

N.V. VSH TRANSPORT

PARANAM PORT



SUMMARY AUDIT REPORT

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VSH TRANSPORT PARANAM PORT TRANSPORTATION SUMMARY AUDIT REPORT

The International Cyanide Management Code (hereinafter “the Code”, “Code” or “the Cyanide Code”), this document, and other documents or information sources referenced at www.cyanidecode.org are believed to be reliable and were prepared in good faith from information reasonably available to the drafters. However, no guarantee is made as to the accuracy or completeness of any of these other documents or information sources. No guarantee is made in connection with the application of the Code, the additional documents available or the referenced materials to prevent hazards, accidents, incidents, or injury to employees and/or members of the public at any specific site where gold or silver is extracted from ore by the cyanidation process. Compliance with this Code is not intended to and does not replace, contravene or otherwise alter the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other requirements regarding the matters included herein. Compliance with this Code is entirely voluntary and is neither intended nor does it create, establish, or recognize any legally enforceable obligations or rights on the part of its signatories, supporters or any other parties.



Introduction

This document provides the framework for the information that an auditor must include in the Summary Audit Report prepared for a Cyanide Code Certification Audit conducted for a cyanide transportation operation and serves as a general template for presenting the required information.

The International Cyanide Management Institute (“ICMI” or “the Institute”) reviews the Summary Audit Report to ensure that it accurately represents the results of the Detailed Audit Findings Report and includes sufficient information to demonstrate the basis for each finding. Once ICMI determines that all documentation required for the Cyanide Code Certification Audit is complete, it posts the Summary Audit Report on the Cyanide Code website.

Current Summary Audit Report has been prepared based on the information available at the time of the audit. Every effort has been made to ensure accuracy of the information presented herein with the supporting evidence available where applicable. Information provided by VSH Transport has been taken in good faith and has been verified where possible.

Operation General Information

Name of Transport Operation:	N.V. VSH Transport at Paranam Port
Name of Facility Owner:	N.V. Suralco/ Alcoa LLC
Name of Facility Operator:	N.V. VSH Transport
Name of Responsible Manager:	Sjoerd Poort, N.V. VSH Transport Managing Director
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Operation Location Detail and Description

Paranam Port is a private port situated on the left bank of the Suriname river, upstream from Paramaribo (Figure A below). The Port of is owned by Suralco/Alcoa (headquartered in Pittsburgh, Pennsylvania, USA) and handles general cargo for the mining industry and also steel, timber and cement. Max size: Paranam: LOA 228m, draught 7.1m springs (6.3m neaps) approximately 40,000DWT, airdraught 41m (high water).

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The Paramam facility is located on approximately 500 hectares of land on the Suriname River (Figure B and Figure C below). There are three private docks for handling bulk bauxite, alumina, general cargo, containers, oil and dangerous goods. The General Dock is designed to receive dangerous goods, including cyanide, has been recently reconstructed and is in receipt of appropriate licenses from the Marine Authority of Suriname.

