Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

ICMI RE-CERTIFICATION – SUMMARY REPORT

1.1 Operational Information.

Name of Transportation Facility:	Bolloré Transport & Logistics Ghana Ltd
Name of Facility Owner:	Bolloré Transport & Logistics Ghana Ltd.
Name of Facility Operator:	Bolloré Transport & Logistics Ghana Ltd
Name of Responsible Manager:	Patrick Banoeyelle (QSHE Manager
Address:	Bolloré Transport & Logistics Commercial Warehouse, Tema, P.O. Box 51 Tema,
State/Province: Country:	Tema, Greater Accra
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Website	www.bollore-transport-logistics.com

1.2 Description of Operation – Bollore transport Logistics, Ghana Ltd.

1.2.1 Company Profile.

Bolloré group was founded in1822. The company was into thin paper in the beginning, but the group has diversified its product rages and services. It is now involved in plastics films for capacitors and packaging, electric batteries, thin papers, transportation in Africa (freight forwarding and stevedoring, railways) and international logistics, fuel distribution and dedicated port 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 Transport and Logistics is one of the largest transport and logistics operators in Africa.

Bolloré Transport & Logistics Ghana was established in 1954. The company's national headquarters are located inTema. In addition to the major ports of Takoradi and Tema. Bolloré Transport & Logistics Ghana operates airfreight services at the Kotoka International Airport in the capital of Accra.

The organization offers complete end-to-end supply chain solutions to their clients, including airfreight, ocean freight—both FCL (Full Container Load) and LCL (Less Container Load), ground transportation, customs brokerage, warehousing &distribution, and many other value-added services.

Bolloré Transport & Logistics Ghana has a broad range of capabilities and experienced staff to handle both general cargo and project cargo with specific expertise in several vertical sectors including mining, oil & gas, industrial projects, aid & relief, power & energy, telecommunications, high tech, FMCG & retail, soft commodities, and infrastructures. Bollore Transport & Logistics Ghana is part of the Bollore Africa group with the head office in France.

The company undertakes cyanide transportation from the port of Tema to Endeavour ManaSemafo mine for Samsung C&T a sodium cyanide supplier. The company has gone through three (3) ICMI recertification after the initial certification in 2013. This recertification is the fourth recertification audit.

1.2.2 Audit scope.

The scope of this audit covers the road transportation of cyanide from the ports of Tema, Ghana to Endeavour Mana Semafo mine in Burkina Faso a distance 1282.5Km.

1.3 Sodium Cyanide Transportation.

Samsung C & T the supplier of Sodium Cyanide ships the product to the port of Tema, Ghana and has contracted Bollore Transport and Logistics Ghana Ltd to handle the logistics namely customs clearance and transportation. The contract agreement states the Bollore Transport and Logistics services provides customs clearing and transportation of containerized sodium cyanide consignment from the port of Tema to Endeavour Mana Semafo mine.

Bollore Transport & Logistics has a Ghana Environmental Protection Permit (EPA) permit number EPA/CCMC/GAR/LHCT-3/22 issued on 18th August 2022 and expiring on 17th August 2023 which allows them to transport sodium cyanide by road. The permit is renewed annually.

Sodium cyanide in briquette form is in polyethylene sacs encased in Intermediate Bulk Containers (plywood box) with a pallet at the bottom to enable easy movement by a forklift. As extra support, the IBC's (box) is then strapped around with steel strapping which supports packaging further. The box is placed on a pallet to provide

further protection during transit and offloading. Ply-wood boxes are then stacked into a 6-meter (20 foot) sea freight container. A maximum of 20 IBCs is packed into a freight container.
The Intermediate Bulk Containers (IBC's) are packed into a 6-meter shipping container and shipped by sea from the Consignor to the Tema port. The weight of sodium cyanide briquettes in one IBC is one (1) ton. A total of 20 IBC's is packed into a sea container with gross weight of the approximately 23tons.

Shipments of containers of cyanide, are shipped into Tema, port, Ghana from the port of Bussan, Korea to Tema port, Ghana using nominated shipping companies such as MSC Shipping line and Maersk Shipping.

Bollore transports cyanide from Samsung C & T which is ICMI certified. Prior to the arrival at the port of Tema, Bolloré ensures that all the shipping documentation are submitted to Ghana Customs for processing, payment of customs duties to allow prompt clearing of the shipment from the port. BTL is notified ahead of time by the shipping line on the Expected Time of Arrival (ETA) of a vessel.

Upon a vessel arrival at the port the containers are offloaded in the terminal of Meridian Port Services (MPS) which is a company contracted by the Ghana Port Authority to handle all hazardous cargo which are arriving in the port of Tema. The sodium cyanide containers are offloaded form the vessel and stored temporary at the MPS terminal for a maximum of a couple of days to enable BTL to finish completely their documentation. MPS has the expertise to handle cyanide at the port. The containers are segregated from other chemicals which are not compatible with cyanide.

Upon the completion of all customs documentation, Bollore Ghana dispatches trucks to the port. The trucks are loaded from the MPS terminal and once loaded, they exit the port. The vehicles spend a few hours in Bollore's yard. The convoy is dispatched with escort team, escorts vehicles and escort equipment.

Prior to the trucks leaving for their destination, tools box talks are held by the Escort leader with all escort team and drivers. Vehicles are pre-inspected before departure of the trucks.

