
ICMI CERTIFICATION – SUMMARY REPORT

1.0 INTRODUCTION

1.1 Operational information.

Name of Transporter facility	: Midroc Gold Mine PLC
Name of facility owner	: Midroc Gold Mine PLC
Name of facility operator.	: Midroc Gold Mine PLC
Name of responsible manager	: Mr. Mengiste Kassa
Address	: Shakiso,
State / Province	: Oromia Region
Country	: Ethiopia
Telephone	: +251 91 120 7236
E-mail	: goldhrm2@midrocinvestmentgroup.com

1.1 AUDIT TERMS OF REFERENCE

Investor Solutions Limited was assigned by Midroc Gold Mine PLC to conduct a certification Audit of their cyanide transportation activities.

1.2 Acronyms

ICMC - International Cyanide Management Code
MGM – Midroc Gold Mine
AGR – Australian Gold Reagents
HGV - Heavy Goods Vehicle
QHSE - Quality, Health, Safety & Environment
HSE - Health, Safety & Environment
IMDG - International Maritime Dangerous Goods
RRA - Route Risk Assessments
IBC - Intermediate Bulk Container
MOTL Ministry of Transport & Logistics
EPA - Environmental Protection Authority
ICMI – International Cyanide Management Institute
CP – Convoy Procedure
ETA – Expected Time of Arrival
BL – Bill of Lading
ERP – Emergency Response Procedures
GM – General Manager
ERV- Emergency Response vehicle

1.3 Description of Operation

1.3.1 Company Profile.

MIDROC Gold Mine Plc., Ethiopia's largest and most advanced gold producer, has been a cornerstone of the nation's mining sector since its acquisition from the Government of Ethiopia in 1997. Acquired through the Privatization and Public Enterprises Supervisory Authority for USD 172 million, the company specializes in high-grade gold and silver production, serving global markets with excellence.

MGM operates around 08 trucks and trailers, and they deliver the following to Kada:

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

Cyanide Transportation

MGM has offices and a workshop in Addis Ababa. 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 Djibouti and delivered to the Legedembi mine site located in Shakiso Town. The manufacturer of the sodium cyanide is AGR Australia.

Djibouti Port → Galafi → Semera → Awash 7 Kilo → Adama → Aleta Wondo → Adola → Shakiso → Legedembi Mine

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, contained in an IBC, are packed into a 6-meter freight container and shipped by sea from the Consignor to the Port of Djibouti. A maximum of 20 wooden fabricated IBCs is loaded into a freight container with a maximum gross weight of 23 tons. Containers are sealed with container seals.

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

MGM then positions trucks at the quay to load the containers. Trucks then exit the port with the required documentation covering the shipment and start the journey to deliver the cyanide to the mine site.

The convoys will comprise up to 05 trucks at a time, each trailer carrying two container loads at a time. From the Djibouti port to the Galafi Border point, the convoy is under Djibouti military control. Upon crossing the border, the convoy is handed over to the MGM escort team. During the Djibouti leg of the transport, the lead truck driver also acts as the escort lead driver.

Once on the Ethiopian side of the journey, they are accompanied by relevant escort vehicles and federal police.

1.3.2 Audit scope.

The audit covers the transportation of cyanide from the port of Djibouti to the Lagedembi mine site located in Shakiso Town Oremia region.

Djibouti Port → Galafi → Semera → Awash 7 Kilo → Adama → Aleta Wondo → Adola → Shakiso → Legedembi Mine

The ICMI protocols served as guidelines for conducting this certification audit.

1.3.3 SUMMARY AUDIT REPORT AUDITORS' FINDINGS

Midroc Gold Mine PLC is:

☒ in full compliance with

☐ in substantial compliance with

☐ not in compliance with

THE INTERNATIONAL CYANIDE MANAGEMENT CODE

Audit Company:

Investor Solutions Limited - Kenya

Audit Team Leader:

Kuldip Singh Degon, Lead Auditor & Transport Specialist

Email:

kuldip@isglobal.net

NAME OF OTHER AUDITORS

N/A

DATES OF AUDIT

The certification audit of the MGM was conducted 05th to 07th August 2025

Attestation:

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

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

1. TRANSPORT: Transport cyanide in a manner that minimizes the potential for accidents and releases.

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

The operation is **X in full compliance with** Transport Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

MGM has selected the appropriate route from the Port of Djibouti to the Shakiso Mine Site. There are two approved routes to the mine site. The company has a Route Assessment & Selection Procedure No. MGM/OP/249 approved on 28th October 2024.

