INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary Certification Audit Report

TRANSCO SA CONAKRY, GUINEA

Date of audit : 8th to 10th April 2024

For the

International Cyanide Management Institute
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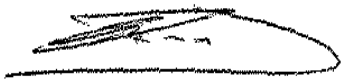
Signature Lead Auditor 25thMay 2024



1.0 INTRODUCTION

1.1 Operation General Information.

Name of Transport Operation	Transco SA
Name of facility owner	Mr. Gamal Challoub (Key principle)
Name of facility operator.	Transco SA
Name of responsible manager	Mr. Kennedy Ismael Ajavon. (Operations Manager)
Address	8 Blvd, Conakry BP 3871 Almamya, Kaloum Conakry, Guinea
State / Province	Conakry
Country.	Guinea
Telephone.	+224628686607
Fax.	
E-mail	i.ajavon@transco-gn.com

1.2 Operation Location Detail and Description.

Transco SA Guinea is a freight forwarding and transport, logistics, stevedoring and ship agency company in situated at 5th Blvd, Conakry, Guinea. The company was established in 1987.

Transco SA has a transportation agreement with Societe Minier Du Mandiana(SMM) and Societe Minier Dinguiraye(SMD) which is situated in Guinea. The contract with SMM is for Transco to do custom clearance from the port of Conakry to the two mines. Distance from port to SMM is about 745Km and from Conakry port to SMD mine is a distance of 670Km. The product is manufactured and supplied by Cyplus.

For deliveries to SMD the route use is as follows; - Conakry port - Kindia - Mamou - Dabola - Dinguiraye and for deliveries to SMM the following is the route use; - Conakry port - Kindia - Mamou - Dabola-Kouroussa - Kankan - Mandiana.

Since establishment, Transco SA has been undertaking the following activities;

- Consignments for all types of ships, containers, rolling stock, conventional, MPV, tanker, off-shore;
- Ship and barge charters;
- Ship and crew assistance, customs, and supply of all goods;
- Customer Service, documentation;
- Freight Transportation Arrangement ,
- General Freight Trucking ,
- KPI implementation and control;
- With a team of experience work force, TRANSCO SA is committed to service excellence and strong values.

The transport company has a procedure for the transportation of dangerous chemicals (Procedure Pour Le Transport Des Produits Dangereux(Procedure number PROO-06-QSE dated for 27/11/23). Transco applied

for a permit to transport cyanide and other hazardous chemicals from the Ministry of Defense (Ministre De La Securite Et de la Protection Civile dated 15th November 2022. Permit was approved and permit number 085//MSPC/CAB/DGPN/DCSP/22 issued to the transporter.

The company has also been issued with a permit (permit number A/2022/2574/MIT/CAB/SGG dated 27th September 2022) from the Ministry of Infrastructure and Transport (Ministere Des Infrastructures Et Des Transport). Both permits were noted as appropriate. These permits are authorization from the government agencies for the transportation of dangerous goods which include cyanide within the borders of Guinea. For every batch of shipment, Transco notifies the two government agencies of the intended deliveries. Guinean police also are notified prior to departure to the mine sites as policemen are allocated to accompany the convoy for security reasons.

1.3 Auditor's Finding.

This operation is

☐ in full compliance

☐ in substantial compliance *(see below)

☐ not in compliance

with the International Cyanide Management Code.

1.4 Compliance Statement.

The transportation operation found to be in full compliance with the Code.

This operation has not experienced any compliance issues or significant cyanide incidents during the previous three-year audit cycle.

1.5 Audit scope.

The audit covers the transportation of cyanide by road from the port of Conakry in Guinea to two consignors (misnes) situated in Guinea. The ICMI transportation protocols were used as guidelines in conducting of this certification audit.

1.6 Auditor Information.

Audit Company:	Transco SA, 5th Blvd, Conakry, Guinee
Lead Auditor:	T. B. Müller
Lead Auditor E mail:	tommieb.muller@gmail.com

Name and signatures of Other Auditors:

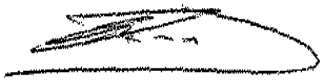
Auditor 1:	Benjamin Amoo-Mensah Name (Print / Type)	BAM Signature:
Auditor 2:	Name (Print / Type)	Signature:
Auditor 3:	Name (Print / Type)	Signature:

Dates of Audit. The certification audit was conducted from 8th April to 10th April 2024.

1.9 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 Certification Protocol and using standard and accepted practices for health, safety and environmental audits.

Transco SA, Conakry, Guinea Name of Operation	 Signature of Lead Auditor	25th May 2024 Date

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

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Transco SA has developed a procedure to guide the selection of transport routes to minimize the potential for accidents and releases or the potential impacts of accidents and releases. The transporter was in consultation with the cyanide supplier/consignor (Cyplus) as well as the two mining companies (customers / consignees). The company has strategically focused on providing services to mining companies which include SMD (Société Minière de Dinguiraye in Guinea) and SMM (Société Minière de Mandiana in Guinea) and has implemented the procedure resulting in a route survey on the selected route. Main route N2. These two consignees are situated on the same route (main route N2). The one just a little further along the same route. No alternative route/s available.

