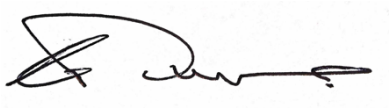
INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Cyanide Production
Summary Audit Report
(Repackaging & Storage Plant #1)

Vehrad Transport & Haulage
Tema, Ghana

21,22 & 23 April 2021

For The
International Cyanide Management Code



Name of Operation:	Vehrad Transport & Haulage
Name of Operation Owner:	Vehrad Transport & Haulage
Name of Operation Operator:	Vehrad Transport & Haulage
Name of Responsible Manager:	Mr. Nazih Husseini
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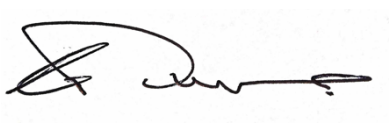
Location detail and description of operation

The repackaging plant, operated by Vehrad Transport and Haulage, is located at Plot 16/17, Heavy Industrial Area, Tema, Ghana, and has been established to provide a sparging service to International Cyanide Management Institute (ICMI) certified cyanide consignors and the mines in West Africa that wish to receive sparged cyanide briquettes, rather than cyanide packaged in shipping containers, containing cyanide briquettes packaged in Polypropylene bags, in wooden boxes.

Consignors deliver to or Vehrad Transport and Haulage collect and deliver loaded shipping containers to the main Vehrad site where they are de-stuffed of boxes containing cyanide briquettes. These boxes are stored in the Customs bonded Cyanide Warehouse, whilst they are awaiting repackaging into sparge (ISO) tanks at either the #1 or #2 repackaging plants or for direct onward transport in sealed Vehrad owned containers to mine sites. Each consignor's or mines cyanide boxes are stored separately in the warehouse and the ISO sparge tanks are filled in client specific batches.

The repackaging plant consists of a two hopper, sparging facility, supported by a warehouse and a secondary overflow warehouse, where the boxed and bagged cyanide briquettes are stored, prior to being sparged or repacked into containers and road transported by Vehrad Transport and Haulage trucks to mine sites in West Africa.

All waste cyanide packaging (wooden boxes, plastics and polypropylene bags) is taken directly to the incinerator facility situated at the Vehrad Cyanide screw feed repackaging



Plant (Sparge Plant #2) located at plot #A/46/30, Tema Heavy Industrial Area, a Vehrad subsidiary site within 5 kilometres of the main Vehrad site to be disposed of.

Auditor's Finding

This operation is

X in full compliance
□ in substantial compliance *(see below)
□ not in compliance

with the International Cyanide Management Code.

* For cyanide production operations seeking Code certification, the Corrective Action Plan to bring an operation in substantial compliance into full compliance must be enclosed with this Summary Audit Report. The plan must be fully implemented within one year of the date of this audit.

Audit Company: TRANSHEQ Consulting

Audit Team Leader: Richard Durrant E-mail: richard@transheq.co.za
& Production Technical Auditor

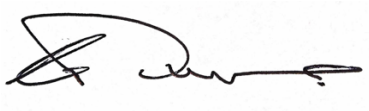
Date of Audit: 21, 22 & 23April 2021

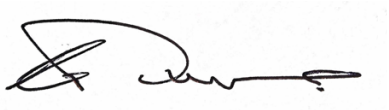
I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management 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 in accordance with the International Cyanide Management Code Verification Protocol for Cyanide Production Operations and using standard and accepted practices for health, safety and environmental audits.

Vehrad Transport & Haulage

Name of Facility

Signature of Lead Auditor and Production Technical Auditor  Date 12 September 2021



