INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Transportation Summary Audit Report Form

For The International Cyanide Management Code

www.cyanidecode.org

December 2016

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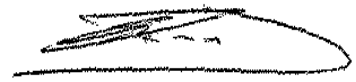
Coleman Transport Walvis Bay. Namibia		23rd June 2017
Name of Facility	Signature of Lead Auditor	Date

SUMMARY AUDIT REPORT
FOR CYANIDE TRANSPORTATION OPERATIONS

Instructions

1. The basis for the finding and/or statement of deficiencies for each Transport Practice should be summarized in this Summary Audit Report. This should be done in a few sentences or a paragraph.

2. The name of the cyanide transportation operation, lead auditor signature and date of the audit must be inserted on the bottom of each page of this Summary Audit Report.

3. An operation undergoing a Code Verification Audit that is in substantial compliance must submit a Corrective Action Plan with the Summary Audit Report.

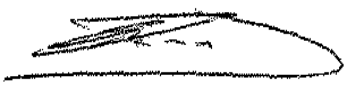
4. The Summary Audit Report and Corrective Action Plan, if appropriate, for a cyanide transportation operation undergoing a Code Verification Audit with all required signatures must be submitted in hard copy to:

International Cyanide Management Institute (ICMI)
1400 I Street, NW, Suite 550
Washington, DC 20005, USA

5. The submittal must be accompanied by
   1) a letter from the owner or authorized representative which grants the ICMI permission to post the Summary Audit Report and Corrective Action Plan, if necessary, on the Code Website, and
   2) a completed Auditor Credentials Form. The lead auditor's signature on the Auditor Credentials Form must be certified by notarization or equivalent.

6. Action will not be taken on certification based on the Summary Audit Report until the application form for a Code signatory and the required fees are received by ICMI from the applicable cyanide transportation company.

7. The description of the cyanide transport company should include sufficient information to describe the scope and complexity of its operation.



Coleman Transport Walvis Bay. Namibia		23rd June 2017
Name of Facility	Signature of Lead Auditor	Date

COLEMAN TRANSPORT SUMMARY AUDIT REPORT

Name of Cyanide Transportation Facility:	Coleman Transport Walvis Bay Depot Namibia
Name of Facility Owner:	Coleman Transport, Rosh Pinah. Namibia
Name of Facility Operator:	Coleman Transport, Rosh Pinah. Namibia
Name of Responsible Manager:	Mr. Johan Oosthuizen
Address:	2426 Moses Garoëb St, Walvis Bay.
State/Province: Country:	Walvis Bay. Namibia.
Telephone:	+264 64 221 105/7
Fax:	+264 64 221 106
E-Mail:	oosie@coleman-transport.com

Walvis Bay Depot.
Physical address – 2426 Moses Garoëb street, Walvis Bay. Namibia
Telephone number - 00264 64 221 105 / 7
Fax - 00264 64 221 106
E-mail address - oosie@colemantransport.com

Head Office.
Physical address – 169 Kurper Road, Rosh Pinah, Namibia.
Telephone number - 00264 63 274 479
Fax - 00264 63 274 478
E-mail address - info@colemantransport.com

SUMMARY AUDIT REPORT

Location detail and description of operation:

The Coleman Transport Depot is situated at number 2426 Moses Garoëb St, Walvis Bay, Namibia with their Head Office been based in Rosh Pinah, Namibia.

Coleman Transport is a registered transport Company registered with the Namibian Department of Transport which transports various types of products (classified and low hazard) in Namibia as well as to and from neighbouring countries. The vehicles are registered with the authorities as carriers of classified (category “D”) and general cargo (category “G”)

The transporter is in the process to enter into a contract with the Consignor and Consignee for the transportation of sodium cyanide in briquette form from the Port of Walvis Bay tomthe end user situated within the borders of Namibia.

In terms of the business contract between the transporter (the operator) and the Consignor / Consignee, Coleman Transport will be operating as an individually certified road transporter and no sub-contractors will be used to assist with the transportation of any of the freight containers loaded with Sodium Cyanide. .

All of the dedicated truck tractors and trailers are owned by Coleman Transport. The truck tractor drivers are full time employed by the transporter with average of 5 years experience in driving of heavy vehicles.

The maintenance records of vehicles still under warranty are kept with the dealership and those been fully paid are kept at the depot in Walvis Bay. During the audit no overdue service of any of their vehicles were noted. Maintenance records and documentation were found to be updated and properly filed.

