

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE**Transportation Summary
Re-Certification Audit Report****Coleman Transport (Pty) Ltd****2426 Moses Garoëb St
Walvis Bay
Namibia****28 to 30 November 2022****For the
International Cyanide Management Code****TRANSPORTATION SUMMARY AUDIT REPORT****Operation General Information**

Name of Transport Operation: Coleman Transport (Pty) Ltd

Name of Facility Owner: Coleman Transport (Pty) Ltd

Name of Facility Operator: Coleman Transport (Pty) Ltd

Name of Responsible Manager: Mr Werner van Zyl

Address: 2426 Moses Garoëb Street, Walvis Bay

State / Province: Walvis Bay

Country: Namibia

Telephone: Landline +264 64 221 105
Mobile+264 81 787 6079

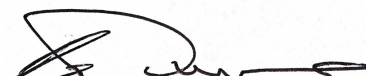
Fax: N/A

Email: hsemanager@coleman-transport.com

Operation Location Detail and Description

Coleman Transport has its headquarters in Windhoek Namibia with operating depots in Rosh Pinah, Tsumeb and Walvis Bay. In South Africa the company has depots in Springbok, Gauteng and Cape Town.

Coleman Transport is a road 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.

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Sodium Cyanide is received via the Port of Walvis Bay and is transported by road in six metre sea containers, packed with wooden crates containing cyanide in solid briquette form. Sea containers are loaded onto skeletal semi trailers specifically designed and manufactured for the transportation of sea containers. There is no interim storage as containers move directly from loading at the port to the transport route and on to the offloading point during the same day.

Auditor's Finding

This operation is in

X 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.

Compliance Statement

This operation has been found to be in full compliance with the requirements of the ICMI Cyanide transportation re-certification audit requirements. This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle

Auditor Information

Audit Company: Transheq Consulting and Auditing (Pty) Ltd

Lead and Transportation Auditor: Richard Durrant

Lead Auditor Email: richard@transheq.co.za

Names and Signatures of Other Auditors: N/A (Sole auditor)

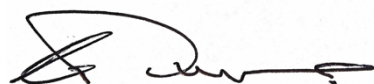
Dates of Audit: 28, 29 and 30 November 2022

Auditor Attestation

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

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


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Principles and Standards of Practice

Principle 1 | TRANSPORT

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

Standard of Practice 1.1

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

X in full compliance with

The operation is in substantial compliance with Standard of Practice 1.1

not in compliance with

The basis for this Finding/Deficiencies Identified:

A documented Cyanide Transportation Protocol & Management Procedure requires that Route Risk Assessments (RRA) are conducted on primary and secondary routes travelled with cyanide and risk are determined and documented. RRA on the primary and secondary routes have been physically conducted and hazards identified. The transport routes pass through various small towns but mainly rural areas with low population density. Road infrastructure, road surface condition, road markings are included in the assessment. Pitch and grade is taken into account in the route assessments. Namibia is generally a very flat country and the specific route travelled by cyanide conveys have no mountain passes that need to be negotiated. Re-evaluation of the transport routes (primary and secondary) are conducted on an annual basis and RRA reviews took place in July 2020, August 2021 and July 2022. During trip de-briefing sessions the Convoy Leader and drivers are given the opportunity to report on areas of concern on the route or areas been found unsafe to travel.

Measures to counteract the potential hazards are documented and the RRA are updated and are discussed with the drivers and the Convoy Leader prior to each first shipment of cyanide. The transporter in conjunction with receiving mine have visited Police Services, Emergency Services and Hospital staff in all the towns along the route as well as to the Regional Police Commanders. All these institutions were informed of the product and related hazards of the cyanide that will be transported through their areas of responsibility. The roles of each of these stakeholders were explained to them as well as their responsibility during an emergency situation.

