Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

ICMI RE-CERTIFICATION – SUMMARY REPORT

1.0 INTRODUCTION

1.1 OPERATIONAL INFORMATION

Name of Transportation Facility:	Bolloré Transport & Logistics, Burkina Faso
Name of Facility Owner:	Bolloré Africa Logistics
Name of Facility Operator:	Bolloré Transport & Logistics Burkina Faso
Name of Responsible Manager: Q-HSE Manager & Délégué Ethique	Abdoulaye Ouattara Bolloré Transport & Logistics.
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1.2 Description of Operation – Bolloré Transport & Logistics, Burkina Faso.

1.2.1 Company Profile.

The Bolloré Group was founded in 1822. From its beginnings in thin papers, the Group has diversified its product ranges and services. It is now involved in plastic films for capacitors and packaging, electric batteries, thin papers, transportation in Africa (freight forwarding and stevedoring, railways) and international logistics, fuel distribution and dedicated terminals and systems.

The Africa transportation arm of the Group is managed by Bolloré Africa Logistics which has been established for more than 50 years. The company is involved in port activity, terrestrial transport and logistics solutions. Bolloré Africa Logistics is one of the largest transport and logistics operator in Africa.

Bolloré Transport & Logistics Burkina Faso is a subsidiary of Bolloré Africa Logistics based in Ouagadougou. Bolloré Transport & Logistics Burkina Faso conducts:

- Air and sea freight forwarding
- National and international transport
- Customs brokerages
- Container management
- Lift-handling
- Warehousing
- Transportation of chemicals and other mining items to mining companies

The company in the past years has been involved in the transportation of sodium cyanide to mining companies in Burkina Faso.

1.2.2 Audit scope.

The audit covers the road transportation of sodium cyanide by road from the port of Tema, Ghana to Endeavour Semafo Boungou mine site located in Burkina Faso.

1.3 Sodium Cyanide Transportation.

Bollore Transport and Logistics, Burkina Faso (BTLBF) has a contract agreement with the supplier, Samsung to transport sodium cyanide from Tema port, Ghana to Endeavour Semafo Boungou mine located in Burkina Faso a distance of 1240Km from the port in Ghana. Burkina Faso is a landlocked country and most shipments for the country come through the Tema port in Ghana. Customs documentation and clearance of shipments from the port are undertaken by Bollore Ghana(a subsidiary of Bollore Africa Logistics) whilst the transportation of the cyanide is undertaken by Bollore Burkina Faso. Bollore Burkina Faso has subcontracted the transportation aspect of the transportation activity to SOTRACOF a company based in Ouagadougou, Burkina Faso.

The agreement with the subcontractor (SOTRACOF) is for them to provide trucks and drivers to Bollore Burkina Faso for the transportation of cyanide. The management trucks and the transportation to the mine are strictly under the supervision of Bollore Burkina Faso. The subcontractor conforms to the standard of operation of BTLBF. Training of the subcontractor's drivers, escorts and other personnel are the responsibility of BTLBF.

Bollore Transport and Logistics, Burkina Faso has been granted a Ghana Environmental Protection(EPA) permit bearing a permit number of EPA/CCMC/GAR/LHCT-3/22 dated August 18, 2022 expiring 17, 2023. No such permit is required to transport cyanide in Burkina Faso.

The subcontractor(SOTRACOF) has also secured a permit from Ghana Environmental Protection Agency permit number EPA/CCMC/GAR/LHCT-53/22 dated October 20, 2022 expiring on October 19 2023 allowing them to transport cyanide through Ghana to the Endeavour Semafo Boungou mine in Burkina Faso.

Once cyanide shipments are offloaded from a vessel at the port, the containers are delivered from the quay to the Meridian Port Services terminal in the port of Tema, Ghana where they are stacked and stored separately.

Control and monitoring of the containers is undertaken at the port by MPS, who subscribes to the IMDG Code. All customs documentations covering the shipments are done prior to arrival of the containers at the port. Bollore Burkina Faso's responsibilities commences once the containers are placed on the transport vehicles in the MPS terminal.
Once loaded, the trucks set off from the port in convoy with BTLBF's escort team to the mine in Burkina Faso.

The route the trucks travel on is follows.
Tema - Accra - Kumasi - Kintampo - Tamale-Paga-Dakola -Pissi - Ouagadougou - Fada - Semafo mine.

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SUMMARY AUDIT REPORT AUDITORS' FINDINGS

Bollore Transport and Logistics, Burkina Faso is:

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

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

THE INTERNATIONAL CYANIDE MANAGEMENT CODE

Audit Company:	Investor Solutions Limited - Kenya
Audit Team Leader:	Kuldip Singh Degon, Lead Auditor
Email:	kuldip@islglobal.net

NAME OF OTHER AUDITORS

Benjamin Amoo- Mensah – Technical Auditor: Transportation.

DATES OF AUDIT

The Re-certification audit of the Bollore Transport & Logistics Burkina Faso was conducted 06th& 7th March 2023

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 Re-certification audit. I further attest that the Re-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.

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Bollore Burkina Faso has a Route Selection Procedure(Realisation et Utilisation d'un Road Survey) document # BLX-AFR-HSE-PRO-0017Rev. 07 dated 12/09/2022. The document spells out that in selecting the cyanide transportation route, towns, villages, rivers, water sources, bridges, hills, sharp curves on the road are to be taken into consideration. Only one approved route is used which is a trans - ECOWAS route from Ghana to Burkina Faso.