Bollore Ghana transports containerized sodium cyanide to Endeavour Mana Semafo mine in Burkina Faso a distance of 1282.5Km from Tema port in Ghana. The trucks which move in convoy are escorted by Ghana Police personnel Bollore's Escort leader and his team to the mine. On reaching the border between Ghana and Burkina Faso, the Ghana police returns to his base and the Burkina Faso military personnel escorts the convoy from the border with the Bollore's escort team to the mine site.

The overall control of the movement of a cyanide convoy is the sole responsibility of Bollore Ghana who provides escorts right from the port to the mine with an Escort leader in charge.

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SUMMARY AUDIT REPORT AUDITORS' FINDINGS

Bollore transport Logistics, Ghana Ltd 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 Degon, Lead Auditor
Email:	kuldip@islglobal.net

NAME OF OTHER AUDITORS

Benjamin Amoo Mensah – Technical Auditor: Transportation.

DATES OF AUDIT

The Re-certification Audit was undertaken on 17th& 18th October 2021.

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.

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 Transport & Logistics has a procedure for selecting transportation routes and conducting a route survey. The procedure is titled "Conducting and Using a Road Survey".

The procedure involves selecting, planning a Route Survey and performing a route survey. The relevant information concerning the selection of a route is reviewed by a team consisting of the Escort leader, QHSE Manager and Logistics Manager. The team is in charge of the study and selection of the route and the organization of resources prior to conducting a route survey on the selected routes. The route survey is undertaken by the QHSE department which includes the QHSE Officer who ensures a successful completion of the road survey.

The route survey team consists of a driver and the QHSE Officer who reports to a team consisting of a Team Leader who is charge of supervising the road survey, Logistics Manager, QHSE Manager and Escort leader.

In selecting the appropriate route, the following were taken into consideration, and these have been captured in their route survey reports.

- Population density
- Town and villages along the route
- Water bodies such as rivers and streams
- Bridges
- Distance and general road condition
- Traffic situation
- Schools
- Road Intersections
- Pitch and grade (slopes, gravel and ungravelled roads)
- Weather conditions such a fog
- Environmental conditions
- Bridges
- Construction activities on the road

It was evident from documentation presented that the findings with respect to road infrastructure and road condition was taken in consideration. Road markings on tarred road, condition of road surface, impact of temperature on road surface, edges of tarred roads, inclines adjoining roads and the possible effect should vehicles need to pull off the road, pitch and grade, rivers, other water sources nearby and weather conditions have all been captured in the RRA and route selection procedures.

Two forms namely "Notes during Route Survey" and “Reporting Form" are used to record as accurately as possible the conditions of the road, its infrastructure and all features of the selected transport route from Tema, Ghana to Endeavour Mana Semafo mine site in Burkina Faso a distance of 1282.5Km.

Bollore Transport and Logistics Ghana (BTL) have conducted Route Risk Assessment of the various hazard types on the road and have risk assessed each risk and have evaluated and put in control measures to eliminate or minimize those risks. RRA has been conducted for the selected road from port of Tema to Endeavour ManaSemafo mine site. Recent RRA is dated 26th September 2022.

BTL Ghana has implemented processes to periodically re-evaluate risks in the route used for cyanide transportation and has a process of getting feedback on the risks noted by drivers and escort leaders during delivery of cyanide. The operation has a Risk Assessment Procedure, which addresses evaluation of risks of selected cyanide transport route. Route surveys and risk assessments are conducted annually as evident by documents and records presented.

The Risk Route Assessment procedure (MANA SEMAFO-BLX-GHA-HSE-WI-0001), Transport Management Plan for Mana Semafo mine (MANA SEMAFO-BLX-GHA-HSE-WI-0002) and Emergency Response Plan (MANA SEMAFO-BLX-GHA-HSE-WI-0003) are evident that the risk on the selected route to the mine site have been evaluated and reviewed by the QHSE Manager.

RRA's were conducted in 2019, 2021 and 2022. Escort leaders and drivers are given the opportunity to comment on areas of concern on the route or areas which are found unsafe to travel during de-briefing session after each cyanide delivery to the mine.

Prior to departure of the convoy of cyanide trucks, tools box meetings are held, and participants sign attendance sheets to indicate their participation. The QHSE department is responsible for organizing the toolbox meetings. The meetings are attended by the drivers, escort team and the police personnel. Evidence of toolbox meeting attendance sheets dated 22nd July 2021, 25th November 2021 and 15th June 2021 were noted. Risks identified on the route in previous trips are discussed at the tools box meetings.

BTL Ghana has a policy titled General Driving Rules (Documents No. BLX-AFR-HSE-POL-0001 Rev 2) dated 1st December 2020. The policy stipulates the following.

Maximum time allowed for continuous driving is 2hrs on laterite roads, and 3hrs on asphalt road. Drivers must take rest for a minimum of 30minutes after the 2hrs before continuing the journey.

- 20km when driving through villages
- 20km/hr when driving on road with works in progress
- 40kph when driving on outside roads, urban area and villages
- 50kph on driving in town on asphalt road
- 80kph when driving on asphalt roads out of town

Night driving is strictly prohibited. Permitted driving hours is from sunrise and sunset. From 6am to 6pm. The vehicles have Sky FMS GPS systems installed in them and is monitored 24/7 by the Trucking Manager during each trip to ensure that the convoy conforms to all the required driving regulations till they arrive at the mine destination.