Namibia has no requirement in terms of legislation that consignments of sodium cyanide need to be escorted. Due to the nature of the roads as well the fact that there are no special safety or security measures are in place, as provided by the Authorities, the transporter in collaboration with the Gold Mines have an agreement to use truck convoys with a lead convoy vehicle and a trailing convoy vehicle for each convoy.

Emergency equipment includes the HCN monitor. The Convoy Leader has been trained in the handling and operation of the HCN monitor. Cyanide antidote kits are carried by the convey trailing vehicle/s which are supplied Navachab Mines and B2Gold

Coleman Transport does not employ sub-contractors for the movement of cyanide

Standard of Practice 1.2

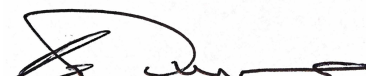
Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 1.2

not in compliance with

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The basis for this Finding/Deficiencies Identified:

Employee Selection and Placement Procedure is in place. The procedure includes a section on the Selection of Drivers for the Transport of Cyanide in which drivers must be subjected to a selection process which includes the validity of extra heavy vehicle driver's license checks, criminal records checks, driving records, valid Professional Driving Permit Category D for Dangerous Goods (PrDP-D), minimum age of 25 years, minimum of Grade 10 school qualification, pre-employment medical examination, annual medicals, annual dangerous goods training and literacy and numeracy testing. The drivers were subjected to various theoretical and practical training programme which include the loading and off-loading of cyanide, the correct use and wearing of personnel protective equipment, spill prevention and control, cyanide awareness, cyanide first aid, actions in a case of emergency. The drivers are subjected to a site specific induction training before a driver is allowed to enter the mine's premises for the off-loading of the cyanide containers.

Cyanide drivers were subjected to the following training: - Company's Medical & First Response Procedure, Convoy Leader Procedure, Breakdown Procedure, Transportation Protocol, Fatigue Policy, Overloading of Vehicle, Tyre Maintenance, Alcohol & Drug Policy, Vehicle Preventative Maintenance Procedure, Incident Reporting & Control Procedure, Basic First Aid, Basic Fire Fighting, Sodium Cyanide Awareness Training including the contents of the Cyanide SDS (Safety Data Sheet), outcome of Route Risk assessment, convoy vehicle procedure, Emergency Response Procedure, Spill Response Plan, Emergency Contact Number procedure, Loading & off-loading of container procedure and Transportation of Dangerous Goods.

Drivers are not directly involved in the physical loading and or off-loading of containers. Once a container has been loaded onto the skeletal trailer, the driver ensures that the container is properly secured to the trailer.

All vehicle maintenance and tyre maintenance has recently been outsourced to independent companies. Outsourced mechanical workshop and tyre contactor employees who may have to perform emergency vehicle breakdown work on loaded vehicles while in transit are trained on the risks of cyanide. Suitable procedures and training is in place to minimize the potential for cyanide releases and exposures to these contractor personnel.

Coleman Transport does not employ sub-contractors to operate its transport vehicles.

Standard of 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 Standard of Practice 1.3
 not in compliance with


The basis for this Finding/Deficiencies Identified:

Truck tractors (6x4 axle configuration) drawing three axle skeletal trailers with container twist locks are used for the transportation of cyanide. Technical specifications for truck tractors and skeletal trailers are available. Permissible load mass capacity of a truck tractor and triaxle trailer combination is well within the permissible mass load when loading one six metre sea container containing solid cyanide. Once the vehicles are loaded the convoy has to pass through a Governmental weigh bridge situated just outside of Walvis Bay.

Truck tractors are serviced in accordance with the Original Equipment Manufactures specified service intervals. Service interval matrix is in place. Skeletal trailers are subjected to a service at least once per quarter. Daily pre-trip inspections are carried out by the driver and any faults identified are repaired immediately.

Vehicle and tyre maintenance services have been outsourced to local contracting companies. A tyre technician will check all truck and trailer tyres prior to and after loading cyanide containers and prior to vehicles departing on a loaded trip.

