Investor Solutions Limited
P.O Box 67562
Nairobi
Kenya

ICMI RE-CERTIFICATION - SUMMARY REPORT

Name of Cyanide User Facility:	Stellar Logistics Limited
Name of Cyanide User Facility Owner:	Not Applicable
Name of Cyanide User Facility Operator:	Stellar Logistics Limited
Name of Responsible Manager:	David Tetety Noi - QHSE Manager
Address:	Airforce Station, Near Kwame Nkrumah Roundabout, Takoradi
Country:	Ghana
Telephone:	+233 552 569 286
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Audit Company	Investor Solutions Ltd

STELLAR LOGISTICS LIMITED (SLL)

SLL became a Signatory to the International Cyanide Management Code on 01 November2012 as part of the repeated requests by companies to transport Cyanide to various mines in West Africa. They were initially Cyanide Code Certified in April 2015. Recertification was completed in 2018.

Stellar Logistics Limited (Stellar Logistics) is a division of the Stellar Group of Companies. Stellar Logistics is a wholly owned Ghanaian entity that was established in 2007 to provide freight forwarding and logistics services. The Company's head office is in Accra, with branches in Takoradi, Accra, Tema, Ouagadougou, Burkina Faso and Lagos, Nigeria.

The Group of companies provides logistics, hospitality, travel, power, ship broking, and property maintenance and retail services.

Stellar logistics transports leg of the business is involved in the transportation of sodium cyanide in sparge containers (isotanks) and containerized IBC's to the mining industry in Ghana.

Currently, the company transports solid sodium cyanide manufactured by Orica Australia Pty Ltd, in 20' general purpose shipping containers or in sparge isotainers from the ports of Tema and Takoradi, Ghana to Orica's Cyanide sparging facility in Tarkwa, Ghana. Containerized cyanide loaded in the port of Tema, Ghana is delivered directly to Asanko mine and Goldfields Tarkwa whilst sodium cyanide in isotanks is delivered to end user destinations namely AngloGold Ashanti Obuasi and AGA Iduapriem mines.

Stellar Logistics has a truck yard and in its office in Takoradi. The Takoradi yard also has a maintenance workshop for repair of vehicles.

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Stellar Logistics Limited

This report has been prepared 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.

CONTENTS

INTRODUCTION

The "International Cyanide Management Code for The Manufacture, Transport, and Use of Cyanide in The Production of Gold" (the Code) was developed by a multi-stakeholder Steering Committee under the guidance of the United Nations Environmental Program (UNEP) and the then, International Council on Metals and the Environment. The Code is a voluntary industry programme for gold& silver mining companies, and companies involved with the production and transport of cyanide to gold& silver mining companies; it focuses exclusively on the safe management of cyanide. Companies that adopt the Code must have their operations, which manufacture cyanide, transport cyanide or use cyanide to recover gold& silver, audited by an independent third party to determine the status of the Code's implementation. Those operations that meet the Code's requirements can be certified and are able to use a unique trademark symbol, which identifies the company as a certified operation. Audit results are made public to inform stakeholders of the status of cyanide management practices at the certified operation.

The objective of the Code is to improve the management of cyanide used in gold& silver mining and assist in the protection of human health and the reduction of environmental impacts (further information can be found at www.cyanidecode.org). The Code is managed by the International Cyanide Management Institute (ICMI).

AUDIT TERMS OF REFERENCE

Investor Solutions Ltd was assigned by Stellar Logistics Limited (SLL) to conduct a Recertification Audit of their cyanide transportation activities.

Acronyms

SLL .....Stellar Logistics Limited
ICMC.....International Cyanide Management Code
HGV .....Heavy Goods Vehicle
QHSE.....Quality, Health, Safety & Environment
HSE .....Health, Safety & Environment
IMDG .....International Maritime Dangerous Goods (Code)
EPA .....Environmental Protection Agency
RRA.....Route Risk Assessments

AUDIT SCOPE AND METHODOLOGY

The scope of this audit covers the road transportation of cyanide from the Ports of Takoradi and Tema in Ghana to customers mine sites and from the Takoradi port to Orica's sparge facility in Tarkwa. The sparge facility is owned and operated by Orica which the supplier. Stellar Logistics transports both sodium cyanide in Intermediate Bulk Containers (IBC's) in 20ft containers and in isotanks. The isotanks are usually transported from the Orica's Sparge Facility in Tarkwa to AngloGold Ashanti Obuasi mine and AngloGold Ashanti Iduapriem mine whilst cyanide in IBC's is delivered directly from the port of Tema and Takoradi to Asanko mine and Goldfields Tarkwa respectively.

STRUCTURE OF THE REPORT

The Protocol, and audit findings against the Principles and Standards of Practice detailed within the Protocol, are presented in tabular form in Section 3 of this report. Observations that are not classified as audit findings but are noteworthy because they provide perspective on the status of cyanide management within the organisation are also detailed within that section.

AUDIT SCHEDULE

The Re-certification Audit was undertaken between 02nd to 4thAugust 2021.

