INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary
Pre-Operational Certification Audit Report

SAS Logistics Ltd
Dar-Es-Salaam
Tanzania

11 to 13 October 2021

For the
International Cyanide Management Code

TRANSPORTATION SUMMARY AUDIT REPORT

Operation General Information

Name of Transport Operation: SAS Logistics Ltd

Name of Facility Owner: SAS Logistics Ltd

Name of Facility Operator: SAS Logistics Ltd

Name of Responsible Manager: Mr Merey Ngitami

Address: Plot 126, Tabata – Mabibo, Dar-Es-Salaam / Box P.O.Box 31531, Dar-es-Salaam

State / Province:

Country: Tanzania

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Email: merey@sas-logistics.org

Operation Location Detail and Description

The scope of this ICMI transportation pre-operational compliance audit covered the preparations for cyanide transport operations by SAS Logistics Ltd.

SAS Logistics Ltd is a privately owned and operated Tanzanian company with its Head Quarters in Dar-Es-Salaam, Tanzania. SAS Logistics currently transports explosives and various other chemicals such as Ammonium Nitrate, Sodium Nitrate, Sulphamic Acid and Soda Ash. Transport is currently in either liquid, powder or solid form and plans to start transporting Cyanide from the Dar-Es-Salaam Port to Gold Mines in Tanzania. The cyanide to be transported will be solid cyanide briquettes form, packed into one ton wooden boxes/intermediate bulk containers and transported in 20m steel sea containers.

The company has workshops at the headquarters in Dar-Es-Salaam, where it conducts all its own vehicle and tyre maintenance.

Auditor's Finding

This operation is in
X full compliance , pre-operationally
☐ 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, pre-operationally and this Pre-Operational Transportation Audit Report will be confirmed through a Completion Report following a verification audit after, and within 6 months of, the first shipment of cyanide by the Transporter.

Auditor Information

Audit Company: Transheq Consulting and Auditing (Pty) Ltd

Lead and Transportation Auditor: Richard Durrant

Lead Auditor Email: richard@transheq.co.za

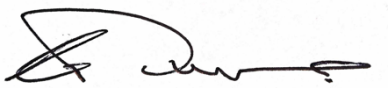
Names and Signatures of Other Auditors: N/A

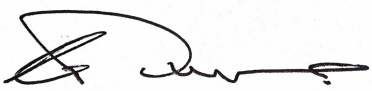
Dates of Audit: 11, 12 and 13 October 2021

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.

SAS Logistics Ltd		09 December 2021
Name of Operation	Signature of Lead Auditor	Date

SAS Logistics Ltd		09 December 2021
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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:
Route Risk Assessments (RRA) are in place for various routes to gold mines from the Dar-Es-Salaam Port (the Port). The distance, travel time and road conditions are recorded on each RRA. The Tanzanian Government Chemist Laboratory Authority (GCLA) requires the routes to be travelled with chemicals to be specified on the permit issued by the GCLA for each convey of chemicals transported. A GCLA representative (Chemist) will accompany the vehicle convoy from the loading point to the offloading point.
Population density is currently not addressed in the RRA and RRA's will be updated to consider population densities relating to cyanide shipments.
Road conditions are described in the RRA's and will be updated to consider more detail relating to cyanide shipments.
Pitch and grade are included in RRA's. Water bodies are not specifically identified in RRA's but will be added in time for cyanide transport. Fog is seldom experienced in the region.
No current procedures in place to describe when and how RRA's will be conducted or the procedure to updated. A detailed procedure for conducting of cyanide RRAs will be in place before the first cyanide transport takes place. RRA's are currently updated based on information received from drivers or from Convoy Leader. This information is provided to the Operations Manager and Head of Health and Safety after each completed trip Convoys are used in all instances when transporting chemicals of any United Nations (UN) Dangerous Goods Class. An escort vehicle accompanies each convoy for the full duration of each loaded trip.
No transport sub-contracting is undertaken for the transport of any chemicals. Accident and cyanide product clean up would be conducted by an in-house team made up of the transporters own staff with the assistance of the police. SAS Logistics undertakes to train and educate its own staff, GCLA staff and the local authorities on each route over which cyanide is transported.