Route risk assessments were conducted during which hazards on route, from the Port of Conakry to the Consignees facility, were identified and noted. Transco SA has documented measures taken to address risks identified along the selected route. Mitigating actions were recommended and the results of this route risk assessments and mitigating recommendations are used as measures to control or minimizing the risks.

There is only a single route available for the delivery of cyanide from the Port of Autonome De Conakry to the consignees (SMD – 745 km and SMM - 670 km). Both Consignees are located to the east-north-east of Conakry. The route selected corresponds to the Trans ECOWAS (Economic Community of West Africa States) route.

Applications made to Ministry of Security and Ministry of Transport for permits to transport of cyanide within the borders of Guinea. Permit obtained from the Ministries specifying that cyanide may be transported along the ECOWAS route. A permit from the Ministry of Transport was issued by the Director in charge of Transportation (Directeur Nationale des Transports) indicating that transporter has been registered as a transporter.

The transporter consulted as necessary with stakeholders and applicable governmental agencies in the selection of the routes and development of cyanide management measures.

In selecting the road, consideration was given to population density, pitch, grade of roadway, decline of road, sharp ends in the road, road infra structure, road surface, general condition of road, 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, rivers, water sources nearby, water fog and other weather conditions. The suitability of the road for vehicles and vehicle weights were considered when RRAs were conducted

Actions to either prevent, mitigating or reducing the risks identified and captured on the RRA are addressed on the well documented RRA document. Attached to each recommendation is a photo of risk / hazard identified during the route assessment. Route Risk Assessment have been conducted from the port of Conakry along the route to the two (2) mine sites (SMM and SMD).

Transporter revises the route risk assessment process and if necessary, updates its route selection procedure and associated documents every year. In addition, verbal debriefing sessions are held with the Convoy Chief and drivers at the end of each delivery upon return to the transport depot and obtaining feedback on route conditions.

The transporter has implemented a procedure for evaluating risks of selected cyanide transport routes and has taken measures to manage the risks. Observations(feedbacks) on road condition and other risks obtained from the chief escort and the drivers are discussed during de-briefing session after each trip from any of the two mines. RRA contents also discussed during toolbox talks, training sessions and during briefing sessions prior to departure with the consignment of cyanide on road. Attendance registers completed with signatures of attendees were sighted and noted. Precautionary or mitigating measures have been documented on RRA form. Records of Feedback reports were sighted and noted by auditors

As per the TMP there is a process to periodically re-evaluate risks on the routes used for cyanide transportation. The TMP refers to annual revision of RRA.

Control measures to mitigate the hazards / risks identified have been captured in writing on the RRA document supported by photos taken of the identified hazards on the routes. These risks and the control (preventative) measures as per Route Risk Assessment (RRA), are discussed by the Escort Chief and convoy vehicle drivers during toolbox talks, training sessions and during briefing sessions prior to departure with a consignment of cyanide on road. Training Attendance Register records of those present were verified and noted. Attendees are required to sign the attendance register as acknowledgement that such training / presentation was attended by them. Records of RRA conducted were sighted. Controls Measures as per RRA were noted and found to be appropriate. Training confirmed during interview with drivers.

Inputs were sought from the Ministry of Security, Ministry of Transport, Ministry of Environment and Pollution, the Fire department and police. Guinea Ministry of Environment and Pollution and the Ministry of Transport are the legal bodies in Guinea who are mandated to regulate the transportation of hazardous goods within the borders of Guinea.

These Governmental Agencies are mandated to regulate the transportation of hazardous material through towns and villages. Stakeholders such as Fire Department and Police were consulted in the selection of routes and development of risk management measures.

Transporter has undertaken "cyanide road show" on the one and only road at each town or village from Conakry to the furthest mine site (SMD). Police, hospitals and Fire Department were visited and educated about cyanide and its hazards. Government organizations were handed a copy of the MSDS for sodium cyanide. Their representatives were however educated on cyanide awareness in respect of their respective roles and responsibilities in the event of an incident.

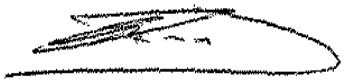
For security reasons, Transporter makes use of Guinean police escort services to ensure safe deliveries to the mine sites. For every delivery, application is made to Minister of Security to obtain police escort services. Two officers manned the escort vehicle. One escort vehicle leading 4 vehicles or a maximum 5 convoy vehicles. Police in front and Escort Chief at the rear of the convoy in the escort vehicles. The Escort Chief is responsible for the overall management of the convoy. The maximum speed limit for the convoy as per the company's Transport Management procedure is 60km/hr on tarred surface and 40Km/hr on dirt roads depending on road circumstances.

No sub-contracting is undertaken, due to the nature of the cargo and the lack of safety standard by service providers. The transporter retains the full responsibility of the operation.