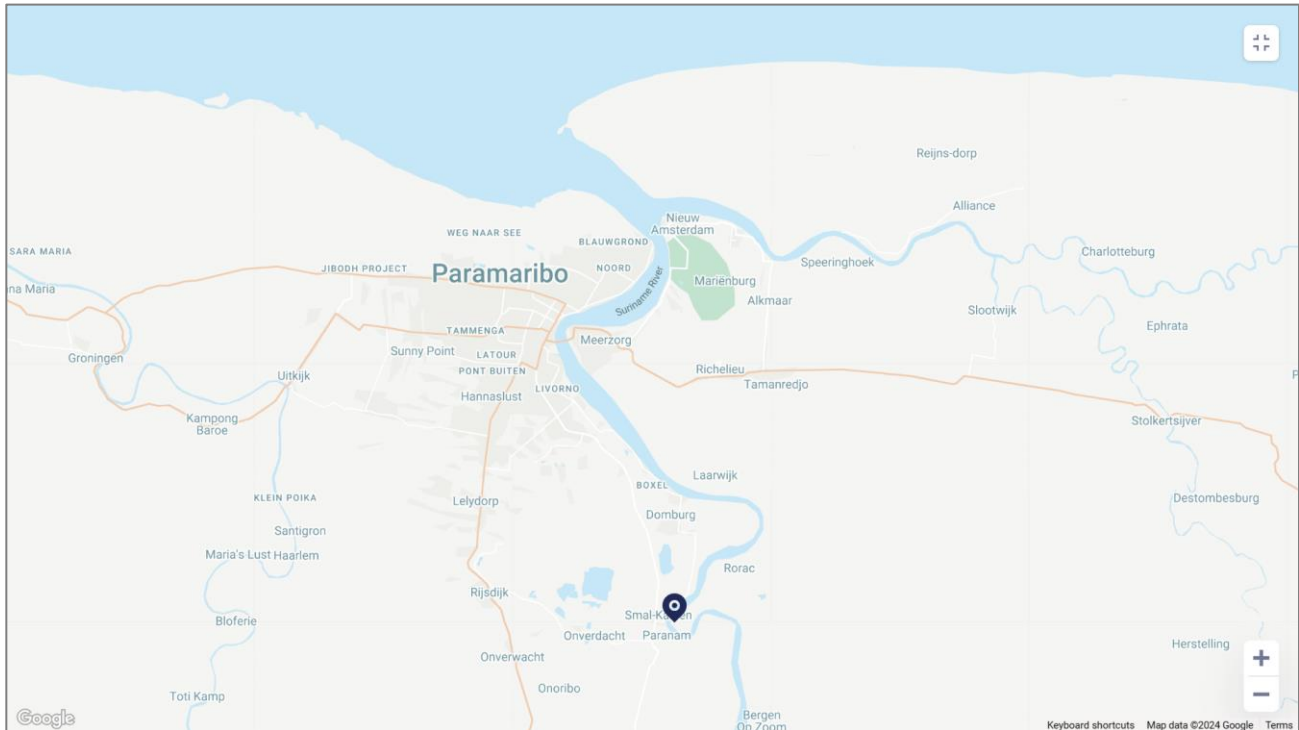


Figure A: Suralco Paramam Port Facility Located in Paramam

Accaribo and La Vigilantia are two villages with a population of several thousand lie approximately 750m northwest of the port facility. The City of Paramaribo lies approximately 30 kilometers to the north and has a population of approximately 200,000 inhabitants. The prevailing winds at Paramam are from the northeast. The area is heavily forested leveled land.

Current activities include area maintenance, bulk handling of acid, bulk handling of fuels, bulk handling of logs and cold stacking of ships. Miscellaneous Support Facilities include a Laboratory Facility, Plant Protection/ Emergency Response Facility, Central Machine Shop, a Mobile Equipment Maintenance Facility, a Utilities Maintenance Facility and Administrative support Department. The facility has restricted access and a security guard force on site.

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Figure B: Suralco Paranam Port Facility Located Along the Suriname River

Administrative controls are incorporated in Standard Work Instructions (SWI's) which are kept at the respective departments and describe the procedures and precautions necessary during the transfer of hazardous materials.

Physical barriers, interlocked warning lights or warning signs used to restrict vehicular movement during transfer operations and prevent vehicular departure before complete disconnect of the flexible or fixed transfer lines are also described in these SWI's.

For the purposes of this report, it is only VSH stevedoring activities that are being assessed for compliance to the ICMI Code (the Code). All other elements concerning the supply chain are being undertaken by others.

VSH are in the process of preparing Paranam port to offload Cyanide ISOtainers. The Government of Suriname is advising that cyanide offloading moves to Paranam, as this port is in a remote industrial zone. It is also closer to Newmont Merian mine, the final destination for the cyanide.



Figure C: Paranam Port, Bird's Eye View

In the event of disruptions at the primary ports (Traymore Port Facility in Moengo and Dr. Jules Sedney Port Facility in Paramaribo), Newmont Suriname has designated this facility as an alternative port for receiving Sodium Cyanide shipments essential to their operations. This designation ensures strict adherence to Newmont's safety and environmental standards.

During the audit of the Paranam facilities it has been established that the Paranam operational practices and procedures are kept in good order and comply with the requirements of the Cyanide Management Code. It is therefore recommended to grant certification to VSH Transport for its future cyanide operations.

Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

Auditor Information

Audit Company: Blackmore & Associates, UK
Lead Auditor: Julia Kennedy
Lead Auditor Email: juliakennedy@kennedy-global.com

Names and Signatures of Other Auditors:

Auditor 1:	<u>Christine Blackmore Lead and Technical</u> Name (Print/Type)	Signature
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Dates of Audit: 16 April 2014

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Auditor Attestation

I attest that I meet the criteria for knowledge, experience and conflict of interest for a Cyanide Code Certification Audit Lead Auditor, 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 Certification Auditors.

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

VSH Transport Paranam Port



09 July 2024

Name of Operation Signature of Lead Auditor Date

Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

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

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.1

Summarize the basis for this Finding/Deficiencies Identified:

This audit summary is relevant to VSH Stevedore activities only. Other aspects of the supply chain audit are the responsibility of other auditors.