AUDIT TEAM

The audit team comprised:

- ✓ Kuldip S. Degon, PCQI (ICMI pre-certified Lead Auditor); and
- ✓ Benjamin Amoo-Mensah (ICMI pre-certified Transportation Technical Specialist).

BACKGROUND

SLL became a Signatory to the International Cyanide Management Code on 01 November 2012 as part of the repeated requests by companies to transport Cyanide to various mines in West Africa. They were initially Cyanide Code Certified in April 2015. Recertification was completed in 2018.

Stellar Logistics Limited (Stellar Logistics) is a division of the Stellar Group of Companies. Stellar Logistics is a wholly owned Ghanaian entity that was established in 2007 to provide freight forwarding and logistics services. The Company's head office is in Accra, with branches in Takoradi, Accra, Tema, Ouagadougou, Burkina Faso and Lagos, Nigeria.

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Stellar Logistics has a truck yard and in its office in Takoradi. The Takoradi yard also has a maintenance workshop for repair of vehicles.

Road transportation

Stellar Logistics Ltd transports cyanide manufactured by Orica (PTY) Ltd which is certified by ICMI. The cyanide (solid) from Orica is packaged into wooden intermediate bulk containers (IBC's) which are packed into shipping freight containers that is to be transported by sea to the ports of Tema and Takoradi in Ghana. A maximum of 20 IBCs with each IBC weighing 1.135tons are packed into a 20-footer freight container with a maximum gross weight of 25 tonnes. Cyanide in briquette form is packed in hermitically sealed polypropylene bags. This bag is enclosed in a woven polyethylene bag that is encased in a custom designed strong plywood box and closed with a wooden lid. As extra support, the IBC's (box) is then strapped around with steel strapping which supports packaging further. The box is placed on a pallet to provide further protection during transit and offloading. Ply-wood boxes are then stacked into a 6-meter (20 foot) sea freight container. A maximum of 20 IBCs is packed into a freight container.

Before arrival of the shipments, Stellar Logistics ensures that the shipping documentation is in order and the goods are cleared to allow prompt handling of the product through the ports. Upon arrival at the ports, the loading of the containers is performed by the port stevedores. Stevedoring company Tacotel is responsible for handling the product at Takoradi port whilst Meridian Port Services is responsible for the port handling activities in Tema port.

In Takoradi port, Stellar Logistics collects the containers and transport them to customer mine sites or to Orica's sparge facility in Tarkwa using the following routes: -

- ❖ TACOTEL terminal in the Port of Takoradi – Agona – Nseum – Bonsaso – Orica sparge facility in Tarkwa.
- ❖ Orica sparge facility in Tarkwa to AngloGold Ashanti Obuasi mine and Iduapriem mines.

In Tema port, Stellar Logistics collects the containers and transports them to Asanko mine using the following routes:

- ❖ Meridian Port Services (MPS) terminal in the Port of Tema – Accra– Nkawkaw - Konongo- Bekwai - Asanko mine site.

SUMMARYAUDITREPORT

Auditors Findings

Stellar logistics Ltd. (SLL)	☑ in Full Compliance with ☐ in Substantial Compliance with ☐ Not in Compliance with	THE INTERNATIONAL CYANIDE MANAGEMENT CODE

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Stellar Logistics ltd, operation has maintained full compliance with the International Cyanide Management Code throughout previous three-year audit cycle.

Audit Company Investor Solutions Ltd

Lead Auditor Kuldip S. Degon, PCQI, (ICMI pre-certified Lead Auditor)
Email address

Specialist Auditor Benjamin Amoo-Mensah (ICMI pre-certified Transportation Technical Specialist)
Email Address csbpghana@ghana.com

_____ 04th August 2021
Specialist Signature Date

Dates of Audit

The Certification Transport Audit was undertaken over three days (Six person-days) on 02nd to 04th August 2021.

I attest that I meet the criteria for knowledge, experience, and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code verification Auditors.
I attest that this Summary Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner inaccordance with the International Cyanide Management Code Verification Protocol for Cyanide Transportation Operations and using standard and accepted practices for health, safety, and environmental audits

Stellar Logistics Ltd. _____ 4th August 2021
Audited Company Lead Auditor Signature Date

Stellar Logistics Ltd. _____ 04th August 2021
Audited Company Lead Auditor Signature Date

PRINCIPLE1-TRANSPORT

Transport Cyanide in a Manner that Minimizes the Potential for Accidents and Releases

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

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Transport Practice 1.1
☐ in Substantial Compliance with
☐ Not in Compliance with

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Stellar Logistics have implemented a procedure for the selection of primary transport routes to identify potential accidents or the potential impacts of accidents and releases. This procedure requires that all possible routes from the Ports in Ghana to the end user must be evaluated.

Reviewed Procedure for Route Assessment Procedure No. OPS-SOP-OO3 dated with current review date of 10th June 2021 version 10. Environmental Protection Agency (EPA) of Ghana issued a permit for the company's cyanide transportation operation, Permit No. EPA/WR/LHCT-179/21 dated 30th March 2021. Permit expires March 21, 2022.