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

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

Signature Lead Auditor 25th May 2024



Summarize the basis for this Finding/Deficiencies Identified:

The transporter uses only trained, qualified and licensed drivers to operate their vehicles. Transco SA has a recruitment procedure number PROD 04 for employing drivers and other staff. If need do arise, HR officer will contact Recruitment Agency.

Drivers go through a selection process which includes verification of qualification of driver, valid driving licence, police clearance report and identity card. Drivers have category C driving licence to enable to drive vehicle of weight more than 19,000kg. A minimum of 23 years of age, minimum of 5 years of experience, Safety orientated, valid driver's licence category C, must be competent in driving, Drug and alcohol free, must be able to read and write and must be medically fit are the requirements for employing drivers and other staff. Transco SA has a training matrix which includes all the requirements of training for the transporting of cyanide. Newly appointed drivers/s and other staff are subjected to the following internal training. Company Induction training as well as consignee's (mine site) plant induction training. Vehicle drivers and escort members receive training on the following training modules: -

- Basic firefighting training (practical & theoretical),
- Transportation of hazardous materials,
- Cyanide awareness,
- Cyanide first aid,
- Basic first aid,
- Handling of dangerous goods,
- Cyanide intoxication,
- Cyanide emergency drill(Mock drill)
- Fatigue management
- The correct wearing of personal protective equipment (PPE),
- Company's off-site emergency procedures, and
- Company's Emergency Response Plan, etc.

.
Vehicle drivers are not involved in the loading and / or off-loading of containers. Unloading of the containers from ship is the responsibility of the Conakry Port Authorities. The drivers and escort team have been trained in various modules that deals with the safe transport of cyanide from Conakry harbour to the mine sites.

Training presented are captured on company's training matrix and employee attendance register.

The effectiveness of external presented training is determined by subjecting employees to a training assessment on each of the subjects. Evidence of attendance register and the assessments were noted.

Toolbox talks on appropriate topics are held weekly and regarded as re-training.

The company's Training Matrix was scrutinized by auditors and reveals various modules related to the transport of dangerous goods, including cyanide. Completed training attendance registers were noted.

No sub-contracting is undertaken, due to the nature of the cargo and the lack of safety standard by service providers. The transporter retains the full responsibility of the operation.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has six dedicated three (3) axle skeletal deck trailers which is fitted with four twist locks.

These trailers are designed and built according to specifications and capable to carry 1 x 6-meter (20 ft) container. One 6-meter (20ft) freight container loaded per trailer. The truck tractors in use are IVECO 6 x 4, as prime movers each with a tracking capacity of 400 horse power. Sizes of the trailers are 13m long, 2.5m wide, 4 axle with capacity of 50t.

Each 6 meter empty container weighs approximately 3 tons and an unloaded trailer about 7.5 tons. Mass of cyanide stacked inside freight container is about 20 tons plus mass of wooden crate about 3 tons. Weight of the truck tractor is about 7 tons. Weight of loaded combination is about 37.5 tons. In Guinea the allowable maximum mass per axle is 10.5 tons. Axle mass of loaded combination is well within the allowable mass.

Company has a planned Preventative and Corrective maintenance programme in place. Plan noted. After each delivery on returning to the depot, the entire vehicle gets mechanically checked. Distance to and from mine sites varies from 1340 km to 1490 kilometers depending where product was off-loaded.

Servicing on vehicles is done every 1000 hours of work. As per the company's procedure, preventative maintenance services done every 250 hours of work. Electronic software system called NIMBA in use that controls the servicing of vehicles. This system alerts the workshop clerk when vehicle is due for servicing. Pre-trip inspections on vehicles are also regarded as preventative & corrective maintenance. Twist locks been included in checklists. Twist lock replacement procedures in use. Damaged twist lock replaced with new ones.

Only new tyres fitted on vehicles utilized for the transporting of cyanide. Same brand and tread pattern tyres have been fitted to vehicles. Minimum tread depth allowed on a tyre is 5mm on all vehicles in the fleet. Scrap tyres are sold to supplier of the tyres for destruction or recycling. No retreaded tyres are used by the transporter.

Truck tractor and trailer serviced as a combination. Electronic software called NIMBA Software that controls the servicing of vehicles alerts the workshop clerk when a vehicle is due for service. The company has dedicated vehicles with the required configuration to transport cyanide to the two mine sites.

Transco SA has a procedure for ensuring to prevent overloading of its vehicles. The weighbridge at the Port of Conakry is no longer in operation, as this facility have become obsolete and therefor been discontinued completely. No weighbridges located on route from the Port to Consignees. The shipping documents such as the Bill of Ladings covering the shipment have the gross weight of the containers captured them. The mass as indicated on the Bill of Ladings is used as the gross mass of the loaded containers. The weight of a container is furthermore confirmed during the loading operations by mass collected by the reach stacker. The weight registered on reach stacker when offloading the full cyanide freight containers from a ship is taken as the acceptable mass. Sampled records of Bill of ladings indicated the gross weights of a loaded 1 x 20ft cyanide container is 23 tons.

