Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

ICMI CERTIFICATION – SUMMARY REPORT

Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

Primefuels Tanzania Ltd

01st & 2nd June 2022

This report has been prepared by Kuldip S. Degon, with all reasonable skill, care, and diligence within the terms of the Contract with the client, incorporating our General Terms and Conditions of Business and taking account of the resources devoted to it by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client, and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

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1.0 SUMMARY AUDIT REPORT FOR CYANIDE TRANSPORTATION OPERATIONS

1.1 Operational Information.

Name of Cyanide User Facility:	Primefuels Tanzania Limited
Name of Cyanide User Facility Owner:	Primefuels Tanzania Limited
Name of Cyanide User Facility Operator:	Primefuels Tanzania Limited
Name of Responsible Manager:	Emmanuel Mabula - HSSEQ Manager
Address:	139 Julius K. Nyerere Road, Dar-es-Salaam
Country:	Tanzania
Telephone:	+255 222842247
E-Mail:	admin.dar@primefuels.com

1.2 Description of Operation – Primefuels Tanzania Ltd

1.2.1 Company Profile.

PFT is a fully integrated logistics company servicing 9 countries across the East Africa region. PFT started with the goal to build strong, enduring relationships and not just meet, but exceed clients' expectations. 25 years on, our goal remains the same. It is one of the largest privately owned African logistics companies employing over 1,000 people and a fleet of over 500 trucks. It transports all types of goods including dangerous goods which includes Sodium cyanide, general cargo as well as machinery and offers a cutting-edge logistics solution. It offers transportation services both in Tanzania and neighbouring countries

Primefuels Tanzania provides road transport and logistics services for mining companies, and other companies.

1.2.2 Audit scope.

The scope of this audit is the road transportation of solid sodium cyanide from the ports of Dar Es Salaam to Geita Gold Mine a distance of 1211Km.

1.3 Sodium Cyanide Transportation.

Sodium cyanide in IBC's which are packed in 20ft containers are loaded from the port of Dar Es Salaam and delivered to Geita gold Mine distance of 1211km from the port to the mine site. The manufacturer of the sodium cyanide is Australia Reagent Comapny a cyanide manufacturer based in Australia.

Currently Primefuels Tanzania are Transporting Cyanide to Geita Gold mine

PFT, became a Signatory to the International Cyanide Management Code on 18th August 2021 to transport Cyanide to various mines in Tanzania.

Sodium cyanide in IBC's which are packed in 20ft containers are loaded from the port of Dar Es Salaam, Tanzania and delivered to Geita Gold Mine. Covering distance of 1220km from the port to the mine site. The manufacturer of the sodium cyanide is Australia Gold Reagent Company, a cyanide manufacturer based in Australia.

Solid sodium cyanide is packaged in Intermediate Bulk Containers (IBC's) of 1000kg capacity. The briquettes are stored within a woven polypropylene bag, sealed with a PVC plastic liner, within a wooden crate. Packaging complies with International Maritime Dangerous Goods Code for Group 1 hazardous goods and has been subjected to the relevant tests required by the Code.

The solid sodium cyanide briquettes which are in IBC's are packed in 6-meter freight container and shipped by sea from the Consignor to the Port Dar Es Salaam. A maximum of 20 wooden fabricated IBC's are packed into a freight container with a maximum gross weight of the product of 20 tons.

Upon arrival of the vessel at the port, all the customs paperwork has been completed the containers are offloaded using container handling equipment as required by the Tanzanian International Container Terminal System. The containers are directly loaded onto the PFT trucks for overnight stay at PFT interim storage yard located off Julius K. Nyerere Road where containers remain on the trailers overnight and from there begin their journey to the mine next day in the morning.

PFT so far have not offloaded any containers in their interim storage yard

The Tanzanian Government Chemist Laboratory Agency administers the Rules and Regulations and is the national regulator for dangerous goods management. The convoys to the Geita Gold Mine can comprise of up to 10 trucks at a time, each truck carrying only one container load at a time. They are also accompanied by relevant escort vehicles.

SUMMARY AUDIT REPORT AUDITORS' FINDINGS

Primefuels Tanzania Ltd is:

☒ **in full compliance with**

☐ in substantial compliance with

☐ not in compliance with

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

Sean Webster – Technical Auditor: Transportation.

DATES OF AUDIT

This Transportation certification audit on Primefuels Tanzania Ltd was conducted on 1st and 2nd June 2022.

I attest that I meet the criteria for knowledge, experience, and conflict of interest for Cyanide Code Verification 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 Verification Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the verification 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:

PFT has selected the appropriate route from Dar Port to PFT storage yard and storage yard to Geita Gold mine. There is only one approved route to the mine. The company has a Route Transport Selection Procedure No, PFT-SOP-ICMI-001. The company has a Dangerous Goods Transportation permit issued by the GCLA (Permit # B001-C000445) expiring on 27th October 2024. PFT has developed a Transport Management Plan to manage its transportation operation. The QHSE Manager is responsible person to conduct the route selection and route review in consultation with the General manager. The HSSEQ Manager organizes all the resources and conduct the route survey and the convoy escort team leader.

Population density in towns and villages along the route has been taken into account during the Route Selection Procedure.
Also, population density has been taken into consideration in the RRA and have been evaluated and documented.

Route Surveys conducted by the company took into consideration, the infrastructure of the roadway, construction activities on the selected route and general condition of the road.

RRAs that have been conducted reveal that different hazard types were considered and evaluated. It was evident from documentation presented that the findings with respect to road infrastructure and road condition were taken in consideration. Road markings on tarred road, surfaces and 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, water sources nearby and weather conditions have all been captured in the RRA.

