



# **BAM CONSULTANCY SERVICES LIMITED**

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

---

## **ICMC PRE-OPERATIONAL CERTIFICATION SUMMARY REPORT**

---

### **INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE**

#### **Transportation Summary Preoperational Certification Audit Report**

#### **SNIAF LOGISTICS, Kayes, Mali**

Date of Audit: 7<sup>th</sup> to 9<sup>th</sup> August, 2025

For the

International Cyanide Management Institute  
1400 I Street, NW, Suite 550  
Washington, DC 20005, USA  
Phone: 202-495-4020  
Fax: 202-835-0155  
E-mail: [info@cyanidecode.org](mailto:info@cyanidecode.org)

---



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

## Table of Contents

Introduction.....	3
Acronyms and Abbreviations.....	4
Background of operation: .....	4
Auditor's Finding .....	6
Attestation .....	7
Principle 1, Transport: .....	8
Transport Practice 1.1: .....	8
Transport Practice 1.2: .....	11
Transport Practice 1.3: .....	13
Transport Practice 1.4: .....	15
Transport Practice 1.5: .....	18
Transport Practice 1.6: .....	18
Principle 2, Interim Storage: .....	20
Transport Practice 2.1: .....	20
Transport Principle 3- Emergency Response.....	20
Transport Practice 3.1: .....	20
Transport Practice 3.2: .....	23
Transport Practice 3.3: .....	24
Transport Practice 3.4: .....	25
Transport Practice 3.5: .....	26



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

## INTRODUCTION

### 1.1 Operational information.

Name of Transport Company	:	SNIAF Logistics, Bamako, Mali
Name of Transport owner	:	SNIAF Logistics, Bamako, Mali
Name of facility operator.	:	SNIAF Logistics, Bamako, Mali
Name of responsible manager	:	Boubacar Niang
Address	:	Grande Marche Imm El Hadji
	:	Hamet Niang
	:	BP 02
Town	:	Kayes
Country.	:	Mali
Telephone.	:	+22366964141
E-mail.	:	bniang@sniaf.ml



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

## Acronyms and Abbreviations

ERP.....	Emergency Response Plan
ICMC.....	International Cyanide Management Code
ICMI.....	International Cyanide Management Institute
QHSE.....	Quality, Health, Safety & Environment
HSE .....	Health, Safety & Environment
IMDG .....	International Maritime Dangerous Goods
RRA .....	Route Risk Assessment
IBC.....	Intermediate Bulk Container
ECOWAS....	Economic Community of West African States
SNIAF.....	Société Nian et Freres
TMP.....	Transport Management Plan

## 1.1 PROFILE OF COMPANY AND TRANSPORTATION OPERATIONS

SNIAF Logistics is a transport and logistics company based in the towns of Kayes and Bamako, Mali. The company was established in 2012. The company is involved in the transportation of mining chemicals and other mining items as well as customs clearance, warehousing etc. SNIAF Logistics belongs to the SNIAF Group of companies which was established in 1963. SNIAF Logistics has other subsidiaries involved in Oil and Gas distribution, construction and provides transportation of ore with in Barrick Mine (Loulo mine) in Mali. SNIAF Logistics does the transportation of grinding media for Fekola Mining (B2 Gold), Antiscalants, Metabisulphites etc.

SNIAF Logistics has 36 personnel of which 20 are trucks drivers. The company has a fleet of 15 trucks for transportation of various goods for the mine within Mali. The company has imported and is expecting 5 more trucks to boost its fleet for future transportation business.

The company is involved in the transportation of the aforementioned mining items from the port of Dakar, Senegal to the mine sites in Mali. Mali is a landlocked country and relies on the port of Dakar, Senegal or Port of Abidjan, Cote d'Ivoire. The company has competent staff to run its business. It has an QHSE department which ensures safety at all times during its business activities.



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

SNIAF Logistics has not yet commenced the transportation of cyanide. The company expects to do cyanide transportation by the end of 2025. The company has a valid Permit # 017/TR/API-MALI-GU from Agence Pour La Promotion des Investissements (API Mali) dated 22/07/25 to do transportation in Mali. The transporter also has a permit (permit # is 234/GRK-CAB dated 28/11/2012) to do transportation for mining companies. The permit is issued by the Ministry of Territory and Decentralisation (Ministère De la Decentralisation). The permit is not renewable.

## Audit Scope

The audit covers the transportation of cyanide in 20ft shipping containers from the port of Dakar, Senegal to Mali. Mali is a landlock country and the transporter transports mining items from the port in Dakar, Senegal to Mali. The ICMI verification protocols were used as guidelines in conducting this preoperational certification audit.

## Audit Schedule

This Pre-Operational Certification Audit was conducted from 7<sup>th</sup> to 9<sup>th</sup> August, 2025.