Transporter do not utilize the service of a sub-contractor for the transportation of the cyanide.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Before departure from the port of Conakry, a copy of Route Risk Assessment and Route Plan handed to the Convoy Chief who discusses the route and risks on the route with the convoy drivers.

The Transporter do have a procedure in place to ensure that the consignment cyanide is transported in a manner that maintains the integrity of the producer's packaging. A "Container collection forms" been incorporated as part of the TM Plan No. PROD 06 QSE rev 1 dated 27/11/.2023

The Transport Management Plan on page 6 requires that the driver along with Clearing and Forwarding officials to check the integrity of each container. It is the responsibility of the driver to check and ensure that each container is in a good condition (i.e. no structural damages, no deformities, no holes, no obvious product leakages, and rusts, etc, that all are safe to use, and whether the seals are still intact on the doors. The driver along with Clearing and Forwarding officials also check the integrity of each container. Should a defect be noticed drivers report to Clearing and Forwarding official. Defects noted are documented on container collection form. If no defect noted, driver leave port premises. Should a defect be noticed, the defect is noted on container collection form. When no defect on the shipping container is noted, the convoy is allowed to depart from the port premises. Upon reaching the mine sites, Container Interchange document which is handed over by the shipping line is given to the mine site representative to sign if satisfied with the condition of the containers.

The placarding as per IMDG code requirements been displayed on all four sides of each container. Checks are done to ensure that these labeling is displayed and visible. Should some be missing, those will be replaced. On the front of each truck tractor the wording "Cyanide" a sign displaying a skull and crossbones with the wording "hazard class 6" are displayed in front of the trucks.

The Transporter do have a procedure that requires that convoy vehicles, emergency equipment, truck tractors and trailer be inspected prior to departure from the port. Pre-trip inspection checklist Form is completed and endorsed by Convoy Chief, driver and workshop representative before the convoys departs. The following checks to be done.

- Vehicle pre-departure check.
- Equipment check.

Work orders are raised by the maintenance department in case any defect is noticed during the inspection. Same inspection is carried out in the morning at overnight stopping places before taking the road again. Selected copies of completed pre-trip inspection checklists were noted by auditor.

Transco SA has a maintenance program both Corrective and Preventive Maintenance for all its vehicles and other equipment. The equipment is monitored and maintained in accordance with the curative and preventive maintenance procedure in force. A summary maintenance program has been addressed above (under 1.301 above).

Driving hours are restricted to maximum of 12 hours per day. Four hours driving, 30 minutes resting time. Maximum driving time in 7 days should not exceed 70 hours. Driving between 18:00 and 06:00 is not permitted. Journey Plans are also used as a measure to check limitation of driving hours. Anytime the convoy stops for a brief refreshment or rest the time of the convoy stopped and departure times are noted on the journey plan forms. Driving hours are controlled by the Convoy Chief and Geolocation Manager. The Geolocation Manager continuously monitors the convoy movement from Port to the mine sites. GPS system in use for this purpose.

Each trailer is fitted with four twist locks. Freight container placed on trailer, the driver engages each twist lock to ensure freight is properly secured to trailer chassis. At each stop on route the drivers check whether twist locks are still intact to prevent the container from shifting. In Guinea no additional load securement device allowed to be fitted to container.

The Transport Management Plan Procedure No PROD-06-QSE rev 1 dated 27/11/2023 refers to bad weather condition, civil disorder, etc. situations. Once the Convoy Chief becomes aware of the conditions continuations of convoy is suspended. Convoy Chief notifies transporter's depot and awaits orders. Transporter's Logistics Department notifies customer about the situation. Once situation has normalized, Convoy Chief notifies the Logistics department of the proceeding of the convoy. The Logistical department will then notify the mine sites accordingly.

Transporter do have a procedure that prohibits the use of prohibited substances (drugs and alcohol included) whilst on duty. Unannounced alcohol tests conducted randomly on employees. Convoy Chief and drivers are tested prior to departure on route. Sampled copies of test results were noted. A LION type breathalyzer in use which has been calibrated. The Calibration certificate covering the breathalyzer is valid. During annual medical examinations employees are subjected to a drug and alcohol test. Testing for drugs and alcohol usage are also carried out during pre-employment examination,

Medical records for employees are retained for a period of 40 years and all other record kept for a period of 5 years. Any vehicle related records are kept for the life span of the vehicle. Disposal of records procedure is in place and when required, implemented.

Due to the hazardous nature of sodium cyanide and the safety and the responsibility, the transporter hasn't entered into a contract with a sub-contractor for the transportation of sodium cyanide. The transporter retains full responsibility for its transportation operation.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Not applicable to this operation as no shipment of cyanide is done by sea.
This Transport Practice 1.5 is not applicable.