Pitch and grade of roadway from Dar Es Salaam to the mine site was taken into account when conducting the route risk assessment.

PFT has implemented processes to periodically re-evaluate risks in the routes used for cyanide transportation and has a process of getting feedback on the risks noted by drivers / convoy leaders during journeys to the mine. Route surveys are conducted at least once every year. After each delivery of containers to the mine. 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 the de-briefing sessions.

Prior to departure of the convoy of cyanide trucks, tools box meetings are held, and participants sign attendance sheets to indicate their presence. The HSSEQ department is responsible for organizing the toolbox meetings. The meetings are attended by the drivers, escort team. Evidence of toolbox meeting attendance sheets have been placed on record.

The TMP requires route survey to be revised periodically. The Transport Management Plan mentions 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 delivery to the mine site. Route survey reports show periodic reviews of the road conditions. Precautionary measures have been implemented. The TMP is also reviewed when necessary, depending on the feedback on the road conditions.

The operation has a system of getting feedback on the road conditions and addressing the risk during feedback reports and putting in controls to eliminate or reduce the risk. Reports on each convoy specifying the road condition and how the journey went are captured in the reports. Reports show pictures of toolbox meetings, convoy of trucks and road condition. Feedback report form is completed after each trip to the mine.

The state of the road which includes changes such as constructions on the road, potholes and sharp diversions which were identified after each delivery to the mine site details the condition of the road are documented. The company's Route Risk Assessment Procedure outlines the category of risks to be identified when conducting a route assessment, risk ratings, and the necessary controls to prevent any incidence as well as the responsible persons. Measures to reduce risks are covered comprehensively in the RRA. The control measures to the hazards identified in the RRAs are captured in the feedback reports which are kept on record.

It was evident that Route Surveys have been conducted. Recommended preventative actions to mitigate or eradicate the risks on selected route are included in RRA assessment document. The identified risk or changes on the route are discussed at toolbox meetings prior to departure of the next convoy. This is to ensure that each person in the convoy get to know the current risk on the route. Attendance registers of those present during the toolbox meetings are kept on record. Those who attends the meetings signs the attendance sheet to acknowledge that such training was presented. There is evidence of training attendance sheets on filed depicting the training programs.

PFT have consulted various stakeholders and applicable governmental agencies as necessary in the selection of routes and development of cyanide management measures.

The Government Chemist Laboratory Authority (GCLA) is the only authority that allows for the transportation of cyanide within Tanzania. Amongst all the importation documentation that needs to be filed, a permit needs to be applied for from the GCLA and this is valid for 30 days. During this time, the goods to be moved from the Port to the receiving mine.

Once the permit from the GCLA is received, and dates confirmed for when the convoy will move, the GCLA will contact the Police stations in each town to inform them of the ETA and then when the convoy either stops at, or is close to the town, the PFT Convoy Leader will contact the local Police to let them know that they are either close by, or in that area.

Inputs have been sought from the Police Service Stations in towns which are along the transportation route for cyanide. In each case, the Police Officers in charge of the various stations have signed and given their approval to assist in case of cyanide incident. Signed sheets also details that the police have been notified and informed about cyanide and have also been supplied with copies of the MSDS of sodium cyanide.

PFT uses convoys with escorts to ensure safe delivery of cyanide shipment to the mine site destination. PFT uses its own escort team For convoys two escort vehicles are used one in front of the convoy and one at the rear.

PFT does not subcontract any of their operational activities.

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:

PFT has a Recruitment Policy PFT-PO-ICMI-008 dated 13th September 2021 version 01. The Recruitment procedure specifies the process of selecting a driver for employment. First, application is invited from qualified drivers to apply after which a pre-selection of candidates is done according to the following criteria.

1, Prospective applicant should be between 23-45 years.

2. He must have a valid driver's license Class C.

3. Must have a minimum of 5 years' experience of driving HDV's

4. Ability to demonstrate positive attitude to road safety both through preliminary interviews and road test assessment.

Before drivers are selected, they undergo theoretical and practical test. At the end of the training qualified drivers who pass the test are appointed permanently. Appointed drivers are taken through training and mentoring. The training they undergo is as follows and these have been captured in a training matrix.

a) Defensive driving
b) Road Risk Evaluation
c) Highway code
d) Fatigue management
e) Fire Fighting
f) Cyanide Awareness training
g) Emergency response and ER scenarios
h) Health and Safety at work
i) First Aid
j) Alcohol, medical and drugs management
k) Manual handling

All drivers are expected to have category "C" license.

It is now a Legal requirement that all Dangerous Goods Drivers are required to be trained and Certified by a Government Agency which is GCLA.

Before drivers are selected, they undergo theoretical and practical test. At the end of the training qualified drivers who pass the test are appointed permanently. Appointed drivers are taken through training and mentoring. The training they undergo is have been captured in a training matrix.

Each of the training programs are organized once/year. Drivers answer questions posed to them verbally after the training to ascertain their knowledge about cyanide.

The details of training used for the cyanide awareness training were found to be appropriate and comprehensive.

Yearly, ER scenarios are performed to ascertain the understanding of drivers and escort team during mock drills. Drivers attend toolbox meetings organized by QHSE department prior to each departure.

Drivers driving in convoy are under the strict supervision of Escort leader. After each cyanide training, certificates are issued to each participant. New drivers undergo defensive driving training before they are allowed to drive a cyanide truck. Certificates of selected drivers were noted and are record. Records show Training Attendance sheets for Cyanide Awareness training. Validity of driver's licenses is checked during pre-departure checks by the Logistics Coordinator to ensure that they are valid. Copies of driving license of some selected drivers were found valid, Drivers who were interviewed to ascertain their knowledge about cyanide proved that they have been trained and are knowledgeable in cyanide handling and emergency response.