BTL has implemented a process for getting feedback on the road condition. The transporter has a system of getting feedback on the road conditions and noting the risks in the feedback reports and putting in controls measures to eliminate or reduce the risks. Report on each trip specifying the road condition and how the journey went are all captured in the feedback reports.

The Transport Management Plan (TMP) requires route survey to be revised periodically. The Transport Management Plan makes provision for a process of continuously evaluating the transportation route using feedbacks obtained on the road condition after each trip. The escort leader completes a feedback report form on the road condition after each trip of cyanide deliveries to the mine site.

Feedback reports are discussed with the drivers, QHSE Manager and Transport Manager and also prior to undertaking another trip.

Route survey reports show periodic reviews of the road conditions from Tema to Burkina Faso. Precautionary measures have been implemented. The TMP is reviewed annually and when necessary, depending on the feedback on the road conditions.

Measures to reduce risks are covered in the RRA. The transporter's Route Risk Assessment Procedure outlines the category of risks to be noted when conducting a route assessment. Control measures to each hazard identified during route survey are captured under the heading 'controls' on the RRA document. The control measures as per RRA are discussed during toolbox talks and during training sessions. Attendance registers of drivers and escort team who were present are kept on record. The attendance register is also signed by all participants acknowledging that they were present in the tools box meetings. Feedback reports on the road condition in 2019, 2021 and 2022 sighted and noted.

BTL has sought inputs from all the relevant governmental agencies. The transporter has secured an EPA permit from the Environmental Protection Agency (EPA), permit number EPA/CCMC/GAR/LHCT-3/22 issued on 18th August 2022 and expiring on 17th August 2023. The permit allows BTL Ghana to transport hazardous chemicals including cyanide. Ghana EPA does community consultation in conjunction with BTL.

BTL has sought input from stakeholders such as Ghana Police, Ambulance Service, hospitals and Ghana National Fire Service. Letters of notifications to Police Stations in towns along the transportation route namely Osino, Offinso, Paga, Buipe, Bolga, Amasaman, Kumasi and Techiman which were acknowledged and stamped by the different stations dated 11/09/22, 12/09/22, 13/09/22 and 14/09/22 were verified. Letters to Ghana Fire Service Stations were acknowledged by station managers in towns namely, Anyinam, Nkwakaw, Jejeti and Konongo towns which are along the route to the mine. The letters were dated 11/09/22, 12/09/22, and 13/09/22. Ghana Ambulance Service in Nkawakaw, Ejisu, Buipe and Tamale town have been notified and their input sought, and they acknowledged receipt of the notifications on 11/09/22, 12/09/22, 13/09/22 and 15/09/22. respectively.

The operation uses convoys with escorts to ensure safe delivery of cyanide shipment to the mine site destination. The Transport Management Plan details that all vehicles must move in convoy.
For three vehicles (3) in convoy, the escort team from Ghana consists of one (1) policeman, one (1) Escort leader and one (1) Escort driver. For a maximum of eight (8) trucks, two (2) policemen are used, one (1) Escort leader, and two (2) Escort drivers and two (2) escort vehicles one in front and one in the rear up to the Ghana - Burkina Faso border. From Burkina Faso border to the mine site, in addition to the escort team the convoy is accompanied by Gendarmes (paramilitary police officer) in that country who use motor bikes to lead the convoy.

Bollore does not subcontract any of the logistics and transport business. All jobs and transportation are done by themselves.

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 Ghana requires that all personnel operating cyanide handling and transport equipment perform their jobs with minimum risk to themselves, the communities, and the environment.
In order to achieve this, the company uses only trained and qualified and licensed drivers to operate its transport vehicles. BTL has a general Human Resource Recruitment procedure number BLX-GHA-HRE-PRO-0002 which outlines a rigid process of employing drivers and other personnel.

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

- Prospective applicant should be between 18-60 years
- Applicants must have a valid driver's license with Category 'F"
- 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.
- Driver must have a minimum of 5 years driving experience

All BTL Ghana drivers undergo the following training programs, and these are captured on the company's training matrix.

- Cyanide Awareness Training - Held Annually
- Defensive driving - Held Annually
- BTL Ghana general driving rules - Held Annually
- Fire Prevention Training - Held Annually
- Route Survey Risk Assessment - Held Annually
- First Aid - Held every 3 years

Training attendance registers show that defensive driving training was organized since the past 3 years, i.e., in 2020, 2021 and 2022. Records show that Cyanide awareness training were organized in 2021, 2021 and 2022. The detail of the training includes, physical and chemical properties of cyanide, Modes of exposition to cyanide, Administration of 100% oxygen, Use of PPE's, Mechanism of cyanide poisoning, Safe transport practices and emergency response.

Defensive driving training for drivers was organized by National Road Safety Authority in 22nd May 2021 and April 2022 whilst First Aid training was conducted by St John's Ambulance, Ghana. The next first aid training is scheduled for December 2023.

Training Attendance registers and certificates of training have all been kept appropriately on record. Firefighting training was held by Ghana National Services for all drivers. Records of recent firefighting training was on 10/09/22 for all drivers and staff. Drivers driving licenses category 'F" and training attendance registers for the training were noted.

Copies of all relevant notifications, permits and other documents have been maintained appropriately.

Bollore Ghana does not subcontract any of its operations.

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 company only use trucks which are designed and are appropriate for the transportation of cyanide. In Clause 8.2 of the company's Transport Management Plan, the following are specification of vehicles that are used.