1. OPERATIONS: Design, construct and operate cyanide production facilities to prevent release of cyanide.

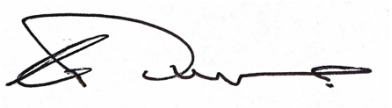
Production Practice1.1: Design and construct cyanide production facilities consistent with sound, accepted engineering practices and quality control/quality assurance procedures.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 1.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The design for the repackaging plant was checked for ICMI compliance by a metallurgical engineer (Afritech) in consultation with tank design, construction company (Memotank) and Plan Wheel Consulting Engineers. Design drawings covering the site plan, fence wall & details, ground plan, roof framing plan, roof plan, sections and details, elevations, foundation plan and details, ground floor plan and detail, columns, and roof beam framing plan were reviewed.
The warehouse was previously modified to accommodate cyanide storage by the installation of ventilation fans, sealing of floors, installation of ramp linked to bunding and containment requirements. Between October 2020 and February 2021, main improvements made to the bonded cyanide main warehouse facilities include new safety showers using potable water and pre-dissolved ferrous sulphate; additional lighting, an additional platform on Sparge#1 plant for easier and safer access, the moving of the electrical switchboard from on top of sparge facility to ground level, adding remote controls to winches on the Sparge#1 unit, addition of a butterfly valve on the gantry to eliminate any remaining cyanide product falling; addition of new effluent interceptor around perimeter and warehouse edge, automatic stop for the crane at platform level, and reduction of hopper height. All of these improvements reduced the cyanide risk.
The second cyanide, bonded overflow, warehouse is ventilated by fans, and has containment and a drainage system for any spills inside warehouse. The drainage system is linked to the existing site containment system for contaminated runoff.
A Quality Assurance/Quality Control Program was used during construction and a “fit for purpose” quality assurance certificate was issued by the Consulting Engineer. The materials of construction were mild steel and the construction engineer was aware that the equipment was to be used in conjunction with sodium cyanide.
There is a standby generator on site. There is also a hoist locking system in the event of power variations and the hoist is controlled by a remote wireless unit which stops the hoist when the correct operational height is reached.
The Repacking Plant, Main Warehouse and Secondary Warehouse are all bunded and the floor is made of concrete. Any spillages would be cleaned in situ and there is an overflow to a collector channel which ultimately leads to the main site interceptor sump for any liquids that may occur.



The offloading yard, adjoining the entrance to the repackaging facility, is fully concreted and slopes gently to the entrance of the repackaging facility. At the base of the slope is a collector trench which runs to the main site containment sump.

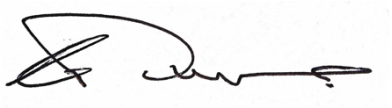
Production Practice 1.2: Develop and implement plans and procedures to operate cyanide production facilities in a manner that prevents accidental releases.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 1.2**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Operating procedures have been developed for the repackaging plant and storage warehouses. Procedures cover pre, post and basic operation, cyanide repackaging plant and warehouse management, guidelines for vital components, inspections, manual of authority, decontamination of equipment, buddy system, change management procedure and process flow diagram.
Procedures all include relevant pre-work inspections and appropriate PPE (Personal Protective Equipment).
Procedures considered include release of HCN gas; Plant Incident – no Cyanide Spill; Plant Incident-Cyanide Spill; Overfilling of Isotank; Bag not splitting for briquette discharge; Bag handle torn while lifting bag onto hopper; Bag handle torn while lifting bag out of hopper; bag partially split; spill from vehicle in the repackaging plant; explosion/fire in the repackaging plant; roof collapse with and without rain; unplanned power outage and other abnormal and emergency situations. There are a total of 24 different scenarios are covered in the procedure.
The Repackaging Facility and Storage Warehouses have Planned Maintenance System (PMS) in place for inspections, maintenance of equipment and history of maintenance of equipment.
Site has 14 x portable personal HCN gas monitors units being 8 x Watchgas UNI MP 100 HCN 0-100 PPM; 2 x Gazomat GAZTOX HCN ; 4 x ToxiRAE 11 HCN PGM-1170. Calibrated to measure 4.5 ppm at the first alarm. Second alarm is at 9.7 ppm. First alarm prompts investigation of cause, and second alarm prompts evacuation.
Under normal operating conditions, the process is a dry process. However, washings from the repackaging area will be flushed into the effluent gutter leading to the containment sump. If necessary, the sump will be neutralised with ferrous sulphate. The sump is emptied periodically by a professional waste disposal company (Bidi Group) who issue cleaning certificates.
In the case of the Storage Warehouse**,** small, dry spillages will be dealt with according to the procedures. Should there be large quantities, these will be disposed of via the mines in terms of the Emergency Response Procedure.



