

***INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE***

Transportation Summary

RE-Certification Audit Report

Alpha Services Mauritania (ASL)

Mauritania

22nd to 26th September 2022

Submitted to:

International Cyanide Management Institute

1400 I Street, NW, Suite 550

Washington, DC 20005, USA

Phone: 202-495-4020

Fax: 202-835-0155

E-mail: info@cyanidecode.org



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

Name of Operation: Alpha Services Limited (ASL)

Name of Operation Owner: Alpha Services Limited (ASL)

Name of Operation Operator: Alpha Services Limited (ASL)

Name of Responsible Manager: Mr Anis Atallah
General Manager

Address: Module F #39 Route NDB Tevragh Zeina 16km away from port of Nouakchott

Country: Mauritania

Telephone: Mobile: +(222) 32460337 +(222) 43433600

E-Mail: Anis.atallah@alpha-services-mauritania.com

Location detail and description of operation:

ASL (Alpha Services Limited) is a Logistics, freight forwarding and transport Company Operating in Mauritania.

The company was incorporated in 2013 and since then has served multinational companies with operations in Mauritania.

ASL has the ISO 9001-14001 and 45001 certification and is authorized to transport hazardous materials, and any other cargo to mining and Oil & Gas industries .

The company is contracted as a cyanide transporter for Tasiast to transport solid cyanide (briquettes) by road from Nouakchott port to Tasiast mine.

ASL Provides Customs Clearance and domestic trucking international trucking and freight forwarding services to their clients.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

ASL has gradually expanded list of services over the years and developed an extensive network of contacts as they are the exclusive agent for DSV, Panalpina in Mauritania.

This continuous progress has allowed us to be awarded with our first Major Contract for Domestic trucking in 2019.

ASL Mauritania 's main operations located #39 Route NDB Tevragh Zeina 16km away from port of Nouakchott

Cyanide is received at the port of Nouakchott by sea in containers, each of which holds 20 boxes of one ton of solid cyanide briquettes.

The containers are offloaded at the ports by a stevedoring company.

A due diligence audit was done by Golder 2021 for Orica as part of the ICMI audited supply chain of the cyanide producers and consignors bringing the cyanide into Mauritania .

For the purposes of Cyanide Code transportation compliance, ASL Mauritania's Code responsibilities commence on collection of the containers from the port.

The audit covers road transport exclusively from the port of Nouakchott to Tasiast mine site (Kinross).

Containers are delivered from the Quays to the port Container Depot where they are loaded directly onto trucks.

ASL Cyanide Code responsibilities commence once they take the containers from the port area.

ALPHA Services clears the consignment and ASL vehicles collect the containers with the documentation and manage them under a Transport procedure (jointly agreed between the mine, and ASL Mauritania).

ASL clears the consignment and ASL Mauritania's vehicles collect the containers with the documentation and manage them under a Transport procedure (jointly agreed between the mine, and ASL Mauritania).

The containers of cyanide, are then transported in escorted convoy by ASL and a Mauritania customs official to the mine sites. There is neither storage nor interim storage during the delivery journey.

Each truck has a driver, who is accompanied by a safety officer.

The safety officer manages the communications between the trucks, the escort vehicles and the convoy manager, and monitors the driver.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

The convoy includes a convoy manager, assistant convoy manager, a cyanide first aider/ paramedic, a mechanic, cyanide emergency response equipment for spills and releases and caynokit or medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations and ingestions).

There is only one suitable route from Nouakchott to the site at Tasiast , a distance of 338 km.

Acronyms:

RA= Risk Assessment

ER= Emergency Response

HSE= Health Safety & Environment

SGS= Societe General De Surveillance

UMOE= Union Economique et Monétaire Ouest Africaine

BIVAC= Bureau Veritas

HF= High Frequency

BL= Bill of Landing

4 transit and Storage

The scope of the audit do not cover interim storage or storage

ASL operation is to transport from port to mine site within west Africa

ASL trucks occasionally passes through the yard just to fuel and do final check before departure

5 Auditor's Finding

This operation is

X in full compliance

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

with the International Cyanide Management Code.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

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

Audit Company: Crown Transport & Logistics
Audit Team Leader: Ghassan Hussein
E-mail: ghass@ctlwa.com
Trainee : Ziad Hussein

Name and Signature of Lead & Technical Transport Auditor:

Name Ghassan Hussein
Date 5-10-2022

Signature



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.

Date of audit: 22-9- 2022

Ghassan Hussein

Lead Auditor

Date



Crown
Transport Logistics Ltd
Industrial Plot P102 Lake Side New Legon
P.O.Box AC321 Art centre Accra
TEL: +233-208-206957
Cell: +233-244-310180
Email: contact@ctlwa.com



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.

X in full compliance

The operation is in substantial compliance **with Transport Practice 1.1**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

A NEW road risk assessment was developed, which includes detailed route,-rest stops - road hazards such - population densities - Customs barriers - road construction, traffic congestion - standard caution - cattle crossing -children - bridges - water bodies -dangerous gases etc. .