Generally, four 4 axle, 3 axle and 2 axle trailers with weight capacities of 70tons, 60tons, 53.5tons respectively equipped with twist locks and designed to carry sea containers are used.

- 6x4 axles trailers with total load capacities of 70t equipped with twist locks and designed to carry 2x 20ft containers of cyanide.
- Trucks are equipped with twist locks and have GPS installed in them

The capacities of the trucks as well as the configuration indicates that the trucks can take the load that they can bear.

The brand of vehicles used are Renault and MAN Diesel trucks having Hose Powers (HP) of 350 and 400). No retreated tyres are used. Only new tyres are used.

The trucks are weighed by Ghana Port Authority at the port after loading and Axle Load Weighing Certificates issued.

Each 6x4 truck trailer configuration is loaded with two 2 containers weighing approximately 46.4mt. Each 1x20ft shipping container contains 20 IBC's of cyanide with a gross weight of one container being 23mt. The sum of the weight of the trailer and the tractor unit and 2x20ft containers is 63.4mt which is below the required regulations. The total load for 6x4 vehicles is 70tons are per Ghana Highway Authority regulation.

The TMP addresses a process to ensure that vehicles are not overloaded. It specifies the different truck configurations and the load that it should take. The total weight that are carried by the trucks are within the required regulations of Ghana and Burkina Faso.

Prior to the departure of the trucks from the port of Tema, they are weighed by the Ghana Port Authorities. Weighing certificates are issued to each truck. Copies of weighing certificates trucks taken on dated 23/09/22 for vehicle numbers GN 1106-Z and GN 1108-Z were noted during the audit. If trucks are found to be overloaded the authorities impose a fine on the transporter. All weighing certificates verified during the audit confirmed that the vehicles are not overloaded.

The weights of every container load of cyanide are also stated on the Bill of Ladings of the shipment which are issued by the shipping line.

The operation has a Maintenance Procedure that outlines processes for Preventive and Corrective Maintenance.

Maintenance programs are planned and categorized into Maintenance A, B and C. Maintenance A are carried out after every 350hrs or 15000Km, Maintenance B is carried out when a vehicle has done 700hrs or 30,000Km and Maintenance C, 1050hrs or 45,000Km.

Trailers are serviced during this routine maintenance of vehicles. Each vehicle has a servicing sticker on the right side of the wind screen that shows the date it was serviced and the next servicing date. The number of hours or kilometers on the odometers that a vehicle has done is noted on the vehicle pre-departure checklist during inspection and prior to departure to the mine site. Defects noted on vehicles during inspections are repaired immediately before departure. If any defect is picked up during pre-departure inspection of the vehicles, a job card is raised by the Transport Supervisor and the defect(s) is/are rectified.

Bollore Transport and Logistics Ghana does not subcontract any of its cyanide transport activities.

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:

BTL has a procedure to ensure that cyanide is transported safely to mine site intact. Cyanide briquettes are packaged within a woven polypropylene bag with a PVC (plastic) liner and encased in wooden Intermediate Bulk Containers (IBC's). The bag is sealed to prevent moisture. The quantity of cyanide in each bag is 1000Kg. The packaging complies with the International Maritime Dangerous Goods Code (IMDG Code). As extra support the IBC's(ply-wood boxes) are strapped around with steel strapping which further support the packaging. The box is placed on a pallet to provide further protection during transit and to allow easy lifting and movement from one place to another. The IBC's are then packed into a 6 meter (20 foot) sea freight containers.

Twenty (20) boxes are in each 1x20ft container. The sea container doors are secured with a seal with a unique seal number. The quantity of cyanide, container number and packing list are stated on the shipping documents prepared by the shipping company to cover the consignment.

BTL Ghana has a "Convoy Identification Transport Units and Loading form" which is completed prior to a convoy departing to a mine. The form details the vehicle number, trailer number seal numbers of the cyanide containers and name of the drivers. The form is signed off by the Escort leader, Police and Gendarme (in Burkina Faso).

Waybills are issued for each load that a vehicle carries. The waybills have seal numbers on them. Personnel at the designated mine receiving the consignment signs and stamps it to authenticate that the product have been received intact or in good condition.

Trailers are fitted with eight twist locks to secure the containers. Before the shipment departs from the port, it is the responsibility of the Escort Leader and the driver to check the condition of each container as well as whether the seals are still intact on the doors.

En-route to the mine, the Escort Leader checks the condition of the containers as well as whether they are still properly secured to the trailers any time the convoy stops for a brief rest. The gendarme from Burkina Faso, takes over from the Ghana police and joins the convoy at the Burkina Faso side of the border." A Trailer Trip Checklist for Transport of Containerized Solid Sodium Cyanide form" is completed daily whilst the convoy is on the road to the mine. Ghana Customs tracking devices are fixed on the containers to track them and ensure that the containers have crossed the borders of Ghana.

Placards are used to identify the shipment as cyanide as required by International standards as well as the IMDG code and are conspicuously displayed on all four sides of a container. The TMP, indicates that cyanide containers should be marked by the required placards. The cyanide manufacturer has visibly placarded all four sides of cyanide containers as required by the IMDG code of Practice. The placards are Hazard Class 6(Toxic 6 label), Skull & Cross bones, UN number 1689, and Marine Pollutant labels.

In addition, the same required placards are on the vehicle, namely marine pollutant and hazard class 6 and cross bones are displayed in front and at the rear of the trucks. Placards are verified during pre-departure inspection and a Trailer Trip Checklist completed. Required placards were verified and noted.