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

The basis for this Finding/Deficiencies Identified:
Truck drivers are all licensed in terms of driver's license requirements for operating heavy vehicles in Tanzania. Control on validity of drivers licenses are in place.
Annual medicals are conducted on all employees by OHSA (Occupational Safety and Health Authority of Tanzania). Drivers attend Defensive Driving Course presented by National Institute of Transport as well as GCLA training for the transport of chemicals.
No personnel operating cyanide transport equipment have been trained to date and the company commits to providing training prior to the first shipment being transported.
No handling equipment operated by SAS Logistics will be utilised for the handling of cyanide.
Training records are in place for other chemicals that are currently transported.
No transport sub-contracting is undertaken for the transport of any chemicals. No sub-contracting is envisaged, but SAS Logistics are aware of their necessary process of making any sub-contractors aware of Code requirements will be complete before any cyanide transport takes place.

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 drawing three axle flat deck trailers with container twist locks will be used for the transport of solid cyanide boxes packed in 6 metre sea containers. One 6 metre container with a mass of approximately 20 tons would loaded onto each vehicle combination. In terms of Tanzania Road Traffic Act a load mass of 30 tons can be loaded on such a vehicle combination therefore the imposed load to be transported is well within the vehicle and legal load limits No forklifts or cranes that are operated by the truck operator will be used for the loading or offloading of cyanide. All loading and offloading equipment for the handling of cyanide will be supplied by the Port for loading and the various Gold Mines for offloading.
Detailed maintenance records are in place for all truck tractors and trailers operated by the company. The majority of maintenance is carried out in-house in the company's own workshops using parts obtained from the Original Equipment Manufacturers (OEM) or their local agents. Every vehicle combination is inspected by the workshops on its return from each trip and any signs of stress or cracking on chassis, axles, decks or twist locks, due to the load or road conditions, is attended to immediately. The company monitors all loads to ensure that they do not exceed the legal load limits prior to the vehicles being loaded or departing from the loading point. There are government controlled vehicle weigh stations in place on all major routes.
Only road transport is and will be conducted and no sub-contracting is envisaged, but SAS Logistics are aware of their necessary process of making any sub-contractors aware of Code requirements will be complete before any cyanide transport takes place.

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:
The packaging for the cyanide being imported will conform to the International Maritime Dangerous Goods Code (IMDG) and is packed at source by the producer/consignor. The container will remained sealed for the duration of the delivery journey to the mine. Convoy leader will ensure that the split placarding on the shipping containers is visible on four sides of each container on collection at the Port. Placarding/marking of vehicles carrying chemicals is a legal requirement in Tanzania and evidence seen that this is done in practice. With the transport of solid cyanide imported in sea containers the IMDG Dangerous Goods Placarding applied to the container by the consignor for sea shipment will remain in place for the land transport. Marking of the vehicle will be in accordance with local legal requirements.
Detailed Pre-Start Vehicle Checklist are in use and are completed prior to each vehicle departure. Preventative maintenance controls and records are in place for all truck tractors and trailers and this includes tyres. Records reviewed during the pre-operation audit extend back for the operational life of existing and disposed of vehicles while under the ownership of SAS Logistics for both trucks and trailers. Any sea containers used for the transport of chemicals by road are not the property or the responsibly of SAS Logistics. No maintenance on these sea containers is conducted by SAS Logistics. This would also apply in the case of sea containers used for the transport of cyanide.
No movement of heavy vehicles is permitted between the hours of 18:00 to 06:00. Police monitor the movement of vehicles closely and vehicle tracking system is set to report any after-hours driving or movement that may occur. When vehicles conveys are in progress regular stops are made to allow for vehicles safety checks and for drivers to relax.
For current loads a procedure is in place for loading and securing of loads. This procedure has been translated into the local indigenous language. The packaging for the solid cyanide being imported will conform to the IMDG Code and is packed at source by the producer/consignor. The shipping container will remained sealed for the duration of the delivery journey to the mine.
Vehicles are tracked in real time by the Operations Manager and any requirement to re-route vehicles under conditions such as severe weather, road damage or civil unrest are made accordingly. The Convoy Leader is also responsible to report any abnormal circumstance to the Operations Manager.
No drug or alcohol testing program is currently in place. A substance abuse policy covering alcohol and drugs that includes provisions for random testing for both drugs and alcohol will be developed
Document records and controls are in place as applicable and will include retention of records for all activities as required by ICMI
No sub-contracting is envisaged, but SAS Logistics are aware of their necessary process of making any sub-contractors aware of Code requirements will be complete before any cyanide transport takes place.