The designated trucks for the cyanide transportation are listed at the back of the EPA permit issued by the authority. During the application process, the EPA is supplied with the cyanide manufacturers (Orica) MSDS, the Emergency Response Plan and Transport Management Plan of the company. SLL has a Route Selection Procedure which is used as a guide for developing of the Transport Route Risk Assessment (RRA) for each route.
Also, during the route selection the Truck Driver Guide-Ghana produced by the Ghana National Road Transport and Transit Facilitation Committee on behalf of Ghana government serves as a guide for all route assessments in relation to the laws and regulations on road transport.

The following was taken into account during the cyanide route selection.
- Distance,
-Number of towns and villages,
-population density
-Schools, Proximity to rivers and water.
-Road sealed or unsealed.
-Bridges and roads suitable for vehicles and vehicle weights,
-Pitch and grade of road and road conditions for wet and fog conditions.
-Environmental conditions

Stellar Logistics have conducted Route Risk Assessments from Takoradi port (TACOTEL terminal) to Orica's facility in Barbex in Tarkwa. From there some of the products in IBC's are transported to Goldfields Tarkwa Mine. Cyanide in sparge containers are transported from Orica's sparge facility in Tarkwa to AngloGold Ashanti Obuasi mine and AngloGold Ashanti Iduapriem mine.

The QHSE managers supported by the Transport Manager and Safety Officers and escort drivers are responsible for conducting the route risk assessment (RRA) during selection of the route Procedure "Transport Management Plan" has been developed on routes from Takoradi and Tema ports to the Asanko mine, Goldfields Tarkwa and AGA Iduapriem and AGA Obuasi mines.

During the RRAs on the selected routes, various potential hazard types such as the condition of the road surface, the pitch of the road, potholes, traffic on the roads and through towns, pedestrians, fog, smoke, sand, population density, rivers, bridges, sand storms and environmental conditions were evaluated and noted in the assessment documents.

Stellar Logistics Ltd. Audited Company

Lead Auditor Signature

04th August 2021 Date

Schools, Proximity to rivers and water, Road sealed or unsealed. Bridges Recommended preventative actions to mitigate or eradicate the risks on the selected routes are included in RRA assessment document. RRA procedure were found to be in place, appropriate and approved.

Recommended preventative actions to mitigate, reduce or eradicate the risks on selected routes are included in RRA assessment document.

Three Route Risk Assessments (RRAs) have been conducted namely
(1) Port terminal in Takoradi to Orica's sparge facility in Tarkwa,
(2) From Orica's facility in Tarkwa to Obuasi mine site and Iduapriem mine
(3) From the port of Tema to Asanko mine site.

Route selection procedure spells out the steps that are to be followed when conducting a RRA. Feedback report on road conditions or journey report is written by the Convoy leader after each trip.

The Transport Management Plan mentions a process of continuously evaluating the transportation route using feedbacks obtained on the road condition after each trip. The Convoy supervisor completes a feedback report form on the road condition after each trip of cyanide deliveries. Route survey reports show periodic reviews of the road conditions from Takoradi port to Orica's facility in Barbex, Tarkwa. Precautionary measures have been implemented. The TMP is reviewed as and when necessary and also depending on the End of Journey Reports obtained.

Measures to reduce risks are covered in the company's Risk Assessment. Stellar Logistics Route Risk Assessment Procedure outlines the category of risks to be identified during the conducting of a route assessment.

The Ghana Environmental Protection Agency assists in the community consultations.

Inputs have been sought from the Ghana Police Service Stations in Bogoso, Ayanfuri and Dunkwa 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 has been notified and informed about cyanide and have also been supplied with copies of the MSDS of sodium cyanide.

The Fire Commanders of the Ghana Fire Service in Tarkwa and Agona Nkwanta Fire stations which are towns within the transportation route have been contacted. Evidence show that each of the stakeholders have signed and stamped a document that they have been notified about cyanide and their roles in case of an emergency. Also two hospitals namely. Effia Nkwanta Regional Hospital and Agona Nkwanta hospital have been notified of their involvement during an emergency.

The Company has implemented a procedure requiring the route surveys be revised at least on an annual basis and has a process of obtaining feedback during debriefing session on route conditions after each convoy. This forms part of the Convoy Leader's responsibilities.

Procedure "Route Risk Assessments" compiled and implemented. The Route Risk Assessment Procedure outlines the category of risks to be identified during the conducting of a route assessment.

The Performing of Road Survey procedure requires route assessment and risks identified along the route be noted and management measures to be documented within a Transport Management Plan. Stellar Logistics has developed a Transport Management Plan for routes the transporter follow to Barbex and the mines.

Procedure requires regularly evaluation and re-evaluation of the risks on the primary route that the cyanide consignment will travel on. Procedure states that the process for selecting transport routes and conducting of RRAs is re-evaluated on at least on an annual basis.