The operations implement a safety program that includes vehicle inspections. Truck Inspections Checklist, Trailer Trip Checklist and Container Checklist are completed during inspections and prior to the departure of a convoy and also when on the road to the mine. Records of inspection checklists were noted. Job cards are raised for any defect

or fault detected during the inspection and defect rectified before the convoy departs. Copies of pre-departure checklist for selected trucks numbers were verified. The checklists have duly been signed off appropriately.

Vehicles are inspected at the workshop after each trip and any faults are rectified before they undertake additional trips. These inspections are carried out once the convoy stops to ascertain whether there are any defects or any fault that has arisen during the trip to the mine site. For defects reported, it was noted that work orders were generated by the Transport Supervisor and defects rectified at the workshop by the company's mechanic and signed off by him as job completed. The Workshop Manager then countersigns.

BTL Ghana has a Maintenance Procedure which guides both Preventive and Corrective Maintenance. Maintenance programs are planned and categorized as Maintenance A, B and C. Maintenance A is carried out after 350hrs or 15000Km, Maintenance B is done at 700hrs or 30,000Km and Maintenance C are done at 1050hrs or 45,000Km. Each vehicle has a sticker bearing the date it was serviced and the next servicing date. The number of hours or kilometers a vehicle has done is noted on the vehicle pre-departure checklist during inspection and prior to vehicles departing for the mine site. Defects noted on vehicles during inspections are repaired immediately before departure. Job orders are raised by the Transport supervisor and the job on a particular truck is done at the company's own workshop.

Records of Job cards for selected vehicles were verified. BTL Ghana has a tyre management process where tires are changed after a minimum depth of 3mm. Tires are inspected prior to embarking on each trip. No retreaded tires are used. Tires are also inspected by tire agents CFAO Limited and Michelin agent who is based in BTL's workshop. Maintenance records were verified.

BTL Ghana has a policy titled General Driving Rules (Documents No. BLX-AFR-HSE-POL-0001 Rev 2) dated 1st December 2020. The policy stipulates the following.

Maximum time allowed for continuous driving is 2hrs on laterite roads, and 3hrs on asphalt road. Drivers must take rest for a minimum of 30minutes after the 2hrs before continuing the journey.

- 20km when driving through villages
- 20km/hr when driving on road with works in progress
- 40kph when driving on outside roads, urban area and villages
- 50kph on driving in town on asphalt road
- 80kph when driving on asphalt roads out of town

Night driving is strictly prohibited. Permitted driving hours is from sunrise and sunset. From 6am to 6pm. The vehicles have Sky FMS GPS systems installed in them and is monitored 24/7 by the Trucking Manager during each trip to ensure that the convoy conforms to all the required driving regulations till they arrive at the mine destination.

The operations implements a safety program that includes; Vehicle Inspections, Health & Safety policy, Drug and Alcohol abuse prevention, Fatigue management all to ensure that drivers drive in accordance to the required procedures and the national regulations.

BTL Ghana has a policy titled General Driving Rules (Documents No. BLX-AFR-HSE-POL-0001 Rev 2) dated 1st December 2020. The policy stipulates the following.

Maximum time allowed for continuous driving is 2hrs on laterite roads, and 3hrs on asphalt road. Drivers must take rest for a minimum of 30minutes after the 2hrs before continuing the journey.

- 20km when driving through villages

- 20km/hr when driving on road with works in progress
- 40kph when driving on outside roads, urban area and villages
- 50kph on driving in town on asphalt road
- 80kph when driving on asphalt roads out of town

Night driving is strictly prohibited. Permitted driving hours is from sunrise and sunset. From 6am to 6pm. The vehicles have Sky FMS GPS systems installed in them and is monitored 24/7 by the Trucking Manager during each trip to ensure that the convoy conforms to all the required driving regulations till they arrive at the mine destination.

Trip Itinerary forms are completed for each trip. The form has the times that the convoy stopped on the road for rest and the times that it departed. Trip itinerary reports dated 26th October 2021 to 31st October 2021 and 21st to 28th April 2021, 8th September 2022 to 15th September 2022 were verified.

The TMP gives a vivid description of step-by-step processes when loading a container onto a truck. Trailer inspection checklist makes provision for checking that the twist locks and ensuring that they are secured firmly on the containers prior to the convoy's departure.

Any time the convoys stops for a brief rest and refreshment break, the twist lock as well as the entire containers are inspected, and conditions documented. These checks ensures that the containers do not shift, or slip form the trailer. Selected copies of completed Trailer Trip Checklists were sighted as a proof that the containers are secured with twist and stabilized to prevent shifting.

The operation has a detailed procedure (i.e., BLX-GHA-HSE-WI-0002 Rev 02) to address weather condition, civil unrest and crowd movement. The p*rocedure* states that the convoy is to suspend the delivery operations during civil arrest, bad weather condition, bridge collapse, mudslides, and other adverse conditions. The Escort Leader is to stop the convoy and park at a safe location until any civil unrest or violence and bad weather conditions are over.
The RRA covers various conditions such as severe weather conditions, and violence or civil unrest. The Emergency Response Plan also addresses same.

BTL has an Alcohol and Substance Abuse Policy that prohibits the use of drugs and alcohol whilst at work. Alcohol tests are performed periodically by the Escort leader. A breathalyzer is used for carrying out the random alcohol test.