The roads within Paranam port are flat (without any pitch and grade), and the surfaces are black top and/or concrete. All roads are sufficiently wide enough for two-way traffic; however, a traffic management system is in place. The roads are in good condition and will be risk assessed as part of the re-generation of the port to receive cyanide.

By nature, the Port is on the water front (River Suriname), VSH provide stevedoring duties at the port only (unloading and loading of cargo), however, should cyanide ever be unloaded, weather conditions will be taken into consideration. Adverse weather conditions considered in Suriname are torrential rain, electric storms, high winds and visibility (fog/mist), during any of these adverse conditions operations are stopped. Details relating to weather conditions are contained in their "Operations Manual" Ref: VSH TRANSPORT- Terminal Operations Handling Guideline dated 2023.

Paranam port is still undergoing preparations for cyanide to be off-loaded. All plans/procedures/protocols prepared by VSH, Haukes and Newmont Meridian applicable to cyanide cargo will be the same as currently practiced at Moengo Port.

Transportation from the quay side to the Dangerous Goods transit area and or exit to from Paranam will be provided by Haukes Transport, who are a signatory of the ICMI Cyanide Code (the Code).

VSH has developed and implemented the guidelines "Transport Driving and Road Safety Tips", to minimize the potential for accidents and releases and considers the presence of workers in the area,

the port infrastructure, access road to the docking area and the proximity of the river. This guidance will be applicable to Paranam. VSH undertake annual reviews of this document or earlier if required. The document will be implemented at Paranam and any feedback provided by Paranam will be taken into consideration.

As with Moengo Port, interested parties including VSH, Haukes and Newmont will meet periodically to discuss the work they undertake at each port, this will now include Paranam. Updating of reports and guidelines will be including Paranam.

The Suriname Government has recommended the use of Paranam port for all Dangerous Goods (DGs) including cyanide to further minimize the risk of any incidents. Paranam is located in an industrial zone in a remote area of Suriname, it was formerly used for the loading of Bauxite concentrate from the process plant and refinery operated by Suralco. The process plant closed a few years ago but the refinery is still active, but does not use the port to its capacity. Paranam has many features already installed and operational, such as: dock side eye wash station and showers, clinic within 500m, ambulance and fire vehicles, trained fire-fighting and medical staff.

Paranam has security staff who patrol the boundary fences every 4 hours 24/7 and CCTV is in operation, this is connected to the control room at the main gate. There is one vehicle access gate, which also has a pedestrian gate, all visitors and vehicles are signed in and out.

Standard of 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 Standard of Practice 1.2

Summarize the basis for this Finding/Deficiencies Identified:

VSH will be using the same stevedore crew that is currently unloading cyanide at Moengo, therefore all procedures and activities will be the same. Procedures for unloading can be found in “Operations Manual” Ref: VSH TRANSPORT- Terminal Operations Handling Guideline dated 2023. It should be noted that the “Operations Manual” is applicable to all 3 ports the stevedore operates at.

VSH uses only experienced, trained, qualified and licensed staff to operate its handling equipment, training records and credentials were shown to the Auditor. In addition, the auditors discussed their

work and experience with VSH staff who currently perform the stevedore tasks. Additional training certificates such as “HazMat” were presented to the auditors.

VSH conducts Safety Toolbox Meetings each morning prior to the operations as an integral part of its safety routine, this will form part of the protocol when Paranam is open. During these meetings the following topics are discussed: moving to a safe location during lifts to avoid incidents due to a swinging cargo in the Hold, on Deck or on the Dock, removing tripping hazards (loose slings/broken dunnage/bands), securing manhole covers before going into the hold, no misuse of cell phones or electronic devices during operational hours, no smoking, etc.

The cyanide isotainers when the port is active will be unloaded by the ships crane. The Stevedores attach and detach the lifting slings and place the cargo on the quay side, details for unloading can be found in “Operations Manual” Ref: VSH TRANSPORT- Terminal Operations Handling Guideline dated 2023. This “Operations Manual” is applicable to all 3 ports where the stevedore operates.

All stevedore staff undertake refresher training on a rolling program, this is followed by competency observation to ensure the safe operation and manual work is carried out safely and risk free.

VSH stevedores will handle cyanide; notably Paranam Port management have initiated bi-annual chemical management awareness sessions for their own workers. Paranam staff conducts inspections of appropriate administrative controls (such as oil spill control equipment, warning signs, etc.) as per the inspection schedule. Any malfunction of equipment or structures noted during an inspection will be rectified before the next inspection. If the problem poses an imminent hazard to human health or the environment, remedial action will be taken immediately.