Stellar Logistics Ltd. _____ 04th August 2021
Audited Company Lead Auditor Signature Date

A Convoy Management Procedure requires the use of one escort with four (4) trucks each carrying one container of cyanide. A maximum of eight (8) trucks per convoy are allowed. but usually there are four trucks per convoy. The maximum speed to be travelled on tar and dirt roads is also specified in this procedure.

The operation has a training matrix which includes the following:
1. Route Risk Assessment
2. First Aid Training
3. Convoy Management
4. Sodium cyanide awareness
5. Tabletop/ field sodium cyanide emergency simulation exercise
6. Correct use of Personal Protective Equipment
7. Fatigue management
8. Defensive driving training organized by Road Safety Limited.

It is a requirement for all drivers to have license "F"

Stellar Logistics Ltd. _____ 04th August 2021
Audited Company Lead Auditor Signature Date

TransportPractice1.2: Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Transport Practice 1.2
☐ in Substantial Compliance with
☐ Not in Compliance with

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SLL requires that personnel operating cyanide handling and transport equipment to perform their jobs with minimum risk to themselves, the communities, and the environment. Stellar Logistics utilizes drivers with Class F licenses to transport cargo. The license is valid for 6 years but renewed every 2 years to be able to drive a truck,

The operation has a recruitment policy and procedures that specifies the process of selecting a driver for employment. The process of employment includes road test, written examination, and valid license checks, and category checks, employment reference checks, driving records, driver's qualifications, drivers' health, and face to face interviews.

SLL only uses trained and competent operators to drive its delivery trucks. SLL has dedicated drivers that have appropriate training and valid vehicle licenses to transport cyanide. Personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimizes the potential for cyanide releases and exposures.

Cyanide awareness including loading and off-loading of cyanide, the company's Transport Management Plan, outcome of the Route Risk Assessment, Convoy management, Defensive driving techniques, Company Emergency Response Plan, Mock drills, Incident / accident management, basic first aid, basic fire fighting, driver fitness, drivers' competence and attitudes, driver's knowledge of the local rules of the road or highway codes.

Training matrix for drivers capture these training requirements. Evidence shows a training matrix for transporter's drivers and escort team members. 95% of the required training is presented by the QHSE Manager of the company. The rest of the training programs are presented by external service providers. Vehicle drivers and escort members are trained on: -
Cyanide Awareness.

- Company's Emergency Response Plan.
- Defensive Driving Training
- Simulation exercise for cyanide
- The Use of PPE.
- Cyanide first aid.
- Basic first aid; and
- Theoretical and practical firefighting.
- Forklift and crane operation.

The training presented is captured on attendance registers as well as the names and signatures of the participants. Orica's training booklet supplied to SLL are completed by the trainer and signed as part of training evidence.

Drivers attend toolbox meeting prior to the departure of each convoy of trucks. The cyanide convoys are usually under the supervision of the convoy leader. New drivers go through induction training before embarking on a journey. A new driver drives with an old driver for his first trip to acquaint himself with the road condition. Validity of driver's licenses are checked before vehicle pre-departure checks.

External responders such as the Ghana Police Service, Ghana Fire Service, St Johns Ambulance Service, West Africa Rescue Association and Nationwide towing service have been notified of their role specified to them. Community consultations are handled by the Ghana EPA in conjunction with Stellar Logistics.
SLL does not make use of sub-contractors for its sodium cyanide transportation.

Stellar Logistics Ltd. Audited Company

Lead Auditor Signature

04th August 2021 Date

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

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Transport Practice 1.3
☐ in Substantial Compliance with
☐ Not in Compliance with

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Stellar Logistics Management requires that transport equipment is suitable for cyanide shipment.

Technical specifications including truck tractor power, axle loadings and other parameters as set by the manufacturer specifications to ensure that the loads are within the legal capacities of the public roads.

The Company uses MAN diesel truck (HP 460 and HP 480) Howo (HP 420), DAF (HP 460/480) Renault (HP.480), and JAC (HP460) trucks. The truck configurations used are 8x4, 6 x4 and 6 x2/2. The trailer configurations are either two, triple or quadruple axles. The 8x4 truck configurations with quadruple trailers load two containers of approximate of 50 tons whilst 6x4 and 6x2/2 configuration of truck load one freight container weighing approx. 25ton.

According to Economic Community of West Africa States the allowable weight per axle for a road vehicle is 11.5 ton. SLL Loaded vehicles have maximum axle loads of 9.7 tons per axle. This is within the requirements of the Economic Community of West Africa state (ECOWAS). Loaded vehicle are within the allowable legal mass. The trucks are also weighed by Ghana Highway Authority weighing bridges along the cyanide transportation route and all records indicate that the trucks are within allowable axle load capacities. Available records show that Stellar Logistics has always been within legal load limit.

The geographical layout of area from port to Orica's Sparge facility in Tarkwa and the mines are fairly flat area but occasionally uphill. The company has an approved vehicle maintenance procedure. Maintenance on vehicles is done as per the manufacturer's specification as well as in accordance with the Company's maintenance procedure. Transporter has a Vehicle Maintenance Procedure supported by manufacturer's specifications requires that vehicles are serviced in accordance with these requirements. Maintenance on vehicles is done as per the manufacturer's specification and in accordance with the company's Fleet Maintenance Procedure. Transporter's Vehicle Maintenance Procedure requires that truck tractors and trailers are serviced at 8000km and 10 000 km maintenance service intervals.

