

**INTERNATIONAL CYANIDE MANAGEMENT
INSTITUTE**

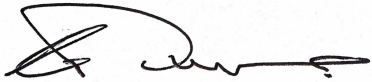
**Summary Production
Recertification Audit Report
Repackaging Plant #1**

**Vehrad Transport & Haulage
Tema, Ghana**

27 and 28 May 2024

**For The
International Cyanide Management Code**

Vehrad Transport & Haulage
Repackaging Plant #1


Signature Lead Auditor

30 August 2024

Name of Operation: Vehrad Transport & Haulage Repackaging Plant #1
Name of Operation Owner: Vehrad Transport & Haulage
Name of Operation Operator: Vehrad Transport & Haulage
Name of Responsible Manager: Mr Nazih Hussein,
General Manager
Address: Plot 16/17/18, Tema Heavy Industrial Area,
P O Box GP 2683, Accra
Country: Ghana
Telephone: +233 26 215 5397 or +233 244 215 5397
Fax: +233-22-205524
E-Mail: nazih.husseini@vehradtransport.com

Location detail and description of operation:

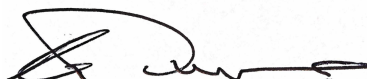
The repackaging plant (Repackaging Plant #1) is operated by Vehrad Transport and Haulage, is located at Plot 16/17/18, Heavy Industrial Area, Tema, Ghana, and has been established to provide a repackaging service to International Cyanide Management Institute (ICMI) certified cyanide consignors and the mines in West Africa that wish to receive cyanide briquettes for sparging, rather than cyanide packaged in shipping containers, containing cyanide briquettes packaged in Polypropylene bags, in wooden boxes.

Vehrad collects and delivers loaded shipping containers to the main Vehrad site, where they are de-stuffed with boxes containing cyanide briquettes. These boxes are stored in the Customs bonded Cyanide Warehouse while awaiting repackaging into sparge Isotanks at the #1 or #2 repackaging plants or for direct onward transport in sealed Vehrad-owned sea containers to mine sites. Each consignor's or mine cyanide boxes are stored separately in the warehouse, and the sparge ISO tanks are filled in client-specific batches.

The repackaging plant consists of a two-hopper repacking facility supported by a warehouse and a secondary overflow warehouse. In this warehouse, the boxed and bagged cyanide briquettes are stored prior to being repacked into sea containers or ISO tanks and road transported by Vehrad Transport and Haulage trucks to mine sites in West Africa.

All waste cyanide packaging (wooden boxes, plastics and polypropylene bags) is taken directly to the incinerator facility situated at the Vehrad cyanide repackaging plant (Repacking Plant #2) located at plot #A/46/30, Tema Heavy Industrial Area, a Vehrad subsidiary site within 5 kms of the main Vehrad site to be disposed of.

Vehrad Transport & Haulage
Repackaging Plant #1


Signature Lead Auditor

30 August 2024

Auditor's Finding

This operation is

X in full compliance

- in substantial compliance *(see below)
- not in compliance

with the International Cyanide Management Code.

Compliance Statement

This operation is in full compliance with the requirements of the ICMI Cyanide transportation re-certification audit requirements. This operation has not experienced compliance problems during the previous three-year audit cycle.

Auditor Information

Audit Company: Transheq Consulting and Auditing (Pty) Ltd

Lead Auditor and Production Auditor: Richard Durrant

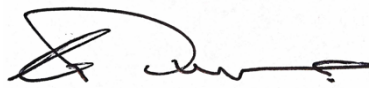
E-mail: richard@transheq.co.za

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 Production Operations and using standard and accepted practices for health, safety and environmental audits.

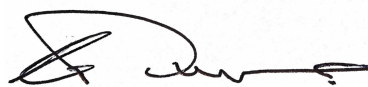
Date of audit: 27 to 28 May 2024

Richard Durrant
Name


Signature

30 August 2024
Date

Vehrad Transport & Haulage
Repackaging Plant #1


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30 August 2024

1. OPERATIONS: Design, construct and operate cyanide production facilities to prevent release of cyanide.

Production Practice 1.1: Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

X in full compliance with

The operation is in substantial compliance with **Production Practice 1.1**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The design for the repackaging plant was checked for ICMI compliance by a metallurgical engineer (Afritech) in consultation with tank design, construction company (Memotank) and Plan Wheel Consulting Engineers. Design drawings covering the site plan, fence wall & details, ground plan, roof framing plan, roof plan, section and details, elevations, foundation plan and details, ground floor plan and detail, columns, and roof beam framing plan were reviewed.