Standard of 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 Standard of Practice 1.3

Summarize the basis for this Finding/Deficiencies Identified:

The ships cranes will be used to unload the isotainers at Paranam. Before commencing unloading the stevedores ensure that the slings are well maintained. VSH only uses equipment designed and maintained to operate within the loads it will be handling. A risk analysis is conducted before the stevedoring activities commence which will include: checking the vessel’s crane load capacity, review of the ships Inspection List, rigging, load lifting equipment and cables. It should be noted

that ships cranes are in general are capable of lifting between 25-50tons, a loaded isotainers approximate weight is 22 ton, therefore well within the limits to lift an isotainer loaded.

VSH implements the Operations Handling Guideline, according to which the total weight of the load must account for every piece of lifting gear involved in the lift, including the hook, the hook block, ropes, lifting beam, lifting slings, shackles, hoist rings, and other hardware. During the handling of dangerous goods, operators are always aware of the environment and are competent of the IMDG code. A DG manifest is always available where DGs are present and includes SDS of the goods.

The tare weights are clearly marked on the all isotainers and cargo weights are indicated in the operators' cab as lifting commences to prevent overloading. Additionally, product weights are specified on consignment notes and bills of lading.

Standard of Practice 1.4

Develop and implement a safety program for transport of cyanide.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 1.4
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide would be delivered in purpose built isotainers, as approved by the IMO (International Maritime Organization). Before unloading the isotainers are inspected by VSH stevedores (as part of the procedure). The inspection includes the structure of the isotainer cage and the tank. If any damage is detected the isotainer would be rejected and stay on the ship.

VSH carries out a vehicle inspection on Haukes transportation vehicles to ensure that they are adequate and appropriate for un-loading the cyanide. Checks by VSH include: trailer locking systems to ensure the load doesn't move in transit and general condition of the vehicles e.g., tires, lights and maintenance. It falls within the remit of the transportation auditing to ensure all other categories e.g., drivers hours, rolling program of maintenance etc. is compliant to the Code. However, VSH does have a policy that limits crane operator hours (4 hours) before the operator is changed. This is logged and overseen by the port manager.

Documents and written records of hours worked have been supplied to the auditors for review. The auditors have no reason to challenge any entry. This was also confirmed by interviews with VSH crane operators. Crane inspections, maintenance and testing records and certificates were presented to the auditors.

VSH has a drug and alcohol abuse policy in place, stating that if any employee is suspected of abuse, they stop work and formal testing is done by an independent laboratory, with results submitted to VSH for action.

Additionally and importantly, Paranam implements administrative controls for loading/unloading operations at the Port, these include the following items:

- Verification that shipment received is the product ordered;
- Verification that quantity of material to be unloaded (loaded) will not exceed storage tank (tank truck) capacity;
- Reviewing the MSDS for use of personal protective equipment and emergency response procedures;
- Requirement that a qualified person from Suralco observes loading/unloading operation and remains with the truck until operation is completed;
- Ensuring that truck brakes are set and wheels are blocked;
- Ensuring packages are secured to prevent motion;
- Ensuring proper tools are used for loading/unloading to prevent damaging containers;
- Taking precautions to prevent leakage during transport;
- Implementing spill response procedures.
- Placing warning signs in view of loading or unloading vehicle;
- Placing spill control equipment in readily available storage to effectively control any spill(s) which may occur during the loading/unloading of hazardous materials.

Standard of Practice 1.5

Follow international standards for transportation of cyanide by sea.

The operation is in full compliance with in substantial compliance with not in compliance with Standard of Practice 1.5

Summarize the basis for this Finding/Deficiencies Identified:

No cyanide has been off-loaded at Paranam, reportedly. However, the cyanide received at Moengo is packaged in accordance with Part 4 of IMO. ISOtainers are listed as an acceptable packaging for cyanide. The isotainers are clearly marked with the UN code of 3414 class 6 (displayed on four sides and on the top). The cyanide delivered eventually to Paranam will be ISOtainers, the auditors have no reason to challenge this.

VSH will not provide transportation at Paranam, this is undertaken by others. The ships manifest is

provided to VSH and this is checked for compatibility stowage and in accordance with Chapter 3.2 of IMO (reacts with acids or acid fumes).

VSH checks the integrity of the ISOtainers before unloading, any defects are recorded. Any damaged or suspect/defect cargo stays on the ship for returning to the manufacturer.