Population concentrations and built-up areas are identified, as concentrations of children or school ,car/taxi parks ,pedestrian activity, cyclists and animals.

This was done from Nouakchott port to TMLSA mine site.

There is one route that is approved by government since the cargo is exempt cargo.

The route is mostly tarred The dirt is managed with a maximum speed of 50 km per hour for a 60km distance.

There are multiple sections of the route have, high risk section

Mitigation measures such as reduced speed, convoy management , added attention , police blocking road to facilitate and control the convoy and stopping for condition checking have been identified.

Further medium risks were also identified with specific types of mitigation, specifically during passage where the convoy leader informs the convoy of the area and the extra attention needed to pass through. further the GOLDER auditor did a due diligence on Nouakchott port submitted to ICMI on Tasia certification.

these are road risk assessments between port and TMLSA mine site, the selection of road procedure referencing the risk assessment plan describes the road risk assessment & route selection based on the level of risk.

Routes selected and approved by
civil protection / ministry of interior
ministry of transport,
ministry of environment

are referred to procedure standard operating procedure and the document from the ministry of environment.

The Route Risk Assessment risk assessment plan highlighting black spots, warnings of hazards and other possible risks

Sighted Route Risk Assessment risk assessment plan using specified routes due to the fact that the convoys need to be escorted by government authorities.

ASL has the needed procedure for the route selection and they have road risk assessment for any route

SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

that they use to transport cyanide
all routes are approved by the authority
the route assessment captured the following

- 1-accident include roll over
- 2-pitch & grade
- 3-population density
- 4-gutters and water bodies
- 5-infrastructure(black point , bridges etc.)

the journey plan has date of departure, where it is going, final destination, trip distance, loading and discharge order, truck number and BL number.

also the journey plan dedicated section for comment, for change of route, condition and emergency numbers as well.

though the emergency response plan is carried along with the emergency numbers the same numbers are repeated with the journey plan

ASL does evaluation of roads, surveys, route risk assessment and also an update on the road changing conditions as it changes.

Road Survey is a set of directions providing details on when and how often to conduct a road survey, it includes the risk assessment, who is responsible, preparation of the material and convoy, identify the points that will be identified, link to hazard map and updating the risk assessment per procedure

The Road risk assessment procedure identifies steps to be taken in the assessment of transport routes and identifies personnel responsible for undertaking each step.

The Escort Commander is responsible for identifying and responding to unforeseen risks during transport and perform an update on the road hazard, changing risks. Those updates are inserted into the road risk assessment.

journey plan and road risk assessment indicates where were authorized rest & stop points to be used along transport routes.

Which incorporates detailed route and rest stops and further identifies road hazards such as slippery roads, bridges fore, population densities, Police barriers, road construction, cyclists, traffic congestion, standard caution, heavy rain, cattle crossing, children, bridges etc.

areas with high risk levels are identified and addressed in the road risk assessment.

Every 5 years the Survey team do a complete Road risk assessment for the roads that ASL uses to transport cyanide, which is a different undertaking than the yearly review or assessment or the journey plan

The survey team also meet and discuss issues or concerns with the client, authority and drivers.

A risk assessment is then undertaken of the proposed route.

This includes implementing controls to reduce potential risks to a defined acceptable level before the route can be utilized.

If controls cannot be implemented to achieve this, an alternative route must be found for consistency purposes of the Survey.

Transport management plan, it ensures that the route has been analyzed in order to minimize the potential and impacts for accidents and releases.

Each delivery is undertaken via convoy.

convoy formation:

- 2 pilot car
- 1 pilot car ambulance,
- 1 convoy manager
- 1 assistant convoy manager
- 4 safety officers
- 1 paramedic,



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

1 mechanic
 1 auto electrician,
 1 Air Technician
 1 Tires Technician
 13 drivers
 1 EPA officer,
 1 Customs officer
 2 Gendarme escort
 1 officer from the ministry of transport
 2 fire service personnel.
 the new RRA identify 2 category of Hazards
 1- temporary (like accident , diversion)
 2-permanent hazard
 and the permanent hazard is divided into 3 category
 short term hazard from a month to a year (eg side rad erosion)
 medium term from 1 to 5 years (eg water trench)
 long term (5 to 10 years like bridges and other)
 However, if the hazard is not permanent, it is inserted during the review -
 the feedback procedure mission report
 The feedback document addresses
 road accidents,
 road conditions,
 population,
 side erosion,
 poor visibility
 area time of transit,
 where delay came from and possible solution to expedite the delivery if any of the aforementioned are encountered.
 Route risk assessments are currently reviewed yearly.
 the RRA and TMP and the ERP shows that ASL has identified the risks and the measures it has taken to address.
 the OBC tracking addresses the driver log and work hours and risks area
 ASL have authorization letters from ministry of Health and public safety respectively .
 Ministry for Health and the Public Health.
 ASL seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.
 • The community is consulted and involved limiting their role to crowd control and not to use any water during emergency until approved by the authority.
 An ASL flyer distributed to all communities along the transport route as mean creating awareness and creating a dialogue between the 2 parties.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 1.2**



not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ASL has specific training for staff chosen based on their competency