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Outsourced mechanical workshop and tyre contractor employees who may have to perform emergency vehicle breakdown work on loaded vehicles are trained on the risks of cyanide. Suitable procedures and training are in place minimizes the potential for cyanide releases and exposures to these contractor personnel.

Standard of 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 Standard of Practice 1.4

not in compliance with

The basis for this Finding/Deficiencies Identified:

Six metre sea containers packed with wooden crates containing Sodium cyanide are loaded onto a skeletal trailer specifically designed and manufactured for the transportation of sea containers. Sodium cyanide is packed into sea containers by the Consignor. Cyanide in briquettes are packed in waterproof polyethylene bags that are then encased in a custom-designed one-ton wooden intermediate bulk container (IBC). These IBC containers consist of a pallet base to provide for lifting and further protection during storage and transit. The wooden intermediate bulk containers is used for transport and storage. Trailers are fitted with four twist locks that are used for the securement of the sea containers. Before shipment departs from the loading point it is the responsibility of the driver of each vehicle as well as the Convoy Leader to check the condition of each container as well as if the container seal is still intact on the container doors. Seal number and findings of physical inspection of the container are recorded.

Transport signage format is dictated by the Namibian Legislation that refers to the labelling of transport vehicles transporting of hazardous substances. This requires format to be in line with the requirements of the IMDG International Marine Dangerous Goods Code. Sea containers are marked/placarded with split placards on all four sides of each container. These marking are in place when the containers are offloaded from the sea transport vessel. Once the container is loaded onto the trailer and before departure on route, an orange diamond sign is displayed to the front of the truck tractor cab for the entire period of transportation. Orange diamond remains displayed while loaded and removed once container is off-loaded.

Daily pre-trip vehicle inspections are conducted by the drivers and findings recorded on a check sheet. Procedures are in place that address vehicle checks, defect reporting and job cards to be issued. Job card are completed for defect/s noted and defects are attended to before a vehicle departs from the depot. Driver and Logistics Controller both sign the pre-trip checklist once completed. Job cards are in place for all repairs and maintenance conducted.


Truck tractors and trailers are maintained according to manufacturer's specifications as well as in accordance to SANS (South African National Standard) SANS 10231:2019). This SANS standard has been adopted into Namibian legislation. Skeletal trailers are subjected to a service at least once per quarter, daily pre-trip inspections are carried out by the driver and faults identified are repaired immediately. Service matrix in place where current kilometres travelled are updated against required service intervals. Information on records was found to be within the required service intervals as per Company's Preventative Maintenance Procedure and OEM specifications for services intervals.

Vehicle and tyre maintenance services in Walvis Bay have now been outsourced to local contracting companies. Trucks can also be serviced at the company workshops in Windhoek if they are passing through Windhoek during one of their journeys.

Annual vehicle roadworthy tests are conducted on all truck tractors and trailers by Government Roadworthy test centres.

Cyanide deliveries are completed within daylight hours only. Trip distance allows for loading at port and transport to the mine within daylight hours. Two to three round trips per week are possible per driver. A resting time of 30

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minutes for every 200 kilometres travelled is enforced and managed by the Convoy Leader . Consignments of cyanide are only received for delivery a few time per annum.

Convoy Leader is authorised to suspend the transportation of the cargo. Conditions such as road closures, road works, inclement weather, breakdowns and civil unrests can lead to the suspension of the movement of the convoy.

Zero tolerance towards an employee or visitor being under the influence of drug or alcohol when reporting for duty, being on the premises or the consuming of an alcohol substance whilst on duty. Alcohol & Drugs Policy included in Coleman Transport induction as well as the Mine plant general induction. Alcohol tests be carried out on all company vehicle drivers when leaving the depot in a company vehicle. Annual medical screening includes the use of alcohol and intoxicating substances, conducted by an independent Occupational Health Practitioner. Daily alcohol screening is conduct on all staff and visitors entering the depot.