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is in full compliance with
 in substantial compliance with Standard of Practice 1.6
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Tracking of the cyanide cargo during shipping is the responsibility of Newmont Merian as the owners of the cargo. VSH only receives notification a few days prior to the ship reaching Suriname so they can prepare their staff and be at the port ready. This is applicable to Paranam port also. Tracking of the cyanide shipment when it has been unloaded is the responsibility of others.

During stevedore activities, communications is by two-way radio during using a designated radio channel, this would be the system if cyanide would be delivered to Paranam. VSH tests their communications (radios) prior to the unloading. Two-way Radio's ensures continual communications during unloading and no blackout spots occur. The radios are distributed between VSH, Haukes and Merian staff.

VSH are notified two weeks in advance of any cyanide shipments, this will also be the case at Paranam Port. VSH will communicate and track Haukes drivers/vehicles during their time in the port. It is the responsibility of others to ensure the onward safe transit of the cyanide. Guidelines for driving safely within the port boundary are contained in VSH document "Transport Driving and Road Safety Tips", this document also includes details of communications.

VSH checks ships manifest (bill of lading) which comes with the consignment, typically this will contain the number of ISOtainers, individual identifier, MSDS sheets, tare weight and contents (in this case sodium cyanide). All valves are sealed and have a tag registration, these are also checked by the stevedores for integrity. This will be the same practice at Paranam. After checking, the documents (consignment notes) are taken by Haukes and finally to Meridian.

VSH always check the ships manifest before unloading begins to ensure that incompatible goods have not been stowed with cyanide. MSDS accompany DGs, as part of the consignment notes.

Principle 2 | INTERIM STORAGE

Design, construct and operate cyanide interim storage sites to prevent releases and exposures.

Standard of 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 Standard of Practice 2.1

Summarize the basis for this Finding/Deficiencies Identified:

There is no interim storage for cyanide currently at the Paranam Port. Paranam Port is developing a dangerous goods transit area in preparation for cyanide being delivered to this port. The port has many existing features that will form part of the emergency response procedures.

The auditors were given a tour of the proposed DG transit area. The proposals discussed for the development of the area are good and in place, these are yet to be implemented.

Principle 3 | EMERGENCY RESPONSE

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

Standard of 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 Standard of Practice 3.1

Summarize the basis for this Finding/Deficiencies Identified:

Paranam Port facilities are in possession of own ERP developed by Suralco LLC in 2015. Suralco's ERP, called "Release Prevention, Control and Countermeasure (RPCC)" covers the types of emergencies that may occur at the facilities and the emergency response procedures that will be employed in the event of a spill, release or a hazardous situation.

The Plan has been prepared for Suralco's Paranam Operations in accordance with Suriname, Suralco and other regulations. The Plan has been designed to provide the controls and procedures necessary

to minimize hazards to human health and the environment from fires, explosions, and releases of toxic and hazardous substances to the environment (air, soil, surface water, and groundwater).

The Plan contains necessary information that is required to stop the source of a spill, notify the appropriate stakeholders, and initiate procedures to prevent or minimize risks to health or the environment as well as clean-up protocols.

In addition, VSH Transport is in the possession of the Emergency Response Plan Guidelines that considers possible incidents during the stevedoring activities: unloading the 20ft containers and ISO tanks from the vessel and transferring them to the trucks.

VSH is responsible for the stevedoring operations and the Plan covers these aspects during the handling of cyanide specifically at the Port.

Haukes N.V. is the approved cyanide transporter with whom VSH works in collaboration during the stevedoring to ensure emergency preparedness. Haukes always transports sodium cyanide in convoys, assesses the transportation route conditions and hazards and has an emergency kit in the Spill Kit Wagon with personal protective and other emergency response equipment.

The ERP considers the physical and chemical form of the cyanide specifying that the solid cyanide may be transported in ISOtainers or 20-ft containers. Cyanco's SDS specifies cyanide physical form as solid and VSH keeps the SDS current as part of the continuous improvement processes. Physical properties include Form, Color, Odor, pH and others.

Safety data sheet (SDS) is available during each stevedoring and shipment operation and describes sodium cyanide characteristics and toxicity in detail. Shipping papers identify hazardous materials and contain emergency response information (such as MSDS) identifying cargo as cyanide.

The ERP is appropriate for the method of loading and offloading. Paranam ensures that any vehicles involved in dangerous goods transportation within the Port area are properly placarded.