The warehouse was modified to accommodate cyanide storage by installing ventilation fans, sealing floors, and a ramp linked to bunding and containment requirements. Previous certification audit reported that the Repackaging facility was constructed from Mild Steel. (confirmed during current site inspection) As per drawing annotations, the Design Engineer was aware that facilities were being used for solid sodium cyanide briquette repackaging. There is a standby generator on site. There is also a hoist-locking system in the event of power variations. The hoist is controlled by a remote wireless unit. The hoist stops automatically when the correct operational height is reached.

The Repackaging Plant, Main Warehouse and Secondary Warehouse are all bunded, and the floor is made of concrete. Any spillages would be cleaned *in situ*, and there is an overflow to a collector channel, ultimately leading to the main site interceptor sump for any possible liquids.

The offloading yard adjoining the repackaging facility's entrance is fully concreted and slopes to the entrance. At the base of the slope is a collector trench, which runs to the main site containment sump. There are no solution pipelines or liquids involved in the processes at Plant #1.

The facility is under a high roof, and boxes are protected from weather. No boxes are stored in the repackaging facility; they are drawn from the warehouse for each repackaging process. Repackaging will not take place under rainy conditions.

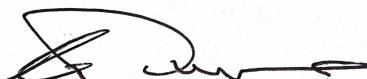
Storage Warehouse procedures are in place to keep water out of warehouses. The roof, gutters, and interior and exterior walls were inspected and found to be in order. A cross drain is located at the entrance to the building to prevent the entry and exit of liquids.

No cyanide is stored in the repackaging facility building, but it has been specifically modified to encourage adequate ventilation and air circulation. The warehouses are ventilated by fans and have containment and a drainage system for any spills inside. The drainage system is linked to the existing site containment system for contaminated runoff.

A security guard controls access to the Vehrad site and the warehouses. No person is permitted in the facility without authorisation, appropriate training, and appropriate PPE. When repackaging operations are not taking place, an on-site Customs Officer locks up and seals the area.

Motion detector beams and CCTV cameras are in place throughout the yard and inside the warehouses and repackaging facility. The entire site is also guarded by an armed Ghana Naval Officer after-hours. Only cyanide is stored in this warehouse

Vehrad Transport & Haulage
Repackaging Plant #1


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Production Practice 1.2: Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

X in full compliance with

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

Summarize the basis for this Finding/Deficiencies Identified:

Twelve operating procedures have been developed for the repackaging plant and storage warehouses. The procedures cover pre, post, and basic operation, cyanide repackaging plant and warehouse management, guidelines for vital components, inspections, equipment decontamination, buddy system, change management procedure, and process flow diagram.

Procedures all include relevant pre-work inspections and appropriate PPE (Personal Protective Equipment).

Emergency Response Plan procedures considered include the release of HCN gas; Isolation Distances, Health Exposures Plant Incident – Cyanide Spill; Plant Incident-Cyanide Spill: Overfilling of Isotank; Bag not splitting for briquette discharge; Bag handle torn while lifting bag onto hopper; Bag handle torn while lifting bag out of hopper; bag partially split; spill from vehicle in the repackaging plant; explosion/fire in the repackaging plant; roof collapse with and without rain; unplanned power outage and other abnormal and emergency situations, etc. There are a total of 14 different scenarios covered in the procedure.

A Management of Change procedure is in place, and any changes must be approved by the HSSE Manager and General Manager. Procedure for New Modification & Change Management Exercise, is used to consider any changed cyanide risk. Change or modification related to cyanide operations must be approved by a cyanide specialist or HSSE Manager.

The Repackaging Facility and Storage Warehouses have a Planned Maintenance Schedule in place for inspections, maintenance of equipment and history of maintenance of equipment. An Ongoing planned maintenance is in place for inspections prior to all operations. maintenance of equipment and history of maintenance of equipment. The inspection of floors for cracks and walls and the roof for cracks/leaks is included.

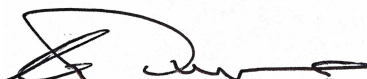
Under normal operating conditions, the process is a dry process. However, washings from the repackaging area will be flushed into the effluent gutter, leading to the containment sump. If necessary, the sump will be neutralised with ferrous sulphate. The sumps are emptied periodically by a professional waste disposal company.