Records of training for drivers and escort team have been retained. All drivers attend toolbox meeting organized by PFT Escort leader prior to departure of each convoy and toolbox attendance register signed by each participant. Convoys are all the time under the strict supervision of the escort leader.

Before drivers are selected, they undergo theoretical and practical test. At the end of the training qualified drivers who pass the test are appointed. Appointed drivers are taken through training and mentoring.
h. Alcohol, medical and drugs management

Copies of cyanide training and defensive driving certificates for the drivers been placed on record. Validity of driver's licenses are checked during pre-departure checks and vehicle predeparture checklist completed. Drivers answer questions after the training to ascertain their knowledge about cyanide. Yearly, emergency response scenarios are performed to ascertain the understanding of drivers and escort team during mock drills.

A review of training records of drivers and escort team against the company's training matrix confirmed that personnel undertaking cyanide transportation have completed the mandated training. Selected drivers and escort team personnel who were interviewed confirmed the training system and are knowledgeable in handling of cyanide as well as convoy management. Copies of training attendance register have been retained.

The containers are directly loaded onto the PFT trucks at the port for overnight stay at PFT interim storage yard located off Julius K. Nyerere Road where containers remain on the trailers overnight and from there begin their journey to the mine next day in the morning.

PFT have an Interim storage area designated for storage of Cyanide containers. At the time of the audit PFT have not stored any containers at the Interim storage.

PFT operators have been trained on Cyanide safety as per training matrix.

PFT does not subcontract any Cyanide transport activities

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:

All vehicles are selected according to industry criteria, such as payload capabilities, maintenance schedules, terrain suitability and availability of spares amongst other criteria. They also stick to Mercedes Benz brand to allow for easier maintenance protocols.

PFT services the vehicles and has a strict maintenance policy. We were shown records for a few vehicles, and they covered the entire life of the vehicles from delivery to date. Paper copies are kept and as services are done, this is captured on SAP including spares that are used in order to calculate running costs.

PFT uses a trailer Side Loader Crane to move cyanide but only in fully packed containers.
The lift truck capacity of the Trailer side Loader is 44 tons and the containers sent to Tanzania are approximately 25 tons, including container. The auditors observed the following calibration documentation.
Certificate no.188 dated 10th January 2022.

At the time of the audit PFT have not stored any containers at the Interim storage.

As per PFT Inspection & Maintenance Procedure Ref no.: PFT-SOP- ICMI-007 Dated 03.09.21 Truck Servicing follows the schedule as shown:

1. **TRUCK SERVICE**

(A) MINOR (PREVENTIVE) SERVICE (18000 km)

- Change of engine oil.
- Change of diesel filters and oil filters.
- Lubrication/greasing of parts.
- Checking of gearbox oil, Differential oil, and top-ups.
- Brake linings and hub oil seal check.
- Wheel bearings check.
- Servicing of the fifth wheel, checking of bolts, cracks, and worn-out parts.
- General Service of parts and electrical system.

(B) MEDIUM SERVICE (36000 km)

- Wheel alignments, wheel bearings
- Ball joints check and repair
- Propeller shaft cross bearings
- Change engine oil.
- Change oil filters and diesel filters
- Check gearbox and diff oils.
- Servicing of the fifth wheel, and inspect damaged bolts and worn out parts
- Lubrication and greasing of parts and checking the electrical system.

(C) MAJOR SERVICE (54000 km)

- Changing of gearbox oil
- Change of radiator coolants and water

- Tappet engine valve clearance
- Changing of differential oil
- Changing of engine oil, and hydraulic oil
- Changing diesel and oil filters
- Testing of shock absorbers and replace weak ones.
- Valve covers gasket change.
- Testing of engine nozzles and replace damaged ones.
- Replace air cleaner elements.
- Check compressor rings.
- Check thermostat.
- Service fifth wheel, check fifth wheel moon and replace worn out parts and bolts.
- General service for parts, check the electrical system, lubrication, and greasing of parts

2: TRAILERS

General Service (done after every trip)

- Visual inspection
- Under chasse inspection
- Twist locks
- Wheel bearing free play
- Pivot and Radius bush check
- Brake adjustment and brake chambers repair
- Bottom valve check
- Tire Check
- U- bolt check
- Lubrication and greasing of parts and checking the electrical system
- Tire changing

2. Trailer Major Service

- Comprehensive service
- Replacement of entire suspension bushes
- Air below replacement
- Control arm bush repair
- Welding of cargo tank (if its leaking or there is intermixing of compartments)
- Wheel alignment

Prior to departure inspections are carried out using a vehicle pre-departure checklist. Defects noted on vehicles during inspections are repaired immediately before departure. If any defect is picked up, a Job Card is raised, and defect(s) are rectified.

Evidence of work orders are on record. The Workshop Supervisor is responsible for raising the work orders after inspecting the trucks with the driver. The head mechanic ensures the defect is rectified and then signs off the work order form indicating the work done. The Workshop Manager countersigns the same work order to confirm that the defect on the vehicle has been rectified.

Pre-departure checklist for vehicles numbers selected trucks were reviewed.

The company uses only new tyres as replacements on vehicles dedicated for the transportation of cyanide. No recapped tyres are used. Pre-trip inspections are conducted on each truck prior to departure and checklist signed by the QHSE Officer and the driver. The operation has a routine maintenance and periodic maintenance programs

for all its vehicles. In case of a breakdown on the road, the operation has a mechanical team who will quickly organize themselves and drive to the site of the broken-down truck and repair it. The maintenance records for work done on some days have appropriately been placed on record.