VSH ERP considers possible incidents during the stevedoring activities: unloading sealed 20 feet containers and ISO tanks from the vessel and directly transferring them to the trucks. Machinery and equipment that are intended for the use during the cyanide handling at the Paranam Port includes a harbour crane. The Plan provides a description of this item.

The ERP considers the port infrastructure. General Dock where cyanide would be discharged has been reconstructed with an impermeable concrete layer. The Paranam facility contains an

extensive network of drainage ditches designed to divert storm water and industrial waste water to the plant periphery and then to the outfalls. Paranam has constructed containment systems for its tanks and has expanded its curbing of process areas.

The ERP considers the design of the relevant machinery and equipment in sufficient detail. N.V. VSH Transport ensures all lifting equipment (crane, spreader, forklift) and tools (wire ropes, slings, beams) is regularly inspected and certified to meet safety standards. All crew members are properly trained in the safe use of all equipment and tools.

The ERP also considers the design of the safety barriers and drainage network systems at the Port. Paranam facility contains an extensive network of drainage ditches designed to divert storm water and industrial waste water to the plant periphery and then to the outfalls described above.

Paranam has constructed containment systems for its tanks and has expanded its curbing of process areas. Any sites where dangerous goods are handled have been constructed with an impermeable layer and safety dikes.

There is no cyanide interim storage facility at the Port.

The Plan includes descriptions of response actions, as appropriate for the anticipated emergency situation. Possible incidents involving cyanide are described in sufficient detail.

The Plan identifies the roles of external responders, medical services and communities in emergency response procedures. The Primary Emergency Response Coordinator identified in the Emergency Response Action Plan shall have full authority to implement the response actions. Suralco LLC will use its personnel, equipment and materials necessary to control any emergency releases and exposures at the Port. The priorities of response team members are based upon protection of human life, environmental media and protection of the assets respectively.

Standard of 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 Standard of Practice 3.2

Summarize the basis for this Finding/Deficiencies Identified:

VSH provides initial and refresher emergency response training to its personnel. In addition, Suralco LLC provides emergency response training to its appropriate personnel. Training includes initial training, inductions, first aid training and emergency mock drills.

All personnel at Suralco LLC receive general environmental awareness training once every two years. The Port also has a master schedule containing exercises (mock drills) for Environmental, Health & Safety emergency situations, including emergency evacuation drills. Personnel handling chemicals at the Port receive training in the safe handling of oils, hazardous substances/wastes and spill prevention and response as required by their assigned jobs. Paranam's shipping/receiving personnel have received oil spill response training IMO – level 1 (which includes hazard communications, guidance and instructions on the location of spill control materials and access to emergency contacts).

Personnel who are involved in handling oil related materials receive appropriate training for safe handling of oil, spill/release prevention and response, and implementation of Paranam Operations' RPCC plan.

Rescue teams are trained to conduct rescue activities in confined spaces and from multiple level buildings. The fire brigade is trained to handle all fire related emergency situations. Rescue Training Records from the recent training, Training Certificates and Training Programmes have been reviewed by the auditors and are found appropriate.

The Plan provides descriptions of the specific emergency response duties and responsibilities of appropriate personnel.

Paranam Port personnel are on duty 24/7 throughout a year including holidays. Some employees, in addition to security functions, are emergency medical technicians (EMT's), members of the plant fire brigade and do receive appropriate training.

These designated workers conduct routine inspections of the facilities and handle emergency response. Any spills or leaks which are observed are recorded and are reported to the responsible managers.

Suralco's Emergency Response Coordinator shall be responsible for the following actions whenever there is an imminent or actual emergency situation:

- Activate internal alarms and hazard communication systems to notify all facility personnel;
- Notify all response personnel, both internal and external (e.g. MAS, the Police, Fire Department or other agencies having designated response roles) if required;
- Coordinate rescue and response actions with all response parties;

- If evacuation of local areas may be necessary: notify appropriate local authorities and notify either the government official designated for that specific geographical area or the National Response Center;
- If the spill is in navigable waters the coordinator will notify the Maritime Authority Suriname (MAS) in Paramaribo at one of the listed numbers.

Paranam ERP maintains safe haven communication system. A safe haven is a designated area which will serve as a safe place to shelter employees, visitors and contractors during an emergency. Safe havens are located in close proximity to working areas.

Designated person will be responsible for the evacuation in an emergency event such as major spill (chemicals or other hazardous materials), fire/ explosion, bomb threat, strikes or civil unrests or other cases where evacuation is required. Critical factors are evaluated prior to evacuation, such as spill flow direction, prevailing wind direction, availability of alternative evacuation routes and other factors.

