INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary Certification Audit Report

Wesbank Transport
Walvis Bay Namibia

26th – 28th May 2021

For the
International Cyanide Management Code

Name of Operation:	Wesbank Transport (Signatory)
Name of Operation Owner:	FP Du Toit Transport (Pty)Ltd
Name of Operation Operator:	Wesbank Transport
Name of Responsible Manager:	Mr Kai Kutzner – SHEQ Manager, Wesbank Transport
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Location detail and description of operation:

Wesbank Transport, a division of FP Du Toit Transport, is a transport company that supplies international, normal & abnormal, and dangerous goods transport, cargo handling and hiring of lifting equipment services to the commercial, industrial, mining, and agriculture industries in Southern Africa.

Wesbank Transport's operation is located in Walvis Bay, Namibia, and there are premises for container & bulk goods storage and warehousing & bonded storage facilities.

Wesbank has been transporting various dangerous goods to various mines since 1995 and started transporting Sodium Cyanide from when Navachab Gold Mine started its operation in 2006. Wesbank Transport has been an ICMI signatory in the past but de-listed over two years ago. Wesbank is proud to have a "ZERO" Incident history regarding Sodium Cyanide transport thus far.

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

Audit Company: Eagle Environmental

Audit Team Leader: Arend Hoogervorst

E-mail: arend@eagleenv.co.za

Names and Signatures of Other Auditors:

Name Richard Durrant Signature Date 03 October 2021
ICMI Transportation Auditor

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 Transportation Operations and using standard and accepted practices for health, safety and environmental audits.

Signed

5/10/2021

Arend Hoogervorst Lead Auditor 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:
The HIRA (Hazard Identification and Risk Assessment), the Risk Assessment of Cyanide Container handling/transport from Arrival at Walvis Bay to delivery to the mine site, was assessed in July 2020. The Procedure for selection of a preferred route for the shipment of cyanide to the mine site, includes alternative routes, where feasible, population density (urban/rural), presence of pedestrians and cyclists, animals (wildlife and domestic), along the route. It also includes road conditions such as dust, tarmac, road surface, road orientation; and also considers railway crossings and tracks specifically. Also reviews condition of the infrastructure of harbour facilities and customs areas, with reference to transport of cyanide. Includes new road and intersection behind the dunes. Area-specific items such as fog and sandstorms, wind, misty conditions, poor visibility, and overcast but not raining, are also noted. Although alternate routes are not always available, where alternative options do exist, these are included. HIRAs are re-evaluated, when necessary, through additional, updated information, or at least annually.
The HIRA includes specific recommendations to mitigate risks such as speed reduction, more driver caution to be exercised, additional cautionary actions by convoy leaders, delayed departures in inclement weather conditions, and avoiding peak traffic conditions
The Namibian Government does not dictate routes for chemical transport. In consultation with the Roads authority, it has been clarified that there are no controls on the size of a convoy and speed is limited to 80 km/hour, with the following distance of 3 seconds. Navachab mine has an ongoing dialogue programme that includes reference to transporters such as Wesbank Transport. Plans will be in place to revise the programme and include additional information, as relevant.
Wesbank transports cyanide in convoys which include an escort vehicle and an emergency trailer. Convoys do not travel at night. The Convoy leader sets the pace of the convoy and adjusts the convoy movement, based upon risks and changes that may occur on the journey.
There is a Stakeholder Consultation procedure that specifies responsibilities of various stakeholders in rendering assistance in case of a cyanide incident. This is also identified in the Emergency Response Plan (ERP).

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

Summarize the basis for this Finding/Deficiencies Identified:
The Minimum Training Requirement procedure and the Wesbank Transport Management Plan (TMP) for cyanide, spell out the training requirements. The procedure states that drivers must be licensed to transport dangerous goods (Wesbank Transport uses an independent, accredited trainer for the Dangerous Goods by Road Training). The transport company use only trained, qualified and licensed operators to operate its transport vehicles. Drivers must have relevant licence codes (EC, plus D + G) according to the Transport Management Plan (TMP). There are seven designated drivers for cyanide transport and three trained side loader drivers who also have Dangerous Goods training. A review of a sample of drivers in the driver training matrix showed that they all had PrDP (Professional Driving Permit)/Licences, Dangerous Goods training certificates, Cyanide training, and medical certificate expiry details. The Side Loader drivers also had Competency Certificates in terms of driven machinery legislation 18.11 of the Occupational & Safety Act, to operate the 38-ton Side loaders.
Prior to the Covid-19 pandemic, the cyanide producer, AGR, provided annual cyanide training to Navachab mine and Wesbank Transport. During the Covid-19 pandemic, when AGR training could not be presented, AGR training material was used for refresher purposes. Attendance registers for eleven driver and side loader drivers' Sodium Cyanide Refresher Training (cyanide awareness training and cyanide emergency refresher) presented on 27 and 28 May 2021, given by the Navachab Mine Cyanide Champion, were sighted.