The training are:

- 1) Eco driving- economical to reduce carbon emission for drivers
 - 2) defensive driving training for drivers
 - 3) premier fire training and process to all staff.
 - 4) HAZMAT transport and Cyanide
 - 5) road risk assessment feed Back
 - 6)general HSE induction
 - 7)general cyanide awareness
 - 8)Hazard indication
 - 9)Accident or Incident investigation
 - 10)cyanide transportation
 - 11)Emergency response
 - 12)First aid
 - 13)authorized gas tester
 - 14-Cyanide Awareness Annually Escort / Emergency Response
 - 15-convoy management
 - 16-Cyanide Emergency Response Scenario Training (Mock Drill) Annually
 - 17- mock drill evaluation
- all the convoy personnel are trained include external res-ponders.

2 pilot car

1 pilot car ambulance,

1 convoy manager

1 assistant convoy manager

4 safety officers

1 paramedic,

1 mechanic

1 auto electrician,

1 Air Technician

1 Tires Technician

13 drivers

1 EPA officer,

1 Customs officer



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

2 Gendarmerie escort
1 officer from the ministry of transport
2 fire service personnel.

The Matrix shows the attendees of the annual training done. Drivers and lead safety officer s have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

This process is complemented with structured training.

The cyanide awareness training module is produced by a cyanide manufacturer (CYANCO).

The module contains information on product awareness and emergency response actions.

Prior to each convoy, a module of the cyanide awareness training is used as a refresher.

Emergency simulation drills are carried out 2 times per year where specific aspects of the emergency plan are evaluated.

The training matrix and records were reviewed to confirm training had been scheduled and conducted.

Emergency simulation or drill are carried out 2 times per year where specific aspects of the emergency plan are evaluated.

Then the one who passes the test to become a driver, the process is explained into the instruction. Recruitment Records are maintained .

If the new driver doesn't pass the test the follow up of the retesting is recorded

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

X in full compliance with

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

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ASL has 13 cyanide specific trucks out of a total fleet of 50 units that comply with Mauritanian regulation ,

ASL made an extended warranty with GICI authorized dealer for maintenance and engineering contract for the repair and recovery of trucks and supply of spare parts

the contract critical point of the extended warranty is as follows :

1- supply of trucks , trailers and spare parts as the authorized dealer.

2-repair all trucks and maintain them, including recovery from road

3-position an implant at ASL premises to do the post trip inspection if there is any repair needed the implant will inform GICI who will take over the repair.

4-GICI are responsible for all technical support needed by ASL and warranty all equipment supplied

5-ASL retain the minor repair that do not jeopardize the contract and the equipment warranty.

6- ASL retain pre-trip and daily inspections.

further ASL uses third party inspection using SGS done annually and a visit from MOT(ministry

SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

of transport once a year for roadworthy certificates for their trucks, apart from this all repairs and maintenance are done by the GICI till the contract expires .

in case of minor brake down on road the convoy mechanics manage the problems for any major GICI will send the needed team and support .

for major repair GICI will mobilize its equipment to location and repair or replace the equipment accordingly.

Brake testing and other inspections are undertaken by GICI.

The on-board computer on the truck dictates the maintenance frequencies, form and type of service required.

Specific truck minor maintenance records were sampled and checked.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 1.4**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The transport producer standard operating procedure and TMP explains how the transport is undertaken.

Additional packaging consists of plastic lined wooden boxes packed into 20 feet containers and sealed.

The integrity of the boxes and containers can only be compromised if they are damaged during handling or moisture/dust /liquids enter the containers or the boxes, in case of an accident on road.

The container is sealed by the producer and only opened at the mine.

The cargo is escorted by armed customs official to mine site because the cargo is exempt from duty so no one is allowed to open the container.

as well as the fact that the container is inspected by third party at Terminals before it leaves the port

there is visual inspection on all seal and containers at every rest stop and is sighted in the standard operating procedure standard operating procedure and TMP and container checklist ASL has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging.

also it outlines the containers must be inspected before loading in order to ensure that proper labels and seal are in place.

Container is not opened for loading or offloading so it stays intact till it reaches the site.

The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the same seal installed by the producers.

The container is also checked by the Mine upon arrival at the mine site based on the delivery order signed.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

Furthermore, a Container Interchange Report is completed and jointly signed by the shipper's representatives and the cyanide transporter's representatives to agree on any damage that may be sighted on the container.

also there is a transport checklist for the container integrity procedure, signed by the driver and the convoy manager and the mine upon delivery.

The Vehicle Trip Checklist is completed and signed at the mine confirming the condition, on delivery of the container and a section reports on container seal, labeling and general container condition.