Cyanide manufacturers package the cyanide briquettes into 1 ton (or, in a few cases, 1,1 ton) bag boxes. These 20 IBC's are then loaded into 20 'containers. Once the weight of the product and the container is added together, they average out at around 26 tons which appears to be an industry average. These weights will appear on the shipping documents and will need to comply with the Tanzanian Regulations.

The Tanzanian Regulations only allow for a maximum gross weight of 53 tons per vehicle, including payload and trailers. As such, only one container is loaded onto a vehicle, to ensure that overloading is not done and minimises various risks.

PFT does have a procedure for the loading of vehicles to prevent overloading of vehicles, but they are also checked at Government Weighbridges, so they need to ensure that they are within legal requirements. The waybills as well as the Bill of Ladings have the weights of each container of sodium cyanide on them.

Trucks which are found to be overloaded will be penalized by the authorities by imposition of a fine on the transporter.

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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:

Procedures are in place to ensure that the integrity of the producer's packaging is maintained.

Sodium Cyanide in briquette form is packaged in Intermediate Bulk Containers (IBC's). The cyanide in briquette form is packed in hermitically sealed PVC bags. The weight of each product in the IBC's is 1000kg. The bag is enclosed in a woven polyethylene bag that is encased in a custom designed strong plywood box and covered with a wooden lid. The boxes are strapped around with steel strapping which supports packaging further. The box is placed on a pallet to provide further protection during transit. The IBC's are stacked into 20ft sea freight container and the shipping container doors secured with seals having unique seal numbers. The seal numbers are stated on the Bill of Lading.

Prior to departure of a convoy, the Escort leader and the driver inspect the truck as well as the container. The pre-departure checklist is then completed. The container number and seal numbers are written on the checklist. The checklist is completed by the Escort leader. The information that is filled are the name of driver, container seal number, vehicle number, trailer number, container number and the gross weight of the cyanide. The checklist is signed off by both the driver and the escort leader.

Upon arrival at the mine site, the mine site personnel will sign the waybill acknowledging receipt of shipment in good condition.

Before the loaded trucks 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. Each trailer of the trucks has twist locks which are inspected to ensure that they are firmly in place. Enroute to the mine, the condition of the container and seal are checked by the Escort leader anytime the convoys stop briefly at the designated resting stops. This is to ensure that the containers are properly secured to the trailers. The container waybills issued also has the container numbers and seal numbers on the container. Copies of waybills were verified. Journey plans which a show the times the convoy stops and time it departs whilst on the road to the mine were noted. Limitations on driver hours are also managed; locally through use of Convoy Leaders who ensure that driver hours are limited each day and also using the GPS system which also monitors driver hours.

All Containers transported are held in place on the vehicles using twist locks, seals are used on the container doors.

At the mine, the consignee signs chain of custody document to acknowledge receipt of the container in a good condition. He checks the condition of the load during the unpacking process and reports on the condition of the shipping container. The Delivery Manifest is signed to confirm the seals were in place on delivery and the delivery was acceptable.

The auditors did not observe any instances where the seals were not in place or where there was an unsatisfactory delivery.

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. Sodium cyanide placards (toxic 6 labels and marine pollutant labels) are displayed in the front of the cabin of the truck tractor. Also, the manufacturer has affixed emergency information panel (EIP) on each container. One EIP is placed on the vehicle so that it is visible from the rear.

As all cyanide is delivered by sea, containers arrive with placards already in place as attached by the supplier, in accordance with the International Maritime Dangerous Goods (IMDG) Code. These placards remain on the containers until the containers are unpacked at the mine sites.

The placards used on containers, which are prescribed in the United Nations Modal Regulations, IMDG Code and required by laws of country include

- UN Numbers - 1689
- Dangerous Goods Class labels
- Marine Pollutant labels

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. Sodium cyanide placards (toxic 6 labels) are displayed in the front of the cabin of the truck tractors

The company has both preventive maintenance and periodic maintenance program. When any fault is identified during vehicle inspection, the Workshop Supervisor is immediately informed who then raises a work order and escalates it to the workshop manager.
PFT services the vehicles and has a strict maintenance policy. We were shown records for a few vehicles, and they covered the entire life of the vehicles from delivery to date. Paper copies are kept and as services are done, this is captured on SAP System including spares that are used in order to calculate running costs.

As per PFT Inspection & Maintenance Procedure Ref no.: PFT-SOP- ICMI-007 Dated 03.09.21 Truck Servicing follows the schedule as shown:

TRUCK SERVICE

(A) MINOR (PREVENTIVE) SERVICE (18000 km)

- Change of engine oil.
- Change of diesel filters and oil filters.
- Lubrication/greasing of parts.
- Checking of gearbox oil, Differential oil, and top-ups.
- Brake linings and hub oil seal check.
- Wheel bearings check.
- Servicing of the fifth wheel, checking of bolts, cracks, and worn-out parts.
- General Service of parts and electrical system.

(B) MEDIUM SERVICE (36000 km)

- Wheel alignments, wheel bearings
- Ball joints check and repair
- Propeller shaft cross bearings

- Change engine oil.
- Change oil filters and diesel filters
- Check gearbox and diff oils.
- Servicing of the fifth wheel, and inspect damaged bolts and worn out parts
- Lubrication and greasing of parts and checking the electrical system.