As a way of checking that no periodic maintenance of a particular vehicle is skipped, the odometer reading for each truck is taken prior departure during pre-departure inspections and the details entered into a fleet Management Software. Maintenance records of each vehicle are kept on the fleet management software. This is monitored and servicing done on the vehicle when servicing is due. Again, servicing tags are put on each truck showing the previous mileage and the next servicing dates of each vehicle.

The operation has a tyre maintenance procedure where (Tyre Management) tyres are changed when the tread depth reaches 2mm. The tyres are replaced with new ones when a particular tyre reaches or is nearing a tread depth of 2mm.

Stellar Logistics Ltd. Audited Company

Lead Auditor Signature

04th August 2021 Date

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

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Transport Practice 1.4
☐ in Substantial Compliance with
☐ Not in Compliance with

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Cyanide in briquette form is packed in hermitically sealed PVC bags. These bags are enclosed in a woven polyethylene bags that are encased in a 1.1 ton custom designed strong plywood box and closed with a wooden lids. As extra support box is then strapped around with steel strapping which supports packaging further. The box is placed on a pallet to provide further protection during transit. Ply-wood boxes (Intermediate Bulk Containers, IBC's) are then stacked into a 6 meter (20 foot) sea freight container with each container containing 20 IBC's. The shipping container doors are secured with seals each with unique seal numbers. Details of consignment are documented on shipping documents.

Stellar Logistics transport both box cyanide in containers and cyanide solid in isotanks (sparge). Trailers are fitted with eight twist locks of which four are utilized for the securing of the containers/isotanks. Before shipment departs from the port it is the responsibility of the Convoy Leader and the driver to check the condition of each container as well as whether the seals are still intact on the doors. The seal numbers on both the cyanide containers and the sparge containers are noted on the waybills.

On route during stops, Convoy Leader checks the condition of the containers/isotanks as well as whether containers are still properly secured to the trailers. SLL has a Convoy Log sheet that details the container numbers, seal numbers and Bill of Lading numbers. The mine sites verify that seals are intact and the exact seal numbers and stamps the waybills once the deliveries arrive at their site.

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 tractor.

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

Prior to the trucks leaving to the port for loading, they are inspected and the predeparture inspection forms completed and signed by the Safety Officer. Prior to departure of the trucks to the mine site destinations, a second inspection is carried out on the convoy of trucks and predeparture checklists completed. Any defect picked up during the first inspection are rectified at the maintenance workshop by raising a workorder and the problem is fixed..

The company's preventaive vehicle maintenance programme specifies that vehicles (truck tractor and trailer) are serviced between 8000km and 10 000 kilometer intervals in accordance with the manufacturers specification. Vehicles fitted with a driver information module, indicates when vehicle is due for service. Periodic maintenance of vehicles are tracked via recorded kilometers registered on the odometer. The odometer readings are checked and noted on the vehicle pre-departure checklist. The different time for servicing of vehicles are tracked by the maintenance workshop.

A container handover procedure been compiled that includes the checking of the integrity of the packaging (container), what to check for, who to check what, who to endorse the document and when handingcontainer/s /isotanks over to mine site and the need to sign acceptance of the consignment. The loading of the consignments is done by Tacotel a company that manages the terminal at the port of Takoradi whilst in the Meridian Port Services terminal in the port of Tema handles the loading of the containers at that port. The Safety officer(Escort leader) is tasked with the checking that containers are in good condition (i.e. no dents, rusts on container etc.) and is in good condition. Container interchange issued by the port authority also specifies the state of the containers prior to loading them onto Stellar Logistics trucks.

Stellar Logistics Ltd. Audited Company

Lead Auditor Signature

04th August 2021 Date

A fatique management policy is implemented that limits drivers driving hours and mandates rest periods.Vehicles are fitted with SkyFMS GPS devices. Driving hours of vehicles are monitored via a GPS system. Driving with consignment of cyanide is only permitted during daytime, 06:00 to 18:00 and maximum speed limit for all vehicles in 70km/hr. No night driving is allowed.

The TM Plan specifies that twist are used to stabilize the freight containers to the trailer and prevent it from shifting. Procedures are in place that specifies that twist locks be checked before vehicles leave the port or Orica's facility in Tarkwa. The condition on twist locks are recorded on a checklist. En-route during compulsary stops these load securement devices are also checked.

The checking of twist locks are included in the list of inspections that are to be checked during preventative maintenance.

Procedure are in place to suspend the operations during to civil arrest, bad weather condition, road collapse, mudslides, and any adverse conditions that will affect the convoy movement.

Maximum continuous driving hours is 2hours and 15 minutes resting time. Maximum driving time within a day not to exceed 12hours.