Placards are used to identify cyanide shipment, as required by international standards.

The ERP and TMP outlines the requirement for placarding to be placed on the 4 sides of the sea containers used in the transport of cyanide.

As a control measure, the cyanide is trucked in convoy under the escort of persons who have received training in cyanide emergency response and dangerous goods training.

Cyanide to have the following markings:

- Number UNO: 1689
- Principal class: 6 Poison
- Group packing: 1
- Exact designation of the dispatched product: sodium cyanide, Solid.

The shipping container containing the IBC's is marked with Hazchem labels on all sides ASL has a extended contract with GICI for maintenance and engineering contract for the repair and recovery of trucks and supply of spare parts that implement a complete complete maintenance program

further preventive maintenance procedures referred to in the TMP includes inspection sheets, escort vehicle checklists, observation sheet, truck checklist and container checklist Seen procedure TMP which indicates the policy and role of drug and alcohol.

Training matrix & and training plan

including defensive driving and assessment plan.

Check list before departure truck checklist and container checklist

Maintenance procedure.

TMP cyanure TMP allows

Convoys move from 6 am to 18.00, after 18.00 the convoy stops

the regulation clearly state convoy cannot travel between 18:00 and 06:00 without prior written permission and accompanying HSE measures in place.

Interviews and convoy documentation confirmed limitations on hours are in place.

maximum driving hours on duty in any 24 hour period (8 hours);

driving hours from 6 to 6 pm

normal situation maximum period of continuous driving (2 hours) with 15 minutes break ;

abnormal situation maximum period of continuous driving (4 hours) with 30 minutes break

minimum daily rest time 180 minutes.

availability is 12hrs /day

maximum weekly driving hours (48),

working week to be a maximum of 6 consecutive days.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

Cyanide boxes come from the producers in 20ft containers and the containers are not opened. The box sizes are such that the boxes fit tightly in the container and do not move. The cargo is secured using twist locks , container side support or shifting prevention guard also ASL are using steel chain to lash the cyanide containers only. Procedures by which transportation can be modified or suspended if conditions such as

MODIFY BASED ON BELOW

1-severe weather

2-civil unrest are encountered.

SUSPEND

1-end user refuses to collect

2-supplier refuses to supply

The use of drugs and alcohol is prohibited in Mauritania and is not allowed, there are no bars or pubs to serve alcohol in the country.

Such products are not allowed to enter the country from a religious, social and legal perspective.

Further ASL has policy to prevent the use of drug and alcohol.

ASL has policy to prevent the use of drug and alcohol when the trucks goes out side the Mauritanian territory further the cyanide delivery is made within the Mauritanian territory were the Mauritanian law applies.

In case anyone is found with alcohol in the breath , the suspect will be sent to the lab for verification.

the TMP commits to training staff HSE matters, misuse of drugs and alcohol and preventative actions relating to drug and alcohol.

The policy also notes that ASL will carry out testing (random and for cause) for use of drugs and alcohol and in the event of a positive test will result in actions including further preventative training, the required level is 0.00.

the policy ensures that drugs and alcohol are controlled.

There is a briefing before every trip on the use of alcohol and drugs and this is also a part of the risk assessment of the pre-trip inspection clearly stating alcohol and drugs are prohibited.

the recruitment policy includes use of drugs and alcohol on the company premises or whilst driving and the consequences of positive test results that leads to immediate termination.

The driver also signs that he accepts the company laws and regulation.

The company do not accept nor tolerate any positive results during working hours.

Records are maintained and were inspected for relevant parts of this element as indicated adjacent for each finding.

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

X in full compliance with

The operation is in substantial compliance

to Transport Practice 1.5

not in compliance with



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

Summarize the basis for this Finding/Deficiencies Identified:

Alpha are not responsible nor contracted to manage cyanide consignment by sea the scope of this audit is only land transport from port to destination..

Alpha is not involved in managing sea nor ensuring compliance with IMO and IMDG Alpha is responsible for cyanide, land transport only.

Alpha does not manage the loading, unloading or DE stuffing of containers. or stevedore .

however this requirement is covered by the due diligence done by diligence done by ICMC AUDITORS Owen Warren FOR GOLDER 2021 and it is visible on the container on all the 4 sides the following
1- 1689 placard
2-marine pollutant placard
3-class 6 toxic placard

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 1.6**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The TMP indicates that ASL uses the following as mean of communication
1-cell phone to communicate directly with the ASL office and emergency res-ponders.
2-Vehicles are equipped with GPS tracking monitored by ASL.
3-VHF -UHF radio used to communicate within the convoy.
4-mobil phone cell & satellite mobile phone to communicate with head office

ASL has a 1 cell & 1 satellite phones that goes on every convoy.
Communication with vehicles in the cyanide convoy is undertaken using mobile phones, and short-wave radio.
Vehicle tracking system

The convoy manager has mobile phone and a second cell phone so that he can call ASL head office.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