The selection of the route is undertaken by the escort leader, his assistant and escort driver. The team travels on the route and notes all the infrastructure, water bodies, villages, bridges, slopes, tarred and untarred road etc. A report is put together after the trip, and then reviewed and signed off by the QHSE Manager.

The Ghana EPA permit and the Ghana Highway Authority have approved the road from Tema to the Ghana - Burkina Faso border. The EPA has granted a permit number EPA/CCMC/GAR/LHCT-3/22 dated August 18, 2022 expiring 17, 2023 for transportation of cyanide through Ghana. The route from Burkina Faso side of the border to the Semafo mine is the approved route by the government of Burkina Faso.

Population density in towns and villages along the cyanide transport route was considered during the selection of the route. The population density was noted in the Route Selection Procedure.

The infrastructure such as rail way crossings, height structures such as power lines, bridges, construction works and general road condition were taken into consideration when selecting the route. The transporter addressed infrastructure on the route during assessment of the route from Tema port in Ghana to Semafo Bougou mine site. Notes were made with regards to the road surface, number of bridges, number of railway crossings and markets along the road.

Pitch and grade was considered in the route selection procedure. The general road condition of the road slope, type of road surface and un-tarred and gravel road were considered during the route selection.

Proximity to water bodies as well as fog were noted in clause 5.1.3.1 of the Route Selection procedure as well as Route Survey reports. These were considered in selection of the cyanide transportation route.

The transporter has implemented a procedure to evaluates the risks on the selected cyanide transport route. Route Survey are conducted annually where the Escort leader, his assistant and escort driver drive on the cyanide transportation route to pick up all the risks and infrastructure, slopes, hills etc. along the road. Route Risk Assessments (RRA's) have been conducted over the years. Records of RRA's from 2020 to 2022 were noted. Risks identified on the road during route surveys have been risk assessed and specific control measures have been put in place to address it. Precautionary measures recommended are implemented. A

discussion about the risks on the routes as well as the precautionary measures to take are discussed at tool box meetings which are attended by both Bollore Burkina Faso staff and the trucks drivers of the subcontractor. Records of Tool box meeting registers "Formulaire de Tool Box Meeting were verified and noted by auditors. Tool box meeting attendance registers which bear the names of all the drivers and escort team and their signatures were noted.

The transporter implements a process to periodically re-evaluate risks in the routes used for cyanide transportation and has a process to obtain feedback on the risks noted by drivers and Escort leaders.

Route Surveys are conducted annually to identify any new risk on the route. Route survey reports show periodic reviews of the road conditions from Tema, Ghana to Endeavour Semafo Boungou mine. Clause 2 of the Transport Management Plan "Gestion Et Revision des Documents" states that route survey are conducted each year to ascertain if there are any changes on the road condition, any new risks and controls put in place to address or minimize the effect of the risk.

For each trip to the mine site, the Escort leader(Chef de Convoi) notes the road conditions and puts together a feedback report(Fiche De Mise A Jour Lors Des Miisions). The feedback on the road conditions are discussed in tool box talks that held with the drivers and escort team prior to departure of a convoy. Records of feedback reports on journeys to the mine were noted.

BTLBF has sought input from Ghana EPA and Ghana Highways and other stakeholders. Since the company transports cyanide from the port of Tema, Ghana to the mine site, the Ghana Environmental Protection Agency has been notified by the subcontractor(SOTRACOF) and the agency has issued a permit to the company to transport cyanide through Ghana. Bollore Burkina Faso also has secured a permit from Ghana EPA through the subsidiary company in Ghana.

Input has also been sought from the following stakeholders and government agencies in the selection of the cyanide transport route and in the implementation of the operations Transport Management Plan.

- Ministry of Environment of Burkina Faso (Ministere de I'Environment)
- Burkina Faso's Ministry of Transport (Ministere des Transport)
- Ministry of Heaith (Ministere Des Sante la Sante)
- Military (Militaire)

All letters of notifications and responses letter from the above stakeholders were sighted and noted. Community consultation is undertaken by Ghana EPA in conjunction with Bollore Burkina Faso. In Burkina Faso communication between the communities is managed by the Ministry of Environment in Ouagadougou, Burkina Faso.

The transporter uses escorts for all deliveries to the mine site. Bollore's Transport Management Plan makes it clear that deliveries to the mine must be done in convoy. The use of escort for convoys are addressed in the TMP. The TMP details the composition of the convoy. The convoys consist of 6x4 truck (with 4 axle trailer) each carrying 2x20ft containers of cyanide.

Convoys consisting of less than 3 trucks are escorted by one(1) escort vehicle which is placed at the front of the convoy. Convoys of more than 3 trucks and less than 9 trucks are escorted by 2 escort vehicles one in front and one at the rear of the convoy. Convoys of more than 9 trucks and less than 12 trucks are escorted by 3 escort vehicles one at the front, one at the middle and one at the rear. The maximum number of trucks

in a convoy is 12 trucks. The operation also has a convoy management plan(document number BAL-COR-HSE-PRO-0010 Rev.5 dated 2nd January 2022 that contains the guidelines governing the movement of a cyanide convoy. Due to security concerns in Burkina Faso, armed military men accompanies the convoy from Burkina Faso border to the mine site. Two military escort vehicles(one at the rear and one in front of the convoy) escort the convoy in addition to Bollore's escort team.