With respect to hydrogen cyanide gas management, in the repackaging facility**,** no cyanide is stored in the repackaging facility building but the building has been specifically modified to encourage adequate ventilation and air circulation. In the storage warehouses, large scale extractor fans are installed to ensure adequate air circulation in the building. Both the repackaging facility and the storage warehouses have procedures and physical facilities to prevent moisture from affecting the solid cyanide during storage and processing. The storage warehous**e** is always locked and monitored by security guards and Customs Officers, as it is a bonded customs warehouse. The repackaging facility is an area within walls, within the main site and access is controlled by a security guard with no persons permitted in the facility without authorisation and appropriate PPE. Customs have an office on site in the Vehrad administration offices.
For New Modification & Change Management Exercise, used to consider any changed cyanide risk. Vehrad uses the ADKAR model – **A**wareness of the need for change, **D**esire to support and participate in the change, **K**nowledge of how to change, **A**bility to implement change, **R**einforcement to sustain change. Evidence seen of Management of Change Request and Approval Form – MOC No.3 dated 01 February 2021 - Changes in Hoist Sparging Layout approved by the Health, Safety, Security and Environmental (HSSE) Manager and Deputy Managing Director
Cyanide is transported in sparge tanks that meet materials design specifications for cyanide. Sighted tank drawings for Portable Tank (FF3 26 GA-T14 00) – meeting tank specifications – American Society of Mechanical Engineers (ASME) VIII DIV.1, International Marine Dangerous Goods Code (IMDG-T14, ISO 1496/3.) The cyanide briquettes are received from the producer, in boxes, in containers, packed and sealed according to IMDG Code requirements.

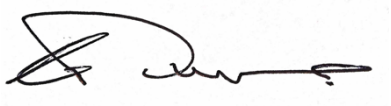
Production Practice 1.3: Inspect cyanide production facilities to ensure their integrity and prevent accidental releases.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 1.3**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Inspections for the sparge tanks have been developed. No pipes or valves are involved in process. Inspection routines in place for hopper and related bag and box handling facilities in repackaging plant. Procedure HO 6 – Repacking-Hoist & IsoTank Maintenance Plan. For Storage Warehouse - Plant Inspection procedure and Checklist (S8) is used.
Hoist and Hopper inspections are covered in monthly and yearly maintenance checks. Storage Warehouse Inspection, before every operation. Inspection documentation identifies all items to be observed, date of the inspection, the name of the inspector, and any observed deficiencies. Corrective actions are documented and records retained.



This was confirmed in records sampling and review.
The secondary containment interceptor is inspected monthly for integrity, status and condition.
In the auditor's opinion the inspection frequencies are sufficient as the repacking facility is not in continual use and the storage warehouse is only accessed when cyanide boxes are being moved into or out of the warehouse. The frequency of inspections would therefore assure that equipment is functioning within design parameters.

2. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.

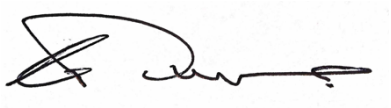
Production Practice 2.1: Develop and implement procedures to protect plant personnel from exposure to cyanide.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 2.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Operating procedures have been developed for the repackaging plant and storage warehouses. These include consideration of PPE, pre-work and post operation checks, heat stress, normal and abnormal conditions, buddy system, Training Plan, pre-, post and basic operations, normal, abnormal and emergency conditions, and a manual of authority
Procedure HO 1 Clause 4.1 Pre-Operation, major maintenance issue identified - Prepare a permit to work document using the risk assessment. HO 1 Clause 5 - Plant Decontamination process
All routine, non-routine and emergency scenarios and their responses are covered by effective procedures and work instructions. A Change Management Plan is in place and was used to consider the changed cyanide risk of introducing a sparging facility and additional storage of cyanide. It will also be used to address any future changes.
Worker input is solicited through consulting with the workforce through risk assessment, Planned Task Observations (PTOs), change management, and health and safety meetings
An Assurance/Quality Control Program was used during construction and a "fit for purpose" quality assurance certificate was issued by the Consulting Engineer. The materials of construction were mild steel and the construction engineer was aware that the equipment was to be used in conjunction with sodium cyanide.
The filling of Isotanks is a batch-based filling process for briquettes. 18 boxes pre-prepared for a 20-ton sparge Iso tank so overfilling is not possible.
Site has 14 x portable personal HCN gas monitors units being 8 x Watchgas UNI MP 100 HCN 0-100 PPM; 2 x Gazomat GAZTOX HCN; 4 x ToxiRAE 11 HCN PGM-1170. Calibrated to measure 4.5 ppm at the first alarm. Second alarm is at 9.7 ppm. First alarm prompts investigation of cause, and second alarm prompts evacuation. Gas monitor calibration matrix and calibration certificates and calibration information are in place as per manufacturers requirements.