After random alcohol test, a checklist is completed with the name of driver, test result, date and signature of the Escort leader. Records of completed alcohol test checklists were verified.

Calibrated breathalizer device is used for the alcohol tests. A copy of calibration certificate of the breathlyzer and HCN gas detectors were reviewed. The punishment of drug and alcohol abuse is suspension and some cases dismissal.

The operation has a document control and retention procedure in clause 18 of the TMP. BTL Ghana has a procedure titled "Structure and Control of Documents" which mentions when and how documents are retained and years that have to be kept before disposal. Documents are retained for a minimum of 5 years. All documented evidence of the above activities were verified by the auditors.

Bollore Transport and Logistics Ghana does not subcontract any of its cyanide transport activities.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

BTL Ghana has a means of communicating with the mining operations, cyanide producer and outside responders. Communication is by cell phones, two-wayradios and satellite phone. Communication via emails and phone are also done between BTL Ghana and the mine (Endeavour Mana Semafo mine) as well as the supplier (Samsung C & T).

Each vehicle in a convoy is fitted with a GPS SKY FMS. Prior to departure of the convoy, emails are sent to the mining company by the Customer Service Officer of BTL. Emails are sent twice in day to the mine to inform them about the locations of the convoy till it reaches the mine site.

The GPS system is monitored 24/7 by the GPS Tracking Coordinator. Emergency responders are communicated to via cell phones and satellite phones.

In Ghana communication is done with service provider MTN and Vodafone. Once the convoy crosses the border to Burkina Faso the escort leader switches to the use of Orange mobile network.

All the communication equipment is detailed in the ER equipment checklist. Emergency contact list has contact cell phone numbers of outside emergency responders. GPS reports were verified in real time by the auditors. Contact list of emergency telephone numbers for the various stakeholders namely mine personnel, cyanide supplier and emergency responders were noted. Vehicle with registration numbers GN1108-Z was tracked in real time.

All communication equipment is periodically inspected and tested by the Escort Leader. The Escort leader is responsible to ensure that all the required equipment is tested. Equipment checklist is completed and signed after an inspection. It is the responsibility of the Escort Leader to check the communication equipments and record the findings on the Equipment Checklist. Prior to departure of the convoy, all mobile phones and radios are inspected and fully charged.

There are no black out areas identified on the road. BTL Ghana has made provision by using two service providers which are MTN and Vodafone sim cards in case one phone network accidentally drops whilst on the way to the mine site the escort leader can fall on the other. In Burkina Faso, Orange network is used during the trip. The Satellite phone is also used as back up.

The GPS tracking system tracks the progress of the convoys 24/7 by the Tracking Coordinator till the convoy reaches the mine site destination. The TMP states that emails and WhatsApp messages are the preferred means of updating all stakeholders on the progress of the convoy each day prior to arrival at the mine site. Evidence of emails sent to the mine and supplier as well as WhatsApp messages were verified. In case of unforeseen road diversion during a trip the escort leader quickly communicates to all concerned including the mine and BTL office.

When noticed on the GPS that a convoy has stopped, the escort leader is contacted by the Tracking Coordinator for him to explain the reason for the stoppage. BTL management is then informed, and emergency response triggered when necessary. In case of over speeding of the convoy, an alert is automatically sent by the GPS to the Tracking Coordinator who will take the necessary action. Tracking reports of each convoy are downloaded each

day and sent to the Transport Manager, Logistics Manager and the QHSE Manager for their review. Real time monitoring of a couple trucks was witnessed.

Shipments are cleared by the Clearing and Forwarding department of BTL Ghana. Copies of Bill of Lading # MAEU913259735 dated 3/11/21, MAEU 913259984 dated 15/11/21 and MAEU9135985508 dated 31/12/ /21 were noted. The Bill of Ladings specify the quantity of product, gross weight of the sodium cyanide, container numbers, seal numbers, the gross weights of each freight container, Shipper's information, Consignee's information, description of packaging and chemical name of shipment.

BTL issues waybills for each consignment which are submitted to the mine site representative to sign and keep copies on record to ensure that the containers have been received intact and in good condition. Copies of waybills numbers, 177094, 17705 and 177093 which departed on 8/1/22 were noted. Container interchanges which are issued by the port authority also indicate the condition of the container load of cyanide at the time of loading in the port. Container interchanges were noted.

Shipping records such as Bill of Ladings and packing list are received by Bollore Ghana from the supplier. The Bill of Ladings have the numbers of containers, date shipped, container numbers and gross weights of the containers. Copies of Bill of Lading were sighted. Each shipment is accompanied by an MSDS. The product MSDS is contained in the Emergency Response Plan. A copy of the product MSDS from the supplier is available with the Escort Leader. The MSDS is in the company's vehicle pre-trip checklist.

Bollore Transport and Logistics does not subcontracts any of its cyanide transport operations.

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

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

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

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

BTL Ghana has a detailed Emergency Response Plan which addresses all issues regarding incidents. The ER stipulates procedures to be adopted and actions required during all phases of emergency response management in case of an emergency during the transportation of solid sodium cyanide.

The ERP discusses the following.