## Auditor's Finding.

This operation is

**X in full compliance**

in substantial compliance

not in compliance

with the International Cyanide Management Code.



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

## Auditor Information.

Audit Company: **BAM Consultancy Services Limited**

Lead Auditor & Technical Expert Auditor: **Benjamin Amoo-Mensah**

Lead Auditor E-mail: **csbpghana@ghana.com**

Names and signatures of other Auditors: **None.**

Auditor 1: \_\_\_\_\_

Name (Print / Type Signature

Auditor 2: \_\_\_\_\_

Name (Print / Type Signature

Auditor 3: \_\_\_\_\_

Name (Print / Type Signature

Dates of Audit: This audit was conducted in the period of 7<sup>th</sup> to 9<sup>th</sup> August 2025.



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

## 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 Cyanide Code Auditors.

I attest that this Summary Audit Report accurately describes the findings of the certification audit. I further attest that the certification audit was conducted in a professional manner in accordance with the International Cyanide Management Code Cyanide Transportation Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Date: 20 August 2025

## Principle 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.**

**The operation is:**

☒ **in full compliance with Transport Practice 1.1**

☐ **in substantial compliance**

☐ **not in compliance**

**Summarize the basis for this Finding/Deficiencies Identified:**

SNIAF Logistics has committed and developed a Route Transport Selection Procedure (#PRO-005/HSE version 001 dated 07/06/2025) which considered the following in 5.1.3(Realisation de l'étude) in page 5 of 7 of the procedure.

- Population density (towns and villages, markets etc.)
- Waterways located along the route
- Prevalence and proximity of water bodies and fog
- Infrastructure such as Railway lines, bridges etc.
- Gradients and Steep turns
- Parking areas
- Schools
- Hospitals
- Pitch and grade of road
- sandstorms and other environmental conditions
- Police stations

The company has a Route Survey Procedure (Realisation Et Utilisation D'un Road Survey). The QHSE Manager, Logistics Manager and an escort driver have done route surveys from Port of Dakar, Senegal to Fekola Mining (B2 Gold) mine site in Mali. The objectives for conducting the route survey were as follows;

- Identify risks on the road from Dakar, Senegal to the mine site.
- Put in measures to prevent or minimize the risks.
- Use the route survey as a tool to inform all the company's drivers on the risks identified on the route and take measures to avoid or minimize the risks.

The Route Survey procedure gives details about how the route survey is conducted. When selecting a particular route, the following was done.





# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

- Recording of distance covered and taking of photos of all hazards on the route
- Considering the population density
- Checking details of road restrictions
- Recording the number of bridges on the route
- Identifying of the hazards on the route
- Identifying any security risk on the route
- Preventive action to minimize the risks on the route
- Informing all stakeholders about the selected route

Route Survey report for the road from Dakar, Port to Fekola Mining (B2 Gold) was sighted by auditor.

SNIAF Logistics has committed to implementing a process to evaluate the risks of selected cyanide transport routes and has taken measures to manage these risks.

The Route Selection Procedure states that the risks on the route will be evaluated and the procedure updated based on significant changes on the route and significant change in operations.

The operation has conducted Risk Assessments in accordance to its Risk Evaluation document # FOR – 021/QHSE Revision 001. Risk Assessment has been conducted on the route from Dakar Port, Senegal to Fekola Mining (B2 Gold). Each risk on the road have been risk assessed and control measures put in place.

The following records of Route Risk Assessment done from Dakar port to Fekola Mining was scrutinized by auditor:

- Route Risk Assessment (# FOR-002/HSE version 001 dated 01/07/2025) from Dakar port, Senegal to Fekola Mining (B2 Gold mine site) a distance of 587.2Km.

The RRA has the various controls to minimize or eliminate the hazards. The controls put in place for the risk identified include;

- Reducing speed
- Adhering to speed limits
- Moving in convoys with escort
- Engaging Higher gears on hills
- Daylight driving at all times

Clause 5.2.4.1 of the Route Selection states that the route risk assessment will be conducted twice in a year.

The outcome of the Route Risk Assessment is used to train the drivers and escort team on the risks on the road before a driver drives on that road.

The company is committed to periodically re-evaluating the risks on the route. Currently, the mine does delivery of mining items to the mine and has a system of getting feedback from the drivers, the mine, the government agencies (on security issues) and other entities such as police and gendarme.



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

The transporter and the transporter have a WhatsApp platform which is used in getting feedback on the security situation on the road as well as the general conditions of the road.

RRAs that have been conducted revealed that different hazard types were considered and evaluated. It was evident from documentation presented that the findings with respect to hazards, road infrastructure and road condition were taken into consideration.

Copies of feedback reports (Repertoire de Dysfonnement Observe encours du trajet # FOR-44/QHSE) on the road conditions were sighted by auditor. The same feedback report form is completed when there is a security risk on the road. The feedback reports are discussed at Tools Box meetings. The meetings are attended by the drivers, escort team and the police. Records of tools box meetings were noted. Topics discussed include road conditions between Dakar, Senegal and the border of Mali, road diversion, road construction on the road and security situation.