Bollore Burkina Faso does not subcontract the activities in Transport practice 1.1

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Bollore Burkina Faso has a Recruitment procedure(Recruitment Du Personnel) that details the processes and criteria for employing drivers. The company as well as its subcontractor(SOTRACOF) uses only trained, qualified and licensed drivers to operate its transport vehicles.

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

- Prospective applicant should be between 18-56 years
- Applicants must have a valid driver's license with Category 'E"
- Driving test is conducted on all shortlisted drivers
- Oral interviews are conducted
- Background checks are done on all prospective drivers
- Selected drivers are made to undergo medical examination.
- A driver must have a minimum of 2 years driving experience

A driver is employed when he satisfies all the above conditions. The requirement for driving in Burkina Faso is that drivers must be licensed with Class License E before driving a truck. Validity of a national driver's license is 10 years whilst International Driver's license is valid for 1 year. International drivers licenses (Permis International De Conduire) allows the drivers to drive across borders of countries in West Africa and beyond. Licences are to be renewed after their expiration dates.. Vehicle drivers and escort team members received training on: -

- Cyanide Awareness
- Emergency Response-training
- Responsibilities during an emergency situation
- Mock drills
- Defensive driving techniques
- First aid
- Basic first aid; and
- Theoretical and practical firefighting training

As per agreement, the drivers of the subcontractor are trained by the QHSE Manager of Bollore Burkina Faso as well as external training companies.

Trained drivers with experience in driving cyanide trucks to the mine site are used to drive cyanide trucks. Copies of both National license E driving license and International driving license were sighted by auditors. It was evident that the company's training matrix captures the names of the escort team and the drivers of subcontractor. Records of training attendance registers were sighted. All the training are conducted by the QHSE Manager(QHSE department) of Bolloré Burkina Faso.

All personnel operating cyanide handling and transport equipment have been trained. The transporter has a training matrix(Matrice Formation et exercise d'intervention) document BLX-BFA-BLMS-F-0005 Revision 11 specifying the type of training and the frequency. The training programs are Cyanide Awareness, Defensive Driving Training, Basic First Aid, Use of Personal Protective Equipment, Fire Fighting, Medical Oxygen administration, Emergency response training, and Personal Protective Equipment training. The training are organized annually except the Fire Fighting and Basic First Aid training which are held biannually. The subcontractor's drivers are trained together with Bollore escort team by the QHSE department of BTLBF.

Tool box meetings are held prior to departure of each convoy. Sampled training attendance register covering Tool Box meetings held on in 2020, 2021 and 2022 were sighted by auditors. Both drivers of BTLBF and the drivers of the subcontractor were involved. New drivers are trained before being allowed to drive. New escort leaders are made to drive together with a competent convoy leader for some number of trips before allowed to escort convoys of cyanide trucks. Valid driving license are also checked during the pre-departure inspections. New drivers are given site induction by the company.

Apart from the training QHSE department, external training consultancy company (Centre de Formation Professionnelle d'EnginsMiniers Et Sante Securite Au Travail) conducts the defensive driving training. Records of cyanide training attendance register for the past 3 years were sighted. The attendance registers have both the names and signatures of the subcontractor's drivers and Bollore escort team. Participants for defensive driving training were issued with certificates. Copies of the certificates were noted. After each training session, the training matrix is updated with the names of the participants and date the training was held. The escort team and selected drivers were interviewed in cyanide handling and found to be knowledgeable in cyanide and emergency response issues.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The equipment used are designed and maintained in accordance with the manufacturers specifications and they carry load in accordance with the legal requirements of Burkina Faso and Ghana and ECOWAS(UEMOA) axle load regulations.

BTLBF ensures that the subcontractor uses only trucks with the required design and specifications. The configuration of the trucks used for carriage of cyanide is 6x4 axle truck tractors. The brand of trucks used are Sinotruk Howo 6x4 trucks with Hose Power(HP) 420. The 6x4 trucks configurations carry 2x20ft containers of cyanide. The gross weight of the 2x20ft containers load of cyanide is 46mt. The trucks are designed to take a maximum load of 65mt.

The company has a Maintenance procedure (Fairs La Maintenance Des Engines Roulants) document number BLX-BFA-AT-PRO-001 04 a procedure used as guidelines in the company's workshop. Periodic maintenance on the vehicles are as per the truck manufacturers specification and in accordance with the company's maintenance procedure.

Any time a defect on the tractor and / or trailer is picked up, such vehicle is withdrawn from service and defect repaired. Once repair is done the truck is tested and put back into use.

The subcontractor has a procedure to maintain the trucks and also manage the tyres of its vehicles. Tyres are changed when the tread depth reaches a minimum of 3mm. The subcontractor does periodic maintenance at 8500Km intervals. A mechanic from the subcontractor accompanies the convoys and faults that are picked up during pre-departure are immediately fixed by the mechanic who is with the convoy.

Faults or defects go through a process of raising a work order, assigning of work on the truck to a mechanic, testing the truck after repairs and the work order card signed off a mechanic and countersigned by the Monitoring Manager(Le Responsable de Suivie) at the subcontractors workshop. Work order is raised by a mechanic after a driver/Escort leader have declared a fault on particular vehicle after pre-departure inspection. Preventive Maintenance records of selected cyanide vehicles were noted. The Odometer readings of the trucks are checked prior to departure and on return to the base from a journey. Auditors reviewed the subcontractors(SOTRACOF) maintenance procedure. Auditors also sampled copies of worker orders and critically examined their contents. The records of work orders were noted.

