 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 Order is then countersigned by the Logistics Manager. Once the repair(s) is done, the truck is tested and put back into use. Tyres are changed when the tread depth reaches 3mm. The escort vehicles are serviced at 10,000Km. Maintenance records for trucks were sighted.

As per the Transport Management Plan drivers drives for 4hrs and takes 30 minutes rest. A maximum of 10 hours per day is required for a driver to drive. Deliveries are done only in 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, TMP states that all containers are to be secured safely on the trailer. No chains are permitted to secure the containers. However, additional straps or chain are used after securing the containers 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 Transport Management Plan 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
- Collapsed bridge on the road.

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 Transport Manager in consultation with mine.

MCL has a Drug and alcohol policy. 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 breathalyser (Breathalyzer Alcohol Tester) is used for conducting the testing. The Breathalyzer Alcohol tester was calibrated in July 2025. The next calibration date is July 2026.

TMP mentions that all records are retained for a maximum of 3 years before being disposed of. Records of documents and journey plans, checklists, policies and procedures have been retained.

MCL does not subcontract the activities above.

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Lead & Transport Auditor

Date: 03.10.2025

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

The operation is:

- in full compliance with  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The transporter does not ship cyanide by sea or air.

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

The operation is:

in full compliance with

in substantial compliance with

not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

MCL trucks and escort vehicles have a means 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 are inspected Inventory Checklist is completed with the observations. Records of completed checklists were noted. The Communication equipment such as, cell phone 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 port until the time of arrival at the mine. The GPS is monitored by the Tracking Supervisor whenever there is a convoy on the road. Tracking is performed while 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 indicate the time of stopping and departure of the trucks, were sighted. Also, sighted were WhatsApp messages. The Escort leader issues a journey report to management after each trip. Sampled records of GPS were verified and noted.

MCL have chain of custody documentation namely Bill of Lading, Customs declaration documents, container interchange, Packing list, Waybills, and Pre-departure checklists. Bill Lading MEDUK1411579 and HLCUSHA2005EPUAS 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 MEDUK1411579 and HLCUSHA2005EPUAS 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 Hebei Chengxin co. Ltd 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

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Lead & Transport Auditor

Date: 03.10.2025

**PRINCIPLE 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:**

- in full compliance with**
- in substantial compliance with
- not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The operation is fully compliant with Transport Practice 2.1: store cyanide in a manner that minimizes the potential for accidental releases.

Currently, MCL does not provide interim storage. The only storage is at the Inland Container Depot.

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**PRINCIPLE 3 – EMERGENCY RESPONSE**

**Ensure that Process Controls are Protective of the Environment**

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

The operation is:

- in full compliance with  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

MCL has developed and implemented an Emergency Response Plan Cyanide Emergency Procedures Ref SOP-MCL-CN-007 Rev 1 Dated April 2024

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 a 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. MCL 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.

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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 considered. 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 and 4x2 vehicle with 2 axles trailer each 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 container, with a total weight of 23 tons. The company uses the Beiben & Scania brands of trucks.

There is no interim storage facility. MCL 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 the container, and no victim.
- Scenario 2: Accident without a spill but resulting in injury of a person(s)
- Scenario 3: 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 dry ground and injury and poisoning of person(s)
- Scenario 5: Rollover of a container resulting in a spill into a water body.

The Response actions for the anticipated emergency scenarios, as well as the responsibilities of all responders (internal and external), have been captured in the ERP. Auditors noted scenarios and response actions.

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, and Fire Dept.

GCLA is the regulatory authority for dangerous goods, and NEMC will assist with 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 the 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 the rescue of an injured person. The Ambulance Service will handle injured persons or a possible cyanide-poisoned person and transport him/her to the hospital. The hospital will undertake treatment of a poisoned or injured person and the administration of pure oxygen to a victim in conjunction with the cyanide antidote (Cyanokit). The cyanide-poisoned persons will be conveyed to the hospital with the cyanide antidote. A doctor or a qualified paramedic will administer the antidote. The QHSE Manager at the base (head office) will brief top management of the incident and coordinate equipment for the recovery of the container in consultation with the logistics manager.

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

The operation is:

- in full compliance with  
 in substantial compliance with  
 not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

The operation is in full compliance with Transport Practice 3.2; designate appropriate response personnel and commit necessary resources for emergency response.

All Drivers must go through mandatory dangerous goods training every 5 years carried out by GCLA. MCL 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 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.

MCL 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

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- Danger flags (Red and Green)
- Bucket with lid
- Torch light
- 6Kg Fire extinguishers
- Helmets
- Megaphone
- Oxygen
- First Aid Kit

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.

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.

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

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

**The operation is:**

- in full compliance with**  
 **in substantial compliance with**  
 **not in compliance with**

**Summarise 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. MCL 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

Procedure for notifying ICMI in the event of a significant incident were sighted by auditors. No cyanide incident has been recorded by the transporter in the past years.

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

**The operation is:**

- in full compliance with**  
 **in substantial compliance with**  
 **not in compliance with**

**Summarise the basis for this Finding/Deficiencies Identified:**

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

- Procedure for recovery and neutralization of Solid sodium cyanide
- Procedure for cleaning 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 states that, when containing a spill, the escort team will ensure it does not enter waterways. In the event of a spill on dry ground, cyanide briquettes will be swept and shovelled into a sealable container. The residue will be neutralized with sodium hypochlorite. 1 litre of Sodium hypochlorite is mixed with 10 litres of water for neutralization. Any contaminated soil should be taken to the mine and processed there to minimise further chemical reactions in the environment. Also, dry spills and spills into waterways are treated separately to avoid creating additional environmental issues.

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 states that, in the event of a spill into surface water, no neutralization of the surface water is permitted. The detailed remediation process 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. The relevant clauses in the ERP were noted by the auditor.

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

**The operation is:**

- in full compliance with**  
 **in substantial compliance with**  
 **not in compliance with**

**Summarise the basis for this Finding/Deficiencies Identified:**

Are there provisions for periodically reviewing and evaluating the Plan's adequacy and are they being implemented?

The operation is in full compliance with Transport Practice 3.5; periodically evaluate response procedures and capabilities and revise them as needed.

The ER Plan makes provision for annual review and evaluation 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, lessons learnt from mock drills and accident investigations are used to review the emergency plan. The ERP was revised once in 2023, 2024 & 2025.

Mock drills are organized once in a year. The training matrix captures the dates mock drills were held, next mock drill exercise and the names of all the participants. 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.

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