SNIAF Logistics has committed to implementing a system to document the measures taken to address risks identified on the selected routes within the Route Risk Assessments.

Records of Route Survey report, RRAs, Feedback reports, Tools box meeting records have all been documented.

The condition of the road which includes constructions on the road, potholes and sharp diversions have been documented. Preventative actions to mitigate or eradicate the risks on selected route are included in RRA assessment document. There is evidence of training attendance sheets on file depicting the training programs.

SNIAF Logistics has sought input from various stakeholders and applicable governmental agencies in the selection of routes and development of risks management measures. The company has contacted the Malian Ministry of Security and Civil Protection (Ministère De la Securite et de la Protection Civile), Ministry of Environment (Ministère de l'Environnement), Hospitals, and the Ministry of Defence (Gendarmerie). In Mali, the Civile Protection is responsible for providing Ambulance services and Fire Fighting.

Confirmation letters showing response from Civil Protection, Ministry of Defence (Gendarmerie), hospital (Hôpital Regional de Kaffrine) and Ministry of Environment were sighted and noted. The Civil Protection Unit and the Gendarme have given their consent to accompany the cyanide convoys when the transporter commences the transportation of cyanide.

SNIAF Logistics is committed to using escorts, convoys and safety and security measures do deliveries of cyanide the mining client. The transporter has developed a Convoy Management Procedure (Procedure Gestion Des Convois Routiers) which states that cyanide will be delivered in convoy with escort. The transporter has also a Transport Management Plan which also reiterate that convoys and escorts will be used to do transportation of cyanide to the mines. A convoy will consist of five (5) vehicles with an escort vehicle.



The composition of the escort team will be as follows;

- 1 Convoy leader
- 1 Convoy Assistant
- 1 Escort driver
- 2 Military (Gendarme) or police
- 1 Civil Protection personnel

SNIAF Logistics will not subcontract any of the transportation of cyanide business.

**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.**

**The operation is:**

**✓ in full compliance with Transport Practice 1.2**

**o in substantial compliance**

**o not in compliance**

**Summarize the basis for this Finding/Deficiencies Identified**

SNIAF Logistics uses trained, qualified, and licensed operators to operate its handling transport vehicles. The transporter has employed qualified drivers with categories for trailers (BE) and heavier vehicles (C1, C, C1E, CE). The driving license is valid for 5 years.

The following criteria is used in employing drivers.

- Driver must have a valid license (Categories BE and C1, C, C1E and CE)
- Driver must have at least 5 years' experience
- Driver must be 24 years and above

Shortlisted drivers are interviewed and selected drivers offered employment. The selected persons are taken through the following mandatory training;

- Fire Fighting Training
- Defensive driving



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

- Cyanide Awareness Training
- Emergency Response Training
- Basic First Aid

A new driver will sit with an experience driver to do about two trips to the mine site before allowing him alone to drive that company's vehicle.

The transporter is committed to train its personnel in cyanide handling and transport equipment to perform their jobs in a manner that minimizes the potential for cyanide releases. The company has a Training Plan document # FOR-034/QHSE dated 01/04/2025. The plan details the following training programs;

- Fire Fighting Training
- Defensive driving
- Cyanide Awareness Training
- Emergency Response Training
- Basic First Aid
- Procedures in Transportation of cyanide
- Alcohol, medical and drugs management
- Mock drill (cyanide simulation)

All the above listed training programs are held annually except mock drill which will be held twice annually.

Fire Fighting Training was conducted by Malian Civil Protection Agency. A training register (Liste de Presence Reunion # FOR-031/QHSE) was completed by all workers who participated in the training. Defensive driving, Basic First Aid, Emergency Response Training records respectively were sighted. Cyanide Awareness Training and Mock drill was conducted by a Chemical Safety Consultant based in the country. The training details and training register were sighted by auditor. Training certificates were sighted and noted by auditor.

A review of training records of drivers and escort team against the company's training matrix indicates that training have been completed. Selected staff were interviewed to ascertain whether there are competent and knowledgeable in their jobs.

SNIAF Logistics will not subcontract Transport Practice 1.2.



**Transport Practice 1.3:**

**Ensure that transport equipment is suitable for the cyanide shipment.**

**The operation is:**

☒ **in full compliance with Transport Practice 1.3**

☐ **in substantial compliance**

☐ **not in compliance**

**Summarize the basis for this Finding/Deficiencies Identified**

SNIAF Logistics is committed to using Mercedes Benz trucks having Horsepower (HP) of 421 with the right configuration to do cyanide transportation.