Every year the trucks go for roadworthy checks at Burkina Faso vehicle licensing authority. The road worthy certificates are subject to renewal every year. Trucks have Roadworthy certificates which are issued by the Burkina Faso government. The subcontractor has a comprehensive insurance policy on all its vehicles and as well as goods in transit insurance.

The operation has a procedure to verify the adequacy of the equipment for the load they must bear.
Two containers of cyanide weighs approximately 46 tons. The capacity of each 6x4 truck configuration is 65 tons. The total weight of the truck, trailer and 2x20ft container of cyanide is 63.7 tons. From the calculation, the weight per axle for the type of trucks used is 9.1tons This is within the requirements of ECOWAS (Economic Community of West Africa States) axle load regulations which states the required load per axle

should be 10.5. The subcontractor has allocated 11 trucks to Bollore Burkina Faso for cyanide delivery to the mine.

Each truck is weighed at a transit yard in the port of Tema prior to the convoy departing. There are weighing bridges along the transportation route which are managed by the Ghana Highways Authority to check overloading of vehicles. The trucks are weighed when the convoy reaches such locations where weighing bridges are located. The trucks are stopped and weighed at 3 different weighing bridges till they reach the mine site. The trucks are also weighed when the trucks enter Burkina Faso. Records of weights taken by the Government agency Chambre De Commerce Et D'Industrie Du Burkina Faso at the Burkina Faso side of the border, have been filed appropriately. Records of weighing bridge tickets of truck numbers were verified and noted accordingly by auditors. The truck weights recorded on these tickets show that the trucks are not overloaded.

The company has subcontracted the transportation aspect of the business to SOTRACOF a transport company based in Burkina Faso. A review of subcontractors activities are in line with Bollore Burkina Faso's procedures.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The cyanide from the supplier is packaged in 1ton PVC bags with a polyethylene linings and encased in plywood boxes (IBC's). Twenty IBC's of sodium cyanide are in each 20ft shipping container. Containers are sealed with container seals. The seals have unique numbers on them and are also on the Bill Ladings. The port authority issues a container interchange report which states the condition of the containers prior to loading from the port. As per the TMP, the Escort leader inspects the containers to ensure that they are intact, seals are in place and the containers are in good condition. The Escort leader then completes a Truck and Container Inspection form ("Identification des Unites de Transport Et de leurChargement) with his observations. The inspection checklist also specifies checks on the container and this includes seals, correct labelling and general container condition.

The Escort Leader performs the following functions before the departure of the convoy;

- Inspection of the state of the containers once loaded onto the truck trailer at the port.
- Checking of all required cyanide placards (i.e. UN number 1689., Class 6 and marine pollutant labels)
- Ensures that container seals are intact on the containers and seal numbers noted.

Ghana Customs attaches tracking device on the door of each container at the port of Tema to track the containers until the convoy reaches the border between Ghana and Burkina Faso. The Ghana Customs device that are affixed on the containers is mandatory for transit goods before the convoy leaves the port. The condition of the container is also checked by the port authority and a container interchange issued, to cover each container. Relevant chain of custody documentation covering cyanide shipments show checks and procedures to ensure that the integrity of the producers packaging is maintained.

Copies of completed sampled trucks inspection forms were verified and noted. Records of waybills covering deliveries to Endeavour Semafo Boungou mine signed and stamped by the mine indicating that the cyanide containers were received in good condition and the contents intact were sighted

The manufacturer has fixed placards on all four sides of the container as required by the IMDG Code. Skull and Cross bones labels, Toxic 6 labels and Marine Pollutant labels are used. Besides the required placards the transporter has fixed placards in front and in the rear of the trucks as per International (IMDG code) and the local regulations. The placards (signage) on the containers identifies the contents of the containers. Placards displayed on containers are checked by the convoy leader and the driver during pre-departure inspection before containers are loaded onto truck trailers and convoy exits the port.

The transporter has implemented a safety program which includes Vehicle Inspections, Health & Safety policies, Drug and Alcohol abuse prevention and Fatigue management to ensure that drivers drive in accordance to BTLBF's procedure and national regulations.

Preventive maintenance are done on trucks and trailers as well as the escort vehicles. As per Bollore's maintenance procedure (Faire La Maintenance Des Engines Roulants), trucks, trailers and escort vehicles are serviced after every 15,000Km for trucks and 10,000Km for light vehicles. Each time the vehicles are filled

with fuel, the speedometer readings are taken. The readings are put into a software(Maximo) and this alerts the maintenance department about the next servicing time of a particular vehicle. The alert goes to the Workshop Administrator) and the Technical Manager of the workshop. When trucks and trailers are due for servicing, e-mails are sent by the Maintenance department to the logistics department alerting them that the trucks & trailers are due for servicing. That particular truck is dispatched to the workshop. A work order is automatically generated by the software(Maximo) for the servicing to be done. Fault Rectification procedure(Effectuer Le Depannage D'un Engine) document # BLX-BFA-AT-PRO-002 which details the process of rectifying faults.