The dedicated truck tractors and trailers are stalled within a properly fenced off depot yard in Walvis Bay from where they will be dispatched from to the consignee's premises via the port of Walvis Bay. After been loaded the vehicles depart directly to the Consignee’s gold mine.

Travelling distance from Walvis Bay to Consignee’s premises can be done with daylight. For this reason night driving is absolute prohibited. .

The movement of vehicles are controlled by utilising a tracking system which is controlled from the Coleman Transport Head Office based in Rosh Pinah, the tracking Company itself as well as from the Deport Manager’s cellular phone in Walvis Bay.

De-stuffed Sodium Cyanide freight containers will be returned to the Walvis Bay Port where it will be off-loaded and forwarded to the Cyanide manufacturer. No nominally empty freight containers will be stacked at the transporter’s depot.

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Defining of acronyms and/or abbreviations.

- RRA, Route Risk Assessment
- SDS, Safety Data Sheet also known as Material Safety Data Sheet (MSDS)
- SADC, Southern African Developing Corporation
- SABS, South African Bureau of Standards.
- SANS, South African National Standard
- COF, Certificate of fitness
- IMDG, International Maritime Dangerous Goods Code.
- ERP, Emergency Response Plan
- EMRP, Emergency Management Response Plan
- ER, Emergency Response
- MSDS Material Safety Data Sheet for the product
- PPE Personal Protective Equipment
- Bakkie Light Duty Vehicle with a maximum load capacity of 1 ton. Also known as a LDV.
- HCN gas Hydrogen Cyanidegas.

SUMMARY AUDIT REPORT

Auditor's Findings.

This operation is

X in full compliance

□ in substantial compliance *****(see below)

□ not in compliance

with the International Cyanide Management Code.

***** For cyanide transportation operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company: T.B. Müller
Audit Team Leader: E-mail: tommieb.muller@gmail.com
Names and Signatures of Other Auditors: None
Date(s) of Audit: 13th to 15th February 2017

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

I attest that this Summary Audit Report accurately describes the findings of the Pre-Operational Verification audit.

I further attest that the Pre-Operational Verification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Coleman Transport Walvis Bay. Namibia		23rd June 2017
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SUMMARY AUDIT REPORT

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

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

X in full compliance with

The operation is
- □ in substantial compliance with Transport Practice 1.1
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Procedure number CT.HSE.4.7.1 Rev 00 dated 10/1/2017 noted. This procedure requires that all possible routes from the port of Walvis Bay to the end user must be evaluated RRAs on both these routes were conducted and such have been documented. During the RRAs on both the selected routes, various potential hazard types such as the condition of the road surface, the pitch of the road, potholes, trees, stray animals, traffic on the roads and through towns, pedestrians, fog, smoke, sand, rail tracks, rivers, bridges, sand storms, etc have been evaluated and noted in the assessments. Recommended preventative actions to mitigate or eradicate the risks are included in RRA summary. RRA procedure is in place and approved. Route Risk Assessment number CT.RRA.009 Rev 00 dated 14/1/2017 noted and found to be relevant.

Findings / observations during RRA conforms to requirements as stipulated in procedure. Extra precautionary measures that are to be taken by the drivers whilst on route are included on RRA summary under the heading "additional precautions to be taken".

Namibian legislation do not require an escort vehicle to lead a convoy when transporting cyanide, however due to the demand from the Consignee the transporter agreed to respect this requirement. Transporter will make use of a bakkie equipped with all the required emergency equipment that will be needed during an unwanted event. Spill kit and first aid kit are available)

Clause 4 of procedure CT. RRA. 009 Rev 00 dated 14/1/2017 and clause 5.1 of procedure CT.SOP. 071 dated 10/1/2017 respectively require re-evaluation of the RRA to be conducted on at least an annual based.

External responders (police and emergency services and Hospitals (medical facilities)) along the route who will play a role during an emergency were visited and informed. Proof of such visits was noted. Product SDS handed to each of them.

In accordance to De-briefing procedure number CT.SOP.122 Rev 00 dated 2/2/2017, it is a requirement that during the de-briefing session, the escort leader or driver will be given the opportunity to report on areas of concern on the route or areas, according to them, being unsafe to travel.

Coleman Transport do not outsource any of the cyanide transport activities to sub-contractors. The outsourcing of any cyanide transport activities to sub-contractors is prohibited. Paragraph 5.3.4 of procedure CT.SOP. 071 Rev 02 dated 10/1/2017 refers.