The TMP, has the configuration of the Mercedes Benz trucks used for transportation. The transporter has a fleet of 6x4 vehicles with 4 axles trailers of which each vehicle will carry 2x20ft containers of cyanide. Each 6x4 truck has a load capacity of 60 tons.

The company has a contract with Malian Automobile Company (La Malienne de l'automobile) to do both Preventive Maintenance and Curative Maintenance on the vehicles. Malian Automobile Company is representative of Mercedes Benz and have the capacity to conduct maintenance on the company's vehicles.

As per the Contract Agreement (dated 03 October 2025) between SNIAF Logistics and Malian Automobile, they are to carry out the following services.

- Changing of oil, filters and greasing,
- Tyre maintenance,
- Trailer maintenance,
- Servicing the trailers

Prior to any deliveries of goods, inspection is carried out by the QHSE Manager and the driver. A vehicle pre-departure checklist (#FOR-007/HSE dated 16/02/2025) is completed. Any fault identified are then reported to the Operation Manager who then raises a work order to Malian Automobile. Malian Automobile after repairing or servicing the vehicle will test and see if the problem has been fixed and the truck handed over to SNIAF Logistics. Tyres are also serviced by the Malian Automobile as per the transporter's procedure PRO-007/QHSE dated 01/06/25. Auditor visited the premises of Malian Automobile found them having good procedures and systems.



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

The vehicle's manual was verified and the load capacities as per the manufacturer's specification noted.

The Mercedes Benz trucks that SNIAF Logistics uses have the required capacities and configurations to carry two(2x20ft) containers of cyanide. This was verified from the manufacturer's manual. The 6x4 couples with quadruple axle trailers have the capacity can load 2x20ft of cyanide. Mali is part of Economic Community of West Africa States (ECOWAS) and abide by the ECOWAS axle load regulation of 10.5 tons /axle (Axle Load Limit). Two containers (2x20ft) of cyanide loaded by 6x4 quadruple axle trailer configuration will be below the axle load limit.

There are procedures in place to prevent overloading of the transport vehicle. Generally, vehicles are weighed at the port of Dakar, Senegal by DP World a Stevedoring company in Dakar, Senegal before they leave the port to prevent overloading of every vehicle loading at the port. Weighing tickets are given to each truck driver and overweight vehicles are either impounded or fined. Records of weighing bridge tickets were noted. There are also weighing bridges within Mali for checking the weights of trucks. Samples of weighing bridge tickets were sighted.

The maximum load per axle of the 6x4 with 4 axles 7.1mt/axle which are lower than the Economic Community of West Africa States (ECOWAS) axle load regulation of 10.5mt/axle. The weights of the containers of cyanide are written on the Bill of Lading documents and that is a guide to ensure the trucks are not overloaded when the company commences cyanide transportation.

SNIAF Logistics will not subcontract any of the above activities in Transport Practice 1.3

## **Transport Practice 1.4:**

**Ensure that transport equipment is suitable for the cyanide shipment.**

**The operation is:**

☒ **in full compliance with Transport Practice 1.4**

☐ **in substantial compliance**

☐ **not in compliance**

## **Summarize the basis for this Finding/Deficiencies Identified**

SNIAF Logistics is committed to implement procedure to ensure that cyanide is transported in a manner that maintains the integrity of the producers packaging. The transporter has a checklist (Checklist des Conteneurs Cyanure avant depart # FOR-041/QHSE) used for carrying out the inspection of containers from the port to the mine site. Things inspected on the container is the doors, signs of corrosion and the general condition of the container. All shipping containers on the company's trucks are tracked till they reach the mine site. The Senegal Customs put a tracking device on the doors of the



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

trucks till the trucks get to the border between Mali and Senegal and the device is remove. The containers also have container seals and the seal remain unbroken till it gets to the mine site in Mali.

The Transport Management Plan gives a description of how sodium cyanide is package. It mentions that the cyanide is packaged in 1ton sacs. The sacs are covered by polyethylene to prevent moisture from getting into contact with it. The sacs are encased in plywood boxes with a pallet at the base in accordance with the IMDG code (IBC). The IBCs are packed in 20ft standard shipping container and doors secured with container seals. The weight of the cyanide briquettes on each 1x20ft is 20 tons. During the transportation of cyanide containers, the seals will remain intact during the entire duration of the journey and be broken at the mine site by the mine operator.

Waybills and Bill of lading have the seal numbers of the containers. The mine operator receiving the goods will sign the waybill and stamp after satisfying himself that the container is intact.

Records of waybills covering grinding media and sodium metabisulphite were signed and stamped by Fekola Mining (B2 Gold) representative were sighted. Records of waybills covering Sodium metabisulphite and grinding media steel balls delivered to the mine were verified by auditor.