Preventive maintenance are done on trucks as well as the escort vehicles. As per Bollore's maintenance procedure (Faire La Maintenance Des Engines Roulants), trucks and escort vehicles are serviced after every 15,000Km for trucks and 10,000Km for light vehicles. Each time the vehicles are filled with fuel, the speedometer readings are recorded. The readings are put into a software(Maximo) and this alerts the maintenance department about the next servicing time of a particular vehicle. The alert goes to the Workshop Administrator and the Technical Manager of the workshop. When trucks are due for servicing, e-mails are sent by the Maintenance department to the logistics department alerting them that the trucks are due for servicing. That particular truck is dispatched to the workshop. A work order is automatically generated by the software(Maximo) for the servicing to be done. Fault Rectification procedure (Effectuer Le Depannage D'un Engine, which details the process of rectifying faults.

The subcontracted (SOTTRACOF's) vehicle maintenance program stipulates that cyanide convoys are to accompanied by a mechanic from the port in Tema, Ghana to the mine site in Burkina Faso. Evidence show completed copies of fault rectification forms (Intervention Technique Sur Camion Pendant Le Convoi). The subcontractor conducts servicing of the trucks at 8500Km intervals as per the manufacturers specification. Stickers bearing the mileage at which a particular vehicle is serviced are affixed on the screens the subcontractors vehicles. Maintenance records of the vehicles are properly filed and also kept electronically.

As per the TMP a driver drives for 3hrs and takes 30 minutes break. Driving hours is from 5am to 6.30pm. A maximum of 10 hours per day is required for a driver to drive. The company has Journey Plan (Registere du Suivi Convoi) which shows the different times the convoy stopped, moved from a specific location and time of arrival at the mine site. Journey Plans are also used as a measure to check limitation of driving hours. Records of Journey plans for delivery to Semafo Bougou mine were sighted. Rule #12 of the company's General Driving Rules (Regles Generales Transport Afrique) mentions that drivers drive 2hrs on laterite road and 3hrs on asphalt road and take 30 minutes rest in each case. Point 7 of the driving rules states that all the ICMC regulations regarding transportation of cyanide should be strictly adhered to. The GPS reports show the driving hours and stopping times . Copies of GPS report were verified and noted.

To prevent loads from shifting, all containers are secured by twist locks on trailers. Each container loaded on trucks are firmly fitted with four (4) twist locks on the trailers. The pre-departure checklist (Checklist d'inspection Camion) are completed with the findings after every inspection on a vehicle. The inspection among other things includes checking of twist locks, general container condition and stabilizing the container to prevent the it from shifting. Clause 10.4 of the TMP "Consignes Chauffeurs -Transport du cyanure mentions that the Escort leader checks the twist locks at the port prior to the departure of the trucks. It is the responsibility of the Escort leader and driver of the vehicle to ensure that the containers are secured firmly on a truck. The twist locks are inspected at intervals of 3hrs during the trip. A pre-departure checklist is filled with the observations anytime these checks are performed.

The Transport Management Plan clearly mentions in clause 9 that in case of severe weather condition and civil unrest the convoy will suspend deliveries or stop moving until the situation is under control. The Escort Leader takes decision and stop or suspend movement of the convoy and informs his office about the situation. The time of stopping and resumption of the movement of the convoy are recorded by the Escort Leader on the journey plan. The decision to continue the journey is made in consultation with the Transport Manager at the head office and the mine. Communication with the Transport manager at the head office is through the use of cell phone.

Bolloré Burkina Faso has a Drug and alcohol policy that prohibits the use of drugs and alcohol whilst on duty or reporting for duty whilst under the influence of alcohol. The Transporter's "General Driving Rules" also states that drinking and driving is strictly prohibited. Alcohol tests are conducted on drivers and the Convoy team members prior to the convoy departing and also during the stops of the trucks for a brief rest. Tests on randomly selected drivers and convoy team are done by the Escort leader. Test report form (Formlaire De Consentement D'ethylotest) is completed with the test results. Records of alcohol tests conducted on selected drivers were noted. All those tested passed the test. Anyone found to have failed the test is reported to the subcontractor and blacklisted and not allowed to drive cyanide. A breathalyzer (Ethylec brand) is used for conducting the testing. The next calibration date is September 2023. Drug and alcohol policy was noted and contents scrutinized by auditors. It was evident that the consumption of alcohol whilst on duty or being under the influence of alcohol is prohibited.

Bolloré Burkina Faso has a Document Control Procedure PO-AR-BF.01 which specified that documents are retained for 4 years before being disposed. Checklists, and shipping document are retained for 4 years. Contents of Document Control procedure were noted.

Maintenance of the transport vehicles is the responsibility of the subcontractor as per their maintenance procedure. Escort vehicles are Bollore's own vehicles and are serviced as per their maintenance procedure. Vehicles inspections, fatigue management, limitation of hours of driving and escorts of the convoy are the responsibilities of Bollore Burkina Faso and not subcontracted. The checking of the integrity of the containers is under the control of the Escort leader of Bolloré Burkina Faso. The minimum driving hours is under the control of the Bollore's escort team led by the convoy leader.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The transport vehicles have a means of communication. Communication between the drivers and Escort leader is by the use of two way radios and cell phones. In Ghana the cell phone networks used are Airtel, MTN and Vodaphone whilst in Burkina Faso MOOV Africaine is used to communicate with the head office, the mining company and external emergency responders. Also, communication with the cyanide producer and the mine is by email communication. Electrical chargers are available in the vehicles to fully charge the radios so that they function effectively. An Inmarsat Satellite phone is used in communication in areas where there are limited phone network(blackout areas). Contact phone numbers of all the emergency responders along the transport route is available with each of the escort vehicle. All emergency equipment are inspected on a regular basis apart from the pre-inspection that is done. A public address system forms part of the equipment and is used to communicate with bystanders in case of an incident to persuade them to move from an accident scene in case of a cyanide incident.