All solid cyanide spillages will be contained, packaged, and sent to the mines. Contaminated packaging will be destroyed in Vehrad's incinerators. Procedures state that cyanide waste packaging is incinerated at 1500 °C till all materials will turn to ash.

Cyanide transported in ISO sparge tanks meets materials design specifications for cyanide. Tank drawings and specifications are in place. The cyanide briquettes are received from the producer, packed in boxes in sea containers, or decanted into sparge tanks and sealed according to Maritime Dangerous Goods Code (IMDG) requirements. All Isotanks and sea containers conform to IMDG specifications, placarding and sealing requirements.

This placarding is checked and inspected prior to dispatch HO1(5)-Pre trip Inspection)

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Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

X in full compliance with

The operation is in substantial compliance with **Production Practice 1.3**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Storage Warehouses - Plant Inspection Procedure and Checklist have been developed and are in use. Repackaging facility inspections for the sparge Isotanks have been developed. No pipes or valves are involved in the process. Inspection routines are in place for the hopper and related bag and box handling facilities in the repackaging plant. Interceptor drains inspection are conducted before every repacking operation.

Annual Hydrostatic Tests conducted on Isotanks by Industrial Engineering Consultants Ltd and an independent approved inspection authority.

Isotainers are inspected prior to loading and prior to despatch to check integrity and security of hatches and valves.

In the auditor's option, the inspection frequencies are sufficient as the repacking facility is not in continual use, and the storage warehouse is only accessed when cyanide boxes are being moved into or out of the warehouse. Therefore, the frequency of inspections would ensure that equipment is functioning within design parameters.

Inspection documentation identifies all items to be observed, the date of the inspection, the inspector's name, and any observed deficiencies.

Corrective actions are documented, and records are retained. Confirmed in records sampling and review.

2. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.

Production Practice 2.1: Develop and implement procedures to protect plant personnel from exposure to cyanide.

X in full compliance with

The operation is in substantial compliance with **Production Practice 2.1**
 not in compliance with

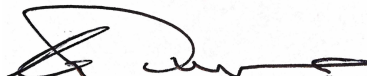
Summarize the basis for this Finding/Deficiencies Identified:

Twelve operating procedures have been developed for the repackaging plant and storage warehouses. These include consideration of PPE, a Hot Spot Survey, pre-work and post-operation checks, heat stress, normal and abnormal conditions, a buddy system, a Training Plan, pre-, post-, and basic operations, normal, abnormal, and emergency conditions, and a manual of authority.

Operating procedures cover stuffing, de-stuffing, repackaging and storage only, as these are the only on-site activities.

All routine, non-routine and emergency scenarios and their responses are covered by effective procedures and work instructions. Decontamination procedures indicate that contaminated equipment must be decontaminated prior to maintenance.

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Procedures cover consulting with the workforce through Job Safety Observations (JSO) risk assessment, change management, and health and safety meetings.

Hot Spot Surveying for HCN gas and particulates using ICMI limits during repackaging operations has recordable levels within the approved limits. The site has 14 x portable personal HCN gas monitors: - 10 x Watchgas UNI MP 100 HCN 0-100 PPM and 4 x ToxiRAE 11 HCN PGM-1170

Monitors are calibrated to measure 4.7 ppm at the first alarm and 9.7 ppm at the second alarm. The first alarm prompts an investigation of the cause, and the second alarm prompts an evacuation. All monitors are submitted to one company for calibration. The monitor register matrix includes all monitors and expiration dates, calibration certificates and calibration information. Monitors are recalibrated on a staggered basis to ensure that always calibrated monitors are available. The monitor calibrations are conducted at annual intervals in accordance with the original equipment manufacturers requirements.

A Buddy System is used and includes a task procedure and abnormal conditions. This includes the functions of the buddy, the required PPE, and what to do in the case of an emergency. The use is also made of an "Ambulance/First Aider" observer who inspects the PPE, donning and doffing, decontaminates, does hot spot surveys, etc.

Driver Health Management is in place to ensure healthy drivers. Drivers, Safety Officers, forklift operators and reach stacker operator staff are given medical examination and screening annually.

Full-cover PPE (full suit, gloves, rubber boots, full face mask, and canister) is always used during repackaging. There is no need for a clothing change policy as clothes do not come into contact with cyanide. There is no sub-contracting of jobs in areas where cyanide is located. Visitors are not permitted to access the cyanide warehouse.