Convoy managers have all the appropriate telephone numbers to communicate with ASL head office and appropriate emergency responders and emergency services during trip communication is based on the communication procedure in the ER plan. The convoy manager is obliged to call ASL every 60 minutes and to call the client every 2 hours at every rest point. The ASL head office manages all associated communications with the mine and the cyanide producer. Emergency contact list in the ER plan, where protocol of communication is part of the procedure. Where no reception exists, the convoy commander calls before and after the reception black spot communication to head office is done by phone and communication with vehicle is done via VHF -UHF radio only on critical cases he uses the Satellite phone to make the needed calls. The ERP contains a map showing areas without telephone reception. also, the GPRS tracking send alert if the trucks is parked idling for 3 minutes. All prime movers and escort vehicles are equipped with tracking which is monitored at the ASL depot. VHF -UHF radio, headlights and horns are used to communicate incidents between vehicles in the same convoy. The closed nature of the convoy allows trucks experiencing troubles to communicate with at least one escort vehicle and this vehicle communicates with the other. In the event of a problem with one truck, the entire convoy stops. All communication equipment is tested prior to departure of convoy. There is also a continuous use contact with the radio communication company for the servicing of the equipment and immediate replacement for mobile phones is in continuous use so no test needed. as well as a clause in the standard operating procedure where the convoy leader has to inform base before entering mobile phone black out area and after exiting black out area. Seen inspection report for communication equipment and radio checklist

There is no blackout area for the HF radio as it is a radio communication type meant for long distance communication. It is the main means of communication also the satellite phone has no blackout area. All convoys have radio communication use of short wave radio and also in case of GPRS black out areas. ASL is permitted by Mauritania government to use a HF Radio. This equipment covers the required communication all over Mauritania and this equipment is installed in all cyanide vehicles. A recorder is also at the base so all communication is recorded. including the Escort convoy vehicles and the ASL Head office. In case of black out, the radio is used for communication. The radio operators have a 12 hours roster when there is a convoy on road. GPS monitors all convoys. Sighted procedure for checking these blackout areas risk assessment plan also there is GPS & on board computers (OBC) on the trucks that can monitor the trucks.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

There is a dedicated person that monitors the trucks.
The on board computer can do a play back after the trip in case there is no GPS coverage.

ASL implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seal intact.
The container weights are also detailed on the Bill of Lading.
A scanner is used at the Port to verify that the correct container has been placed on the selected trailer.
The container seal are checked by the mine upon arrival at the mine site to confirm.

ASL uses convoys as a means of managing the risks of road transportation, responding to emergencies and to prevent product loss.
ASL manages the supply custody using the TMP
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
ASL transports and delivers cyanide only in sealed containers

Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.
The delivery documentation notes the container numbers, weights and seal numbers.
The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.
ASL implement chain of custody processes to prevent loss of cyanide during shipment.
The Bill of Lading is stamped by the Port Authority indicating the containers have been delivered undamaged with the seal intact.
The container weights are also detailed on the Bill of Lading.
The declared weight of the container is appearing on the delivery note.
The container seal are checked by the Mine upon arrival at the mine site to confirm.
The cyanide from the port of entry to destination is under the control and the responsibility of the authority due to the dangerous nature of the cargo.
CYANCO MSDS sighted and placed in vehicles.
ASL retain all records for 5 years

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

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

X in full compliance with

The operation is in substantial compliance **to Transport Practice 2.1**
 not in compliance with



Summarize the basis for this Finding/Deficiencies Identified:

There are no situations where interim storage occurs since the cargo is under the customs custody and customs doesn't allow the exempt cargo to park or be sent anywhere apart from the approved route.

There is a procedure that prohibits eating or drinking near the cyanide and the Emergency response plan manages different scenarios on how to manage spill and contain releases.

Within the scope of this audit, there are no trans-shipping depots or Interim storage sites, as defined in the audit protocol.

Following collection from the Port, the containers are sent to client site.

At no stage is cyanide removed from the trucks or containers prior to unloading at mine sites.

N/A There are no situations where interim storage occurs

since the cargo is under the authority custody and the authority doesn't allow the cargo to park or be sent anywhere apart from the approved route.

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

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

X in full compliance with

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

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ASL Emergency Response Plan covers different scenarios for different, all the scenarios that are in the emergency response plan are addressed as drills (they implement the scenario in a drill case)

The ER PLAN gets updated:

1. After an accident to add the learning points
2. After a requirement done by the Tasiast mine
- 3-drill where there was variation in the implementation
4. The yearly review or procedural yearly review
5. Or in case there is a change in the law or the regulations

As all cyanide deliveries are made in convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan unless more support is needed.

Then they will report to head office or external res-ponders whose responsibilities and

SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

obligations are stated in the Plan.

These also describe at what level each of these external res-ponders should be called on.

In case of an emergency truck breakdown the escorting team will repair the vehicle

The only liquid covered is if the cyanide briquettes fall into a liquid medium.