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

X in full compliance with

The operation is
- □ in substantial compliance with Transport Practice 1.2
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Drivers employed as dangerous goods drivers must be older than 25 years of age. Namibian legal requirement and must be medically fit for the duty.

Drivers are legally licensed as a Professional Heavy Duty Driver Category PrDP "D" (Dangerous Goods) drivers, and is renewed every two years. Namibia have adopted the South African requirements for driver involved in the transportation of classified goods, as no such legislation exists in Namibia. A SADC agreement. Drivers have attended and passed their dangerous goods training course as required by the South African National Road Traffic Act and the SABS code of practice number SANS 10231:2014.

Dangerous goods training for drivers transporting classified goods are required to attend and pass dangerous goods training course (practical and theoretical) which must be presented by and approved and registered training institution. Training of such is an annual requirement. Certificates as well as training course material was sighted. Divers have also attended and passed their 2 yearly level 1 basic first aid training course. Certificates are still valid. Certificates sighted. Training and legal requirements for drivers are included in an Excel spreadsheet-based training matrix.

Drivers are not directly involved in the physical loading and or off-loading of containers. Only once container have been loaded onto the skeleton trailer, the driver ensures that the container is properly secured to the trailer by engaging all four twist locks.

Coleman Transport do not outsource any of the cyanide transport activities to sub-contractors. The outsourcing of any cyanide transport activities to sub-contractors is prohibited. Paragraph 5.3.4 of procedure CT.SOP. 071 Rev 02 dated 10/1/2017 refers

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

	X in full compliance with
The operation is	☐ in substantial compliance with Transport Practice 1.3
	☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Technical specifications for truck tractors and skeleton trailers available. Specifications are recorded in "Overload procedures" with reference number CT.SOP.060, Rev No. 0, dated 18/1/2017. Truck tractors and trailers are manufactured against the specifications. Truck tractors been maintained according to manufacturer's specs as well as in accordance to SANS (South African National Standards) Codes 10231-1:2014. Skeleton trailers been serviced once per month See clause 6.3.4 of procedure CT.SOP. 001 Rev 0 dated 14/1//2017. "Company's preventative maintenance procedures". Truck tractor are serviced every 30 000 kilometres. Daily pre-trip checks done on vehicles prior to departing from depot. COF's on all truck tractors and trailer done annually. Control document kept at Rosh Pinah (head Office of Coleman Transport).

The trailer manufacturer's rating of the loading capacity of such transport equipment is rated at max mass of 32 000 Kg which is adequate as a container packed with sodium cyanide has a mass of max 22 000 Kg. Only one 6 meter container will be loaded onto a trailer. Should two containers (44 000 KG) be loaded on a trailer, the loaded mass will exceed the manufacturer's load-bearing limit of 32 000 Kg per trailer.

Pre-trip checks are performed before transport departs from depot. Regular servicing of truck tractors and trailer are done. No overdue servicing was noticed. Vehicle out of warranty period are serviced in accordance to the manufacturer's requirements.

Coleman Transport do not outsource any of the cyanide transport activities to sub-contractors. The outsourcing of any cyanide transport activities to sub-contractors is prohibited. Paragraph 5.3.4 of procedure CT.SOP. 071 Rev 02 dated 10/1/2017 refers

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

	X in full compliance with
The operation is	☐ in substantial compliance with Transport Practice 1.4
	☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Container collection procedure noted. Clause 6.3.6. of "Loading procedure" refers to the checking of the integrity and condition of the container once loaded onto trailer and the proper securing of the container on top skeleton trailer by applying the twist locks into locking position. Clause noted.

Transport signage format and styling dictated by the Namibian Government Notice number 156 of the Labour Act of1992, Regulation number 177 that refers to the labelling of transport vehicles transporting of hazardous substances, requires format to be in line with recommendations of the United Nations, read in conjunctions with the requirements of the IMDG code of practice and the South African SABS Codes of Practice, SANS code 10232-1:2007 clause 4.4.2. Freight containers will be placarded with split placards on all four sides. Once freight container is been loaded onto the trailer and before departure on route, an orange diamond sign will be displayed to the front of the cab of the truck tractor. Split placards will consists of the UN number of the product and the hazard class diamond (in this case 6.1)

Truck tractors are serviced at 30 000 km intervals with a 2 000km variance both sides. Trailers are serviced every month. The transporter's vehicle preventative and maintenance program was found to be sound and sufficient to ensure the safe transportation of the cyanide. Any maintenance of what mature on a vehicle have been documented and filed on the respective vehicle's file.