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:
Vehicle combinations operated to transport cyanide are 6x4 International truck tractors drawing 12.5m, three-axle, flat deck AFRIT flat deck trailers with container twist locks fitted. The vehicle's total axle mass load capacity would be 36.3 tons; however, due to

other restrictions such as vehicle power to mass ratio, the allowable payload on a vehicle combination would be approximately 30 tons.
Certificates of conformity for two Container Side Loaders in terms of driven machinery legislation Section 18 of the Occupational & Safety Act) were sighted. The side loaders were certified for 35 tons and tested for 38 tons. The cyanide shipping containers will be a maximum of 24 tons, gross mass. At Wesbank 2 Yard, overnight convoys would be offloaded by one of three reach stacker cranes in the yard, which have a safe working load of 45,000 kgs and are tested at a 2.8 m reach to 43,800 kgs.
In the TMP, it states that only one 6m container with a weight of approximately 24 tons will be loaded onto a three-axle trailer. This will ensure that the vehicle will be well within the maximum axle load range of 27 tons. The TMP further states that the vehicle and trailer, on departure from Wesbank 2 Yard, will pass over the municipal weighbridge before proceeding on the route to the mine. If the vehicle and trailers travel from the port direct, they will travel over the Government weighbridge. There is also a calibrated, certified weighbridge at Wesbank 2 Yard.

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:
The packaging for the cyanide conforms to the IMDG (International Maritime Dangerous Goods) Code. It is packed at source by the producer/consignor, AGR. The Convoy Leader will ensure that the split placarding on the containers is visible on four sides on collection at the Walvis Bay port.
A Safety Program forms a part of the Transport Management Plan (TMP) for the Transport of Cyanide from Wesbank Transport Depot No 2 to the mine site.
There are Truck Tractor and Trailer Pre-Trip Checklists. Checklists for convoys travelling on 08-03-2021 and 23-04-2021 were sampled and checked and found to be satisfactory by the Transport Auditor.
The maintenance and inspection of trucks and trailers is carried out via a Truck and Trailer PMS (Planned Maintenance System), which uses the SAP accounting software system to manage maintenance planning and maintenance records. The maintenance records for truck tractors of two of the ten truck tractors that could be used for transporting cyanide, were sampled. Both have kilometres travelled in excess of 1.0 million. Various service records for trailers and side loader trailers were also examined by the Transport Auditor and found to be in good order and the PMS system well managed.
The Driver Hours and Fatigue Management procedure, details drivers' hours. The Wesbank Convoy Leader is responsible for compliance. The maximum driving period is 5 hours continuous driving, with a maximum total driving time of 14 hours in a 24 hour

period. The resting period is a minimum 15 minutes, with 30 minutes accumulated during a period of 5.5 hours and a minimum continuous rest period of 9 hours in every 24 hours. Cyanide is only delivered during daylight hours. Driving hours for the Convoy dated 8-3-2021 and the Convoy dated 23-04-2021 were checked by the Transport Auditor and found to be compliant.
The 20 cyanide containing boxes are packed into a 6m container which gives a tight fit and prevents excessive load shifting. The container is sealed at source, and the Transporter cannot affect any inspection or change to the load configuration.
There is a Transport Modification Procedure after Convoy has left the depot in place. The circumstances covered that may trigger modification include: - inclement weather, civil unrest, road closure or road works. The responsibility of the Convoy Leader is to ensure the safety of the convoy. The leader will liaise and communicate with the mine and the National and/or SHEQ (Safety, Health, Environment and Quality) Manager at Wesbank Transport. If severe weather conditions or other unsafe conditions prevail, the Convoy Leader may halt the convoy at a safe place and proceed ahead to check conditions.
There is a Drug and Alcohol Policy in place, and the relevant Alcohol Test Form was sighted. The Policy is used in conjunction with the Company Disciplinary Policy. An FP Due Toit (parent company) Employee Rule Book, which includes a section on Alcohol and Drug-related offences in the company, which has a zero-tolerance policy, was sighted.
Drug and alcohol records are kept on personnel files for the life of employment of the employee, plus a minimum of 5 years. Medical records are kept for 30 years, financial records are kept for 5 years, vehicle records are kept throughout the life of the equipment. In practical terms, records have been kept as long as there is storage space, and since the original company inception.