Signage is in place. PPE requirements, warning signs and appropriate prohibitions. Signs are prominently displayed at all facilities' entrances, including no smoking or open flames and no eating and drinking other than in designated areas.

Production Practice 2.2: Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

X in full compliance with

The operation is in substantial compliance with **Production Practice 2.2**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Facility has its own Emergency Response Plan to respond to cyanide exposures. The Repackaging-Hoist Emergency Response Plan. The Plan includes sections on Sodium Cyanide, Roles and Responsibilities, Emergency Equipment, and 14 x Hoist Emergency scenarios.

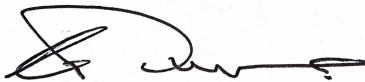
Custom-built safety showers supplying potable water and pre-dissolved ferrous sulphate are located outside the Repackaging plant and Warehouse #6. Potable water supplies eye wash at the same location. Nozzles have lower-pressure water and caps to prevent them from being dirtied. An eye wash bottle is also located in the first aid kit.

Fire extinguishers are strategically located in the yard and building (repackaging area and warehouse). They are maintained annually, and monthly inspections are recorded. Extinguishers are included in a register. They are all dry powder, non-acidic type.

Oxygen is available in the emergency room outside of the warehouse and repackaging facility via an "oxygen concentrator" (Perfecto2 Invacare) and an Oxy-Viva oxygen bottle. Emergency communication is via a man-down alarm and cell phones. The antidote is stored in an air-conditioned office for transport with the patient, and it is also supplied to Lagoon Clinic, a private medical facility.

Cyanide first aid equipment is inspected monthly. Cyanide antidote is stored according to the manufacturer's specifications. The HSSE Department manages the schedule for replacing the antidote. Monthly First Aid Inspection Checklist in place and First Aid / Cynokits inspected prior to the commencement of any repackaging operations.

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English is the working language of the site. SDSs are included in Emergency Response Plans and procedures. SDSs are also located on the labels of the cyanide boxes. Sighted SDSs for all types of sodium cyanide on site.

The Decontamination Procedure details the Plant and Equipment and the Decontamination Procedure. Visitors and contractors are not permitted in the area during repackaging.

Eleven Safety Officers are all trained first aiders. If repackaging is undertaken, an "ambulance" staff member (as identified in the procedure) is always a trained first aider.

First aiders are trained by the Ghana Red Cross, and recent training registers and certificates are in place. Safety Officers each have an HSSE Training Passport detailing all HSSE training, including first aid. Ghana First Aid is competent in cyanide first aid and has conducted this training since 2017.

Emergency Response Plan indicates that in the event of a cyanide exposure safety officers apply the first aid, Ghana Red Cross evacuate contaminated persons to the hospital while giving oxygen, and hospital will administer the cyanide antidote.

The Incident and Accident Investigation Procedure covering the warehouse and repackaging facilities is in place. The procedures describe the process of investigation of any incident that may occur. The procedure covers both cyanide and no-cyanide. No incidents have occurred at the repackaging or warehouse facilities in the recent past.

3. MONITORING: Ensure that process controls are protective of the environment.

Production Practice 3.1: Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

X in full compliance with

The operation is in substantial compliance with **Production Practice 3.1**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

No water that is used in the facility escapes from the site. No direct discharge to groundwater. All discharge goes to an effluent and hydrocarbon, three compartments, and a linked containment sump, which is emptied whenever one compartment is full by a specialist waste company.

Water and soil sampling and analysis are done approximately every six months by an external test laboratory. Testing of water and soils shows results are at or below the limits of detection, recent test results indicate (WAD - Weak Acid Dissociable) WAD < 0.001 mg/l, free cyanide = 0.001mg/l and total cyanide= 0.001 mg/l and no seepage has ever required remedial activity. There is no mixing zone. The production plant is in an industrial area where no groundwater has beneficial uses by the jurisdiction.

The repacking #1 facility has extraction fans with filtration equipment. The hopper is also designed with flexible rubber flaps to keep any dust within the hopper and facility.

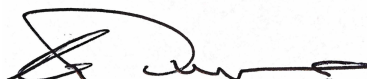
Monitoring is undertaken during repackaging plant operations. Portable gas and particulate monitor is available to check levels under normal, abnormal, and emergency conditions. Background and baseline monitoring has been undertaken during the plant's current commissioning operations.

Hot Spot Surveys are conducted while plant operations are taking place.

HCN monitoring is conducted on site on a daily basis. The facility is located within an industrial area.