Hot Spot Surveying for HCN gas and particulates using ICMI limits during sparging operations has recordable levels within the approved limits. The Driver Health Management procedure is in place to ensure healthy drivers. Drivers and safety staff are given medical examination and screening annually.
Full cover PPE is always used (full suit, gloves, rubber boots, full face mask and canister) during repackaging. There is no need for a clothing change policy, as clothes do not come into contact with cyanide.
Signage is in place, including presence of cyanide, no smoking or open flames, and no eating and drinking other than in designated areas.

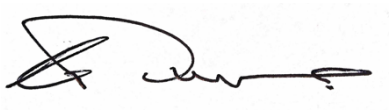
Production Practice 2.2: Develop and implement plans and procedures for rapid and effective response to cyanide exposure.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 2.2**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Facility has its own Emergency Response procedure to respond to cyanide exposures. Custom-built safety showers supplying potable water and pre-dissolved ferrous sulphate are located outside of the Customs bonded warehouse. An eye wash, supplied by potable water, is available at the same location and nozzles have lower pressure water and caps to prevent nozzles being dirtied. Potable water is readily available. An eye wash bottle is also located in the first aid kit.
Fire extinguishers are located strategically in the yard and building (repackaging area and warehouse). Fire extinguisher maintenance is carried out annually. Monthly inspection of extinguishers denoted by changing colour stickers. Extinguishers are included on a register. Fire extinguishers are all of the dry powder being non-acidic type.
Oxygen is available in the emergency room outside of the warehouse and repackaging facility, via "oxygen concentrator" (Perfecto2 Invacare) and Oxy-viva oxygen bottle. Emergency communication is via man down alarm and cell phones. Antidote is stored in fridge for transport with patient and antidote also supplied to Tema General hospital.
Health Safety, Security and Environmental (HSSE) Department manages the schedule for replacement of antidote from the Belgian supplier SERB SA. Monthly Equipment Inspection is required in terms of the procedure.
English is the working language of the site. SDSs (Safety Data Sheets) are included in Emergency Response Plan and procedures. SDSs are also located on the labels of the cyanide boxes. Sighted SDSs for all types of sodium cyanide on site. Operators go through the shower and decontaminate their PPE. Visitors and contractors are not permitted in the area during repackaging.
Seventeen safety officers are trained first-aiders. If sparging undertaken, "ambulance" staff member (as identified in procedure) is always a trained first aider. First aiders are



trained by Ghana Red Cross. Sighted Health Safety and Environment (HSE) passports indicating First Aid Training. Ghana First Aid is competent in cyanide first aid. The Ghana Red Cross has taken responsibility to collect and hospitalise potential cyanide patients. They are trained in treatment of cyanide patients and undertake cyanide first aid training. They have undertaken to ensure that patients will be taken to appropriate facilities. Confirmed in interview with Ghana Red Cross National First Aid Instructor.
Sighted results of mock emergency drill conducted 16 December 2019 . Scenario, during sparging at Hoist Repacking facility forklift driver lost concentration and collided with a beam supporting the plant. Also sighted Drill Evaluation template forms from two observers.

Procedures are in place for Incident and Accident Reporting/ Investigation covering warehouse and repackaging facilities. No incidents have occurred at repackaging facility since the last audit.

Sighted Accident Report and Investigation of Pickup accident on 12 February 2018. Investigation concluded that cause was driving too fast and lack of vigilance.