Currently, the only form of cyanide that is transported is solid cyanide briquettes.

ASL prepared to respond, to manage and recover from any realistically foreseeable emergency associated with Alpha transport operation.

The Plan considers all aspects of road transport only, since sea air and railway are not part of the scope.

the due diligence done by ICMC AUDITORS Owen Warren FOR GOLDER 2021 to ensure the supply chain

ASL only uses Flatbed trailers to transport containers containing boxes of cyanide briquettes in sea worthy containers. They do not use tanks.

ASL trucks carry 1 x20 ft container per truck.

The weight of cyanide briquettes in a 20 foot container is 23 tons gross weight.

Furthermore, the trucks are actually owned by ASL .

The weight of the container, empty, is 2.3 tons and the weight of the cyanide, 20 tons, and the weight of the trailer is 6 tons. The weight of the truck is 8.1 tons so the total is $2.3+20+6+8.3=36.6$ tons.

The Mauritanian regulations allow 11 tons per axle and the truck trailer is minimum 6 axles - total 66 tons

ASL has 13 cyanide specific trucks varying between MAN, ASTRA and HOWO & trailers that comply with Mauritanian regulation ,

the company does third party inspection using SGS done annually and a visit from

MOT(ministry of transport once a year apart from this all repairs and maintenance are done by the agent as the trucks are still under warranty

in case of brake down on road the convoy mechanics manage the problem until they reach mine site

Brake testing and other inspections are undertaken by the company itself.

The on-board computer on the truck dictates the maintenance frequencies, form and type of service required.

ERP describes the drills and exercises to be performed for Alpha services and operations and propose a long-term planning schedule when these should occur.

The Plan also includes a series of likely scenarios: -

- (a) Truck Breakdown
- (b) Truck Accident – No Spill
- (c) Truck Accident – Spill
- (c1) Truck Accident – Spill in water
- (d) Truck Accident with Fire no spill
- (d1) Truck Accident with Fire and spill
- (e) Truck Driver Injury
- (f) Security Risk- Armed Robbery or civil unrest
- (g) Truck Accident Communication



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

Also external res-ponders are detailed as there are 4 government escorts, gendarme EPA , ministry of transport and customs.

As all cyanide deliveries are made in convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan unless more support is needed and then they will report to head office or external res-ponders whose responsibilities and obligations are stated in that plan which also describes what level each of the external res-ponders should called upon.

Drills are done in conjunction with
police
EPA
gendarme
Customs
Ministry of transport
members mentioned above are part of the drills and evaluation
where roles and responsibilities are discussed per stakeholder

All the scenarios that will be responded to by the convoy's own dedicated emergency response team and the government officials on the convoy will take over the government communication and external res-ponders.

Any outside additional assistance would be requested or coordinated through the Ministry of Security

ASL has developed a list of roles and responsibility attached to the critical tasks for each party or person involved in the ER in case of an emergency for both Internal or external res-ponders

The possibility of using outside medical res-ponders has been addressed by the communication with the two clinics Ibn Sina and AL Chiva

There are only 3 possible medical facilities more than 2 medical facilities in Nouakchott but only 2 hospitals replied, 2 in Nouakchott, and one at Chai Chami it is an infirmary and is not equipped to deal with extensive injuries or poisoning, as the rest of the country is just desert and there are mostly only small clinics which are inadequate to deal with cyanide cases.

Alpha does not contract nor subcontract any of its activities except for
The supply of trucks and repairs that are covered by extended warranty contract
supply, maintenance and engineering contract for the repair and recovery of trucks and supply of spare parts
Alpha retain the full responsibility of the operation and the only function that is contracted is the port operation and that is covered by the due diligence done by ICMC AUDITORS Owen Warren FOR GOLDER 2021
Alpha does not manage the loading, unloading or DE stuffing of containers.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.2**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

ASL has defined the critical task and critical position by a matrix that gives for each person his roles and responsibilities deriving from the training done for him and his skill set.

sighted ER drill training

sighted Kinross cyanide awareness training

sighted recruitment policy/procedure

emergency response plan an overall guide to dealing with incident management involving Sodium & Potassium Cyanide.

Competency frame work procedure standard operating procedure

The TMP indicates the training and competency needs of all jobs and includes emergency response.

training done by third party Precision safety, health and environment

Reference emergency response plan and standard operating procedure

Details the mechanisms for handling and managing chemicals and dangerous goods

The ERP part 6 identifies the roles of outside responders and medical facilities procedures

The mine site primarily provides logistical support in the event of an emergency (crane, security etc.) in case the incident is close to the mine.

The roles of the gendarme, Fire Brigade and Hospitals are in accordance with their duties

In the event of an emergency, gendarme are responsible for security of product and the military for crowd control

ASL provides emergency response training for appropriate personnel that are involved in the convoy.