- Descriptions of appropriate response actions for the anticipated emergency situation.
- Physical and Chemical form of cyanide
- Spill management and clean up
- Minimization of risk to the public, environment, employees, members of emergency response service, property and equipment.
- Roles of outside responders, medical facilities and communities.
- Incident investigation
- Emergency scenarios and roles and responsibilities. Different possible incident scenarios have all been addressed in the ERP
- Emergency contact numbers of all emergency responders both in Ghana and Burkina Faso
- Details of required Personal Protective Equipment (PPE's) for emergencies

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

The operation's ERP is appropriate for the transportation of cyanide from Tema-Offinso-Pong Tamale-Dakola-Ouagadougou - Mana Semafo mine site.

The TMP, RRA, and ERP have considered the road condition including rivers, slopes, curves, bridges, tarred and dusty road and road surface. The plan was reviewed and found to be appropriate for the activities it has been designed for as it addresses issues regarding road transportation of cyanide.

Clause 2 of the ERP describes the physical form of cyanide and chemical properties of cyanide. Cyanide being transported is white solid briquettes. It also mentions the chemical composition of sodium cyanide.

It describes the nature of cyanide and its packaging and other chemical properties. 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 placards identifying the product sodium cyanide. These placards are UN No. 1689, Toxic 6 and Marine pollutant labels. Neutralization processes in case of a spill are all noted in the plan.

The TMP describes that transportation is by road. Route surveys and RRA's were conducted for the transportation route from Tema port in Ghana to the mine in Burkina Faso.

BTL Ghana's ERP cross references the RRA document number MANA SEMAFO-BLX-GHA-HSE-WI-Revision 2 which considers all aspects of transport infrastructure such as the road condition i.e., gravelled or ungravelled, curves, bridges, water bodies, slopes, and villages and towns. Various conditions on the transportation route have been risk assessed.

The design of the vehicles has been considered in the ERP and is appropriate for the transportation of of sodium cyanide in IBC's. The ERP details the following specification of trucks that are used. These are as follows:

- 6x4 axle, 3 axle and 2 axle trailers with weight capacities of 70tons, 60tons, 53,5tons respectively equipped with twist locks and designed to carry sea containers.
- 6X4 axle trucks are equipped with twist locks carry 2x20ft

The brand of trucks used are Renault and MAN Diesel trucks having Hose Power (HP of 350 and 400).

The ERP details the various response actions during an incident. Clause 10 of the ERP describes the following scenarios and response actions during emergency situations. The following have been addressed vividly.

- Vehicle rollover with no spillage caused by driver over speeding while negotiating a curve to catch -up with Convoy.
- Vehicle rollover into a river caused by a driver veering off a narrow bridge with possible spillage
- Vehicle knocking down pedestrian/motor rider caused y rider not respecting convoy movement and forcefully manoeuvring his way through the convoy
- Extreme weather conditions i.e., severe rainfall and thunderstorm and road flooding
- Civil unrest/Crowed movement i.e., community agitations

The ERP describes the various roles of each of the emergency responders, escort team, drivers, the mine and the supplier in the above incident scenarios.

The ERP and describes spills and the various clean up and neutralization process to be followed.

ERP addresses the roles of emergency responders namely police, fire service, mine, and supplier(Samsung). The escort leader will activate a response by immediately taken initial actions at the incident site. The overall coordination and management of an incident is the responsibility of the escort leader in consultation with the QHSE Manager.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Bollore Transport and Logistics provides emergency response training to appropriate employees as specified in the ER Plan. Training matrix shows that annual refresher ER training are conducted for the employees. The company has planned training programs for drivers, escort team and other staff. Cyanide Awareness training and mock drills are covered in the ERP. ER training is organized annually. Records of Emergency response training held on 6th April 2021 and 23rd April 2022 were noted. Records of training attendance register were verified.

The company has a training plan(document. no. BLX-AFR-HR-002) which guide them on when a particular training was held and the next training dates. To ascertain the effectiveness of the training assessment of participants verbal assessments(questioning and answering verbally) are conducted.

Responsibilities of personnel as well as the emergency responders are specified in clause 7.1.2(Crises Management responsibilities and Sections A, B, C, D, E and F details the responsibilities of each ER responders.

The escort leader is responsible for the overall management of the incident. The escort team will cordon of the incident area, move any victim from there and will also be involved in cleanup of briquettes of cyanide. BTL Ghana will provide equipment for the recovery of container. Mine site will receive the container and also provide recovery equipment when necessary. Samsung which the supplier will offer technical support as appropriate. The Ghana police will assist in traffic management and also moving people from the incident site and write their report, protecting people and securing the incident site. The Fire fighters will be in charge of providing assistance to victims in the event of an emergency.

The Ghana Environmental Protection Agency will provide specialist advise and technical and regulatory advice. The escort leader will be responsible for administering 100% oxygen to a victim of cyanide poisoning. The Ghana Ambulance Service will be responsible for the transportation of a patient to the hospital as well as administration of oxygen to a person while on the way to the hospital. The hospital is responsible for the treatment and the administration of cyanide antidote to the patient in conjunction with oxygen.

Bollore Ghana Has notified Ministry of Environment Affairs in Bukrina Faso through their subsidiary office in Burkina Faso about its activities. The ministry will assist in providing technical advice in case of significant incident. No special transport permit is required in Burkina Faso.
The Civil Protection Agency, National Ambulance Service and police in Burkina Faso have been notified and will be called upon to assist in case of an incident. The police accompany the convoy from Burkina Faso side of the border to the mine site. The contact phone no's of all these stake holders are detailed in the ER contact list.

A list of emergency equipment is contained in the company's Emergency Response Plan. All the required first aid equipment and recovering equipment are listed in the ERP.