SLL has a Drug and Alcohol policy. Unannounced and random test are carried out on employees. Drivers are subjected to these tests before departure to the mine site or to Orica's sparge facility in Tarkwa. Testing for drugs and alcohol are captured in document "Medical Examination form" as a requirement in the recruitment process as well as during annual medical examinations. Calibrated breathalizer device is used for these tests. A copy of calibration certificate of the breathlyzer and HCN gas detectors were reviewed. Anyone found to have drunk alcohol is suspended in the first instance and summarily dismissal from the company if found to have repeated the same act. Drivers go through annual medical checks to ensure that they are healthy at all times to work. The Breathylizer is calibrated by an independent qualified company called ALCO Safe Pty Ltd.

The operation has a "Control of Records Procedure which stipulates the retention period of commercial and other transport related documents. Documents, Checklist, and other records are retained in archive for a minimum period of 5 years.

Copies of bill of ladings gets retained and filed with the documentation of that consignment.

Stellar Logistics does not subcontract any of its cyanide transport activities.

Stellar Logistics Ltd. Audited Company

Lead Auditor Signature

04th August 2021 Date

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

SLL is in full compliance with Transport Practice1.5, based on the finding that the transport operation does not transport cyanide by sea or air. The operation is considered to be in full compliance due to this Transport Practice not being applicable.

This Transport Practice is Not Applicable

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

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Transport Practice 1.6
☐ in Substantial Compliance with
☐ Not in Compliance with

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All drivers have been allocated with cell phones to communicate with one another as well as with the convoy leaders. Convoy leader is issued with a Company cell phones and chargers. The convoy leader uses the cell phones to communicate with the Stellar Logistics head office, the mining company, the cyanide producer (Orica) and emergency responders. The convoy leader is issued with two sim cards namely MTN and Vodafone Truck tractors are fitted with SKY FMS GPS tracking system and Company cell phones for the escort vehicles. System is manned 24/7 by dedicated personnel.

Emergency telephone contact list is incorporated into the Company's Emergency Response Plan. The list details names of relevant people, contact phone numbers and email addresses of Orica Mining (Consignor), Goldfields Tarkwa, AngloGold Ashanti Obuasi and Iduapriem mines and Asanko mines, selected Ghana police stations along the transportation route, Ghana Fire Service, Ghana Environmental Agency, hospitals and Ghana Ambulance Service.

Communication equipment are tested to ensure their availability and that they functions properly. This inspection of communication equipment is mentioned on the vehicle pre-departure checklist and checklist is completed during vehicle pre-departure inspection. The GPS system monitors the locations of the convoy. No communication blackout areas were identified during RRA along. Despite this the convoy Leader is in possession of two sim cards from two cell phone network service providers i.e. MTN and Vodafone. In case one network does not work due to an issue from a service provider, the alternative network is used.

GPS tracing system is used to track and monitor the position and progress of the cyanide shipment. The system is manned by a dedicated Tracking Officer. As a backup, the QHSE Manager and the Fleet Manager can also access the GPS at any time a convoy is on the road. The convoy supervisor is responsible for sending the updates via emails to all concerned as mentioned aforementioned.

The transporter has implemented inventory controls and or chain of custody documentation to prevent the loss of cyanide during shipment when it commences cyanide transportation activities.

In-Vehicle Monitoring System (IVMS) has been installed in the vehicles. The company has a Standard Operating Procedure for tracking the company's fleet. The procedure covers a process for tracking the fleet through the GPS-GSM tracking and Monitoring the live feed and review of downloaded videos from the IVMS.

The containers being transported are covered with container waybills which are created based on the shipping documentation for each container. The documents and MSDS accompany the container throughout the deliveries. Updates of the convoy location are sent to all relevant stakeholders including the mine sites during the trip. The convoy supervisor is responsible for sending the updates via emails.

Stellar Logistics maintains records that indicate the total weight of the cyanide in transit when it commences the transportation of the product. This is achieved through the creation of a waybill which is based on the information provided on the shipping documentation. The waybills include a description of the goods including the freight containers details and weight. Upon signing the waybills at the respective mine site destination, the mine representative acknowledges that the consignment has been received in good condition and not tempered with.

A product Material Safety Data Sheet accompanies each shipment to the end user. The product MSDS is incorporated in the Emergency Response Plan. A copy of the product MSDS been made available to the Convoy Leader before embarking on a trip. Proof thereof is noted on a completed vehicle pre-trip checklist.
Stellar Logistics does not sub-contracts any of its cyanide transport operations.

Stellar Logistics Ltd. Audited Company

Lead Auditor Signature

04th August 2021 Date

PRACTICE 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.

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Transport Practice 2.1

☐ in Substantial Compliance with

☐ Not in Compliance with

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SLL is in full compliance with Transport Practice2.1, based on the finding that the transport operation does not store any cyanide. SL does not have a cyanide trans-shipment depot or interim storage of Sodium Cyanide.
Within the scope of this audit, there are no transshipment depots or interim storage sites as defined in the audit protocol. The operation is considered to be in full compliance due to this Transport Practice not being applicable.