Consideration is given to:

- Explanation for choosing one route over another route
- Population Density
- Infrastructure Construction and Condition
- Proximity of water bodies
- Potential for cyanide Spill and its potential environmental and public impact
- Mitigation strategies for environmental and public impact

The Route Assessment and Selection Procedure document, MGM/OP/249, addresses the above. In selecting the route, the escort leader and the escort driver drove on the road to identify risks (hazards) and count the number of bridges, railway crossings, rivers, and streams, as well as the distance from the port to the mine site destination.

The Road Risk Assessment procedure document No. MGM/OP/249 outlines the steps to be taken in assessing transport routes and designates the personnel responsible for undertaking each step. It's the responsibility of the Administration & General Service Department Head to designate competent individuals to perform route assessment and facilitate communication with stakeholders. Competent individuals Route Assessors team consisting of Convoy leader, Safety & environmental supervisor, and lead escort driver who carry out route risk assessment.

The RRAs considers population density, bridges, water bodies, blackout areas, potholes on the road and general condition of the road.

MGM has implemented a process to evaluate the risks on the selected cyanide transport route. The operations have identified two routes available for transport of cyanide.

Route Surveys have been conducted on the route from the Glaafi Border to the MGM mine site, Dewele to Awash & Awash to the Mine site, Shakiso town.

Preferred route for cyanide transport is Galafi to Awash town due to significantly higher proportion of low risk due to very low population along the route, road infrastructure, Terrain, hills, and a few bridges. Route risk Evaluation analysis have been carried out and the analysis were seen by the auditor.

From port of Djibouti to Galafi border point the cyanide is transported in convoy by Djibouti Army and once it crosses the border point the army hand over the convoy to MGM escort team for transport to MGM Mine site. MGM is not allowed to carry out RRA on the Djibouti side of leg. Last RRA was conducted 2nd February 2025. Route risk assessments are planned annually.

The road surveys are reviewed and updated annually or when road conditions change based on feedback from convoy leader and Drivers. Current version of route risk procedure is 2.0.

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

After each delivery to the mine, drivers and convoy leader prepares Cyanide convoy report No. MGM-OF-51 dated 17th June 2025 indicating major changes on the road conditions especially major deterioration, ongoing road works and submitted to the Administration and General service Dept head for review.

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

After each delivery to the mine site, a Trip Report is written on the trip Cyanide Post delivery Feedback form ref no. MGM/OP-475. Route Survey on the selected route is conducted annually to identify any new risks on the route.

Feedback reports are used to determine if any changes are needed on the road and controls are subsequently put in place to address or minimize the risk's effect. Changes to road conditions, changes due to construction, road diversions, and 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 the Port of Dar to the Mine Site were noted.

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

The escort leader provides the mine site status of the convoy before reaching each town. Then, when the convoy either stops at or is near the town, the Convoy Leader also informs the local Police to let them know that they are nearby or in the area.

The transporter documents the measures to address the risks identified on the route. All risks identified are risk assessed in the Risk Assessment document. The RRA details the risks or hazards and the controls taken to address the risks. Risk assessment reports on the road from Port of Djibouti to Mine sites were noted by auditors. The risks and the controls are discussed with the drivers and escort team at tools box meetings. Records of feedback reports detailing and any new risks on the road are discussed and measures to address the risks documented in the risk assessment form.

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 sheets also details that the police have been notified and informed about cyanide and have also been supplied with copies of the MSDS of sodium cyanide.

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

The operation has a Convoy procedure no. MGM/OP/252 which mentions use of convoys for cyanide transport. Maximum 8 trucks in one convoy carrying two containers of Cyanide each.

Convoy consists of 8 trucks, 1 Lead Escort vehicle, 1 escort vehicle in the middle of the convoy, One ERV at the end of the convoy with Ambulance equipped with all medical equipment.