(C) MAJOR SERVICE (54000 km)

- Changing of gearbox oil
- Change of radiator coolants and water
- Tappet engine valve clearance
- Changing of differential oil
- Changing of engine oil, and hydraulic oil
- Changing diesel and oil filters
- Testing of shock absorbers and replace weak ones.
- Valve covers gasket change.
- Testing of engine nozzles and replace damaged ones.
- Replace air cleaner elements.
- Check compressor rings.
- Check thermostat.
- Service fifth wheel, check fifth wheel moon and replace worn out parts and bolts.
- General service for parts, check the electrical system, lubrication, and greasing of parts

2: TRAILERS

General Service (done after every trip)

- Visual inspection
- Under chasse inspection
- Wheel bearing free play
- Pivot and Radius bush check
- Brake adjustment and brake chambers repair
- Bottom valve check
- Tire Check
- U- bolt check
- Lubrication and greasing of parts and checking the electrical system
- Tire changing

3. Trailer Major Service

- Comprehensive service
- Replacement of entire suspension bushes
- Air below replacement
- Control arm bush repair
- Welding of cargo tank (if its leaking or there is intermixing of compartments)
- Wheel alignment

Prior to departure inspections are carried out using a vehicle pre-departure checklist. Defects noted on vehicles during inspections are repaired immediately before departure. If any defect is picked up, a Job Card is raised, and defect(s) are rectified.

Evidence of Job Cards are on record. The Workshop Supervisor is responsible for raising the work orders after inspecting the trucks with the driver. The head mechanic ensures the defect is rectified and then signs off the Job

Card form indicating the work done. The Workshop Manager countersigns the same work order to confirm that the defect on the vehicle has been rectified.

Pre-departure checklist for vehicles numbers selected trucks were reviewed.
Pre-trip inspections are conducted on each truck prior to departure and checklist signed by the HSSEQ Officer and the driver. The operation has a routine maintenance and periodic maintenance programs for all its vehicles. In case of a breakdown on the road, the operation has a mechanical team who will quickly organize themselves and drive to the site of the broken-down truck and repair it. The maintenance records for work done on some days have appropriately been placed on record.

Upon return from a trip each truck is inspected, and faults identified are fixed. The company has three escorts pick up vehicles. Evidence show that maintenance is carried out on trucks as well as the escort vehicles.

The company has a tyre management Policy PFT-PO-HSEQ-013 ver 09. Tyres are inspected periodically to ensure that they are in good condition. During pre-departure inspections, tyres of each vehicle in convoy are also inspected and the condition of tyres noted on the pre-departure checklist. A tyre inspection form is completed any time tyres are changed on a particular vehicle. The tyre inspection form shows the brand of tyres changed, the serial numbers and the location on the tractor unit or the trailer.

As per the Fatigue Management Policy PFT-PO-HSEQ-16 drivers are to respect the stipulated driving hours and take 30 minutes break for every 4hrs of continuous driving. To conform to the fatigue management policy of the company the operation has developed a journey plan which is completed by the Escort leader anytime the convoy stops for the drivers to take rest and the time of departing where they stop. No night driving is permitted and is strictly prohibited. Permitted driving hours is from 6am to 6pm. The GPS is monitored 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. Completed copies of journey plans were noted.

PFT has a Convoy Procedure which states that a special attention is made to ensure that twist locks and the fifth wheel are well fitted on trailers to avoid unhitching during driving. The checklist also makes provision for checking that the twist locks are firmly in place prior to the departure of the trucks. During brief stops for rest or a brief refreshment break, twist lock as well as the entire container are inspected, and the outcome documented. checklist is completed after the inspections before the convoy continues its journey. Evidence of copies of completed.

The RRA covers various conditions such as bad weather conditions, violence or civil unrest. Drivers are to stop in case of bad weather condition that impacts visibility of the drivers. The convoy is to stop and park at safe location until any civil unrest or violence is over before the journey is continued.

The company has a Drug and Alcohol policy (PFT-PO-ICMI-003 Dated 13.09.21) that prohibits the use of drugs and alcohol whilst at work. Alcohol tests are performed periodically by the QHSE team.

Alcohol test record is completed with the results of the tests performed indicating the name of driver, test result, date and signature of the HSSEQ person. Copies of alcohol tests records show the implementation of the drug and alcohol policy of the company.

The company has a document control procedure. All documented evidence of the activities conducted has been retained appropriately. Documents are retained for a minimum of 3 years.

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

PFT does not subcontract.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Besides every vehicle equipped with a tracking system – AFRITRUCK – each driver also has a cell phone.
Astrata does ongoing maintenance every three months to ensure uninterrupted service provision. The same company keeps backups for trips done and these can be accessed by the PFT Office.
The drivers communicate at least twice a day with the office – this is over and above of the communications that the Convoy Leader does.

During office hours, there are two people who track the convoys since the convoy only moves during the hours of 6 AM and 6 PM.

Coupled with the satellite tracking system, and predetermined check in calls, a WhatsApp group is set up per convoy and besides members of the convoy, the Workshop Manager, HSE, Finance, Operations Manager and Mechanics are put onto the group. This ensures seamless communication.

It is the responsibility of the HSSEQ Dept, Escort Leader to ensure that communication equipment is checked and record the findings on the Vehicle pre-departure checklist. The Escort leader further ensures that all mobile phones are inspected and are fully charged.

All equipment is checked prior to any convoy leaving the yard to ensure full functionality of all communication equipment and if a problem arises, it can be resolved before leaving.

The convoy leader has a list of all the emergency numbers to be called such as police, hospitals and people at PFT & Mine Site – this is in addition to the internal WhatsApp group that is set up for each convoy.

The mines are informed of the ETA for every shipment, and all the required paperwork is carried with the convoy to ensure a seamless chain of custody. Shipping documents include delivery manifests, truck checklists, MSDS's, quantities loaded and container seals.
Each driver also has a basic version of the MSDS in the local language, Swahili to ensure that there is no confusion with any information that the driver needs to know.