SAS Logistics Ltd — 09 December 2021
Name of Operation. — Signature of Lead Auditor — Date

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

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:
Mobile phones are supplied by the company to each driver. Each driver and Convey Leader has emergency contact numbers available for use in the event of an emergency. Drivers are responsible to have sufficient airtime available. Random testing of communication is conducted prior to vehicle departures. No record of testing of mobile phones is currently maintained. A process of testing of mobile phones will be implemented prior to the first shipment of cyanide.
Communication blackout areas will be included in the RRA's before any shipments of cyanide take place. No substantial blackout areas have been experiences on any of the current routes travelled.
Tracking systems are installed on all vehicles. Tracking is monitored by the Operations Office and Operations Manager and can also be monitored on various mobile phones**.** Alerts for speed violations, off route, night movement are currently in use and acted on as required.
Currently each consignment of chemicals is weighed when being loaded. Inspection of locks or seals on sea containers are checked when sea containers are utilised. No documented procedure is currently in place. This procedure will be implemented before any shipment of cyanide takes place. Cyanide will be delivered directly from the port to the mines.
Safety Data Sheets (SDS) are be provided to each driver together with other load documentation by SAS Logistics. The provision of SDS sheets is a legal requirement for all chemicals transported and is verified by the GCLA for each consignment and for each vehicle in a chemical transport convoy.
No sub-contracting is envisaged, but SAS Logistics are aware of their necessary process of making any sub-contractors aware of Code requirements will be complete before any cyanide transport takes place.

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 envisaged. Road transport of solid cyanide is currently only envisaged directly from the Port to the mine in sealed sea containers.

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:
An Emergency Response Plan is currently in place and it will be reviewed in the context of the new cyanide route risk assessments and changes made, as appropriate, before cyanide transport. Only solid cyanide is currently being considered for road transport.
The design and configuration of the transport vehicles being truck tractors drawing three axle flat deck trailers with container twist locks would be used for the transport of solid cyanide boxes packed in 6 metre sea containers.
No interim storage will take place.

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:
Cyanide specific emergency response training will be conducted for all appropriate staff prior to cyanide transport taking place . Description of the specific emergency response duties and responsibilities of personnel will be included in the Emergency Response Procedure as related to cyanide emergencies.
No inventory of emergency response equipment is currently in place. This will be revised, as appropriate, before cyanide transport commences.
A commitment is in place to supply appropriate Personal Protective Equipment (PPE), based upon risk assessments and scenarios identification before cyanide transport commences.
Emergency response equipment in the form of fire extinguishers, first aid kits, spill response

kits, safety cones and hazard tape is carried on vehicles in the conveys. Prior to a convey departing on a trip this equipment is checked and verified that they are in place and in good working order. Vehicle equipment checklists are in place.
No emergency equipment for cyanide specific incidents is currently available. This equipment will be in place before cyanide transport commences.
No sub-contracting is envisaged, but SAS Logistics are aware of their necessary process of making any sub-contractors aware of Code requirements will be complete before any cyanide transport takes place.

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:
An Emergency Response Plan is currently in place and each driver and Convey Leader currently has emergency contact numbers available for use in the event of an emergency. Procedures and contact information for notifying appropriate entities such as the cyanide producer, the customer, regulatory agencies, external response providers, medical facilities and potentially affected communities of an emergency will be included in the Emergency Response Plan in the context of cyanide-related modifications to the plan. The Emergency Response Plan is currently updated whenever a change occurs, or at least annually.
A procedure will be put in place regarding the requirement to notify ICMI of any significant incident that may occur. This procedure will be in place before any cyanide transport takes place.

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:
Remediation will be carried out by SAS Logistics with assistance from the GCLA. Inputs and assistance will also being sought from the various gold mines. This will be finalised before cyanide transport takes place.
The prohibition for the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide, that has been released into surface water, will be included in the Emergency Response Plan and communicated to all parties before cyanide transport commences.

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:
The Emergency Response Plan will be reviewed annually as a minimum. The cyanide components will be reviewed before cyanide transport commences.
Site fire drills have been conducted in the past. No cyanide drills have been conducted as yet. Once the Emergency Response Plan has been updated for cyanide, drills will be planned.
The cyanide adapted Emergency Response Plan is yet to be implemented. It is, therefore, too premature to evaluate the performance of the Plan in a cyanide simulated or actual context.

End of Report

SAS Logistics Ltd — 09 December 2021
Name of Operation. Signature of Lead Auditor Date