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

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

Summarize the basis for this Finding/Deficiencies Identified

Transco SA have communication equipment to communicate with the head office, mining company and the cyanide supplier. The transport vehicles are fitted with a means of communication. Howen dash cameras are installed in the trucks. The dash cameras show live video of the driver whilst driving and serves as a means of communication between the driver and the head office. The dash camera ensures that driver fatigue is

prevented. The camera sends signals to the driver's seat which shakes the seat and keeps the driver attentive when a driver is feeling sleepy or vehicle is moving out of its lane.

In addition, drivers have cell phones which they use for communication when the trucks stops for brief rest or refreshment break. The convoy leader and his assistant have company phones to communicate with the head office in Conakry and the mine sites. List of all the emergency telephone numbers (appendix G1 to G3) at hand with convoy chief. Emails and WhatsApp communication are also used to communicate with the supplier and the mines. GPS tracking devices are also installed in the trucks. Copies of emails records were sighted and noted by auditors. Also, communication between the company's logistics department, the supplier and mine is through a WhatsApp group platform. Those on the WhatsApp platform are Escort leader, Safety Manager and Logistics Managers of Transco and mine site representative. Electrical chargers are available in the vehicles to fully charge the cell phones. A list of contact phone numbers of all the emergency responders along the cyanide transportation route is available with the escort leader. Auditors carried out physical inspections of the Dash Cameras installed in the trucks, GPS and phones and found them to be in good condition and working correctly.

The GPS is constantly monitored by Geolocation Manager. The TMP states that prior to each cyanide convoy, the GPS is checked by the Geolocation manager. The drivers and escort leader ensure that cell phones are fully charged before departure. It is the responsibility of the Geolocation manager and the Escort leader to ensure that the communication equipment is working effectively. Sampled records of communication equipment checklists were sighted and noted by auditors.

Route Survey reports and RRAs indicate that there are couple of areas along the transportation route from Conakry port to SMM and SMD that there are blackout areas for certain network service providers. But these are catered for by the transporter by using alternative cell phone network service providers. Three (3) different service providers which are used during trips to the mine sites are MTN, Orange and Cellcom phone networks. In case there is no phone network in a particular area or one cell phone reception drops, the transporter relies on the alternate service provider’s network which is active within that particular area. The GPS covers the entire routes to the mines.

The transporter has Queclink GPS tracking System installed in all its vehicles. The time, location and speed of the vehicles are monitored by the GPS which then sends signals to the head office. The GPS is monitored by the Geolocation Manager whenever the convoy is on the road. The tracking is done between the hours of 6am to 6 pm when the convoy is on the road. The journey plan (document number SIM-HSEC-000333 Version 1) is completed anytime the convoy stops for a break or stops to spend the night. The time of departure of the convoy after short break and overnight stops are noted on the journey plan form. At each stop, the escort leader informs the Logistics Manager via phone notifying him of the convoy's location. The location of the convoy is communicated by the Convoy leader on the WhatsApp platform and sometimes verbally on phone to the logistics manager, the mining companies, and the supplier. The Geolocation Manager can also be contacted by the logistics department to get feedback on the location of the convoy. Sampled copies of journey plan records indicated the time of stopping and departure. Sampled records of GPS reports for selected vehicles were sighted and noted. Live tracking of some selected vehicles were sighted and noted by auditors.

The transporter has a Chain of custody documentation namely Bill of Lading, Customs declaration documents, container interchange, packing list, Waybills (delivery notes) and Pre-departure checklists covering each cyanide shipment. Copies of Bill Lading numbers were noted. The Bill of Ladings have a list of container numbers and quantity of cyanide. Samples copies of delivery notes(waybills) have the sea container numbers and seal numbers. Copies of delivery notes which are signed by the mine site representatives were noted.

Upon reaching the mine sites, the mine representative checks all the shipping documents and signs and stamps the delivery notes. Consignment letters (Lette de voiture) showing the consignee (name of the mine), container numbers and date of delivery were sighted. The consignment letters are issued to cover any shipment to the mine sites. Prior to loading containers at the port, the shipping line issues interchange document which states the condition of the container. Copies of container interchange issued by the shipping line covering some containers of were sighted and noted during the audit.

Shipping records such as Bill of Ladings, waybills and packing list indicates the quantity of cyanide container per shipment. Bill of Ladings specifies the quantity of shipments, date shipped, container numbers and gross weights of the containers. Each truck and escort vehicles have copies of MSDS from the supplier. The MSDS is part of the required document prior to a trip and is stated on the transporter's Inventory Sheet (Convoy Interventaire De Mission) which is completed during pre-departure inspection.

The transporter does not subcontract the activities in Transport Practice 1.6.

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

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

	X in full compliance with	
The operation is	□ in substantial compliance with	Transport Practice 2.1
	□ not in compliance with	

Summarize the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, there are no transhipment depots, no interim storage sites or storage facility. Transco SA does not have trans-shipping depot and interim storage sites.

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

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

	X in full compliance with
The operation is	□ in substantial compliance with Transport Practice 3.1
	□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Transco SA has an Emergency Response Plan ("Plan durgence Transport De Cyanure" number PROD 07 QSE Revision 02 dated 06/04/2023).