Procedure "Fatigue Management & Drivers Hours Policy, number CT. HSE. Fatigue Policy with Rev No. 01 dated 11/1/2017 found to be in place and enforced. Deliveries are all in a 12 hour travel distance. Legal driving hours requirements of not more than 14 hours in a 24 hour cycle.

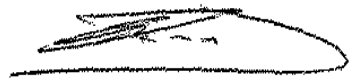
The escort leader can suspend transhipment if any condition is been observed or prevails, which could cause interruptions of the transport convoy. Conditions such as road closures, road works, inclement weather, breakdowns and civil unrests can lead to the suspension of the movement of the convoy. Escort Leader procedure T. SOP. 070 Rev No.0 dated 15/1/2017 clause 1.5 stipulates the responsibility of the escort leader. The escort leader to communicate to the Transporter Management in Walvis Bay any delays experienced en-route of changes in the planned routes or the temporary suspending of the transportation of the cargo.

Drivers been subjected to annual medical screening conducted by an Occupational Medical Practitioner based in and around Walvis Bay.

A Drug & alcohol policy is found to be in place. Daily alcohol tests been conducted on all employees & visitors Proof of such activity available at the Depot. Alcohol tests will also be conducted on drivers before cyanide transportation commences to ensure that they have no traces of alcohol in the system. During pre-employment medical test applicants are subjected to a drug & alcohol test. Test results to be negative before employment contract is signed. Random selection of current drivers files were scrutinised and checked. Copies of such tests that have been conducted, noted. Results of drug & alcohol tests that have been performed on drivers noted

Paragraph 5.4.3(g) of the procedure No. CT.SOP 071 Rev No. 0 dated 10/1/2017 addresses the retention of documentation. Cyanide record retention period matrix compiled and available. Information in document reveals the periods of retaining documents as per Namibian and Company requirements. Maintenance records on vehicle to be archived for the life of the vehicle. Personnel files to be archived for a minimum period of 30 years. Records are kept in archive at transporter's head office based in Rosh Pinah. Matrix requires documents to be kept for a minimum period of 5 years. Retention Period Matrix noted.

Medical certificates of the three (3) identified drivers were scrutinised and found to be on their personal files. Medical test results reveal that test results to be negative. Random alcohol tests also been conducted after employee's lunch breaks.

Coleman Transport Walvis Bay. Namibia		23rd June 2017
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Paragraph 5.4.3(g) of the procedure No. CT.SOP 071 Rev No. 0 dated 10/1/2017 addresses the retention of documentation. Cyanide record retention period matrix compiled and available. Information in document reveals the periods of retaining documents as per Namibian and Company requirements. Maintenance records on vehicle to be archived for the life of the vehicle.

Hazardous Chemical Substances Regulation of the South African Occupational Health & Safety Act, Act 85 of 1993 requires that personnel files to be archived for a minimum period of 30 years. Records are kept in archive at transporter's head office based in Rosh Pinah.

Matrix requires documents to be kept for a minimum period of 5 years. Retention Period Matrix noted.

Coleman Transport do not outsource any of the cyanide transport activities to sub-contractors. The outsourcing of any cyanide transport activities to sub-contractors is prohibited. Paragraph 5.3.4 of procedure CT.SOP. 071 Rev 02 dated 10/1/2017 refers.

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

X in full compliance with

The operation is
- □ in substantial compliance with Transport Practice 1.5
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

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

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

X in full compliance with

The operation is
- □ in substantial compliance with Transport Practice 1.6
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The main means of communication between escort leader, driver and Transport Company is via cell phone. Escort leader / driver do not communicate with the Consignee. Only in case of an emergency the escort leader is allowed to contact the emergency responders. A Company cellular phone is allocated to theescort leader and the truck drivers. During walk about mobile phones were noted and checked for functionality. Drivers also have personal cell phones as back-up. Daily trip checklist and briefing session includes check/verification of cell phone functioning.

During the conducting of the RRA, no communications blackout areas were identified. In the event of a black-out area, drivers and escort leader been issued with two way radios that can be used to establish communication with one another. In the event of a cell communication break-down, alternate arrangements have been made with the escort leader which includes telephone report-in at beginning and end of blackout areas.