This Transport Practice is Not Applicable

Stellar Logistics Ltd. Audited Company

Lead Auditor Signature

04th August 2021 Date

1 PRINCIPLE 3 - EMERGENCY RESPONSE: ENSURE THAT PROCESS CONTROLS ARE PROTECTIVE OF THE ENVIRONMENT.

Emergency Response Practice 3.1: Prepare detailed emergency response plans for potential cyanide releases.

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Emergency Response Practice 3.1
☐ in Substantial Compliance with
☐ Not in Compliance with

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

Physical and chemical composition of sodium cyanide is detailed in the ER Plan. Solid Sodium Cyanide, in briquette form, is transported by road stacked in 6 meter sea freight containers. No product is transported by rail or air. Sodium Cyanide enters Ghana through the port of Tema or the port of Takoradi.

The transporter has developed detailed procedure to cover emergency response for potential cyanide releases for cyanide transportation within the transportation routes to the respective mines and Orica's facility in Tarkwa. The scope of this plan is to provide information to all role players (in and external responders) with regards to each responder's role and responsibility who will be involved in the primary stage of an emergency situation. A list of Emergency Contact numbers is included in the plan. The information is contained within the route specific Emergency Response Plan and a Transport Management Plan.

The Transport Management Plan and Emergency Response Plan are based on road transportation of solid sodium over the routes to the end users. The cyanide may either be in containers or isotainers (when loaded from Orica's sparge facility). The ERP was found to be appropriate for the transportation of cyanide by road transportation on the selected roads.

The ERP has roles and responsibilities of each external responders such as the Ghana police, Fire Service, Ambulance, hospitals, mining company, Orica (supplier) and escort leader. The ERP also enumerates the various cyanide neutralization processes in handling spills and decontamination.

Categories of Sodium Cyanide Emergency Scenarios during transport: -

- Rollover of cyanide shipping container or isotainer without spill on dry ground.
- Roll over of container or isotainer with spill on dry ground.
- Roll over of cyanide container into water body.
- Rollover of Shipping Container/Isotainer container resulting in injury.

The ER Plan details the descriptions for the responses to the aforementioned anticipated emergency situations in the transportation of cyanide by road that have been identified during the process of conducting of the route risk assessment process. The plan describes the sequence of events during a road transport incident. The route risk assessments included consideration of the road transport infrastructure as outlined in 1.1 above. External stakeholders include emergency response organizations and government authorities / departments. The external responders such as Ghana Police, Ghana Fire Service, Ghana Ambulance Service and hospitals facilities, mines and EPA mentioned in the ERP, have been notified and are aware of their roles in an emergency. 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.

MSDS from Orica the producer of the cyanide is available at the transport facility. MSDS accompanied each shipment to either the end user or to Orica facility in Tarkwa as well as the respective mines destinations.

Both the ER Plan and the TM Plan details the physical and chemical properties of sodium cyanide. ERP and TMP focuses on the transportation of sodium cyanide by road. No transportation of this product is done by rail of water.

Flatbed trailers are fitted with manually operated twist locks utilised to stabilize the container to the trailer framework. The designs of the trailers used are appropriate for the load of 20ft containers and isotanks loaded with sodium cyanide.

The Emergency Response Plan details the roles and responsibilities of the outside emergency responders in the event of emergency situations. External responders identified in the documents, are aware of their roles during an emergency.

Emergency contact telephone numbers for both internal and external emergency entities are provided in both the ERP as well as the TMP.

Emergency Response Practice 3.2: Designate appropriate response personnel and commit necessary resources for emergency response.

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Emergency Response Practice 3.2
☐ in Substantial Compliance with
☐ Not in Compliance with

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Stellar Logistics provides emergency response training to appropriate employees as specified in the ER Plan. Training matrix shows annual refresher ER training are conducted for the employees. The cyanide awareness training is provided twice per year as per the transporter training matrix. Mock drills are held on annually. Mock drills have been addressed in the ERP. Evidence (training records) of annual ER training are appropriately placed on record. The training is mandatory for all drivers, escort team and other auxiliary staff of the company. The QHSE Manager is responsible for conducting the ER training. Orica the manufacturer of the cyanide also organizes training for SL staff.

The training records were reviewed and discussions with transporter's drivers and the escort team member confirmed that they have completed cyanide awareness and ER training.

The Emergency Response Plan identifies the specific emergency response duties and responsibilities of personnel for the four ER scenarios. Descriptions of the specific emergency response duties and responsibilities have been clearly documented.

The transporter's emergency response equipment consists of full face respirators and canisters, HCN gas detector, tyvek overalls, PVC gloves, OxyViva, First Aid Kit, rubber boots, shovels, brooms, reflector tape, cones, mattock, danger flags, PVC gloves, HCN gas detector and Ferrous sulphate (50kg bag).

Stellar Logistics has an arrangement with Goldfields Tarkwa mine clinic to administer the required cyanide antidote (Cyanokit or Hydroxycobalamine) to any cyanide victim. Stellar Logistics will take the initial administration of oxygen to a suspected cyanide person and transport him or her to Goldfields Tarkwa mine for further treatment including the administration of a cyanide antidote. MSDS received from Orica indicates that intravenous Hydroxycobalamine 5 gm or Kelocyanor (Dicobalt edetate) be used but any of these antidotes must be administered by a doctor.