A review of convoy records. has shown that convoys include the cyanide trucks (number depending on load being transported to the mine) and two support vehicles

- 1 Escort leader
- 1 Escort Driver
- 8 Truck Drivers
- 1 ERV Driver
- 1 Safety Officer
- 1 Medical Officer
- 1 Ambulance Driver
- 1 Head Mechanic
- Federal Police is also part of the convoy

Ethiopian Federal escorts and additional safety and security measures as appropriate should the selected route(s) present special safety or security concerns.

MGM 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 or leave the area during the convoy.



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

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

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

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

MGM does not subcontract the activities in transport Practice 1.1

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

The operation is **X in full compliance with** Transport Practice 1.2

Summarize the basis for this Finding/Deficiencies Identified:

MGM use only trained and qualified staff. The transporter has a procedure MGM/OP/175 that details the process and criteria for employing drivers and other staff. The company uses only trained, qualified and licensed drivers to operate its transport vehicles.

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

- Prospective applicant should be between 25 to 45 years of age and above.
- The prospective employee should be in good physical and mental condition
- Be of good moral character
- Have no criminal records
- Have a driving license categories "Grade 5" license
- Have at least 10 years' experience
- Drivers are Evaluated through Driving testing centre
- Once they pass the driving test at the centre
- Oral interviews are conducted
- Shall provide minimum once reference form previous employers
- Background checks are done on all prospective drivers
- Selected drivers are made to undergo medical examination & Police check for any criminal record.
- 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. Drivers medical is conducted every Twice a year and records are available.

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

- General Induction – where relevant
- Cyanide Awareness – Annually
- Cyanide Convoy procedure – Twice a Year
- Emergency response – Annually
- Defensive driving – Every 2 years
- Driver fatigue management – Twice a Year
- PPE Training – Twice a year

Convoy Procedure Training, Cyanide Emergency Response Training, Fire Fighting & First aid training certificates for 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 First Aid training, Defensive Driving & Fatigue Management and Use of PPE training were noted.

Selected drivers were interviewed to find out their knowledge about cyanide and were found to be knowledgeable in properties of cyanide, precaution to take when driving and how to respond to cyanide incidents. Escort leader and his assistant namely were also interviewed by auditors and were found to be competent.

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

MGM does not subcontract any of the activities above.

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

The operation is **in full compliance with** Transport Practice 1.3

Summarize the basis for this Finding/Deficiencies Identified:

The transport company only use equipment designed and maintained to operate within the loads it will be handling, the operation has a procedure no. MGM/OP/256 on use of equipment designed and maintained to operate within the loads it will be handling

The procedure specifies the design of trucks & trailers used for the transportation of cyanide. The company has records documenting the load-bearing capacities of its transport equipment and their maximum operating weights. The company uses Volvo FM400 tractor units of HP 400 equipped 6x4 axels with GPS tracking system. The weights of truck tractor unit are approximately 21 tons

Three axle flatbed trailers approximately weigh 11 tons Carrying Two (2) 20ft container. A 1x20ft container full load of cyanide weighs 23 tons approximately. 3 axle trailers with weight capacities of 60tons.

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

The operation has a procedure to verify the adequacy of the equipment. MGM has allocated 8 trucks for cyanide transportation. The company has records documenting the load-bearing capacities of its transport equipment and their maximum operating weights. The company uses Volvo FM400 tractor units of HP 400 equipped 6x4 axels with GPS tracking system. The weights of truck tractor unit are approximately 21 tons.

Three axle flatbed trailers approximately weigh 11 tons Carrying Two (2) 20ft container. A 1x20ft container full load of cyanide weighs 23 tons approximately. 3 axle trailers with weight capacities of 60tons

The company has an approved vehicle maintenance procedure. Maintenance on vehicles is done as per the manufacturer's specification and in accordance with the company's maintenance procedure. Both Preventive Maintenance and Corrective Maintenance are carried out on all vehicles and trailers at the company's workshop. Problems on vehicles picked up during inspections are attended to immediately.

There are no weighing bridges along the transportation route. The company uses Volvo FM400 tractor units of HP 400 equipped 6x4 axels with GPS tracking system. The weights of truck tractor unit are approximately 21 tons.

The gross weight of the cyanide containers is also on the BLs of each shipment of cyanide which also guides the transporter from overloading the transport vehicle.