3. MONITORING: Ensure that process controls are protective of the environment.

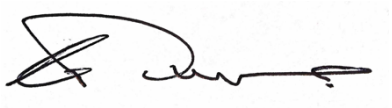
Production Practice 3.1: Conduct environmental monitoring to confirm that planned or unplanned releases of cyanide do not result in adverse impacts.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 3.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
No possibly contaminated water from the facility escapes from the site All liquid discharges go to an effluent and hydrocarbon, three compartments, linked containment sump, which is emptied whenever one compartment is full, by a specialist waste company. Reviewing of records at the sump shows results at or below limits of detection
The sparging facility has extraction fans with filtration equipment. The hopper is also designed with flexible rubber flaps to ensure any dust is kept within the hopper and facility.
Monitoring will continue to be undertaken during repackaging plant operations. Portable gas and particulate monitor are available to check levels under normal, abnormal and emergency conditions. Background and baseline monitoring has been undertaken during the current commissioning operations for the plant. No gas levels above permitted levels were detected. Persons entering the warehouses wear portable gas monitors.
Surface water is monitored with samples taken and analysis reports from an independent laboratory. No direct discharge. All discharge goes to an effluent and hydrocarbon, three



compartments, linked containment sump, which is emptied whenever one compartment is full, by a specialist waste company.
In the auditor's opinion the inspection frequencies are sufficient as the repacking facility is not in continual use and the storage warehouse is only accessed when cyanide boxes are being moved into or out of the warehouse. Trained personnel are in attendance at all times when cyanide is being handled.

4. TRAINING: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Production Practice 4.1: Train employees to operate the plant in a manner that minimizes the potential for cyanide exposures and releases.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 4.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Workers at the # 1 repackaging facility and the warehouse have been trained in cyanide awareness and hazards and cyanide emergency response. Up-to-date training "passport" records were sighted. Periodic refresher training is carried out
PPE training is included in Cyanide Awareness Training.
Training for the process is done using the procedures and is conducted on an "on the job" basis and PTOs (Planned Task Observations) are conducted to check compliance. Trainers are well qualified and experienced.
No person is permitted to work in the repackaging plant until they have been appropriately trained.

Production Practice 4.2: Train employees to respond to cyanide exposures and releases.

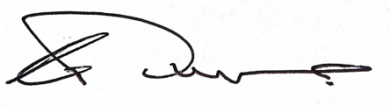
X in full compliance with

The operation is □ in substantial compliance with **Production Practice 4.2**

□ not in compliance with

□ not subject to

Summarize the basis for this Finding/Deficiencies Identified:
Training was given to all operators on the Repackaging Plant Emergency Response Plan which covers both cyanide releases and worker exposures. A mock drill was conducted on 16 December 2019 to check response. Training records are kept in the form of individual "Passports to Operate" (kept on site, not with employees) as well as training



course attendance lists. All records are kept permanently.

Training is given to all operators on the Emergency Response Plan including cyanide releases and worker exposures. Sighted Training Passports showing ER training. (Training records kept in form of individual "Passports to Operate" which are kept on site, not with employees.) . Sighted Cyanide Training Evaluation form which is True or False questionnaire consisting of 70 questions that must be answered.

A Desktop drill was carried out on 04-01-2021. Scenario – HCN poisoning during repackaging operation. Learning points were established and additional cyanide awareness training conducted.

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

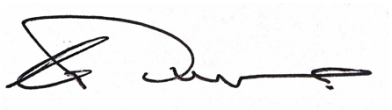
Production Practice 5.1: Prepare detailed emergency response plans for potential cyanide releases.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.1**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
The Emergency Response Plan and Repackaging Hoist Emergency Response. Plan which includes 24 scenarios that may require a response cover the repackaging plant and storage warehouse.
The scenarios considered in the Plan include: - roof collapse and impact of rain on stored cyanide; release during loading whilst repackaging; Explosion/fire outbreak in the repackaging facility-no cyanide release. Explosion/fire outbreak in the repackaging facility-cyanide release and evacuation plans. Emergency Response to Catastrophic Release of HCN Gas Unplanned power outages and plant stoppage in the repackaging plant.
Use of the Antidote and Advice to Doctor and First Aid Treatment for Exposure to Sodium Cyanide are included in the Emergency Response Plan.
Control of releases at their source - Covered in normal and abnormal operating procedures for Repackaging Plant



Production Practice 5.2: Involve site personnel and stakeholders in the planning process.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.2**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Tema Heavy Industrial Area has created a Safety Task Force called Tema Industrial Area Task Force. The objective of the Task Force is to take a proactive approach in preventing any unforeseen events due to fire and property damage. This includes educating stakeholders, peer-to-peer review audits, share industrial ideas and best practice, and support between each other in the event of an emergency, e.g., fire, spill etc.
The site engages with key stakeholders such as the Ghana EPA, Police, National Security, Ghana Red Cross, and Fire Service through continuous liaison. Confirmed in interviews with the Ghana EPA and the Ghana Red Cross.