Auditors inspected and noted the communication devices. Emails to the mine and the cyanide supplier updating them about the convoy locations were noted. Two way radios, cell phone and Satellite phones were verified and noted.
Communication equipment such as two way radios, cell phones and Satellite phones are inspected prior to the departure of the convoy. The GPS device is also tested to ascertain whether they are functioning properly. An emergency equipment checklist (Inventaire Materiel D'urgence) is completed with observations after inspecting the communication equipment. It is the responsibility of the Convoy leader to ensure that the communication equipments are working effectively. Copies of the escort equipment checklist were noted.

There are no blackout areas on the road from Tema port, Ghana to the border between Ghana - Burkina Faso. However, blackout areas have been identified in certain areas within Burkina Faso. RRA's conducted show that there are no blackout areas on the road from the port in Ghana to the border but blackout areas were identified within areas in Burkina Faso. RRA contents scrutinized. In these blackout areas the Satellite phone is used for communication.

The subcontractor SOTRACOF has installed Mix Telematix GP tracking System on all its vehicles. The GPS is monitored 24/7 by the Monitoring supervisor of the subcontractor. The system sends SMS alerts to the monitoring supervisor when a truck over speeds. It also shows the locations of the convoy at any given time. The GPS is also monitored by the QHSE Manager and Safety Officer of Bollore. Bollore Burkina Faso has direct access to the tracking system of subcontractor and monitors it from their office in Ouagadougou, Burkina Faso. The monitoring of the GPS by Bollore is done in 8 hours a day between 4.30am to 18:30 when a convoy is on the road. Ghana customs also attaches a tracking device to each container in Tema port which is removed at the Ghana and Burkina Faso border and the device returned to Ghana Customs at the port by the Ghana Customs officials at the border. The customs device tracks the trucks till they exits Ghana.

Chain of custody documentation namely Bill of Lading, Packing list, Waybills and Pre-departure checklists are kept in the escort vehicle by the Escort leader. Shipping documents from the supplier are sent to BTLBF

weeks before the arrival of the shipment. These documents are shown to the shipping line as proof of ownership before the container are released from the port. Waybill reflects the shipping container numbers and seal numbers. Proof of delivery(Bordereau de lavraison)' for deliveries to the mine at different dates were noted. The transporter has a container Collection Control Sheet("Identification des Unites de Transport et de leurChangement) which is filled by the Convoy Leader. The sheet(checklist) contains a list all the documents required for a trip.

Shipping records such as Bill of Ladings, waybills and packing list indicating the amount of cyanide per shipment are received from the supplier before arrival of the vessel. The Bill of Ladings specifies the quantity of shipments, date shipped, container numbers and gross weights of each container. Each truck and escort vehicle has copies of MSDS from the supplier. The MSDS is part of the required document for a trip and it is specified on the pre-departure checklist.

The subcontractor's vehicles have GPS already installed in them. Regular tracking of the sub-contractor's vehicles are done by both the subcontractor staff and Bollore Burkina Faso. Tracking the progress of the shipment and communication are the responsibility of Bollore. Inventory controls, shipping records, communication equipment are solely the responsibilities of Bollore.

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Bollore Transport & Logistics Burkina Faso (BTLBF) is in full compliance with Transport Practice 2.1, based on the finding that the transporter does not store any cyanide.

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

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has an Emergency Response Plan ("Plan dÚrgence Transport document number BLX-BFA-BLMS-MAN-0002 Revision 17 dated 7th March 2023).

The plan covers the following.

- Measures to take during an incident.
- Communication with stakeholders
- Incident scenarios
- Roles and responsibilities of emergency responders in the event of spill
- Minor spills and major spills and how to handle.
- Neutralization processes

The contents of the ERP was found to contain all the required information to handle cyanide incidents. The ERP was noted.

The ERP is appropriate for the selected transportation route. RRA and Route Surveys have been conducted on the road from Tema, Ghana to the Semafo Boungou mine site in Burkina Faso.

The TMP, RRA, and ERP all considered the road condition including potholes rivers, slopes, curves, bridges, fog, population density, tarred and dusty road and road surface. The ER plan was reviewed and was found to be appropriate for the cyanide transportation from Ghana to the mine site in Burkina Faso. It addresses issues regarding road transportation of cyanide.

The ERP describes the physical and chemical properties of sodium cyanide. It describes the nature of cyanide and its packaging and other chemical properties (in clause 1). The ERP describes sodium cyanide as a white solid briquette which are in sacks and encased in plywood boxes. The ERP covers reactions when on contact with acids and other incompatible chemicals and when exposed to moisture. It has a vivid description of the physical and chemical properties of the sodium cyanide, including the required labels identifying the product sodium cyanide. These placards are UN No. 1689, toxic 6 and marine pollutant labels and skull and cross bones labels. The MSDS for Sodium Cyanide from the supplier is available and it also gives information about the product.