Three axle flatbed trailers approximately weigh 11 tons Carrying Two (2) 20ft container. A 1x20ft container full load of cyanide weighs 23 tons approximately

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

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

The operation is **X in full compliance with** Transport Practice 1.4

Summarize the basis for this Finding/Deficiencies Identified:

The operation has a procedure to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging Procedure no. MGM/OP/259 outlines processes to ensure the integrity of the producer packaging. The Procedure describes how the cyanide from the supplier AGR is packaged. The cyanide from the supplier is packaged in 1ton PVC bags with a polyethylene lining and encased in plywood boxes (IBC's). Twenty (20) IBCs of sodium cyanide are in each 20ft sea container. The gross weight of the containers and the product combined is approximately 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 in the port issues a container interchanges a report which states the condition of the containers prior to loading from the port. The Procedure states that the driver and escort leader inspect the container to ensure that it is intact, container numbers are noted, seals are in place and the containers is in good condition. The drivers and Escort leader ensure that all the required shipping documents are complete. The above activity is done in the loading area in the port where the trucks are loaded. After exiting the loading area in the port to the parking area within the port, the Escort leader inspects the container and completes a Truck and Container Inspection form no. MGM/CD/008

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

The manufacturer has placards on all sides of the container as required by the IMDG Code. CHM describes the placards on containers and on the trucks. These are Toxic 6 labels and Marine Pollutant labels as well the UN number 1689 for solid sodium cyanide. The Toxic 6 labels, UN number 1689 and Marine Pollutant labels are the required placards fixed in front and in the rear of the trucks in accordance with the IMDG Code as well as in local language. The placards and signage on the containers identify the contents as solid sodium cyanide. In addition, the transporter also puts banners Infront and at the rear of the trucks in local languages as warning signs that the convoy is carrying poisonous chemicals.

MGM has implemented a safety program that includes.

- Cyanide handling procedure
- Vehicle Inspections before departure
- Preventive and Corrective maintenance
- Drug and Alcohol Policy
- Fatigue management policy
- Procedure to Modify or Suspend Transport Activities.
- Procedures for loading and offloading

MGM ensures that vehicles are inspected before departure of the trucks to the mine site and upon return to their base. The transporter has a CHM which requires inspections to be carried out prior to the trucks departing for the port for loading. The inspection is carried out by the driver together with the Local Fleet Coordinator, HSE Manager, Maintenance Manager. All of them sign the inspection checklist ref no. MGM/CD/093 after the completion of the inspection. The inspection checklist detailed what is to be inspected. Records of vehicle inspections checklists were sighted. Defects picked up during the inspections are rectified immediately by a mechanic at the company's workshop. Selected vehicles were physically inspected by auditors and found to be in good condition.

MGM has a preventive and corrective maintenance procedure MGM/OP/17 to ensure that the truck and trailers are always in a good working condition to do deliveries of cyanide safely. The company has a Maintenance procedure. Periodic maintenances are done at every 20,000Km intervals as per the trucks manufacturers specification and in accordance with the transporter's maintenance procedure. Drivers also report faults using Drivers Job card whenever they encounter any issues with the trucks

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

As per the fatigue management procedure ref no. MGM/OP/248 drivers drive from 6am to 6pm Maximum of 8 hours of driving per day 4hrs and takes 1hr rest. A maximum of 12 hours per day is required for a driver to drive. 4 hours of driving 30-minute brake. No night driving is permitted. The company completes a Journey Plan before a trip. The Trip logbook has the consignment number, time of departure, stopping times and name of locations that the convoy stopped. The trip logbook completed is also used as a measure to check limitation of driving hours. Records of Trip logs for deliveries to Mine were verified and noted. GPS reports were verified and noted. The GPS reports show the driving hours and stopping times and the system sends a notification in case of any violation.

The transporter has a procedure no. MGM/OP/253 to prevent load from shifting, the procedure states that all containers are to be secured safely on the trailer. Containers are secured with twist locks. The inspection includes inspection of twist locks. It is the responsibility of the Escort leader to ensure that twist locks are firmly in place when conducting the pre-departure checks. The twist locks are further checked anytime the convoy parks for a brief rest to prevent container from shifting. The cyanide trucks have eight (8) twist locks and hold Two containers.