ER TEAM

2 pilot car ,



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

1 pilot car ambulance,
1 convoy manager
1 assistant convoy manager
4 safety officers
1 paramedic,
1 mechanic
1 auto electrician,
1 Air Technician
1 Tires Technician
13 drivers
1 EPA officer,
1 Customs officer
2 Gendarme escort
1 officer from the ministry of transport
1 officer from Ministry of Mining
2 fire service personnel.

ASL has developed a training matrix for transport personnel.

This matrix identifies the minimum training requirements for escort personnel and convoy drivers:

First aid

fire fighting

cyanide awareness

Responding to accidents to incidents

Defensive driving

Emergency response cyanide include Roles and responsibilities

Emergency simulations are carried out 2 time per year where specific aspects of the emergency plan are evaluated.

External agencies including gendarme, fireman, hospital etc. are also involved with incident scenario training simulations once per year.

The communities have not been allocated a major role during an emergency only crowd control and disseminate information not to use water until approved by authority, however the communities are informed and trained and consulted with all details.

The majority of scenarios will be responded to by the convoy's own dedicated emergency response team. Any outside additional assistance would be requested or coordinated through the Ministry of defense The possibility of using outside medical res-ponders has been considered and a communication through letters and CYANCO brochures

the ERP define the type of response and the external involvement based on the significance of the incident

tier 1 is within the company capabilities

tier 2 is national involve Mauritania government

tier 3 is international

Records of this training are kept for future reference.

Discussions with escort team members and a review of training records confirmed that they had attended the cyanide awareness and emergency response training.

Also the TMP states that involvement and training of stakeholders in case of emergency.

Personnel are trained on the CYANCO training module and Barick presentation.

Convoy team members are trained in emergency response.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

ASL has a checklist for emergency equipment that is available during transport or along the transportation route.

Equipment lists are provided in the Appendix of the ERP

Checklists include the presence of equipment required and also check the state (good/ bad) of equipment. According to the TMP escort vehicles must be equipped with the appropriate equipment and thoroughly checked before the start of the convoy.

This includes the antidote kits that are sent along with the convoy brand cynokit, that is stored according to manufacturer's specifications, expiry date 2023

The equipment is checked per trip and monthly expiry and testing is done per inspection.

As well as training is done by the manufacturer to the paramedics teaching them how to use it. But company policy states they are to refrain from administering it unless under extreme circumstances, if not they are to bring the cynokit as well as the patient to the nearest medical facility identified in the RRA, and let them administer the cynokit.

The procedure also states the equipment needed per convoy.

The equipment is checked per trip and test are done per inspection.

ASL carry along

1-OXYVIVA for oxygen (that is also checked for the oxygen level within the tank)

2-cyanco antidote kit (that is stored according to manufacturer's specifications)

3-HCN detector

4-Full face mask and canister

5-tyvec suits

6-gloves

7 Boots

8-genral first aid box

ASL has procedures to inspect emergency response equipment and assure its availability when required.

The ERP outlines the requirement to check emergency response equipment prior to each convoy departure.

The convoy cannot leave unless all equipment is available and in appropriate condition.

Copies of checklists were sited and personnel interviewed confirmed checks occurred.

Convoy equipment is checked and tested before the convoy moves.

TMP contains a checklist that is completed prior convoy departure to ensure appropriate safety equipment is given.

The HCN detector is also tested and sent to the manufacturer when due for calibration every 12 months when it's not possible, new HCN detector is both when due for calibration.

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

X in full compliance with



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

The operation is in substantial compliance **with Transport Practice 3.3**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Emergency response plan has Emergency contact list and Incident notification procedure contains contact information .

also a communication with the gendarme and with the medical service facility using the MSDS for discussion.

Further, the Minister of Transport, Not all communities are directly consulted but where relevant, communities are involved through discussions and meetings as referred to in the document from the local governor stating that Alpha are using a pictogram with the locals to make the population aware of cyanide and to take their opinion on the use of the route. also Alpha got approval from the ministry of environment for the selection and use of their routes including 2 clinics Chiva and Ibn Sina

the local governor in consultation with the local community approved the transport;

The convoy manager will communicate with the base who will regulate communications to interested and affected parties including client and other bodies that need to be communicated with.

The communication is contained in the ER plan sighted by the auditor.

Updated annually when all procedures are due for update Or in case of emergency.

reference procedure emergency response plan

the ERP indicates the contacts that are relevant during an emergency with their appropriate work position.

The ERP and TMP contain procedures and current contact information for notifying the shipper.

The receiver/consignee, outside response providers, and medical facilities during an emergency.

The ERP and Emergency contact list includes a contact list of all the staff companies that must be contacted before each voyage is undertaken.

This includes supplier, shipping line, Stevedores, clearing agent, government agencies, and client and ASL representatives.

A flow diagram is included in the ERP that outlines the conveying of information in the event of a cyanide incident during transport.

In the event of an emergency incident, it is the lead safety officer who contacts ASL and ASL contacts the required people outlined in the flow diagram.