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

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:
The consignor ships the containers according to the IMDG (International Maritime Dangerous Goods) Code requirements. This is normally specified in the Mine's Procurement Contract, and the transporter is not involved in this process. The containers of cyanide are placarded in compliance with IMDG Code requirements. The transporter only transports solid cyanide by road and not by sea or air; thus, this section is not applicable, and therefore in full compliance.

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:
The TMP (Transport Management Plan), Section 1.3, states that all vehicles are fitted with vehicle tracking. Selected vehicles, i.e., side-loaders, are fitted with Drive Cam cameras. All drivers are in possession of a cell phone, and the company provides credits for the phones.
Communications equipment is checked at the beginning of the trip (Drivers must have a cell phone, and it must be charged). The Convoy Leader and Support vehicle driver have company-issued cellphones. The vehicle tracking system uses GSM cell phone technology. The Briefing checklist asks, are you in possession of a cell phone and is the phone in working order? There are no special arrangements for communications back up. There are no blackout areas on the current route to the Navachab mine. The GSM cell-based vehicle tracking system also records events such as harsh braking, collisions, and violent steering. The Convoy Leader reports progress at set points, particularly when close to mine.
The Convoy Leader Checklist includes checking container numbers, twist locks, and container seals against the Bill of Lading and customs and clearance documentation. The TMP confirms that containers must have intact seals and not be tampered with. Seals are inspected during loading and the journey. There is also an Overnight Storage and Pre-delivery checklist, should the containers be released too late for direct transport and have to be stored overnight at the Wesbank 2 Yard. Safety Data Sheets (SDSs) are held by Wesbank Transport. Shipping records include the number of containers and serial numbers, which indicate the quantity of cyanide being transported. The Briefing Checklist for Cyanide Drivers, checks if the SDS is in the driver's possession.

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:
The cyanide containers are not always cleared through the port by Customs quickly enough to commence the journey to the mine (No cyanide transport occurs after dark) in

one day. In that situation, the cyanide containers are taken to Wesbank 2 Yard and stored overnight, leaving after 9.00am the following day. The Container Collection procedure, Clause 7. The temporary storage of containers will be done at the Wesbank 2 Yard and in a pre-determined area away from foodstuffs, animal products, and other containers. Cyanide must be stored separately from acid, corrosives and strong oxidisers. The storage area will be barricaded off, and applicable safety signage will be displayed. Access to the area will be limited. On-site security services will be notified of the temporary storage of the containers and that special care has to be taken concerning these containers.
When the containers are stored overnight at Wesbank 2 Yard, warning signs are put up (no entry, no smoking and no open flames, no eating and drinking) around the cyanide containers, and they are circled with hazard warning tape. The containers are stored inside a secure area, patrolled by security staff (24/7). Containers are still sealed, and doors are stacked door-to-door to prevent access. The site is in desert conditions, and there is a low risk of water impacts. Storage time is very short (overnight), reducing the potential risk. Cyanide containers are stored in the open air. The local climate is very windy (coastal area), causing good circulation and dilution effects.
There is a Cyanide Emergency Spills procedure, whose scope is to handle a controlled or uncontrolled cyanide spillage in all areas and processes whilst the delivery of cyanide to the mine is in progress. The procedure will also apply to the designated delivery team while cyanide containers are stored at Wesbank 2 Yard before delivery. The containers are inspected before being left in Wesbank 2 Yard overnight to ensure that there is no leakage or spillage.

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:
The transporter has a Sodium Cyanide Emergency Response Procedure, and the HIRA is aligned with the Emergency Response Plan. Mitigating measures are in place to minimise the risk of a cyanide emergency. The Plan considers the transporting of solid cyanide briquettes in secure packing; Road transport as the method of transport; and response actions are geared to the type of incident that might be expected.
The Plan considers the vehicle and trailer design and takes into account the transport of a single container on a trailer within the load capabilities of the truck-trailer combination.
Descriptions of response actions are included in the flow diagram (point 14), who does

what? The Convoy Leader will determine the extent of the incident, the remainder of drivers and escort vehicle team to don PPE, monitor for any gas present, barricade area and exclude bystanders, tend to injured, and cover any spilt product if raining. The Gold Mine representative provides technical assistance, as appropriate. The communities have no role to play in any emergency except to obey instructions to keep safe. The roles of outside responders are identified. This includes: - hospitals, ambulances, police and traffic officers, private security companies who can be called upon to provide assistance, including government agencies (Environmental Affairs, Water Affairs and Transport). The Navachab Gold Mine is an integral part of cyanide emergency response, and this is cross-referenced in both the mine's and Wesbank Transport's procedures, and in the Cyanide Transport Contract.