The transporters Procedure MGM/OP/254 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, Heavy rainfall, damaging winds, fog etc.)
- Riots or civil unrest, armed banditry
- Infrastructure Damage

The Convoy Leader will take a decision and stop or suspend movement of the convoy in consultation with contact one. 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 by the General Manager.

MGM has a Drug and alcohol policy ref no. MGM/OP/002. 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 no. MGM/CD/104 is completed with names of the employee and test results. Records of alcohol tests conducted on selected drivers were noted. Anyone found to have failed the test is reported to management and sanctioned appropriately. A breathalyzer (Alcomate Premium AL7000) is used for conducting the testing. The Breathalyzer Alcohol tester was Purchased in May 2025 so the next calibration date is May 2026.

Procedure for Control of documented Information ref no MGM/OP/001 mentions that all records are retained for a maximum of 4 years before being disposed of. Records of documents and journey plans, checklists, policies and procedures have been retained.

MGM does not subcontract the activities above.

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

The operation is **X in full compliance with** Transport Practice 1.5

Summarize the basis for this Finding/Deficiencies Identified:

Not applicable to this operation as no shipment of cyanide is done by sea.

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

The operation is **X in full compliance with** Transport Practice 1.6

Summarize the basis for this Finding/Deficiencies Identified:

MGM trucks and escort vehicles have means by which they communicate with their head office, mining operation, the supplier and emergency responders. Communication between the drivers and Escort leader is by the use of cell phones. Emails and WhatsApp communication are used to communicate with the office and mine site supplier communication is done through emails. 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 inspection procedure No. MGM/OP/261 talks about Mobile phone & and GPS Tracking system inspection before any cyanide transportation.

Communication Equipment and GPS system are checked before the trip and Pre-Trip Inspection checklist is completed with the observations. Records of completed checklists were noted. The Communication equipment such as, cell phones are inspected and tested prior to the departure of the convoy. The GPS device is also tested to ascertain whether they are functioning properly or not. It is the responsibility of the Fleet Manager to ensure that the communication equipment's are working effectively. Copies of completed Pre-Trip checklist showing the communication equipment are tested were noted.

There are blackout areas identified during Route risk assessments, and the operation has come up with a procedure no. MGM/OP/262 on the road from port to mine site. cell phones and GPS tracking is used as primarily used for communication purposes. Other measures taken are as follows

Before entering the black out zone The Conoy leader reports the current location estimated duration of black out area to contact one based on RRA's. One Escort vehicle moves back and forth with in the blackout area until the cyanide trucks exit the blackout zone.

Immediately after exiting the black out area Convoy leader will communicate to contact one and contact one will start monitoring the convoy on the GPS system.

The tracking is done when the convoy is on the road. The journey plan is completed anytime the convoy stops for a break or stops to spend the night. The time the convoy departs after break and overnight stops are noted on the journey plan. At each stop, the escort leader informs Fleet manager via phone notifying him of the convoy's location. Sampled copies of journey plans which indicates the time of stopping and departure of the trucks were sighted. Also, sighted were WhatsApp messages. A journey report is issued by the Escort leader to management after each trip. Sampled records of GPS were verified and noted.

MGM have chain of custody documentation namely Bill of Lading, Packing list, Customs declaration documents, container interchange, and Pre-departure checklists. Bill Lading MBED0491952 dated 09.05.25 was noted. Waybill shows the sea container numbers and seal numbers. Copies of container interchange covering container numbers TCKU2737533 dated 4th June 2025 and container number CMAU2802484 dated 4th June 2025 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, and packing list indicates the quantity of cyanide containers per shipment. The Bill of Ladings MBED0491952 dated 09.05.25 specifies the quantity of shipments, date shipped, container numbers and gross weights of the containers. Each truck and escort vehicles have copies of MSDS from the AGR which is the supplier. The MSDS is part of the required document prior to a trip, and it is specified on the Inventory sheet which is completed during pre-departure inspection.

The transporter does not subcontract the activities in Transport Practice 1.6

2. INTERIM STORAGE: *Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.*

Transport Practice 2.1: Store cyanide in a manner that minimizes the potential for accidental releases.

The operation is **X in full compliance with** Transport Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

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

Within the scope of this audit, there are no transshipment depots or interim storage sites as defined in the audit protocol.

The operation is considered to be in full compliance due to this Transport Practice not being applicable.