Also ASL management inform ICMI of the following incidents

- a) Human exposure that requires an action by an emergency response team, such as decontamination or treatment. ;
- b) release which enters natural surface waters, ;
- c) A transport incident requiring emergency response for cyanide release;
- d) Events of multiple wildlife fatalities where cyanide is known or believed to be the cause of death
- e) Theft of cyanide.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

ASL has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.
The ERP requires a review of the Contacts List prior to the convoy departure and yearly .
This ensures that the list is kept up to date.
The TMP designates the responsibility of the Health Safety Security and Environment Officer / Convoy Leader to ensure that contact numbers are checked and validated prior to departure. Updated annually when all procedures are due for update.
ASL has defined roles for internal and external responders include roles and responsibility. Incident notification procedure contains contact information .
the local governor in consultation with the local community approved the transport.
The convoy manager will communicate with the base who will regulate communications to interested and affected parties including client and other bodies that need to be communicated with.
The communication contact updated annually during yearly review
or in case of emergency.
in case change
in mine site contact
in security and government agencies contact

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.4**
 not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The ERP and TMP contain procedures for remediation such as recovery or neutralization of solutions or solids, decontamination of soils
or other contaminated media and management and/or disposal of spill clean-up debris.
In the event of a spill, all cleaning will be carried out by Alpha personnel are first required to contain the spill or discharge as soon as possible to avoid greater contamination of the site.
Residual cyanide will be recovered and neutralized according to the procedures for neutralization which were established by the manufacturer.
Recovery and treatment of Spills goes with the following steps :
Recovery of Solids;
Neutralization or removal of soils;
Treatment and or disposal of soils;
reclamation of Sodium Cyanide;
Transport of contaminated material;
Neutralization; and
Water Resource Treatment.
Alpha has emphasis in the ERP not to use chemical in water bodies.

SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

All debris and waste are sent to the mine for disposal since it contains cyanide.

Both the ERP and TMP have statements prohibiting the use of chemical such as sodium hypochlorite, ferrous sulfate or hydrogen peroxide for the treatment of cyanide discharged to surface moving or underground water.

the ER plan roles and responsibility section state "if any spill occurs Alpha and the authority will notify affected communities not to use or drink water until is safe to do so".

Residual cyanide will be recovered and neutralized according to the procedures for neutralization which were established by the manufacturer.

Recovery and treatment of Spills; Recovery of Solids; Neutralization or removal of soils; Treatment and or disposal of soils; reclamation of Sodium Cyanide; Transport of contaminated material;

Neutralization; and Water Resource Treatment.

Not to use chemical in water bodies.

All debris and waste are sent to the mine for disposal since it contains cyanide.

The convoy manager provides the initial response to the incident.

reference to the spill, contaminated or used items are sent to the mine for disposal by EPA approval

There is no much water 90% Mauritania's land is in the Sahara Desert , further to avoid cyanide seeping into underground water the process of neutralization is done at the mine and minor management is done at the point of accident.

ASL policy prohibits use of neutralizing or water treatment chemicals in water.

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

X in full compliance with

The operation is in substantial compliance **with Transport Practice 3.5**

not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Alpha reviews all procedures include ER plan every year.

also the management reviews were all recorded.

Incidents are reviewed especially emergency situation .

The internal audit evaluates the effectiveness of the system.

Alpha has provisions for periodically reviewing and evaluating the adequacy of its plans.

Alpha has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current

The ERP requires a review of the Contacts List prior to the convoy departure.



SUMMARY AUDIT REPORT
Alpha Services
22-9-2022 to 26-9-2022

This ensures that the list is kept up to date.
The ERP has had yearly revision since its development.
Yearly review of the road risk assessment are identified and review of the procedures are updated yearly.
generally the ER plan is reviewed on the following basis

1. After an accident to add the learning points
2. After a requirement done by the Tasiast mine
- 3-drill where there was variation in the implementation
4. The yearly review or procedural yearly review
5. in case there is a change in the law or the regulations

Alpha conducts at least 2 mock drill per year, cyanide 's mock drill is a as part of the cyanide awareness training.

Drills could be done with client or external res-ponders.

As discussed in Section 3.2.1, emergency simulations are carried out 2 per year where specific aspects of the emergency plan are evaluated.

A training simulation involving external res-ponders is conducted at least once per year.

the drill done by Alpha in order to have the escort team to react effectively and professionally in the case of a cyanide incident in workshop.

Evaluation of the Mock drill was done by Dept HSE manager

No cyanide incidents have been reported to date.

In addition the ERP contains the requirement that it is to be reviewed and implemented.

Alpha has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current.

The ERP requires a review of the contacts list prior to the convoy departure.

This ensures that the list is kept up to date.



Lead & Technical expert Auditor
GHASSAN HUSSEINI



Crown
Transport Logistics Ltd
Industrial Plot P102 lake Side New Legon
P.O.Box AC321 Art centre Accra
TEL:+233-208-206957
Cell:+233-244-310180
Email:contact@ctlhwa.com