The TMP describes the signage to be used to identify the shipment as cyanide as required by international standards as well as the IMDG code and are expected to be displayed conspicuously on all four sides of a container. The TMP discusses placarding, Hazard Class 6 skull & Cross bones, UN number 1689, and Marine Pollutant labels. As per the TMP, the required placarding namely Marine Pollutant and Hazard Class 6 and cross bones will be displayed in front and at the rear of the trucks. The transporter has in possession, printed placards. The required signage(s) identifying the shipment as cyanide were verified by auditor.

SNIAF Logistics has implemented a safety program for all its transportation operations for the mines and other clients.

(a) The company carries out various inspections before a convoy sets off for a trip. The inspection includes;

- Vehicle pre-departure inspection
- Container Inspection
- Escort Equipment Inspection

Prior to departure of the vehicles, they are inspected and the pre-departure checklist completed. Records of vehicle inspections carried on selected vehicles were noted. Escort equipment are also inspected and Equipment Checklist is signed off by Escort Leader. Copies of equipment checklists were verified.

(b) The transporter has a contract with Malian Automobile Company (La Malienne de l'automobile) to do both Preventive Maintenance and Curative Maintenance of the vehicles. Malian Automobile





# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

Company is representative of Mercedes Benz and have the capacity to conduct maintenance on the vehicles.

As per the Contract Agreement (dated 03 October 2025) between SNIAF Logistics and Malian Automobile, they are to carry out the following services; Vehicle inspection, Tyre maintenance, Trailer maintenance, and Servicing of the trailers.

The Mercedes Benz Trucks are serviced at every 10,000Km by the Malian Automobile the agent of Mercedes Benz in Mali as per the manufacturer's recommendations.

During the inspection the distance covered is recorded on the pre-departure checklist. When a truck is almost due for servicing, the operations manager is informed and a work order raised for Mali Automobile to service the truck. After each servicing, the Mali Automobile place a sticker on the front screen of the vehicle which shows the next expected servicing date. When a fault, is identified during the inspection, a workorder is raised and the vehicle sent to Mali Automobile to be fixed. When a vehicle breaks down, Mali Automobile has a maintenance vehicle which drives to the location to fix the vehicle. Mali Automobile has representatives in along the road to the mine which also works on break downs of vehicles along the road. A visit to Mali Automobile revealed that the company is competent to carry out maintenance of SNIAF Logistics vehicles. Records of completed works (Rapport de d'intervention) were verified noted by auditor. The work order forms were signed off by the Maintenance Manager of Mali Automobile.

The transporter has a Tyre Management Procedure. Tyres are inspected periodically to ensure that no defective tyres are used. The procedure states that the positions of the tyres on the trucks are rotated after every 10,000Km. The procedure indicates that a tyre is replaced with a new one when the tread depth is 5mm.

(c) The company has a Drivers Regulations which contains the rules and regulations for SNIAF Logistics drivers. Point 6 of the transporter's Driver Regulation document states categorically that the maximum number of driving hours is 2hrs continuous drive on laterite road and resting for 15 minutes or drive for 3hrs on an asphalt road and have 30 minutes rest. The company has a Journey Plan showing the times of stopping for a brief rest and departure times.

(d) Clause 5.4 of the TMP clearly states that the twist locks are inspected and verified that they are securely fastened on the containers. In clause 5.5, it is the mandatory for the convoy leader to inspect the twist locks and complete the pre-departure inspection checklist. The Convoy Leader conducts the inspection and to verify that the twist locks are firmly in place in the containers any time the convoy stops for short rest or refreshment break. Sampled records of predeparture checklists were sighted by auditor.

(e) As per the TMP and the Emergency Response Plan (#IT-004/HSE version 001) the convoy will suspend the operations during civil arrest, bad weather condition, terrorist attack, road collapse,





# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

mudslides, and any adverse conditions that will affect the convoy movement. Scenarios 6 in the ERP, titled "Manifestation et trouble socio-politique et attaques") the convoy will do the following;

Convoy will stop immediately and park at a safer place far from the area of incident

- The convoy leader will inform the mining company and its management
- The Malian military will be informed to handle a situation where there is terrorist attack and to safeguard the containers and the truck.

In case of civil unrest (demonstrations etc.) and poor weather conditions the convoy will stop at a convenient place till the civil unrest is over or the weather improves.

The decision to continue the trip will be made by Convoy Leader in conjunction with the mine client, the military and his office after the terrorist attack, civil unrest or bad weather condition is over.

(f) The transporter has a Drug and Alcohol policy (FOR-019/QHSE). The objective of the drug and alcohol policy is to prevent drivers and the entire staff from drinking to work. The procedures states that there are consequences when found to be drunk with alcohol or taken drug while at work. Random testing for alcohol is conducted on the staff and an alcohol test form completed. Copies of completed alcohol test checklists were noted by auditor. The random tests are performed by the QHSE Manager. Records of alcohol tests performed on drivers were noted. The company has an AD 6000 Breathalyzer which is used to conduct the alcohol tests. The Breathalyzer was last calibrated on 24<sup>th</sup> March 2025 with the next calibration date being 24 March 2026.