The Ops Controller at random calls the escort leader / drivers en route to determine their position and compare that info with the image on the tracking system.

All truck tractors are fitted with a tracking device (Scannia's own tracking system) System is manned 24/7. The Satellite Tracking System is used for constant monitoring the movement of the consignment and it is done from the Coleman Transport Control Room based in Rosh Pinah. System sighted and found to be operative.

Coleman Transport do not outsource any of the cyanide transport activities to sub-contractors. The outsourcing of any cyanide transport activities to sub-contractors is prohibited. Paragraph 5.3.4 of procedure CT.SOP. 071 Rev 02 dated 10/1/2017 refers

The operation has systems in place to test radios and GPS systems. The Escort leader's responsibility to ensure that the all mobile phones and two way radios are checked and tested to ensure functionality and that the batteries are fully charged. The same procedure applies for their two way radios. Findings to be recorded. It will also be required from the drivers when conducting their pre-trip checks to also include the checking of their communication system i.e. two way radios, cellular phones. Findings to be recorded on pre-trip check sheet. Any deviation / non conformance to be reported to the Depot Manager or escort leader. Pre-trip checklists to be retained for a minimum period of 90 days after delivery was made.

Testing of the vehicle tracking system (GPS) is carried out daily between the drivers and the transport controller.

The movement of the vehicles are monitored 24/7 from the Rosh Pinah Transport Control Office. Operations Controllers at the Rosh Pinah Control room will be alerted on the departure of the convoy and should any of the vehicles move out of their set routes the depot in Walvis Bay will be notified. Communication from Convoy leader vehicle to Depot (and vice versa), The Global Positioning System (GPS) system is also linked to the cell phone of the Operations Manager which he uses to track the vehicles position on route The Operations Manager demonstrated to audit how the system on his cell operates.

Mass of cyanide in each freight container is indicated on the freight documents, the dangerous goods declaration as well as on the delivery documents. Vehicle will carry a Tremcard, trip sheet, dangerous goods declarations, driver's hazchem training certificate, delivery document and SDS. Legislation requires that aforementioned documents must available in the designated document box of the loaded vehicle. Designated box affixed to the front of the vehicle's cab as well as in the escort vehicle. A copy of the product SDS is available in the office of the office of the Depot Manager in Walvis Bay as well as in the 24/7 Control office at Rosh Pinah.

Available product SDS found to be not "older" than 3 years as required by legislation.

(Due to the sensitivity of security issues regarding storage of cyanide, no descriptions of substantial or non-compliance with this aspect of the Transport Practice should be provided.)

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

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

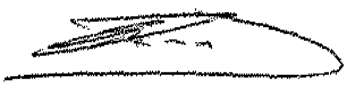
X in full compliance with

The operation is
- ☐ in substantial compliance with Transport Practice 2.1
- ☐ not in compliance with

*Summarize the basis for this Finding/Deficiencies Identified:**

These questions are not applicable as no storage of Sodium Cyanide will be done on the premises. Load at Namport and off to the Consignee at B2Gold mine.

Containers loaded with Sodium Cyanide are loaded at Namport where after the convoy departs to the Consignee where it will be off-loaded. No interim storage of Sodium Cyanide will be done at the transport depot.



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

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

X in full compliance with

The operation is
- ☐ in substantial compliance with Transport Practice 3.1
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Cyanide (in briquette form) will be transported by road stacked in freight containers. No product will, be transported by rail or air. Sodium Cyanide will enter Namibia through the port of Walvis Bay.

An "Emergency Preparedness and Spill Contingency Plan" number CT. SOP. 083 Rev No. 0 dated 1/2/2017 for the handling of a cyanide (in solid form) off-site emergency situation is available at the transporter's office in Walvis Bay of which a copy is kept at their Rosh Pinah offices where they do have a 24/7 control centre. The contents of this plan spell out each role players duties and are relevant to the cyanide transport operation by road. A list of Emergency Contact numbers is included into the plan.

The transporter has entered into a contract with NAM Chemicals, an approved spill response and cyanide first aid service provider who will be activated to respond in the unlikely event of an accident / incident where Sodium Cyanide has been spilt. Contract noted by auditor.

This plan does make provision for the actions of the lead escort driver and those drivers not directly involved in the accident / incident.