Employee Selection and Placement Procedure states that medical records shall be kept intact for 30 years. All information and specifically medical records are confidential. Records of operational information is retained and available.

Coleman Transport does not employ sub-contractors for the movement of cyanide

Standard of Practice 1.5

Follow international standards for transportation of Cyanide by sea.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 1.5

not in compliance with

The basis for this Finding/Deficiencies Identified:

Not applicable. The transporter will only transport solid Cyanide by road and is not involved in cyanide transport by sea. Road transport only.

Standard of Practice 1.6

Track cyanide shipments to prevent losses during transport.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 1.6

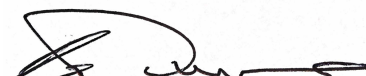
not in compliance with

The basis for this Finding/Deficiencies Identified:

Cyanide Transportation Protocol & Management Plan stipulates that the Convoy Leader and drivers to be in possession of an operative cellular (mobile) phones. Minimum Requirements for Implementation of convoys and Minimum Standards for Convoy Operations addresses the communication equipment required during the transportation of cyanide. Truck tractor drivers and convoy vehicle driver uses cell phones when engaged with the transportation of cyanide.

Cellular phone equipment is checked by Convoy Leader to ensure functionality prior to leaving the depot to collect containers of cyanide from the Port of Walvis Bay. During the vehicle pre-trip check drivers ensure that their cellular phone are operative, Findings recorded on appropriate checklist. Cellular phone charger plugs

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are available in the cabs of truck tractor. Functionality is checked periodically on route to ensure that devices are working properly. Two way radios are no longer used as a means of communication.

Truck tractors are fitted with a Web Fleet tracking system with which the movement of vehicles are monitored 24/7 from the office during the day and cell phones issued to the Management team. Transporter's Central Control Room located in Windhoek are alerted by the tracking system should any of the vehicles move off their set routes. This notification is also been sent to Transporter's Management's cell phones. Communication from Convoy Leader vehicle to drivers, transport depot, Emergency Services on route and Consignee can be established via cell phones. List of all the relevant emergency telephone numbers is available convey Leader s vehicle. This information is stored and is available inside the Designated Space envelope in the cab of each truck tractor and in the Convoy Leader 's vehicle.

No extended communication blackout areas have been noted where cellular phone communication may be disrupted on the transport routes. This was checked when conducting RRAs and during past deliveries to the mine. In the event of a cellular communication break-down, drivers and Convoy Leader are instructed to reduce speed and to close the distance between each convoy vehicle. The practise is so that the convoy vehicles must always be within sight of each another.

Inventory controls and/or chain of custody is achieved through Web Fleet vehicle tracking system with which the movement of vehicles is monitored 24 hours per day. A Central Control Room located in Windhoek are also alerted by the tracking system should any of the vehicles move off their set delivery routes. This notification also been sent to Transporter's Management's cellular phones.

Delivery Procedure Control Sheet for Sodium Cyanide is in place. This control sheet details each truck and trailers registration number, drivers name, container number and container seal number. The control sheet also records the dates, Convoy Leader details, Halt Locations between Port and Mine, distance between Halt Locations, arrival and departure time at each halt location as well as arrival time at mine, unloading time and departure time from mine is recorded. Container Loading and Off Loading Procedure states - Seals are check before loading and seals are checked and broken by the Mine responsible person who inspects and signs the sheet that the product is received in good order.

The mass of cyanide in each sea container is indicated on the shipping documentation which is handled by Clearing & Forwarding Agent. From this documentation a Landing Order is generated by the Clearing Agent and sent to the Transporter. The Landing Order details the mass and contents of each container. The contents of the Landing Order and the waybill serves as a Dangerous Goods Declaration. Tremcard (Transport Emergency Card) related to the consignment and product SDS is issued by Consignor. Vehicle will carry a Tremcard, trip sheet, dangerous goods declaration, driver's Dangerous Goods training certificate, delivery document and current SDS. National legislation requires that the aforementioned documents must be available in the designated space in the vehicle. Designated space (orange container) must be in each vehicle cab as well as in the convoy vehicle. A copy of the product SDS is kept in the office of the Depot Manager in Walvis Bay.