(g) The transporter has a Document Control Procedure (PRO-009/HSE version 001) which states that documents are to be retained for a period of 5 years before being disposed of. There is evidence that checklists, maintenance record etc. on the above activities have been retained. This was verified by the auditor.

SNIAF Logistics will not subcontract above activity in Transport Practice 1.4.



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

**The operation is:**

- ☒ in full compliance with Transport Practice 1.5
- ☐ in substantial compliance
- ☐ not in compliance

**Summarize the basis for this Finding/Deficiencies Identified:**

This Standard of Practice is not applicable. SNIAF Logistics will not ship cyanide by sea.

**Transport Practice 1.6:**

**Track cyanide shipments to prevent losses during transport.**

**The operation is:**

- ☒ in full compliance with Transport Practice 1.6
- ☐ in substantial compliance
- ☐ not in compliance

**Summarize the basis for this Finding/Deficiencies Identified:**

As per the TMP, the medium of communication with the mining company, producer and external and internal responders will be by use of Cell phones namely Orange Senegal, Orange Mali and Moov Mali. These three (3) networks will be used for communication. Communication will also be via Whatsaap and emails. The company has placed an order for a Satellite phone for its communication between all the stakeholders in blackout areas. A list of emergency telephone numbers for the various emergency services which will be kept with the Convoy leader were sighted by auditor. Portable Phone charges are installed in the trucks for charging phones. Currently, communication equipment are inspected and checklist completed during the predeparture inspection prior to delivering any mining items to the mine.

SNIAF Logistics ensures that all communication equipment's are regularly tested and functions correctly. Communication equipment such as cell phone and GPS are installed in the tractor units of the vehicles and are inspected prior to the departure of a convoy. The cell phones are inspected and pre-departure checklist completed. Cell phones and GPS tracking system are part of the



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

communication equipment listed on the Escort equipment checklist. It will be the responsibility of the Convoy leader to ensure that the communication equipment's are working effectively. The emergency equipment checklist was verified and noted by auditor.

There are black out areas along the route on Dakar, Senegal to Fekola Mining in Mali. The transporter currently uses 3 cell phone service providers namely Orange Senegal, Orange Mali and Moove Mali. Black out areas are covered by alternative network service network. The company has placed order for a Satellite phone from Orbitica a French company based in Dakar, Senegal. GPS tracking system is used to monitor the location and progress of shipments. The system is manned 24/7 by the Operations Manager.

When trucks are on the way delivering goods to a mine, the Operations Manager checks the status of the vehicles every 1hr and note the locations of trucks and then notify the mining client what the Expected Time of Arrival (ETA) will be.

The GPS sends alerts to the operations manager in case the trucks overspeed. The shipping line sends notification and documents covering the shipments consigned to the mine. The documents are Bill of Ladings and Packing list to the transporter. Updates are sent by the shipping line on the locations of a vessel. Copies of Emails communications between the mine and the transporter were sighted. Copies of Bill of Lading showing the number of containers mining chemicals such as sodium metabisulphite were sighted. The waybills have the container numbers, seal numbers, weight and name of the type of mining item. All waybills are stamped by the mine site personnel signifying that the containers have been received safely. The same process will be followed when the company starts the transportation of cyanide.

Records of the Bill of Ladings specifying the gross weight of some mining items were reviewed. Waybills are written to cover each container and these are given to the mine site representative who signs it to ensure that the containers have been received in good condition. Copies of waybills numbers as well as copies of container Interchange documents issued by the shipping lines were noted by auditor.

The transporter has committed to provide shipping records indicating the amount of cyanide and MSDS with the cyanide shipment. Delivery of chemicals such as Sodium metabisulphite etc. to Fekola Mining are accompanied with shipping records and MSDS from the manufacturer. The transporter has not started the transportation of cyanide yet. However, the transporter has Sodium cyanide MSDS printed from the internet. This was sighted by the auditor.

SNIAF Logistics will not use sub-contractors for any of activities specified in Transport Practice 1.6



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

**2.0: 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.**

The operation is:

☒ in full compliance with Transport Practice 2.1

☐ in substantial compliance

☐ not in compliance

**Summarize the basis for this Finding/Deficiencies Identified:**

The transporter will not have any transshipment depots or interim storage sites. SNIAF Logistics will not have a cyanide trans-shipment depot or interim storage for cyanide.

**Transport Principle 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.**

The operation is:

☒ in full compliance with Transport Practice 3.1

☐ in substantial compliance

☐ not in compliance

**Summarize the basis for this Finding/Deficiencies Identified:**



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

SNIAF Logistics has already developed an Emergency Response Plan (Plan d'urgence transport cyanure # IT-004/HSE 001) for the transportation of sodium cyanide.

The details of the plan are as follows.