The transporter's Emergency Management Response Plan (EMRP) defines the roles that outside responders, medical facilities and or communities have to play during an emergency situation. A *flow diagram clearly spells out the duties of each of the role players during an emergency situation.*

The transporter does have a container stocked with all the required equipment that will be needed during an incident. The escort leader will be responsible to take stocked container along during the transhipment of the cyanide. This is done due to the lack of resources at some of the Municipal Emergency Services. The EMRP will be revised annually or as a result of leanings gathered from Emergency Response drills, incidents or additional information obtained from external resources. Clause 6.7 of procedure refers. Clause noted.

The Emergency Management Response Plan was forwarded to the Consignor (AGR Australia) for attention Mr. Ed Beard who acknowledged having received it.

Emergency response to cyanide releases associated with transportation is channelled through the Transporter's Depot based in Walvis Bay where after their Emergency Response Protocol for off-site incidents will be activated. Appropriate response teams, based upon geographical location and circumstances will be mobilised.

Coleman Transport will not directly be involved in clean-up response as their role during an emergency situation will be one of providing assistance where and when required. The entire emergency situation will be handled by the local Emergency Services in the affected area un conjunction with their approved spill clean-up service provider Namchem. Should the unlikely incident is close to the Consignee's facility, latter will assist with their emergency team.

It has been arranged that any contaminated material / soil will be disposed of at the Consignee's facility where they do have the capacity to perform this task.

During the audit it was noted that the trailers onto which the 6 meter freight containers will be stacked are fitted with four twist locks with which the containers will be secured to trailer frame. It was further noted that the twist locks were operative and signs of been services was noticeable.

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

X in full compliance with

The operation is
- ☐ in substantial compliance with Transport Practice 3.2
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The escort vehicle drivers the truck drivers attended the basic first aid course which was presented by approved service provider. They also attended a course in the transportation and handling of dangerous goods. Latter training is required by Namibian legislation before a driver will be issued a Professional driving permit (PrDP-D). During Dangerous Goods handling course, basic fire fighting was also presented. By law refresher training in Dangerous Goods handling must be attended annually. A PrDP is valid for a period of two years.

Before a driver is allowed to attend a DG Handling training course and before a PrDP "permit will be issued to such applicant, he/she must be certified medically fit. These certificates were issued by a Professional Health Practitioner. This was found to have been done, valid and on record. Documents noted by auditor..

Training and awareness sessions for medical, emergency staff and traffic officers were held to understand cyanide emergencies. During December 2016 cyanide awareness training was presented by Consignor representative (Mr. Ed beard) to the drivers and the escort leaders. Attendance register for latter training was completed and kept on record. Documents noted.

Namchem the Company's appointed spill recovery and rehabilitation of an effected area was also informed re the hazards of sodium cyanide. Relevant cyanide procedures were used as training manuals and for drivers and escort leaders were subjected to theoretical questionnaires and record of these training was found on file. Clause 6.2.5 of procedures number CT. SOP. 071 and clauses 2.1 and 6.3 of procedure CT. SOP. 083 respectively refer to training and refresher training(annually) to be given to employees and service providers.

The responsibilities of response personnel have been identified and stipulated in the Emergency Response Plan. Clause 6.7 "Responsibilities" of the ER Plan spells out the expectations and responsibilities of each role player during an emergency situation..

The required emergency response equipment has been identified in the transporter's document CT.SOP. 070 Rev No. 0 dated 15/1/2017

Coleman Transport do not outsource any of the cyanide transport activities to sub-contractors. The outsourcing of any cyanide transport activities to sub-contractors is prohibited. Paragraph 5.3.4 of procedure CT.SOP. 071 Rev 02 dated 10/1/2017 refers

Coleman Transport do have their own cyanide emergency response equipment that will be available in the scort vehicle (bakkie) running along with each convoy, Escort leaders and drivers been issued with a basic kit of Personal Protective Equipment (PPE) (Hard hat, gloves, overall fitted with reflective strips, reflective vest, safety boots, safety goggles, respirator with appropriate canister). The PPE issued is in line with the required by product Material Safety Data Sheet (MSDS) . The list of PPE forms part of the Emergency Response Plan.

It is the responsibility of the escort leader, prior from leaving the Depot, to inspect emergency equipment. Inspections will be focused on the presence thereof, the availability and in good working order. Inspection findings recorded on inspection checklist. The inspection list form part of the Emergency Response Plan.

Equipment will be maintained and a separate check sheet for inventorying. The emergency equipment that's available and that is to be taken along by the escort is listed and forms part of the escort leader's vehicle checklist. Before departure it is required from escort leader to check the availability and effectiveness of such equipment.