The ER Plan considers road transportation of solid sodium cyanide from the Tema port, Ghana to the mine site by road using vehicles of the required specification. The plan was developed only for the transportation of cyanide by road using trucks.

All aspects of infrastructure which includes bridges, hospitals, markets, bus stops, asphalts road, curves and slopes have been considered in the ERP. The ERP was reviewed by auditors and found to have covered all aspects of the road infrastructure.

Clause 2 of the ERP describes the design of the trucks. The configuration of the trucks used for carriage of containers of cyanide is 6x4 axle trucks with 4 axle flatbed trailers. The brand of trucks used are Sinotruk Howo 6x4 trucks with Hose Power 420. The 6x4 configuration of trucks are used to carry 2x20ft containers of cyanide with a total weight 46 tons. The trucks has the capacity to take a maximum load of 65mt.

Clause 3.3 of the ERP gives a vivid description of the various incident scenarios.

The ER Plan addresses the following scenarios.

- Scenario 1: Incident without spill and without impact on the integrity of the container.
- Scenario 2: Incident without spillage but the container tipped off the trailer and was damaged.
- Scenario 3: Incident with limited spillage on the road (dry ground)
- Scenario 4: Incident with a large or complex spill in:

a) A water supply source
b) Permeable soil
c) Non removable ground or inaccessible place
d. In confine space.

- Scenario 5: Incident resulting in major spill and one cyanide poisoned person.

Response actions for the above anticipated emergency situations are captured in clause 3.3 of the ERP and were noted by auditors.

The roles of the Escort leader, escort team and outside responders namely the police, Fire Service, gendarmerie, Ambulance services, hospitals, Ministry of Environment and the mine are clearly defined in clause 4 of the ERP. In case of an incident the Escort leader will notify the various external responders for them to come and assist in the cleaning of the spill and neutralization when necessary. The escort team will assist the convoy leader in executing the aforementioned responsibilities. The Escort team will cordon off the incident area and move people upwind.

The overall coordination of an incident is the responsibility of the Escort leader. Cleaning and shovelling of the solid sodium cyanide briquettes is the responsibility of the escort team. The Escort leader is responsible for administration of oxygen to a cyanide poisoned person and hand the victim over to the Ambulance when they arrive. The role of the Fire Service is to assist in case of fire and rescue of injured person. The Ambulance Service will give first aid to an injured persons or possible poisoned person and transport the patient to the hospital. The hospital will undertake treatment of a poisoned or injured person and the administration of 100% oxygen to a victim in conjunction with cyanide antidote.

The Ghana EPA's responsibility is to give expert advice on remediation measures and supervise clean-up of spill whist the Ministry of Environment of Burkina Faso will be involved with communicating with the local community, pick samples in case of spillage into water body and also offer technical advice. The mine will be responsible for receiving the recovered container and contaminated soils and properly neutralize. The mine will be fully involved in the recovery in case the incident occurs close to the mine site. These above roles and responsibilities clearly stated in the ERP were noted.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has a training matrix detailing the various training programs for its workers. The training includes ER training. ER training is organized annually for all cyanide drivers and escort team. Role and responsibilities of drivers and escort team in case of an incident, how to handle cyanide spill, hazard identification, transportation and handling of cyanide are part of the topics that are discussed. The ER training is conducted by the QHSE Manager of Bollore Burkina Faso's who is qualified and authorised to conduct training.

The Escort leaders, escort vehicle drivers, subcontractor's drivers (SOTRACOF) and mechanics attend the training sessions. Records of ER training attendance register for the past 3 years were noted. Assessments are conducted on the participants. Participants of the training including drivers are assessed verbally by questioning and answering. Apart from the theoretical training a practical training (Mock drill) is also organized. Training certificates for the ER training were verified and noted by auditors.

Clause 3.3 of the ERP spells out the emergency response duties and responsibilities of personnel. The expectations and responsibilities of each of the emergency responders have been spelt out in the ERP. The responsibilities of the Escort leader is to be the incident commander and to ensure that the incident is handled properly with assistance from the escort team.

Bollore Burkina Faso has a list of cyanide emergency response equipment which are kept in one of the escort vehicles that escorts cyanide convoys to the mine site. The following is the list of ER equipment;

- Tyvek overalls
- Pair of waterproof boots
- Pair of gloves
- HCN Gas detector (Honey Well BW Solo brand)
- Antidote kits (Hydroxocobalamin)
- Full face respirator and Cartridges (ABEKP3)
- Beacon
- PVC gauntlet gloves/overalls
- Rubber boots
- Safety triangles
- Caution tape
- Cones
- Shovels
- Stretch film roll.
- Broom
- Tarpaulin
- Empty sacs
- Plastic bucket
- Spray pack

- Reflector tape
- Sodium hypochlorite
- Danger flags (Red and Green)
- Bucket with lid
- Torch light
- Cyanokit (Hydroxocobalamine)
- 6Kg Fire extinguishers
- Helmets
- Spray pack
- Tapaulin

When there are no deliveries to the mine, the escort equipment are kept in the lockable store room. The escort equipment are inspected and an escort equipment checklist completed. Cyanide antidote expires on the 6th of April 2024. HCN gas detector was calibrated on 29th April 2022 and expires on 28th April 2023. All the escort equipment were inspected, and the quantities compared with the transporters inventory checklist.