- Containment, neutralization and decontamination processes
- Description of the physical properties and chemical properties of sodium cyanide
- Description of scenarios and response actions
- Roles and Responsibilities of emergency responders and other stakeholders
- First Aid and medical treatment
- PPE requirements

The contents of the plan were critically scrutinized by auditor and found to contain the above relevant information.

Route Risk Assessment conducted from the port to the mine site took into consideration the general road conditions. The ERP addresses road transportation of the sodium cyanide to Fekola Mining. The ERP is appropriate for the transportation of cyanide on the following road to the mine; Dakar Port, Senegal – Tambacounda – Kedougou -Mousala- Kenieba- Fekola Mining.

The ERP gives a description of the physical and chemical composition of sodium cyanide. It describes the nature of cyanide and its packaging and other chemical properties. The incompatibility cyanide to acids and the reactions thereof when they are put together and when exposed to moisture. The plan discusses the placards used in identifications of sodium cyanide namely UN No. 1689, Toxic Six and Marine pollutant labels used which conforms to the International Dangerous Goods Code. The plan further addresses the process of handling accidental release of cyanide. The plan contains the MSDS for sodium cyanide.

The Emergency response procedures are based on the road transportation of solid cyanide in IBCs within a 20ft shipping container using 6x4 trucks coupled with 4 axle trailers.

The ERP considers all aspects of transport infrastructure. Road infrastructure i.e. bridges, sharp curves, slopes and general condition of the road were considered in development the plan. RRAs that have been developed mentions the road infrastructure and general road conditions.

The ERP (in Clause 2) took into consideration the design of the trucks for road transportation. The plan mentions that delivery of cyanide to Fekola Mining will be with the use of Mercedes Benz trucks with configuration of 6x4 with quadruple trailers.

The ERP includes descriptions of response actions for anticipated emergency situation. Response actions of different incidents scenarios have been described comprehensively. The ERP describes the following 5 anticipated emergency situations.



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

- Accident involving a cyanide truck resulting in a rollover of cyanide shipping container on dry ground without any spillage.
- Accident resulting in fire of the cyanide truck but container is intact with its contents
- Accident resulting in the cyanide container falling into water body.
- Rollover of cyanide container resulting in a spill on a dry ground
- Incident involving the sabotage and hijacking of a cyanide truck

The actions in handling the above anticipated emergency situation have been detailed in the ERP.

Clause 4 of the ERP addresses the roles of emergency responders namely Convoy leader, drivers, Civile Protection, Gendarme (Military), mine, cyanide supplier. The plan mentions that in the event of an accident the Convoy leader will immediately inform the Operations Manager and the external emergency responders. The operation manager will then inform the mine and the cyanide producer about the incident. The Convoy leader will be responsible for managing the incident which includes administration of 100% oxygen to a victim, neutralization and decontamination.

The escort team will prevent people from the incident site and move them opposite to the direction of the wind. The escort team will condone off the area. The Civil Protection in Mali is involved in firefighting as well as providing Ambulance and will be responsible for rescuing and putting off fire with the appropriate fire suppressant. The Ambulance will continue the administration of oxygen to stabilize the victim and hand him over to the nearest hospital.

The Hospital will provide treatment for a cyanide poisoned person. The responsibility of the mine is to receive and offload damaged IBCs. The mine will be fully involved in the recovery in case the incident occurs close to the mine site.

The military(gendarme) will do traffic control and also prevent intruders to the incident area.

Civil Protection will assist in cleaning up the area of an incident and assist in rescue of a poisoned person.

The community will not play direct role when there is an incident but will directed by the Civil Protection. The Malian Ministry of Environment will test any contaminated water bodies (in case cyanide has entered) and also advice the nearby community about the need to avoid the use of the contaminated water. The cyanide supplier will offer technical advice.

The auditor scrutinized the roles of the external responders.



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

**The operation is:**

**✓ in full compliance with Transport Practice 3.2**

**o in substantial compliance**

**o not in compliance**

**Summarize the basis for this Finding/Deficiencies Identified:**

The transporter has developed a Training Plan which shows annual refresher ER training for its employees. SNIAF Logistics has started training its staff in Emergency Response. Records of Training Attendance Register were sighted by auditor. Competencies of the drivers and escort team are done through assessments. Selected drivers were interviewed by auditor to find out about their knowledge. The performance of the drivers and escort team proved that they have been trained.

The specific emergency response duties and responsibilities of the Convoy leader, escort team, drivers, Military, Civil Protection, hospitals are all clearly outlined in Transport Practice 3.1.

Section 4 page 11 of the company's emergency response equipment has a list of emergency response equipment. The company has procured the following equipment.