Air Emissions testing for SO₂, NO_x, Carbon dioxide, Flue gases, and HCN is conducted on monthly basis and reported to the Environmental Protection Agency The results must comply with Ghana Standard Health Protection GS 1236:2019.

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Surface water discharges are also monitored, and samples are taken bi-annually and analysis reports are made from an independent laboratory. Decontamination process is conducted after every plant operation. Decontaminated material is directed to the sump. HCN monitoring is conducted prior to every plant operation.

In my professional opinion the frequencies of monitoring are adequate for the nature of the operations and the levels of detection recorded.

4. TRAINING: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Production Practice 4.1: Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.

X in full compliance with

The operation is in substantial compliance with **Production Practice 4.1**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Workers at the Repacking Plant #1 facility and warehouses have been trained in cyanide awareness, hazards, and emergency response. Sighted up-to-date training "passport" records for a employees working with cyanide. Periodic refresher training is carried out. The training includes: Cyanide History & Uses, Physical & Chemical Properties, Cyanide Packaging, Manufacture of Cyanide, Neutralization of Cyanide, Effects & Symptoms of Cyanide, Protection from Cyanide, Cyanide spill - What to do? and First Aid. PPE training is included in Cyanide Awareness Training.

Training is conducted on all Safe Operating Procedures and tasks relating to cyanide.. All training is conducted by the HSSE Manager.

No person is permitted to work in the repackaging plant until appropriately trained. Training passports in place as evidence of training.

A training matrix is used to manage training requirements and programmes. Formal training, on-the-job procedure training, and Planned Task Observations (PTOs) are all used. A procedure is in place that explains the type of training to be conducted and the required frequency of the training.

Training is conducted by experienced and qualified training personnel.

Production Practice 4.2: Train employees to respond to cyanide exposures and releases.

X in full compliance with

The operation is in substantial compliance with **Production Practice 4.2**

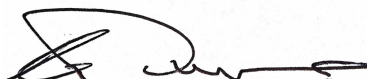
not in compliance with

not subject to

Summarize the basis for this Finding/Deficiencies Identified:

All operators at # 1 and # 2 Repackaging Plant and the warehouse received training on the Emergency Response Plan, including cyanide releases and worker exposures. Training Passports showing ER training were sighted.

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Emergency Response Training was provided to 41 Vehrad employees and 9 Ghana Fire Service officers. Training on procedures, including Evacuation and Isolation training, Chemical Awareness and Chemical Segregation and Standard Fire Aid covering stress management, Immediate first aid training in the event of cyanide contamination, and CPR.

Cyanide Awareness Training has been conducted extensively over the last three years, with topics and registers in place. In 2023, awareness training from Orica Limited was provided for 163 Vehrad employees.

Vehrad training is conducted on all Safe Operating Procedures relating to cyanide.

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

Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.

X in full compliance with

The operation is in substantial compliance with **Production Practice 5.1**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Repackaging Hoist Emergency Response. The Plan includes fourteen scenarios that may require a response.

The scenarios considered in the Plan include roof collapse and the impact of rain on stored cyanide; fire outbreak in the repacking plant during operation; robbery/Civil Disturbance; Overloaded Isotank; bag handle torn while lifting bag with briquette spill; and unplanned power outage during repacking operation.

The Emergency Evacuation Map and Repackaging Emergency Response Plan include specific response actions, as appropriate for the anticipated emergency situations, including an isolation radius around the plant.

The procedure for medical treatment for cyanide exposure includes the use of the Antidote, advice to the Doctor, and First Aid Treatment.

Control of releases at their source is addressed in normal and abnormal operating procedures for the Repackaging Plant.

The Plan includes assessment, mitigation and investigation to prevent future releases. Emergency Plan process Flow is described in the Emergency Response Plan.

Production Practice 5.2: Involve site personnel and stakeholders in the planning process.

X in full compliance with

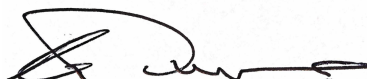
The operation is in substantial compliance with **Production Practice 5.2**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Tema Heavy Industrial Area has created a Safety Task Force called the Tema Industrial Area Task Force. The objective of the Task Force is to take a proactive approach to preventing unforeseen events

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due to fire and property damage. This includes educating stakeholders, peer-to-peer review audits, sharing industrial ideas and best practices, and supporting each other in an emergency, e.g., fire, spill, etc.

Through continuous liaison, the site engages with key stakeholders such as the Ghana EPA, Police, navy, National Security, Ghana Red Cross, and Fire Service.