Principle 2 | INTERIM STORAGE

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

Standard of Practice 2.1

Store cyanide in a manner that minimizes the potential for accidental releases.

X in full compliance with

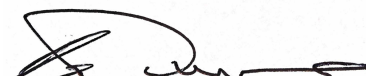
The operation is in substantial compliance with Standard of Practice 2.1

not in compliance with

The basis for this Finding/Deficiencies Identified:

Not Applicable. No interim storage is conducted.

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Principle 3 | EMERGENCY RESPONSE

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

Standard of Practice 3.1

Prepare detailed emergency response plans for potential cyanide releases.

X in full compliance with

The operation is in substantial compliance with Standard of Practice 3.1
 not in compliance with

The basis for this Finding/Deficiencies Identified:

Emergency Response Plan (ERP) number as well as that of HazKem Namibia cc Emergency Spill Response Plan for Coleman Transport are in place. The transporter has entered into an agreement with HazKem Namibia cc (approved spill clean-up Company) as the Company's official cyanide first responder and spill response service provider. ERP includes off-site emergency response to be taken by the drivers and emergency team. Emergency Preparedness procedure developed for the handling of a cyanide (in solid form) during an off-site emergency is available at the transporter's office. Driver's responsibilities / duties during an emergency on route have been made available to all drivers. Driver's attended a training session on the Company's Transport Emergency & Spill Plan conducted by HazKem titled Cyanide Response Training Coleman Transport. A list of Emergency Contact numbers are included in the plan.

The ERP includes the actions to be taken by the drivers, Convoy Leader and first responders at the scene of a cyanide incident on route. Although no cyanide incidents been experienced, it will be required from the Operations Manager or a representative of the transporter to proceed to the scene of the accident and offer assistance. In the case of remote site incidents, the transporter has entered into an agreement with HazKem Namibia cc and Navachab Gold mine's emergency team to react when requested. Emergency equipment is available on lead convoy vehicle. Procedure stipulates that medical, emergency staff and traffic officers be provided with cyanide awareness information to understand cyanide emergencies. Should assistance be required closer to the Consignee, Navachab Mine team will retire and B2Gold emergency team will then assist.

The SDS for Sodium Cyanide is available. The plan is structured to handle sodium cyanide (solid form) (UN 1689). ERP refers to Sodium Cyanide in briquette form as well as appearance of being white colour with bitter almond odour. On-route & on-site Spillage / Accident / Incident / Response procedure / Spill clean-up procedure addresses this chemical form of cyanide. For the purpose of neutralising sodium cyanide, the procedure prohibits the use of Ferrous Sulphate, Sodium Hypochlorite and Hydrogen Peroxide to be applied any spilled cyanide released onto the ground or into surface water. Small quantities of Ferrous Sulfate will only be used to detect any traces of sodium cyanide.

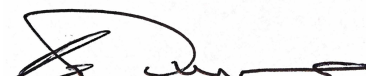
The Emergency Preparedness Plan & Spill Contingency Plan focuses on the road transportation of sodium cyanide packed in one ton bags stacked inside a wooden crate (IBC) packed inside a sea container. The Port of Walvis Bay have their own ERP.

Transportation of cyanide is done by following primary routes of which the road surface is generally in a good condition. Secondary routes were also assessed and findings documented. RRAs have been conducted and documented detailing the condition of road surfaces, rivers, bridges, prevailing winds.

Only skeletal trailers built by accredited trailer manufacturers in South Africa are used for the transport of cyanide. Trailers have been built according to the international standard for the transportation of sea containers. Trailers are fitted with four twist locks with which a 6 metre sea container is centre loaded on the trailer and secured to trailer chassis. No cyanide is stored at the transporters facilities at any time.