Emergency Response infrastructure available at the Paranam Port facilities includes the Residue department, MER shop, Central Civil Services & Contract Management and Port Operations (also in case of oil spill to Suriname River), Polyclinic with 4 nurses and 2 doctors, 2 ambulance vehicles and a Fire Brigade with a fire engine.

Paranam has determined that a spill event requires a priority response and has heavy machinery, spill cleanup materials, and trained personnel available to ensure a rapid response.

Port operations have oil spill response equipment to respond to oil spills on the river. There is heavy equipment on-site that can be called in as needed if earthen dikes need to be organized.

Suralco's ERP provides a detailed list of Emergency Response Equipment which includes the following:

- An emergency phone or radio system available at each transfer location to allow for quick notification of a spill in case of an emergency;
- Sorbent material and sorbent booms for containment of spilled material;
- Equipment necessary to shutoff/stop flow of material from storage unit or vessel.

First aid supplies are maintained in the Polyclinic and the Ambulance on site. Rescue equipment and the fire brigade equipment is stored in the Fire Brigade garage.

Taken together, the Emergency Response Equipment is sufficient to handle the emergencies pertaining to the fire, explosions and chemical spills as well as sodium cyanide related emergencies.

Paranam Operations maintain spill control and cleanup equipment, fire-fighting and other emergency response equipment. Storage locations for this equipment are identified on the map contained in the ERP. The ERP provides a detailed description, quantity and storage location of the equipment and materials that may be used during the emergency response at the Port.

Paranam Operations maintains its own fire department with a trained and well-equipped fire brigade and two life support ambulances. At the time of the audit, these were inspected and found in good order, one of the ambulances was operational and the second one was under the repair and maintenance.

VSH shall use the emergency response equipment that is provided by Haukes (the cyanide transporter) which is stored at a designated Spill Kit Wagon. Cyanide discharging does not take place until such time when this wagon is provided and is ready for use.

Paranam Port operations maintain its emergency response equipment in good order. There are procedures to inspect the equipment on-site, including PPE and heavy machinery.

Haukes maintains inspections of its emergency response equipment regularly, as can be established from the public summary report.

VSH does not contract other entities to conduct any of the activities required in Transport Practice 3.2 nor has it designated other entities to conduct emergency response activities.

Standard of 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 Standard of Practice 3.3

Summarize the basis for this Finding/Deficiencies Identified:

Paranam Emergency Response Plan contains current information for notifying appropriate entities of an emergency. There is a list of the Emergency Response Coordinators responsible for implementing the Emergency Response Plan. The list includes their names, titles and phone numbers. The Security Supervisor is the primary Emergency Response Coordinator, the alternative Coordinators shall serve as the primary Coordinator in his absence.

Whenever there is an imminent or actual emergency situation, the Emergency Response Coordinator shall be responsible for notifying all facility personnel, notifying all response personnel, both internal and external (e.g. MAS, the Police, Fire Department or other agencies having

designated response roles) if required, notifying appropriate local authorities and either the government official designated for that specific geographical area or the National Response Center if evacuation of local areas may be necessary.

Emergency Notification Phone List contains contacts for the General emergency response & dispatcher (Medical, Fire, Rescue, etc.), Primary Emergency Response Coordinator, Alternate Emergency Response Coordinator, Paranam Operations Ambulance, Paramaribo Medical Department, Suralco LLC Medical Department, Paranam Rescue Team Coordinator, Fire Brigade Coordinator and outside agencies: Police, Fire Departments, hospitals, governmental agencies such as NCCR, District Commissioner (DC) of Paranam, National Environmental Agency (NIMOS) and other stakeholders.

Should the emergency situations require involvement from the outside emergency response agencies, including regulatory bodies or other external stakeholders, the following Emergency Response and Assistance Agencies would be contacted:

- In case of major incidents and emergencies which are beyond control of the facility and/or public areas are affected, the NCCR (National Disaster Center) would be the primary emergency response agency to be contacted and coordinate response actions;
- In case if Fire Assistance is required, Paranam Operations will notify the Onverdacht Fire Department;
- Medical Assistance at Paranam Operations is available in any emergency situations. Should specific care be required, personnel will be transported to hospitals in Paramaribo using fully equipped Suralco ambulance;
- In situations which may require law enforcement assistance Paranam Port will call on Paranam Police Department.

“LIST OF STAKEHOLDERS for EMERGENCY RESPONSE” is kept current at VSH and includes contact information of the main stakeholders, such as VSH and Suralco managers, Haukes, Newmont, and also governmental agencies.