The plan details the following: -

- Objectives of the incident management
- Reduction of effect to health and Safety of people
- Prevention and contamination of humans to cyanide
- Measures to take during an incident
- Emergency Communication with stakeholders
- Reduction or prevention of cyanide into the environment.
- Strategies for an effective clean up of spills(both minor and major).
- Responsibilities of internal and external responders.
- Basic Intervention plan in case of a cyanide poisoned incident
- Roles and responsibilities of drivers, escort team and escort leader.
- Decontamination of cyanide contaminate soils
- Proper use of cyanide neutralization chemicals

The contents of the ERP were found to contain all the required information to handle cyanide incidents. The plan is appropriate for cyanide emergency situations.

The ERP is appropriate for the selected transportation route. RRAs and Route Surveys have been conducted on the road from port of Conakry to SMM and SMD mines distances of 745Km and 670Km respectively. Route Surveys and RRAs captured bridges, pot holes, rivers, slopes, sharp curves, fog, population density, and general condition of the selected transport route from the port to the mine sites. The plan was reviewed and was found to be appropriate for the cyanide transportation. The ERP addresses incidents scenarios regarding cyanide on the roads from the port of Conakry.

The ERP gives a vivid description of the physical and chemical properties of the sodium cyanide including the required placards identifying the product sodium cyanide. These placards are UN No. 1689, Toxic 6 and Marine pollutant labels. The physical properties and chemical properties of the sodium cyanide is also described vividly in the supplier's MSDS.

The ERP describes sodium cyanide as a white solid briquettes which are in sacs lined with polythene to prevent moisture and encased in plywood boxes. Each briquette of cyanide weighs 15g. The packaging is in accordance with the IMDG Code. A total of 20 IBCs is in one 20ft container each with a gross weight of approximately 23.5tons. The ERP covers the outcome of reactions when sodium cyanide solid comes into contact with acids, moisture and other incompatible chemicals and the resulting effect being the evolution of hydrogen cyanide gas.

The transporter's ER Plan considers road transportation of cyanide from the port of Conakry to SMM and SMD mines. The method of transport is described in Section 1 of the ERP. The plan was developed only for the transportation of cyanide by road. Vehicles of the required capacity and configuration are utilized for cyanide transportation. Route surveys reports and RRAs have been conducted for the roads from Conakry port to the two mines.

The Emergency Plan is developed from the Route Surveys and Route Risk Assessments that were conducted which took into consideration all aspects of transport infrastructure. On development of the Emergency Response Plan the actual conditions of road, bridges, slopes, water bodies, markets, slopes, untarred and tarred roads were considered. RRA's and Route Survey reports captures pictures of the infrastructure on the road from the port to the two mine sites

The ERP considered the design of the transport vehicles. The brand of vehicles used is IVECO trucks. The design of the transport vehicles is described in Appendix C of the ERP. The design of the vehicles as follows:

- IVECO 6x4 vehicles with model 400 HP capacity of 50t. This configuration of trucks takes 1x20ft container of cyanide.
- Sizes of the trailers are 13m long, 2.5m wide, 4 axle with capacity of 50t.

The ERP addresses response actions for the following anticipated emergency situations. The ER Plan have addressed the following incident scenarios.

- Rollover of a truck loaded with Cyanide container resulting in a spill during a raining day
- Rollover of a truck with a Cyanide Container on the ground with spill in or outside a community
- Rollover of Cyanide container without spill in or outside a community
- Rollover of Cyanide container resulting in an injury to a person but no spill
- Roll over of cyanide container into a water body

The Response actions for above anticipated emergency situation for the various scenarios as well as the responsibilities of all the responders (external and internal) have been captured comprehensively in the ERP. The descriptions and response actions were reviewed and noted by auditors.

The ERP identifies the roles and responsibilities of both internal and external responders. The transporter's ERP details the roles of medical facilities along the transportation routes namely hospitals in the towns of Kindia, Momou, Dabola, Kouroussa, Kankan and Dinguiraye which are along the road from the port of Conakry to the two mine sites. The ERP emphasizes the role of the Police, Gendamarie, Fire service, Ambulance as well as the Ministry of Environment and Pollution.

In case of an incident the overall coordination of the incident is the responsibility of the convoy leader. The procedure mentions that the escort driver (escort assistant) will assist the convoy leader in his role. The Escort team will cordon off the area and move people upwind. Cleaning and shoveling of the solid sodium cyanide briquettes is the responsibility of the escort team. The Escort leader is responsible for administration of oxygen to a cyanide poisoned person and hand the victim over to the Ambulance personnel upon arrival. The oxygen cylinder is serviced to ensure it functions perfectly by a company called Sogedi SA, Conakry, Guinea. A sticker showing the service date was sighted by auditors.