Descriptions of response teams with actions are documented in the ERP. As many as possible potential hazards on route were noted in the RRA. Additional precautionary measures to be taken by Convoy Leader and drivers are noted in the RRA. The hazards as noted on the RRA are conveyed to the Convoy Leader as

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well as the drivers. As the transport of cyanide is not be a regular operation, the Convoy Leader and drivers are briefed on the hazards before each cyanide transport operation. Agreement have been entered into with the Management of Navachab mine to assist with their emergency team during an potential or product spill. Closer to the offloading point the emergency team B2Gold will assist.

The roles and responsibilities of outside responders, medical facilities and or communities during an emergency situation have been detailed in the Company's ERP. Emergency calls will be directed to the Transporter's Depot Manager or Health and Safety Manager who are accessible by cellular phone 24 hours per day and 7 days per week. The responsible person receiving the call will relay the emergency call information to all the relevant persons who need to be informed. An updated list of telephone contact numbers of transporter staff and local authority's emergency services in detailed in the ERP and kept at the office and numbers saved on cellular phone and included on the contact list as stored in the Designated Space in each vehicle.

Standard of 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 Standard of Practice 3.2
 not in compliance with

The basis for this Finding/Deficiencies Identified:

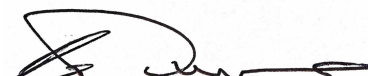
Convoy vehicle driver and cyanide specific truck drivers attended basic first aid course and a course on the transportation and handling of dangerous goods. Latter training is a requirement by Namibian legislation. Before a driver will be issued with a Professional Driving Permit, drivers to present training received in the handling of dangerous goods as well as a valid medical certificate. During Dangerous Goods handling course, basic firefighting is also presented. Cyanide awareness training presented by HazKem Namibia cc the appointed spill recovery and rehabilitation company was also informed regarding the hazards of sodium cyanide as well as the Company's ERP to the drivers and Convoy Leader. Attendance certificates for all training completed are kept on record. Transporter has presented procedure and standard training to relevant employees with signed registers in place. Cyanide awareness information session have been held with members of the emergency services responders on route in the past. This was previously done by B2Gold. HazKem Namibia cc the appointed spill recovery and rehabilitation Company was also informed regarding the hazards of sodium cyanide as well as the Company's ERP. Relevant cyanide procedures are used as training manuals for drivers and Convoy Leader s who are subjected to theoretical questionnaires and record of this training. Recent cyanide emergency response off site simulation exercise was conducted.

The responsibilities of response personnel been identified and displayed in the Emergency Response Plan. Clause – Responsibilities in the ERP spells out the responsibilities of each role player during an emergency situation. Flow diagram in shown in EPR.

Emergency response equipment as required is kept in locked store at the depot when not in use. Prior to dispatch of a consignment of cyanide the required equipment is checked and then loaded onto the lead Convoy vehicle. Convoy driver and heavy vehicle driver been issued with a the PPE as specified on the SDS. The list forms part of the Emergency Response Plan. Equipment check list sheet are in place for inventory keeping. Equipment is stored in sealed in plastic storage crates and locked in a storeroom between cyanide loads. Before departure the Convoy Leader will check the availability and condition of the equipment. Cyanide antidote kits do not form part of the Coleman Transport Emergency response equipment. Cyanide antidote kits are carried by the convey trailing vehicle/s which are supplied and manned by Navachab Mines and B2Gold. The respective mines carry the responsibility for training of personnel for the administration and storage of the antidote.

Emergency response equipment identified in the transporter's document Convoy Leader Procedure that requires that the Convoy Leader inspects emergency equipment. Inspections will be focused on the availability and condition of the equipment. Inspection findings are recorded on the appropriate inspection checklist. The

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checklist forms part of the Emergency Response Plan. Equipment is maintained and a separate check sheet and form the responsibility of the Convoy Leader . All equipment inspected by Convoy Leader prior to leaving on route.