According to the ERP escort equipment is checked at regular intervals and before a cyanide convoy departs to the mine. The list of equipment's include.

- Oxygen apparatus
- Cyanokit

- First Aid kit
- Filters/canister
- Spare Full-face respirators and filters
- Tyvek overalls
- PVC gauntlet gloves/overalls
- Rubber boots
- HCN Gas detector
- Safety triangles
- Revolving top light
- 6kg or 9kg DCP fire extinguisher
- Signed sign board
- Shovels
- Cones
- Rubbish collector
- Broom
- Tarpaulin
- Bulk bags
- Plastic bucket
- Spray pack
- Reflector tape
- Ferrous sulphate
- Touch and spare batteries
- 200liters Water drums
- Water hose22. Danger flags
- Container belt to hold drum
- Danger flags/traffic warden light
- 2 Way radios
- Car Radio charger
- Satellite phone
- Mobile phone
- Call credit
- Distress device
- Alcohol test kits
- Megaphone
- Digital camera

Cyanokit is stored according to manufacturer's recommendations. Oxygen gas cylinder is periodically checked for Oxygen levels

The HCN gas and the Breathalyzer have been duly calibrated. Calibration certificate number GE 22108 dated 23rd May 2022 expiring on 23rd May 2023 for HCN gas detector with serial number J619-Z009720 and GE22109 dated 23rd May 2023 for HCN Gas detector with serial number J619-Z009718 were noted. A breathalyzer with a serial number TB15H0034 with calibration certificate number AG22033 done on 6th July 2022 was noted. The calibrations of the HCN gas detectors and the Breathalyzer were done by Ultimate Resurgence Services in Ghana.

The Emergency Response Equipment are available and ready for use should they be required. Emergency equipment are carried in the escort vehicle during the journey. The Escort leader is responsible for the equipment. The equipment is kept intact in the company's store.

The emergency response equipment is periodically inspected, and equipment checklist completed. The ER equipment are also checked before commencement of a journey. ER equipment were verified by auditors during the audit.

Bollore Transport and Logistics does not use subcontractors for the transportation of cyanide.

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:

BTL Ghana has an ERP that has current contact information and a process for notifying external responders, regulatory agencies, hospitals, and other stakeholders. The list includes regulatory agencies in Ghana and Burkina Faso.

The plan contains current emergency contact list of all external responders including regulatory agencies (EPA) and Endeavour mining Mana Semafo mines. The QHSE is responsible to ensure that the contact numbers and email addresses of all the stakeholders are current. In case of incident, it is reported to the relevant competent authorities and emergency responders as required. The Ghana Environmental Protection Agency, mining client and affected community (notification done by the EPA), Police Fire Service and Ambulance are notified.

Revision of internal and external notification and reporting procedures is the responsibility of the QHSE Manager. Clause 7.2 of the ERP mentions that the ER contact numbers are reviewed, and contacts confirmed annually and when necessary. A test conducted on selected contact phone numbers proved that the contacts were active. The telephone numbers of Kintampo Municipal Hospital, Ghana National Fire Service in the town of Walewale and Police Station Bolgatanga were called, and the contacts found active.

Clause 7.1.1. of the ERP states that in an event of the following significant cyanide incident the company will notify ICMI about it.

- 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.

The Procedure was verified and noted in the ERP.

No significant incidents occurred during past three years

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:

Part D of page 28 of 47 of the ERP addresses the following recovery and neutralization processes.

1. Recovery of solid or solution
2. Neutralization of the removal of soil
3. Treatment and/or disposal of excavated soil
4. Treatment and/or disposal of recovered cyanide
5. Recovery and treatment of ground water

The procedure states that soils contaminated by cyanide residues will be removed during clean-up and will be conveyed to the mine site where it will be disposed off by the mine appropriately.

The transporter's ERP states that use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide is prohibited and that under no circumstances should they be released into surface water.

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:

As per the ERP, the plan is reviewed at least every once a year and as and when is necessary. The annual review will be initiated in accordance with BTL Ghana's document control system. The QHSE manager is to ensure that the Emergency response plan is reviewed and evaluated. The ERP has been reviewed in 2021 and 2022. Copies were verified by auditors.

Mock drills are organized once a year for all staff. Clause 8.2 of ERP makes provision for annual emergency response drills. Cyanide Emergency response exercises are conducted annually involving drivers, escort team and other logistics staff. The QHSE department is responsible for organizing the drills. The training matrix also makes provision for mock drills to be conducted once annually. Mock drills are reviewed and evaluated. and any corrective action plan put in place. Records of mock drill reports dated 23rd April 2022 and 16th August 2022. The report includes incident scenarios, non-conformities and corrective action plans.

The operation has a procedure to evaluate the plan's performance after its implementation. The ERP makes provision for periodically reviewing and evaluation of the procedures. Mock drills organized on 23rd April 2022 and 16th August 2022 show that the mock drills were repeated to ensure perfection. The head of logistics, head of transport and workshop, Quality and Safety Manager, Samsung C&T representative, and Endeavour Semafo mine representative notified after the evaluation.

Following any incident, lessons learned are used to trigger the evaluation of the ERP. Non-conformances noted during the previous mock drills were recorded and attended to. Mock drills are evaluated through debriefing and corrective action plans put in place to correct any lapses. All the non-conformities in the mock drills are rectified when the drills are repeated. The corrective action plans are used to revise the ER procedures.

No incidents occurred during past three years recertification period