There are no black out areas identified on the road. However, the transporter has made provision by using multiple service provider's sim card in case one network drops.
It would appear that the issue of mobile phone blackout spots has been resolved by the mobile phone operators, so communication is seamless.

There are systems and procedures in place to track the progress of cyanide shipments.

The operation uses GPS Tracking system to track the progress of the convoys. The GPS is monitored 24/7 by the Tracking Manager. The driver or escort leader is quickly contacted in case there is a deviation from the approved route. Escort Leader or driver when contacted is expected to give reason(s) for the diversion. Management is then informed, and emergency response triggered when necessary. The Convoy Management Procedure specifies that email notifications are sent once every day to the Office who then informs the mine about the location of the convoy. In case of over speeding an alert is automatically sent by the GPS to the Tracking Manager who will take the necessary action. After each delivery to the mine, tracking reports of each convoy are printed and sent to the client for their records. Copies of GPS reports have been placed on record.

Shipping records such as Bill of Ladings and packing list are received from the manufacturer. The Bill of Ladings have the number of containers, date shipped, container numbers and gross weights of the containers. Copies of Bill of Lading also show gross weights of containers.

Shipping records indicate the amount of cyanide in transit and Materials Safety Data Sheets are available during transport.

The Suppliers MSDS for solid sodium cyanide is kept by the Convoy Leader, which describes the necessary handling precautions.

A summary data sheet that describes the necessary handling precautions is also included within the driver's delivery folder

The auditors observed the following documents

- MSDS-NaCN.pdf

Primefuels Tanzania does not subcontract.

Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

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:

The PFT storage area located on Julius Nyerere Road adjoins the Toyota Tz yard. The area has several other industrial activities.

The storage area is secured, with walls of around 4 meters in height topped with an electric fence. In addition to this, CCTV systems are in place to constantly monitor any activity either on the perimeter or inside, especially on sensitive areas such as the dedicated cyanide storage area. The management team also has access to footage while using their cell phones, so besides the service provider, PFT has private guards' security who monitor the site 24/7.

At the main entrance, there is adequate signage highlighting the dangers of entering and what PPE is required. There are guards on duty to monitor access control and the main gate is covered by CCTV.

A bunded zone has been built, this area also has security visible and is in a locked area. The bunded area was approved by the GCLA and can contain any spills for further treatment.

If the trucks had to collect containers and delivery would take place the next day, the trucks are driven to the storage yard and kept there overnight.

At the dedicated cyanide storage area there are adequate signs up warning of what PPE is to be worn and what is stored in that area.

The storage area is secured, with walls of around 4 meters in height topped with an electric fence. In addition to this, CCTV systems are in place to constantly monitor any activity either on the perimeter or inside, especially on sensitive areas such as the dedicated cyanide storage area. The management team also has access to footage while using their cell phones, so besides the service provider, PFT has private guards' security who monitor the site 24/7.

There are guards on duty to monitor access control and the main gate is covered by CCTV.

Cyanide is stored so as to minimize the potential for solid cyanide to come into contact with water.

The solid cyanide is packed by the cyanide manufacturer in heavy duty plastic bags inside nylon bulk bags which are packaged into UN approved wooden IBCs which are in turn placed within shipping containers for transportation.

The ICMI recognizes Sea Containers as secondary storage.

When required, the cyanide shipping containers are stored on a sealed hardstand and bunded area.

The integrity of the shipping containers is checked upon loading and their condition is recorded on a Dangerous Goods Container Check sheet when they enter the Interim Storage Facility.

Cyanide is stored with adequate ventilation to prevent the build-up of hydrogen cyanide gas.

The solid cyanide is packed by the cyanide manufacturer in heavy duty plastic bags inside nylon bulk bags which are packaged into UN approved wooden IBCs which are in turn placed within shipping containers for transportation.

All cyanide in PFT's interim storage facility is in transit; none is removed from the sea containers. Sea containers are stored in the open air and are loaded directly onto trucks.
At the time of the site no containers of cyanide were held at the interim storage facility. The area where the cyanide is kept is demarcated by metal grill fence.

There are systems in place to contain any spilled cyanide materials and to minimize the extent of a release. The emergency response plan includes procedures to manage spills.

The solid cyanide is packed by the cyanide manufacturer in heavy duty plastic bags inside nylon bulk bags which are packaged into UN approved wooden IBCs which are in turn placed within shipping containers for transportation.

In case of any spillage PFT must inform GCLA. Any spillage containment will be done under GCLA supervision.

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:

PFT has an Emergency Response Plan (ERP) which guides responses to potential cyanide emergencies. The ERP and the Transport Management Plan (TMP) are specific to the transportation routes used by the company.

The ERP address various neutralization processes namely.

- Neutralization of residues of sodium cyanide
- Procedure for decontamination of PPE's and equipment.
- Spill site actions

The plan describes the various actions of each of the emergency responders that are to be taken in case of an incident.

The physical and chemical composition of sodium cyanide is detailed in the ER Plan. Solid Sodium Cyanide, in briquette form and in IBC's and stacked in 6-meter sea freight containers is transported by road.

In the ERP is the MSDS, which provides information on the physical and chemical form of cyanide and the associated hazards and response actions, its UN No. 1689, product description and packaging. It also describes the reactions that may result when in contact with acids and other incompatible chemicals and when exposed to moisture.

The emergency procedure focuses on the transportation of cyanide by road. Route surveys have been conducted for the transportation routes from Dar Es Salaam port to the mine destination.