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

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

The operation is **X in full compliance with** Transport Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

MGM has developed and implemented an Emergency Response Plan Cyanide Emergency Procedures Ref MGM/OP/267 Dated 15th October 2024 Rev 1

The plan details the following.

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

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

The ERP is appropriate for the selected transportation route. The ERP addresses issues regarding road transportation of cyanide. RRAs and Route Surveys have been conducted on the road from Djibouti port to 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 Djibouti 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. MGM 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 24ton 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 Djibouti 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 port of Djibouti to the mine site. Vehicles of the required specification are used to do the transportation.

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

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

1. 6x4 vehicles with 3 axle trailers 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 2x20ft containers a total weight of 46 tons The company uses Volvo FM400 brand of trucks with 400HP.

There is no interim storage facility. MGM 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: Dry Sodium Cyanide spill inside a sea container
- Scenario 2: Handling Sodium Cyanide IBC's
- Scenario3: Dry Sodium cyanide in water bodies
- Scenario 4: Spill of Cyanide into soil
- Scenario 5: Truck on fire involving Sodium cyanide

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

The ERP identifies the roles and responsibilities of both internal and external responders. Emergency response Plan defines the roles of the General Manager, Convoy leader, Safety officer, Health officer, Truck Drivers, Fleet manager (Contact one) On road mechanic and his Assistant, escort team, drivers, Code Manager, ERV Driver, Convoy Escort Drivers, Police, Hospitals, Fire Brigade & Environmental Protection authority.

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 shoveling of the solid sodium cyanide briquettes is the responsibility of the escort team. The Escort Leader is responsible for administration of oxygen to a cyanide poisoned person and hands the victim over to the Ambulance when they arrive at the incident site.

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

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

The operation is **X in full compliance with** Transport Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

MGM 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 Fleet Manager who is qualified and authorized to conduct training. Records of ER training attendance registers dated 17th August 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. Emergency response training certificates awarded to participants were verified and noted by auditors.

Emergency response Plan defines duties and responsibilities of both internal and external responders. The ERP defines the duties and responsibilities of the Cyanide Convoy Leader, Safety Officer, Truck Drivers, contact one (Fleet Manager), Health officer, Senior Mechanic, ERT Chairperson (General Manager), Cyanide Code Manager, ER Vehicle Driver, 3 Escort Drivers, Ambulance Driver, Federal police, Regional Police, Fire Brigade, Hospitals, Environmental Protection Authority (EPA)

MGM 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 is the list of ER equipment.

- 4 Reflective triangles
- 4 Reflective Vests
- 4 PVC Gloves Elbow Length
- 4 Leather Gloves
- 2 Antidote Cyanokit
- 1 First aid Kit Large
- 10 Plastic Bag Large Size
- 5 helmets
- 100 Cable Ties
- 1 Measuring Tape – 50mtrs
- 1 Extension cord 20m
- 20 tons Hydraulic Jack
- 4 PVC Raincoats
- 4 PVC Chemical Suits
- 4 pairs Gum boots
- 2 Gas Testers
- 1 Cyanide test Kit
- 4 Goggles Clear
- 4 Safety Glasses
- 7 Full face mask Respirator
- 14 Canisters A2B2E2F2-P3
- 2 100m reflective Danger tape
- 16 Tyvek Chemical suits
- 2 Dust Pans
- 1 Paddling Pool (Inflatable)
- 4 Fire Dry Powder Fire Extinguishers
- 10 Traffic Cones
- 2 SCBA Set Complete (4500 psi)
- 1 Life Oxygen pack
- 2 Oxygen cylinders
- 2 Tarpaulins – poly 3m x 6m
- 1 Bags Soda Ash 25kgs
- 5 liters Calcium hypochlorite
- 2 200ltrs Water Drums



- 6 20ltr Pails and lids
- 2 Bulk bags 1m3 Capacity
- 10 Poly bags 25kg each
- 1 Basic Tool Kit
- 1 Genset 5kva Genset
- 1 Light stand
- 2 Shovel Long handles
- 2 Brooms
- 2 Hoe-pick
- 1 Bolt cutter large
- 1 Sledgehammer
- 2 Pangas
- 1 Wheelbarrow
- 1 Chemical containment kit
- 11 Driver ER kits
- 1 Stretcher in the ambulance
- 1 Foldable stretcher