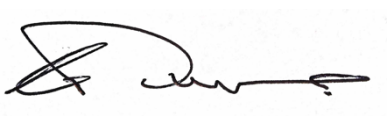
Production Practice 5.3: Designate appropriate personnel and commit necessary equipment and resources for emergency response.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.3**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Emergency Response Plan – Roles and Responsibilities for Hoist Emergency Response designates primary, secondary and alternate emergency response coordinators with explicit authority to commit the resources necessary to implement the Plan. All repackaging and warehouse operators are trained as emergency response team members and their training is included in the Training Matrix and the Training Plan.
Duties and responsibilities and a list of emergency response equipment are also included in the Plan. Alarm System and Notification Procedure and Emergency Communication System procedures in place.
The role of outside responders, medical facilities or communities in emergency response are covered in the Repackaging Emergency Response Plan - Roles and Responsibilities, the role of the EPA Officer, Ghana Fire Service Officer and External Medical Emergency.
Regular inspection of equipment is undertaken with checklists in place.
The site engages with key stakeholders such as the Ghana EPA, Police, National Security, Ghana Red Cross, and Fire Service through continuous liaison. Confirmed in interviews with the Ghana EPA and the Ghana Red Cross. Due to lack of resources the key stakeholders do not participate in mock drills.



Production Practice 5.4: Develop procedures for internal and external emergency notification and reporting.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.4**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:

Emergency Response Plan – Roles and Responsibilities includes procedures and contact information for notifying management, regulatory agencies, outside response providers and medical facilities for any emergency.
Information for notifying potentially affected communities of the incident and/or response measures and for communication with the media is Emergency Response Plan, and Emergency Communications System

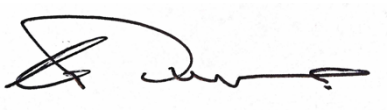
Production Practice 5.5: Incorporate into response plans and remediation measures monitoring elements that account for the additional hazards of using cyanide treatment chemicals.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.5**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Repackaging Hoist Emergency Response Plan - – Decontamination Process describes specific, appropriate remediation measures, such as disposal and neutralization of solutions and solids, decontamination of soils and other contaminated media and management and disposal of spill clean-up debris. The Procedure prohibits the use of chemicals such as sodium hypochlorite, ferrous sulfate and hydrogen peroxide to treat cyanide that has been released into surface water but this is unlikely as there is no surface water likely to be affected. Solid Spills are contained, collected and sent to mine site for processing, otherwise neutralize and dispose using ferrous sulphate. Waste neutralized cyanide solutions must not be allowed to be discharged directly into sewers, drains or water courses. Therefore, it is collected to a nearby interceptor. The waste from the interceptor will be collected by approved waste disposal company for final disposal.



Production Practice 5.6: Periodically evaluate response procedures and capabilities and revise them as needed.

X in full compliance with

The operation is □ in substantial compliance with **Production Practice 5.6**

□ not in compliance with

Summarize the basis for this Finding/Deficiencies Identified:
Repackaging-Hoist Emergency Response Plan specifies: The Emergency Response Plan needs to be reviewed yearly, after mock drills, when the ERP is activated and change or alteration of any routine operation or legislative changes, . Last review was conducted in December 2019 after a mock drill held on 16 December 2019 and next reviewed date is planned for December 2021. HCN poisoning was simulated during this drill.
Desktop drill was carried out on 04-01-2021. Scenario – HCN poisoning during repackaging operation.
All mock or desk top drills conducted simulate HCN release or poisoning.
There have been no actual cyanide release emergencies experienced since the last audit.

End of Report