Production Practice 5.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

X in full compliance with

The operation is in substantial compliance with **Production Practice 5.3**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Repackaging Emergency Plan- Human Resources (HR) informs medical services, police and other government departments. Base Controller is the General Manager or Operations Manager, Incident Controller is the HSSE Department. This is all dependent on the nature of the incident.

The Emergency Response Plan (ERP) details the Emergency Control Centre and Emergency Control Team designations. It also includes a 24-hour Emergency Contact List.

All repackaging and warehouse operators are trained as emergency response team members and their training is included in the Training Matrix and the Training Plan.

In 2023, 49 people, including Vehrad staff and Ghana Fire and Police Service officers, received emergency response training.

The Repackaging Plant Emergency Response Plan describe the roles and responsibilities of members of the emergency control centre, emergency control team and external emergency responders.

The Emergency Response Plan details the Emergency Equipment—Plant Emergency Response Equipment, an Emergency Van (4x4 vehicle), and a Pumper Tanker Truck. The procedure with emergency tools and equipment checklists lists the emergency equipment for each of the above.

The site engages with key stakeholders such as the Ghana EPA, Police, Navy, National Security, Ghana Red Cross, and Fire Service through continuous liaison. However, these key stakeholders do not regularly participate in mock drills due to a lack of resources.

Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.

X in full compliance with

The operation is in substantial compliance with **Production Practice 5.4**

not in compliance with

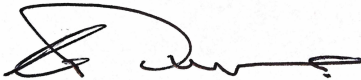
Summarize the basis for this Finding/Deficiencies Identified:

Emergency Response Plan in place - Roles and Responsibilities are detailed in the plan and this includes notifying management, regulatory agencies, and potentially affected communities of an incident and/or response measures and communication with the media

Vehrad has a written procedure for notifying ICMI of any significant cyanide incidents, as detailed in the Emergency Response Plan—Roles and Responsibilities.

No significant cyanide incidents have occurred on the site that required reporting.

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Production Practice 5.5: Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

X in full compliance with

The operation is in substantial compliance with **Production Practice 5.5**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Repackaging Plant is fully concreted from front to back, with no exposed soil or environment. The only tasks required would be to clean up dry spills. Treatment chemicals are stored in an emergency equipment trailer on-site when repacking occurs. Recovery or neutralization of solutions or solids is detailed in the Emergency Response Plan - Clause Neutralization, which decontaminates soils or other contaminated media. Waste-neutralized cyanide solutions must not be allowed to be discharged directly into sewers, drains or water courses. Therefore, it is collected in the site interceptor. Samples will be taken, and analysis will be conducted by an independent test laboratory. This waste will be collected by a waste disposal company for final safe disposal. There would be no need to provide alternative water supplies because all water is provided by a Municipal reticulated water supply. Potable water is provided from bottled water in all circumstances. Neutralization or disposal of sodium cyanide spills using ferrous sulphate and sodium/calcium hypochlorite is permitted unless there is a possibility for these chemicals enter standing water or streams and may affect aquatic life. In these circumstances, the neutralization agents may not be used unless there is a direct threat to human life. Emergency Response Plan details the Treatment and Neutralization of Sodium Cyanide Spills and explains the monitoring and treatment of any potential spill to the land surface and water. As the facility is fully concreted and drains to a containment sump the risk of environmental contaminations is seen as low.

Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

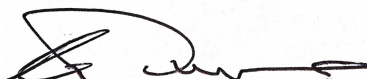
X in full compliance with

The operation is in substantial compliance with **Production Practice 5.6**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The Emergency Plan is revised annually or when necessary after mock drills, activations of the Emergency Response Plan, changes or alterations of any routine operation, or legislative changes. The last Emergency Plan revision was conducted in March 2024. Mock Emergency - Mock drill carried out in March 2024. Sighted drill in 2023 - Cyanide poisoning during spillage recovery- testing the first aid response, communication, roles and responsibilities and spill recovery. Evaluation was done with future recommendations noted. Emergency Plan states that mock or tabletop exercises are to be conducted at least once per year.

Vehrad Transport & Haulage
Repackaging Plant #1


Signature Lead Auditor

30 August 2024

Evaluation is included in the Mock Emergency documentation process. The mock drill carried out in January 2024 included an evaluation and lessons observed from the exercise, including an Immediate Action Plan and additional Buddy personnel to be available during repackaging operations.

End of Report