When there are no deliveries of cyanide to the mine, the escort equipment is kept in Safety division office at mine site. 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 it's 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 as below

- 4 Reflective triangles
- 4 Reflective Vests
- 4 PVC Gloves Elbow Length
- 4 Leather Gloves
- 2 Antidote Cyanokit
- 1 First aid Kit Large
- 10 Plastic Bag Large Size
- 5 Helmets
- 100 Cable Ties
- 1 Measuring Tape – 50mtrs
- 1 Extension cord 20m
- 20 tons Hydraulic Jack
- 4 PVC Raincoats
- 4 PVC Chemical Suits
- 4 pairs Gum boots
- 2 Gas Testers
- 1 Cyanide test Kit
- 4 Goggles Clear
- 4 Safety Glasses
- 7 Full face mask Respirator
- 14 Canisters A2B2E2F2-P3
- 2 100m reflective Danger tape
- 16 Tyvek Chemical suits
- 2 Dust Pans
- 1 Paddling Pool (Inflatable)
- 4 Fire Dry Powder Fire Extinguishers
- 10 Traffic Cones
- 2 SCBA Set Complete (4500 psi)



- 1 Life Oxygen pack
- 2 Oxygen cylinders
- 2 Tarpaulins – poly 3m x 6m
- 1 Bag Soda Ash 25kgs each
- 5 liters Calcium hypochlorite
- 2 200ltrs Water Drums
- 6 20ltr Pails and lids
- 2 Bulk bags 1m3 Capacity
- 10 Poly bags 25kg each
- 1 Basic Tool Kit
- 1 Genset 5kva Genset
- 1 Light stand
- 2 Shovel Long handles
- 2 Brooms
- 2 Hoe-pick
- 1 Bolt cutter large
- 1 Sledgehammer
- 2 Pangas
- 1 Wheelbarrow
- 1 Chemical containment kit
- 11 Driver ER kits

The quantity of each PPE was checked with the equipment checklist. Cyanide Antidote is carried in the ambulance as per manufacturers specifications.

Emergency Response Equipment are inspected & recorded on Emergency Response equipment checklist no. MGM/CD/099 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 Safety Officer. The ER equipment is kept in safety department store when not in use to prevent unauthorized entrance and for safe keeping.

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

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

The operation is **X in full compliance with** Transport Practice 3.3

Summarize the basis for this Finding/Deficiencies Identified:

The ERP outlines the procedure for notifying the mine, all the stakeholders including medical facilities and affected communities. The contact list is part of the Escort leader's documents and in each truck. The ERP stipulates the call-out procedure to follow during an incident. MGM has an emergency contact information which include a list of mine and supplier, medical facilities, other external responders EPA, Police, 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 Fleet Manager, and the contact phone and email addresses are amended. Contact phone numbers are reviewed and tested regularly by the Fleet 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, 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.

In case of a significant incident, an Accident Report Form will be completed by the Fleet 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.

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

The operation is **X in full compliance with** Transport Practice 3.4

Summarize the basis for this Finding/Deficiencies Identified:

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

- Procedure for recovery and neutralization of Solid sodium cyanide
- Procedure for clean of emergency equipment
- Neutralization and disposal of recovered cyanide
- Neutralization and disposal of contaminated soil
- Proper use of cyanide neutralization chemicals.

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

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

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

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

them as

The operation is **X in full compliance with** Transport Practice 3.5

Summarize the basis for this Finding/Deficiencies Identified:

ER Plan makes provision for annual reviewing and evaluating of the adequacy of ERP. The ERP is reviewed when there is a major or critical changes on the road conditions or changes to infrastructure and changes to the transport equipment. Also, after conducting mock drills and accident investigations, lessons learnt are used to review the emergency plan. The ERP has been revised once, on 15 Oct 2024.

Mock drills are organized twice in a year. The training matrix captures the dates mock drills were held, next mock drill exercise and the names of all the participants. Two Mock drills were held on 19th May 2025 as the convoy was transporting the cyanide to Mine site for each mock drill a report is written by the Fleet Manager. Mock drills covered cyanide release and cyanide truck on fire. Records of mock drill reports 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 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 Fleet Manager in consultation with management.