Coleman Transport does not employ sub-contractors for the movement of cyanide

Standard of 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 Standard of Practice 3.3

not in compliance with

The basis for this Finding/Deficiencies Identified:

Procedures are in place for notification of appropriate parties in the event of a cyanide release or exposure during transport. ERP details the various responsibilities and the individual parties. Mine emergency number and the telephone numbers of each emergency responder (police, fire department, ambulance services) on-route forms part of the Transporter's ERP and is available in each of the vehicles. List of telephone numbers included in driver's / vehicle emergency envelope which accompanies each driver on route and stored in the Designated Space. The availability of such list also forms part of Convoy Leader 's checklist.

Approved documented procedure Incident Reporting & Investigation procedure is in place for recording and investigating 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. The Depot Manager has formally been appointed as the Emergency Controller for the Walvis Bay Depot. Transport Management Plan read in conjunction with the ERP, stipulates that the Emergency Response Plan be revised at least annually or as a post-drill recommendation derived from an emergency drill held or after a real emergency situation. The process for the testing of the emergency telephone numbers is done by physically dialling the available telephone numbers to confirm detail. 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. Company Chief Executive is designated as the company media spokesperson in the event of a catastrophic incident. The Emergency Contact Number list was updated on 28 November 2022 as the Depot Manager details have recently changed.

ICMI Significant Incident reporting requirement is included in Incident and Reporting and Investigation Procedure - Reporting to the ICMI will be conducted by the appointed Health and Safety Manager or General Manager of Coleman Transport - within 24 hours of such occurrence. No significant cyanide incidents have occurred since Coleman Transport's October 9, 2019 certification,

Standard of 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 Standard of Practice 3.4

not in compliance with

The basis for this Finding/Deficiencies Identified:

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The clean-up and rehabilitation process of an effected area has been contracted out to a commercial chemical remediation company, HazKem Namibia cc, who is based in Walvis Bay. Their Emergency Spill Responder is responsible for the clean-up of the contaminated soil / product and to remove such to B2Gold mine where the waste will be disposed of. A written contract between spill clean-up company and the transporter been entered into. Should an such an event takes place close to the Consignee, B2Gold's emergency response team will be deployed to assist with the clean-up of the scene.

Transport Management Protocol prohibits the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into ground or water bodies. HazKem Namibia cc, being appointed as the Transporter's official Spill Clean-up service provider have included this prohibition into their Emergency Spill Response Plan: Sodium Cyanide: Coleman Transport 2022

Standard of 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 Standard of Practice 3.5

not in compliance with

The basis for this Finding/Deficiencies Identified:

Company will review the Transport Management Plan as well as the Emergency Response Plan on at least an annual basis or as a result of changes to conditions along a primary or 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. Transport Management Plan as well as the Emergency Response Plan were reviewed annually under the period of review. Last document review was conducted in July 2022.


Off-site simulation emergency drills were held in June 2020, June 2021 and June 2022. Eight employees took part in the most recent drill including the Convey Leader now Depot Manager. Post mortem reports are compiled and retained and 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.

Incident Reporting & Investigation procedure in place. Document makes provision for the establishing of immediate causes, root causes and recommended actions that are to be implemented to eliminate or eradicate the causes. Should there be a failure of a procedure or a clause in the procedure, the procedure gets amended.

Transport Management Plan states that emergency drills will be evaluated to determine if response time and if procedures are adequate, emergency telephone number still valid, emergency equipment is appropriate and personnel are still acquainted with emergency requirements. Post mortem reports are to 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. ERP and relevant response procedures shall be evaluated and reviewed at least on an annual basis or following an incident that necessitate a review. Last document review was conducted in July 2022. No significant cyanide incidents or cyanide emergencies have occurred since the Coleman Transport's October 2019 certification.

End of Report

Coleman Transport
Name of Operation


Signature of Lead Auditor

14 December 2022
Date