All emergency equipment as per Emergency Response Equipment Inventory List are available and ready for use should it be required. Personal Protective equipment, namely, disposable tyvek overalls, rubber boots, gloves, full face and respirator with canisters and helmets are available. The necessary emergency equipment and Personal Protective Equipment are kept at an office in the company's premises where they are locked when not in use. Cyanokit is stored according to manufacturer’s recommendations. Oxygen gas cylinder is periodically checked for Oxygen levels.

Auditors inspected and confirmed the availability of the transporter's ER equipment and cyanide antidote.

The Emergency Response Equipment are inspected to ensure availability, good working order and functionality. Equipment checklist form (Inventaire Materieil d'urgence) is completed with the findings after the inspection and checklist signed by the Escort leader. Equipment is inspected prior to departure to the mine and after returning. Inspection is carried out by Escort Leader. The Emergency equipment are kept in a lock-up room to prevent unauthorised entry and safe keeping of the equipment.

The transporter does not subcontract above activities in Transport Practice 3.2.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The ER outlines the procedure for notifying the mine, supplier, gendermarie, Ministry of Environment of Burkina Faso, Ghana EPA, medical facilities and affected communities. Current emergency telephone contact numbers of the Semafo Boungou mine, Ambulance Service, Police, Customs, and Ghana Fire Service are contained in the ER contact list. Similar list of phone numbers are with the Escort leader. The ERP gives details of call-out procedure to be followed in the case of an emergency. The Escort leader is responsible for ensuring that the emergency contact numbers are kept current.

The emergency contact list in the ER Plan is revised at least once a year or as and when necessary. Telephone contact numbers are reviewed and tested regularly to ensure that the phone numbers are still active. Provision is made in the Emergency Response Plan for annual or more frequent review of the contact number to ensure they are current. Two (2) contact phone numbers one for a hospital in Burkina Faso and one in Ghana were tested(called) and found to be working. Procedure to ensure that the internal and external notification and reporting are kept current was verified and noted.

Clause 3.2 of the ERP(document number BLX-A-BLMS-MAN-0002 revision 17 states that in an event of a significant cyanide incident impacting on the environment, ICMI will be notified. Significant incident includes the following;

- Human exposure that requires action by an emergency response team, such as decontamination or treatment.
- An unauthorized discharge that enters natural surface waters, on or off site.
- An unauthorized release that occurs off-site or migrates off-site.
- An on-site release requiring the intervention of an emergency response team
- A transport incident requiring an emergency response in the event of a release of cyanide
- A multiple wildlife death event where cyanide is known or credibly suspected to be the cause of death.
- Theft of Cyanide

Procedure for notifying ICMI in the event of a significant incident was sighted by auditors.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has a procedure for recovery and neutralisation of solid sodium cyanide and solution cyanide in the ERP.

The following are the details of remediation measures in the ERP.

- Solid sodium cyanide containment and recovery
- Neutralization and disposal of recovered cyanide
- Neutralization and disposal of excavated soil
- Neutralisation of solutions

The procedure states that, in containing a spill the escort team will ensure the spill is prevented from entering water ways. In case a spill on dry ground the briquettes of cyanide will be shovelled into a sealable container. The residue will be appropriately be neutralized with sodium hypochlorite or Ferrous sulphate under the supervision of the Escort leader. The recovered cyanide briquettes will be sent to the mine for disposal. The ERP describes the appropriate use of neutralizing chemicals. The initial clean-up is the responsibility of the convoy leader and the emergency team. In the case of a large spill, the convoy leader will take the initial response and then call in the outside responders to assist. The ERP mentions that the neutralization chemicals are not to be used in rivers or surface waters. The detailed process of the aforementioned remediation measures were scrutinized and noted during the audit.

Clause 3.3.3 and 3.3.4 of the ER Plan stipulates that cyanide that under no circumstances should sodium hypochlorite, Ferrous sulphate and hydrogen peroxide be used to treat or neutralise cyanide that has entered surface water. The procedure strictly prohibit the introduction of the aforementioned neutralizing chemicals in surface waters. The relevant clauses in the ERP was scrutinised noted by auditors.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

There are provisions for periodically reviewing and evaluating the emergency procedures adequacy and they are being implemented.

The ER Plan makes provision for reviewing and evaluating the ERP annually. The ERP is reviewed when there are significant or critical changes on the road conditions, changes to infrastructure and changes to the transport equipment. Also, after conducting mock drills lessons learnt are used to review the plan. The ERP has been revised sixteen (16) times with the current revisions being 17th March 2023

There are provisions for periodically conducting mock drills and they are implemented. The operation conducts emergency response and mock drills annually for cyanide related scenarios. A review of mock drill reports and interviews confirmed that mock drills have been completed in accordance with commitments. Mock drill reports were sighted, and content were scrutinized. Records of Attendance Registers with the names and signatures of participants were sighted and noted by auditors. Mock drill reports describe the incident scenarios, non-conformities, and corrective action plans. The corrective actions identified in drill corrective action plans have been completed. The mock drills held addresses both cyanide exposures and releases.

The ERP is evaluated and revised when there are changes to the conditions along the transportation routes, observations made after an accident, significant incident or after a mock drill. Lessons learnt from the mock drills are also used as the basis to make changes in ERP. After each mock drill, debriefings are held with all participants and changes are made to the procedure. Evaluation is done during annual review of the ERP.

No cyanide incident have been recorded in the past 3 years.