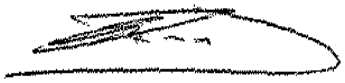
The responsibility of the hospital will be to immediately dispatch an ambulance to the accident site upon receiving notification of a cyanide incident. The Ambulance Service will continue the administration of oxygen, provision of first Aid to an injured persons and transporting them to the nearest hospital. The hospital will undertake treatment of a poisoned or injured person and the administration of pure oxygen to a victim in conjunction with cyanide antidote (Cyano kit). The transporter has an arrangement with the mines clinics to provide them with cyanide antidotes for use by a doctor in case of cyanide poisoned incident. The cyano kit is to be administered by a doctor or a qualified paramedic. The QHSE Manager at the transporter's head office will brief top management of the incident, coordinate equipment for recovery of the container with the Logistic Manager. The police will be responsible for directing traffic, controlling the crowd and accident reporting. The community are not assigned any role in Guinea. In case of an incident the community will be prevented for coming to incident site by the police and the escort team. The community will stay away from the incident site and follow the directives of the Ministry of Environment and Pollution. The role of the Fire Service to standby for any fire incident and rescue.

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

X in full compliance with

The operation is
□ in substantial compliance with Transport Practice 3.2
□ not in compliance with

Signature Lead Auditor 25th May 2024



Summarize the basis for this Finding/Deficiencies Identified:

The transporter's Emergency Response Plan which details the various training programs including emergency response training for drivers, escort team and other staff. ER training is organized once per week for all cyanide drivers and escort team. The ER training is conducted by QHSE Officer who is qualified and authorized to conduct the training. Records of ER training attendance registers organized at different dates were verified and noted. Contents of the ER emergency response training and the qualifications of the trainer was verified by auditors.

Assessments are conducted on the participants either written or verbal. Samples of marked assessments were sighted. The theoretical training is followed by cyanide simulation.

The ERP identifies the emergency response duties responsibilities of both internal and external responders. The ERP, pages 16 & 17 of 31 describes the duties and responsibilities of the drivers, convoy leader, escort assistant, police, the Ministere de Protection Civile, medicals facilities, fire personnel, Ambulance and hospitals along the cyanide transportation route in case of an incident. The roles and responsibilities of each of the responders mentioned in the ER Plan were reviewed by auditors.

Transco has a list of cyanide emergency response equipment which are kept in one of the two escort vehicles that escorts the convoy to the mine site. The following is a list of ER equipment;

- Oxygen resuscitator
- First Aid Kits
- PVC Gloves
- HCN Gas detector
- Cyano kit (Hydroxycobalamine)
- Full face respirators and Cartridges (ABEKP3)
- Beacons
- Safety triangles
- Caution tape
- Cones
- Shovels
- Stretcher
- Brooms
- Tarpaulin
- Empty bulk bags
- Plastic bucket
- Spray pack
- Reflector tape
- Ferrous sulphate monohydrate
- Danger flags (Red and Green)
- Bucket with lid
  22. 6Kg Fire extinguishers
- Helmets
- Oxygen Resuscitator
- Rubber boots

The equipment is kept under lock and key in a container when there are no deliveries to the mine. Prior to departure of a cyanide convoy, the escort equipment is inspected and an escort equipment checklist completed. The Escort leader is responsible for keeping the equipment safe. The HCN gas detector was calibrated on 14th March 2024 and the next calibration date is 14th March 2025. All the escort equipment were inspected by auditors and the quantities compared with the transporters inventory checklist.

The transporter has the necessary emergency equipment and Personal Protective Equipment which are available and forms part of the escort equipment. PPEs are part of the ER equipment checklist. Personal protective equipment are; disposable tyvek overalls, rubber boots, PVC gloves, full face respirator with canisters and helmets. Auditors carried thorough inspection of all the PPEs and found them available and in

good conditions. The quantity of each PPE was cross checked by auditors using the Escort equipment checklist (Inventaire des Controle des Equipments d'urgence).

Emergency Response Equipment is inspected to ensure availability, good working condition and functionality. Prior to departure of each convoy and upon return, the quantity of each ER equipment is inspected and the equipment checklist (Checklist Equipment D'escort pour Transport de cyanide) completed with the findings after the inspection and checklist signed by the escort leader. Inspection is carried out by the Escort Leader. Emergency equipment is kept in a lock-up container to prevent unauthorized entrance and the safe keeping. Sampled records of Inspections checklist forms were verified.

Transco SA does not subcontract any of the cyanide transportation activities.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

Transco SA has an Emergency contact list for SMM and SMD mines and supplier (Cyplus), medical facilities, other external responders namely police, gendamarie, Fire service, hospitals, Ambulance and Ministry of Environment and Pollution. The ERP outlines the procedure for notifying the mine and all external responders in case of a cyanide incident. The ERP details the various responsibilities of the individual stakeholders. The contact phone numbers of the two mining companies (SMM and SMD) and the telephone numbers of each emergency responders along the transportation route forms part of the ERP and is available in the escort vehicles. The contact list is part of the Escort leader's documents the he carries with him on a trip. The ERP stipulates the call-out procedure to follow to notify all the stakeholders in case of an incident. In the event of an emergency, the community will be notified by the Ministry of Environment and Pollution.