There are systems in place to ensure that internal and external emergency notification and reporting procedures are kept current at the Paranam Port. Shipping papers properly identify hazardous materials and contain emergency response information (such as MSDS) and emergency telephone numbers are updated. These are monitored at all times when the cargo is in transit and must be answered by person or agency knowledgeable of hazards, characteristics and emergency response procedures for materials of concern.

Suralco’s internal and external communication systems are available 24/7 in case of an emergency and include the following:

- Internal Communications: two-way radios, mobile phones and an internal telephone system;
- External Communications: telephone system. Should outside services be required from the Governmental Fire Department or an outside contractor, they will be contacted directly by the Emergency Response Coordinator;
- Alarm System: to provide warning for necessary emergency actions by trained employees and to ensure safe evacuation of untrained employees from the affected areas;
- Emergency Horns: wail tone for the emergencies.

The company-wide telephone network serves as the primary external communication source. All personnel carry mobile phones. Should assistance be required by outside agencies, they would be contacted directly by the Incident Commander or a designated representative.

There have been no significant cyanide incidents that have occurred at the Paranam Port. Reportedly, the Paranam Port has not received cyanide shipments to date.

The Paranam Operations are committed to the protection of surface waters, as described in the ERP. The likelihood of a major release reaching surface water courses remains relatively high, because of several factors, such as the proximity of these watercourses and extreme volumes of rainfall generated during the rainy season.

The Paranam Port ERP includes a procedure for notifying ICMI of any significant cyanide incidents, as defined in ICMI’s *Definitions and Acronyms* document.

Standard of 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 Standard of Practice 3.4

Summarize the basis for this Finding/Deficiencies Identified:

The ERP contains procedures for remediation and decontamination of soils or other contaminated media and management of spill clean-up debris for dangerous goods. The Plan stipulates that in the affected area(s) of the Port facility it is necessary to ensure that no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed,

all emergency equipment identified has been cleaned and is fit for its intended use before operations are resumed.

If the spill is in navigable waters the coordinator will notify the Maritime Authority Suriname (MAS) in to inform the MAS officer of a spill and that Paranam Operations are prepared to start clean-up procedures if no other group has accepted clean-up responsibility.

VSH Emergency Response Plan includes procedures for recovery of any spilled or released solids, decontamination of any soil or clean-up debris and neutralization of any non-recoverable sodium cyanide. The plan calls for any recoverable cyanide, cyanide contaminated material and spill cleanup debris to be placed in appropriate containers and transported to the destination mine for recovery.

There are procedures prohibiting the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water in the VSH ERP.

Standard of 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 Standard of Practice 3.5

Summarize the basis for this Finding/Deficiencies Identified:

There are provisions for periodically reviewing and evaluating the Plan’s adequacy, these are implemented by VSH at least annually or on when required basis.

Suralco ERP has provisions for the periodic revisions as necessary or at least annually to satisfy the following conditions:

- following the annual training review and any revisions to the training program;
- following the completion of the annual visit to review the location and properties of all on-site hazardous wastes and materials by the rescue, police and fire brigades;
- following any hazardous material release should these occur.

VSH ERP has provisions for periodically conducting mock emergency drills. Suralco has an annual emergency drill schedule that is maintained by the Security Department. Drills to manage environmental releases are included. Actual drills are documented including the date, length of

exercise, number of participants, procedures tested, and any changes made to the procedures following drill outcomes. Periodic spill prevention briefings are conducted to review known spill events, malfunctioning equipment, and to discuss recently developed preventive measures.

There are provisions to update the Plan within 60 days to modify any ineffective response procedures or if the emergency equipment or coordinators change, in case of changes to the design, construction, operation, or maintenance of the facility which increases the potential for fires, explosions, or releases of oils, hazardous materials or wastes, if the facility permit is modified or if the regulations change, and if any other changes occur that materially affect the implementation of the Emergency Response Plan.

Suralco's Paranam Terminal will be used for the sodium cyanide shipments either in abnormal circumstances or upon government's decision to move some or all heavy industry shipments to this industrial area.

During the site inspection and upon the review of the relevant policies and procedures it was established that the Paranam Port is well positioned for the handling of possible cyanide shipments. Importantly, N.V. VSH Transport is experienced in performing its stevedoring activities for such type of dangerous cargo, keeps its policies and procedures in good order and maintains its Cyanide Code accreditation for the other two ports it operates at. It is therefore recommended to provide the Cyanide Code certification to N.V. VSH Transport and its Paranam Port operations.