RRA's conducted describes the nature of the road. It was evident from documentation presented that the findings with respect to road infrastructure and road condition were taken into consideration. The nature of the roads (graveled or un graveled), slopes, bridges, water bodies, towns and villages, road markings on tarred road surfaces and condition of road surface are included in the RRA.

The designs of the vehicles are considered in the ERP and are appropriate for the load of sodium cyanide. The ERP considered the design of the transport vehicle.

PFT has an Emergency Response Procedure (ERP) document which details the procedures to be adopted and the required actions during all phases of emergency response and management associated with the transport of sodium cyanide.

The ERP is designed to provide the following.

1. Descriptions of response actions as appropriate for the anticipated emergency situation.

2. Physical and Chemical form of sodium cyanide transported.

3. Sufficient instructions to effectively deal with a cyanide transportation emergency

4. Minimization of risk to the public, environment, contractors, employees, emergency responders, property and equipment.

5. Roles of outside responders, medical facilities and communities.

The contents of the ERP were found to be appropriate to the company's transportation operations. The ERP contains the required PPEs which are part of the escort equipment. The escort equipment includes Safety hat, Rubber Gum boots, Goggles. Neoprene Gloves, Disposable Overall; HCN detector, and Oxygen resuscitator.

The roles and responsibilities of external responders are stated in the plan. Different possible incident scenarios have all been addressed in the ERP. The ERP and the Transport Management Plan (TMP) are specific to the transportation routes used by the company.

ER Procedure is applicable for the transportation of cyanide from Dar Es Salaam Port to Geita Gold Mine. The RRA, TMP and ERP took into consideration the road condition which includes rivers, slopes, curves, bridges, gravelled and un-gravelled portions of the road, road surface or dirt roads etc. The contents of the ER Procedure were found to be appropriate for the activities it has been designed for as it addresses issues particularly for the road transportation of the sodium cyanide.

The ERP mentions the physical and chemical composition of sodium cyanide. It describes the nature of cyanide and its packaging and other chemical properties. The plan describes the physical and chemical properties of the sodium cyanide. It details the results of reactions when on contact with acids and other incompatible chemicals and when exposed to moisture. The type of placards, namely toxic six and Marine pollutant labels. The plan further addresses the neutralization of released cyanide.

The emergency procedure focuses on the transportation of cyanide by road. No transportation is done by rail or sea. Route surveys RRA have been conducted for the transportation routes from Dar Es Salaam port to the mine site.

The ERP considers all aspects of transport infrastructure. The transport infrastructure is covered in the RRA. Evaluation of the route is done during route survey and outcome is mentioned in the route survey report. The nature of the roads, tarred or untarred, slopes, bridges, water bodies, towns and villages are appropriately covered.

The company’s ERP considered the design of the transport vehicle.

The ERP gives descriptions of response actions by various emergency responders as appropriate for an anticipated emergency situation.

The plan addresses the following four (4) incident scenarios.

1) Rollover of cyanide shipping cyanide container on dry ground without any spillage.

2) Rollover of shipping cyanide container resulting in spill on dry ground

3) Rollover of shipping container into water body.

4) Rollover of cyanide container resulting in injury.

The ERP addresses the roles of emergency responders namely Police, Ambulance, Fire Service, GCLA and the mine site.

In the event of an accident the Escort leader will notify the HSSEQ Manager who in turn will notify management about it. The QHSE Manager will then inform the company's crises management team. The HSSEQ Manager will activate the emergency response immediately. The Escort leader will contact the local authority and supporting government agencies. The ER team led by the escort leader will then cordon off the area and move people upwind. Action will be taken by the ER team to do a clean-up, neutralize and recover the container(s). The overall coordination and management of an incident is the responsibility of the Escort Leader in consultation with the HSSEQ Manager.

The ERP contains the phone contact numbers of all external responders namely Police, Hospitals, Ambulance, Fire Service, GCLA and the mine.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The company has a training program for all its workers.

The TMP details the following general training for both drivers and escort team.

1. Proficiency in the management of emergencies involving the spill of sodium cyanide

2. Proficiency of understanding emergency procedures in the event of a cyanide spill

3. The recognition and classification of sodium cyanide

4. Specific transport procedures and precautions

5. General awareness in clean-up operations.

Training is conducted practically and theoretically on cyanide handling.

PFT has the following mandatory training programs.

a) Cyanide awareness training
b) Health & Safety at work
c) Defensive driving
d) Emergency response
e) Fatigue management training
f) Highway code (driving code)
g) Fire Fighting
h) First Aid Training

All the training are conducted once per year. It was evident that training has been conducted in the past years. There is evidence of two years records of training attendance sheets.

The training details cover all aspects of cyanide awareness and emergency response. The HSSEQ Manager is responsible for conducting the training.

Training matrix shows annual refresher ER training which are organized for employees. To ascertain the effectiveness of the training, assessment of participants are done by verbal assessments (questioning and answering verbally).

The ERP give details of the duties and responsibilities of the escort team and each emergency responder. In case of an incident, the Escort Leader will be in charge of the overall management of the incident. He takes the appropriate measures for the management of any emergency in consultation with the emergency responders.

The company's transport department will be responsible for providing human and material resources for the proper management of emergency situations during cyanide transportation incident. The police will assist in traffic management, moving of people from the accident area, protect people and secure the incident site and write their accident report. The Fire Service will be in charge of providing assistance to victims in the event of an emergency. The administration of 100% oxygen to a victim is the responsibility of the Escort team leader. The hospitals are responsible for the treatment or administration of antidote to a person poisoned by cyanide. The GCLA will give expert advice and advice on remediation measures.

PFT has a list of emergency equipment containing the names of the individual items and quantities.