The list of the emergency response equipment's are checked and the equipment checklist completed and signed off by the Safety Officer prior to the departure of each cyanide convoy from the port to each mine site destination. The escort equipment and the quantities are listed on the escort equipment checklist, and they are checked prior to departure to the mine site destinations.
Stellar Logistics maintains a list of available emergency response equipment needed during the transportation of cyanide on the transport route. The safety equipment and PPE are checked on regular basis and also prior to departure of each convoy to ensure applicability, availability and functionality. Equipment checklist is completed during such equipment inspections. Used or outdated equipment gets replaced immediately. HCN gas monitoring device is available, and Convoy Leaders have been trained in the use of such equipment. The HCN gas detector has been calibrated. Calibration certificate was found to be still valid.

It is required from the Escort Leader to keep his office updated of the progress of the convoys either during the movement of the consignment or in emergency situation. The Safety Officer as the escort leader contacts the external emergency responders when required during an incident.

The required roles and the responsibilities of the External Emergency Responders and that of the relevant personnel of Stellar Logistics, who will attend to a cyanide incident / accident, are stipulated in the company's "Emergency Response Plan".

Stellar Logistics does not use subcontractors for the transportation of cyanide.

Stellar Logistics Ltd. Audited Company | Lead Auditor Signature | 04th August 2021 Date

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

☑ in Full Compliance with Emergency Response Practice 3.3

Stellar Logistics Ltd. (SLL)

☐ in Substantial Compliance with

☐ Not in Compliance with

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The Transport Management Plan and Emergency Response Plans contain procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency. The transporters Emergency Response Plan has contact information in notifying regulatory agencies, shipper, medical facilities, Ghana Environmental Protection Agency. The EPA is responsible for consultation of potentially affected communities in consultation with Stellar Logistics.

The list details including contact numbers is part of the documentation that the Convoy Leader carries with him during trips to enable him contact both internal and external responders.

Procedure for Contacting responders stipulates that the contact phone numbers are checked during the operations yearly Route Risk Assessments and as when necessary.

The QHSE Manager is tasked with: -

- The up keeping of internal and external emergency reporting procedures.
- Reporting of all incidents during the transportation of sodium cyanide to regulatory authorities.
- Keeping current the list of Emergency Responders telephone numbers e.g., the Ghana Police, hospitals, local Fire Services, Nationwide towing service and Ambulances.

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

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Emergency Response Practice 3.4
☐ in Substantial Compliance with
☐ Not in Compliance with

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Stellar Logistics ERP addresses the remediation procedures for the following.

1. Recovery of sodium cyanide solid material.
2. Neutralization and/or disposal of dry sodium cyanide spill and neutralization of excavated soil;
3. Neutralization and/or disposal of recovered solution
4. Recovery and decontamination of contaminated ground.
5. The use of "Ferrous Sulphate to neutralize any residues of solid sodium cyanide after the briquettes of the cyanide have been swept and shovelled into sealable containers.
6. "Neutralisation and or disposal of excavated soil"

The initial clean-up will be the responsibility of the Convoy leader. In the case of a large spill of product, the Convoy leader will take the initial response and then call in the outside responders to assist. Any contaminated soil / product removed during clean-up will be sent to the mine site where the waste will be disposed off by the mine appropriately.

Ferrous Sulphate is kept in the escort vehicle as part of the escort items.

The Emergency Response Plan prohibits the use of sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface waters. This statement is clearly stated in the ERP.

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Emergency Response Practice 3.5: Periodically evaluate response procedures and capabilities and revise

Stellar Logistics Ltd. (SLL)

☑ in Full Compliance with Emergency Response Practice 3.5
☐ in Substantial Compliance with
☐ Not in Compliance with

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As per the Emergency Response Plan the procedure and others are reviewed and updated annually and as and when necessary.

The ERP is periodically reviewed and evaluated based on the outcome of the yearly mock drills or when significant or critical changes have been observed or recommendations made after a transport incident investigation.

As per the company's training matrix mock drills are held annually. Evidence show that mock drills have been conducted and are done annually. Mock drill reports covering mock drills are placed on record. The mock drills are evaluated to determine the response times of the participants, to identify and lapses and put in corrective actions and drill repeated to perfect the drill. Mock drill review meetings are held after each drill exercise and shortfalls noted and corrective action plans put in place.

Some of the mock drills that were held simulated transport related cyanide incidents where there is a "Rollover of Cyanide Container with product spill".

The training records were reviewed and discussions with Stellar Logistics drivers and the escort team confirmed that they have attended training sessions and mock drills.

The ERP makes provision for the outcomes of simulation exercises and mock drills which are conducted to be evaluated, and the lessons learnt used to update the plan.

Since the previous audit was conducted up to the time that this audit was conducted, no cyanide related incidents reported / recorded by the transporter.