To ensure that the external and internal emergency list and procedures is kept current, Annex G1 of the company's ERP states that review of the contact information is conducted at least once a year or as and when necessary. During route survey conducted annually the external responders are contacted to find out if any changes have occurred in their telephone numbers and email addresses. A process of verifying from all stakeholders whether the contact details are current is initiated by the QHSE Manager and the contact phone and email addresses are amended. Phone contact numbers are called regularly by the QHSE Manager to ensure that the phone numbers are still active. Provision is made in the Emergency Response Plan for an annual or more frequent review of the contact phone numbers and email addresses to ensure they are current. Sampled contact phone numbers of hospitals along the route were contacted. Auditors called the some selected hospitals, Ministry of Environment and Pollution, fire department and a mine to ascertain whether the contact phone numbers are active. The phone numbers were found to be active.

Transco SA has a procedure in Clause 3 page 14 of 31 of the ERP version 02 which states that in an event of a significant cyanide incident ICMI will be notified immediately.

Significant incident as defined in the transporter ERP is in accordance with ICMI definitions and acronyms are as follows;

- Human exposure that requires action by an emergency response team, such as decontamination or treatment.
- An unauthorized discharge that enters natural surface waters, on or off site.
- An unauthorized release that occurs off-site or migrates off-site.

- An on-site release requiring the intervention of an emergency response team.
- A transport incident requiring an emergency response in the event of a release of cyanide.
- A multiple wildlife death event where cyanide is known or credibly suspected to be the cause of death.

When an incident occurs an accident report form (Formulaire De Rapport D'incident/Accidant) will be completed by the QHSE Manager with the cause findings and corrective actions. The QHSE Manager will be responsible for sending the notification to ICMI in case of an incident.

Procedure for notifying ICMI in the event of a significant incident were sighted by auditors. No cyanide incident has been recorded in the past years.

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

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

Summarize the basis for this Finding/Deficiencies Identified:

The Transco SA has developed a procedure for recovery, decontamination and neutralization of solid sodium cyanide and dissolved solid cyanide. The following are the details of the remediation measures addressed in the ERP;

• Procedure for decontamination of solids and dissolved cyanide in soils
• Procedure for utilization of neutralizing chemicals
*Procedure for decontamination of PPEs
• Neutralization and disposal of contaminated soil

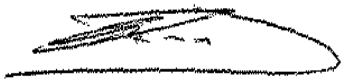
The procedure states that in containing a spill, the escort team will ensure the spill is prevented from entering water bodies. In case a spill on a dry ground the briquettes of cyanide will be swept and shoveled into a sealable container. The residue will be neutralized with Ferrous sulphate monohydrate. The ERP describes how the sodium hypochlorite, Ferrous sulphate and Hydrogen peroxide should be used correctly. The initial cleanup is the responsibility of the convoy leader and his assistant. The detailed process of the aforementioned remediation measures were scrutinized and noted by auditors. The ERP mentions that in case of a spill to surface water, no neutralization of the surface water should be done as this action is not allowed.

The ER Plan states that under no circumstances neutralizing chemicals such as sodium hypochlorite, Ferrous sulphate and hydrogen peroxide be used to neutralize cyanide that has entered surface water. The procedure strictly prohibits the action of using neutralizing chemicals in surface water. This caution was noted in page 21 of 31 of the ERP by auditors

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

	X in full compliance with	
The operation is	□ in substantial compliance with	Transport Practice 3.5
	□ not in compliance with	

Signature Lead Auditor 25th May 2024



Summarize the basis for this Finding/Deficiencies Identified:

Page 31 of the ERP (Clause XI) makes provision for reviewing and evaluating the adequacy of ERP. The ERP is reviewed when there are major incident on the road, changes to road conditions or changes to infrastructure such as bridges, rails line across the road and changes to the brand and configurations of the vehicles. The last time the ERP was reviewed was 20th February 2023 and 2nd January 2024. Periodic review of the plan was noted by auditors.

Mock drills are organized once a year and as when necessary. The training matrix captures the dates mock drills were held, next dates for subsequent mock drill exercises and the names of those who participated in the drill. Sampled Mock drill attendance register indicates that mock drills were verified. The mock drill attendance register signed by the participants were sighted. Reports of each mock drill were sighted and noted. The mock drills involve a rollover a vehicle on the road resulting in a spill and the remediation measures taken to conduct a clean-up of the cyanide briquettes, administration of 100% oxygen to the poisoned person and how neutralization was done. Report details the corrective actions that was done after noting some mistakes that were made by the participants. Sampled mock drill attendance register were sighted by auditors.

Generally, evaluation of the plan is done annually. The transporter evaluates the plans performance from lessons learnt from the mock drills when there are changes to conditions on the routes to the mine sites or observations and corrective actions after a minor or significant incidents as well as inputs from participants after a mock drill. Revision of the plan's performance is the responsibility of the QHSE Manager in consultation with top management. The relevant procedure and records of evaluation and implementation were sighted by auditors.

End of report.

Signature Lead Auditor 25th May 2024