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

Summarize the basis for this Finding/Deficiencies Identified:
The Minimum Training Requirements Procedure covers all training, including emergency response, product awareness, convoy procedures, transport of dangerous goods, and SDS (Safety Data Sheet) training.
In the procedure, Minimum Requirements of Convoy Operations, Sections 6.1 Convoy Leader, and 6.2 During Transport Operations, detail the duties and responsibilities of the Convoy Leader from before the convoy commences, until the end of the journey. The procedure also details the responsibilities of the drivers and the emergency vehicle driver. Section 6.4B Emergency vehicle driver taking over duties of Convoy Leader, details the Emergency Driver's responsibility to take over the role of Convoy Leader, if the Convoy Leader is incapacitated or unable to continue as the Convoy Leader. The drivers receive their emergency response training from the AGR cyanide emergency training.
The Sodium Cyanide Emergency Response Procedure includes Section 12 Emergency Response Equipment, and contains a complete inventory list of all emergency equipment accompanying every cyanide convoy. The list is checked prior to departure on every shipment. There is also an Inventory list for the Cyanide Emergency Response Trailer. Included are: - 4 sets x PVC chemical suits with hoods marked cyanide, 4 pairs x 11 cm Mapa gloves, 4 x respirators and cannisters, 4 x pairs of nitrile boots, 2 x sets of SCBA (Self Contained Breathing Apparatus) equipment. Drivers only have overalls (with reflective strips), hard hats, earplugs, safety glasses and safety boots.
The Sodium Cyanide Emergency Response Procedure, Section 10, Training, includes the mandatory requirement that the training module Sodium Cyanide: consisting of 1. Product awareness, 2. Convoy Procedures, 3. Emergency Response Requirements, 4. Transportation of Dangerous Goods by Road Course (Required by law), be trained

annually. The Minimum Training requirement procedure is also used. Drills are used to check competency.
Emergency response equipment (listed in Section 12 of the Sodium Cyanide Emergency Response Procedure and Cyanide Emergency Response Trailer) list is checked prior to departure on every shipment.

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:
In the Sodium Cyanide Emergency Response procedure, under Annexure 1, Medical Support and Emergency Contacts. Clause 14 - basic incident Response Plan - Flow diagram, it is indicated, in case of an emergency, that the Convoy Leader will contact and inform the gold mine, Wesbank Transport, and the emergency services, if required. SHEQ Manager will notify the relevant government agencies, depending upon the type of incident. The SHEQ Manager personally reviews contacts annually, or updates as and when required.

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 Sodium Cyanide Emergency Response Procedure under Section 13, Responsibilities, states, "...Gold Mine Emergency Response Teams

- If available, shall support first aid to victims of accidents in the absence of medical facilities and Ambulances
- Shall supervise the remediation and recovery process with the assistance of the Wesbank personnel, if required..."

The Navachab Mine Cyanide Spillages Procedure includes Cyanide Code compliant remediation procedures for Controlled and Uncontrolled liquid and solid cyanide spillages, including recovery, neutralisation of liquids and solids and decontamination of soils, is used in the event of releases.
There is a Wesbank Cyanide Emergency Spills procedure, whose scope is to handle a controlled or uncontrolled cyanide spillage in all areas and processes when delivery

of cyanide to the mine is in progress. The procedure will also apply to the designated delivery team while cyanide containers are stored at Wesbank 2 before delivery.
The Navachab Mine Cyanide Spillages Procedure states that the Mine only uses Ferrous Sulphate for neutralisation and identification purposes. Under 6.1.3 Uncontrolled Liquid Spillages, sub-section 11, it states, "...Ferrous sulphate (or any other neutralizing agent) should never be used to neutralise cyanide spillage into clean-water rivers or dams..."
The Wesbank Cyanide Emergency Spills procedure states, under section 6.1, Uncontrolled Liquid Spillages, "...10. The recommended neutralisation reagent to be used for uncontrolled cyanide spillage, decontamination and neutralisation procedures is ferrous sulphate (FeSO4). The ferrous sulphate will, however, only be used under the strict guidance and supervision of the Navachab Emergency Team..."

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

Summarize the basis for this Finding/Deficiencies Identified:
The Emergency Response Plan is reviewed annually. Drills incorporated in Plan and requirement for annual refresher training. No provision yet for combined drills with mine. There is an intent to evaluate the Plan's performance after its implementation and revise it as needed. However, this is not done currently but is to be incorporated. The Plan has not had to be implemented, and only desktop exercises have been undertaken. It is too premature to expect performance evaluation at this stage.