The list of equipment are;

01 Oxygen resuscitator
02 Tyvek Overalls
03 Cyanide Antidote kits
04 First Aid kits
05 Full face respirator and filter
06 HCN Detector
07 Spare filters
08 PVC gauntlet gloves/overalls
09 Rubber boots
10 Safety triangles
11 Convoy signs
12 Cones
13 Shovels
14 Broom
15 Tarpaulin
16 Bulk bags
17 Plastic bucket
18 Spray pack
19 Reflector tape
20 Ferrous sulphate
21 Touch
22 Water drums (200liters)
23 Danger flags
24 Distress device
25 3meter
26 Sodium hypochlorite
27 Torch light
28 Megaphone
29 Radios
30 Digital camera
31 Oxygen resuscitator
32 Cyanide antidote (Cyanokit)
33 6Kg Fire extinguishers
34 Helmets

HCN gas tester is new and calibrated by the manufacturer. PFT has a plan for Calibrating the HCN gas meters every year according to the manufacturer's recommendations.

The Escort leader is responsible for the equipment. As per the ERP, the escort equipment is inspected at regular intervals and before a convoy departs to the mine. This is to ensure availability and operability.

Emergency equipment's are carried in escort vehicle during the journey to the mine site.

The Escort Equipment is kept in the QHSE Manager's office and buffer stock of the spares at the company's warehouse.

The ER equipment's are inspected by the escort leader prior to departure of a convoy. An escort equipment checklist is completed after the inspection.

PFT does not subcontract.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The operation has procedures and current contact information for notifying the appropriate stakeholders. The Reporting and Investigation sections in the ERP states that all incidents and near misses during the transport operations are to be reported to PFT's HSSEQ department. This will allow for investigation of events and causes, and for tracking any follow up actions that arises. All transport incidents or accidents are to be reported to the relevant competent authorities as required.

The ERP has the list of Emergency contact phone numbers of external responders such as police, Ambulance, Fire Dept, Hospitals, mine site.

Revision of internal and external notification and reporting procedures are kept current by HSSEQ Manager. As per the ERP, the ER contact numbers are reviewed and confirmed twice a year during a route survey. The HSSEQ Manager's responsibility for updating the list of current internal and external emergency telephone numbers as well as the reporting of incidents to the authorities.

The ERP details a procedure to notify ICMI about any significant cyanide incidents that may occur. These include the following events:

a) Human exposure that requires an action such as decontamination or treatment.

b) Accidental release which enters natural surface waters, on or off-site.

c) Accidental release that occurs off-site or migrates off-site.

d) An onsite release requiring action by an emergency response team.

e) A transport incident requiring emergency response for cyanide release.

f) In case of a multiple wildlife fatalities where cyanide is the cause

g) In case of theft of cyanide

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:

There are procedures for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

In the Cyanide Procedures there is The Emergency Response 'Decontamination of a Spill of Solid Cyanide into Soil'. This details the decontamination of a spill of solid cyanide into soil and includes details if water is impacted. The emergency guide details the following:

- Appropriate PPE;
- Determine the area affected;
- Measure pH of contaminated soil;
- Determination of soil type;
- Instructions to contact the supplier where required for assistance on concentrations of sodium hypochlorite or Furrous Sulphate needed;
- Addition of alkali reagent (lime or sodium bicarbonate);
- Need to excavate soil;
- Testing sub-soil;
- Replacement with fresh soil;
-
- Taking bore samples;
- Consultation with Water Authority; and
- Decontamination of clothing and equipment following the procedure.

For treatment of contaminated ground, Sodium Hypochlorite (Hypo) is the preferred reagent

It includes a procedure for disposal of cyanide contaminated soil and wash water. It states that contaminated soil and spilt material will be disposed of at a mine site facility/tailing.

There are also procedures for dealing with a dry spill and for dealing with a wet spill.

The Secondary Response section of the Cyanide Procedures states that PFT in conjunction with regulatory authorities will undertake a monitoring program at an accident/incident site where cyanide is released into surface water.

The ERP discusses remediation procedures for the following.

- Clean up and recovery of sodium cyanide solid material
- . Neutralization and disposal of contaminated soil
- Neutralization and disposal of recovered solution.
- Neutralization and or disposal of removed topsoil.

The process of neutralization of soil has been addressed appropriately in the ERP. The Escort team leader is responsible for the initial overall management of recovery in consultation with the external responders.

Any contaminated soil or product removed during clean-up will be sent to the mine site where the waste will be disposed off appropriately by the mine.

The procedures prohibit the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

ERP prohibits the use of sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water. Statement confirmed during interviews with Escort leaders.

ERP prohibits the use of sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been 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:

PFT's ERP makes provisions for periodic review and evaluation of the response procedures and capabilities adequacy, and they are being implemented. As per the procedure, the ERP is reviewed annualy or when changes to system or procedures make it necessary.

The ERP makes provision for annual emergency response drills. Cyanide Emergency exercises are conducted biannually involving drivers, HSE and logistic agents. Training is organized by the QHSE department of the company. The QHSE Manager is responsible for developing the strategies and training outcomes. The training matrix also makes provision for emergency drills to be conducted once annually. Recent mock drill was conducted on 10th May 2022. Mock drill report noted, and content was scrutinized. The report describes the incident scenarios, participants, non-conformities and corrective action plans.

The operation has a procedure to evaluate the plan's performance after its implementation. There is a provision made in the ERP for periodic reviewing and evaluation of the procedures. Records of mock drill reports shows that mock drills were repeated to ensure that any non-conformities are rectified Non-conformances noted during the last drill were appropriately addressed. Mock drills are evaluated through debriefing and corrective action plans put in place to correct any lapses. The corrective action plans are used to revise the procedures.