HCN gas detector device is available and escort leaders have been trained in the use of the equipment.

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

X in full compliance with

The operation is
- □ in substantial compliance with Transport Practice 3.3
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

A written plan for dealing with off-site emergencies compiled and available.

The transporter has a protocol which stipulates who should be contacted available. Procedure found to be in place for the notification of appropriate parties in the event of a cyanide release during transportation thereof. ER Plan CT.RRA. 009 Rev No. 2 dated 9/12/2016 reflecting an up to dated telephone contact details. The entities been notified are the ones identified in the Emergency Response Plan with designated roles in the response namely that of NAMCHEM, EMED 24, Coleman Transport Management, Namibian radio stations, Consignor's emergency number, NAMPORT emergency services, B2Gold emergency number and the telephone numbers of each emergency responder (police, fire department, ambulance services) on-route. "Route Emergency Contact Numbers" with reference number CT.RRA. 009 Rev No. 0 dated 9/12/2016 noted.

The list of contact number was approved by transporter's Operations Manager. The list of telephone numbers included in driver's package which accompanies each driver on route. The availability of such list also forms part of escort leader's checklist.

The Transporter have formally appointed the Depot Manager as their Emergency Controller of which some of his duties are to keep the emergency contact telephone list updated and to submit reports to Governmental Authorities. The Emergency ERP to be updated yearly. Reporting document available and noted by auditor.

Approved documented procedure with reference No. CT.HSE 4.5.3 (no approval date) 1.2.1.1 Incident Reporting & Investigation Procedure in place for recording and investigating of non-conformances / Accidents / Incidents. The Namibian Environmental Management Act requires that any spillage of a chemical must be reported to the Department of Environmental Affairs.

Clause 6.5.2 of Transport Management Plan CT. SOP. 071 dated 10/1/2017 read in conjunction with clause 6.7 of Emergency Plan, stipulates that the Emergency Response Plan be revised at least twice per year or as a post-drill recommendation derived from an emergency drill that was held or after a real emergency situation. The process for the testing of the emergency telephone numbers will be that the available numbers physically be dialled. Should it be found that a number or some of the numbers are no longer in existence, or have changed, the list of emergency telephone numbers must be updated and circulated to all those who need to be informed.

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

X in full compliance with

The operation is
- □ in substantial compliance with Transport Practice 3.4
- □ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

The clean-up and rehabilitation process of an effected area have been contracted out to a commercial chemical remediation company, Namchem, who is based in Walvis Bay. This Emergency Spill Responder will be responsible for the clean-up of the contaminated soil / product and to remove such to B2 Gold mine where the waste will be disposed.

Should an unlikely event takes place close to the Consignee, latter's emergency response team will be deployed to assist with the clean-up of the scene.

Clause 6.4.2 of the Transport Management Protocol number CT. SOP. 071 rev no. 2 dated 10th January2017 forbids the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into dams or rivers.

The Namchem Emergency Spill Response Plan clauses 4.5.4(a) and 4.5.4(l) and the Consignor echoes the same than the Coleman Transport Protocol with regards to the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide.

Ferrous Sulfate in small quantities may be used to locate traces of cyanide remains after clean-up have been done.

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

X in full compliance with

The operation is
- ☐ in substantial compliance with Transport Practice 3.5
- ☐ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Procedure Ref. No. CT. SOP. 083 states that the ER Plan need to be revised at least annually or as a result of changes to conditions along a primary of secondary routes, changes to the transport equipment that is to be used, emergency drills and lessons learned and gathered from accidents, incidents, additional information, observations and other responses.

Company's Transport Management Plan clause 6.5.1 as well as the ER Plan Ref. No. CT. SOP. 083 states that documentation be revised at least annually or as a result of changes to conditions along a primary of secondary routes, changes to the transport equipment that is to be used, emergency drills and lessons learned and gathered from accidents, incidents, additional information, observations and other responses.

Drills will be evaluated to determine if response time and if procedures are adequate, equipment is appropriate and personnel are still acquainted with emergency requirements. Post mortem reports will be compiled and retained and to be used as a basis for changes to procedures, equipment, if re-training is necessary to ensure better preparedness in the event of an actual incident / exposure.

Emergency mock drills will be held at least annually. The reason for this training is to simulate an emergency situation and to familiarise emergency response and own personnel with the necessary procedures.