Ferrous sulphate monohydrate  
Dry powder Fire Extinguisher  
Full face respirator with canister (ABEK)  
Tyvek Overalls  
First Aid kits  
Oxygen resuscitator  
HCN gas detector  
PVC gauntlet gloves/Overalls  
Rubber boots  
Safety triangles  
Cones  
Shovels  
Tarpaulin  
Torch  
Plastic bucket



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

Spray pack  
Reflector tape

The above equipment(s) are stored in a designated room within the company's office block under lock and key. The QHSE Manager is responsible for keeping the equipment safe. The company has procured an HCN gas detector which was calibrated on 12<sup>th</sup> February 2025. The company has also procured Oxygen resuscitator which is periodically inspected for by the QHSE Manager to ensure it is always full. The QHSE Manager and the Convoy leader have been trained the use of the HCN gas detector and the Oxygen resuscitator by the Malian Civil Protection. Training attendance sheet dated 22 March 2025 was sighted by auditor.

Personal Protective Equipment such as Tyvek overalls, rubber boots, PVC gloves and Full-Face respirator with canisters (ABEK) form part of the escort equipment. Before an employee is given any PPE, he is taken through the correct use of it by the QHSE Manager.

The company has developed a procedure to inspect emergency response equipment and assure its availability when required. The ER procedure mentions that prior to delivery, the emergency equipment's will be inspected by the Convoy leader and an Emergency Response Equipment Checklist will be completed. Defective PPEs will be replaced with new ones before a convoy departs.

SNIAF Logistics will not sub-contract any of the activities in Transport Practice 3.2.

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

**The operation is:**

☒ **in full compliance with Transport Practice 3.3**

☐ **in substantial compliance**

☐ **not in compliance**

#### **Summarize the basis for this Finding/Deficiencies Identified:**

The transporter has developed a procedure for notifying all the stakeholders in case of an emergency. A list of contact phone numbers of the Emergency responders is in Appendix B of the ERP. The same list of contact phone numbers of the Ministry of Environment, Gendarme (Military), Civil Protection, Hospital and Fekola Mining (B2 Gold) are kept by the drivers. Community consultation in Mali will be done by Civil Protection and there is no direct consultation with community. Selected phone numbers were called by the auditor to check whether they are active and were found to be active.





# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

The ERP mentions that the emergency contacts and reporting procedures for the internal and external responders will be tested once a month by the QHSE Manager. Contact details found to have changed will be amended. At the end of each month the QHSE Manager will call the contact phone numbers of all internal and external responders to find out whether they are active and whether the individuals have changed and amend the ER contact details accordingly.

The ERP states that in case of a significant incident ICMI will be informed by the General Manager of the company within 24hrs as per the following ICMI definition and Acronyms.

- 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 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.
- Unauthorized release that occurs off-site or migrates off-site.
- Theft of cyanide.

SNIAF Logistics is yet to commence cyanide transportation and therefore has not recorded any incident.

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

**The operation is:**

☒ in full compliance with Transport Practice 3.4

☐ in substantial compliance

☐ not in compliance

**Summarize the basis for this Finding/Deficiencies Identified:**

SNIAF Logistics has developed a procedure for remediation, such as recovery or neutralization of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris. Clause 5.3(Neutralization) gives a detail description of how neutralisation is carried out using either Ferrous sulphate or sodium hypochlorite. In containing a cyanide spill, the escort team will ensure the spill is prevented from entering water ways. In case a spill on dry ground the briquettes of cyanide will be shovelled into a sac. The residue will be neutralized with Ferrous sulphate monohydrate. Contaminated soil or product removed during clean-up will be sent to the mine.



# BAM CONSULTANCY SERVICES LIMITED

P.O. Box: CS 8154 TEMA, GHANA

TEL: 030 331 9983 / 024 433 0392

GPS: GT-115-5410

Website: [www.bamconsultgh.com](http://www.bamconsultgh.com)

In case of a spill into a river the procedure mentions that the Civil Protection and Ministry of Environment will be notified and in conjunction with the company inform the villages and town downstream to avoid using the water and alternative water supply given to them. Sample of the river will be taken and tested regularly by the Malian Ministry of Environment till the river is declared safe.

Procedure was noted and contents scrutinized by auditor.

Scenario 3 of the anticipated emergency states clearly that under no circumstances will the company introduce Ferrous sulphate, Hydrogen peroxide or Sodium hypochlorite into surface water in an attempt to treat cyanide that has been released into it. This statement was noted by auditor.

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

**The operation is:**

☒ **in full compliance with Transport Practice 3.5**

☐ **in substantial compliance**

☐ **not in compliance**

**Summarize the basis for this Finding/Deficiencies Identified:**

The operation has made provision for periodic review of the ERP. Page 9 of the ERP mentions that the ERP will be reviewed annually after it is activated, after an accident, or if legal requirements change. It may also be reviewed after mock drills. The procedure reiterate that the revision and update will be based on findings from yearly mock drills conducted by the QHSE team as well as lessons learned from a cyanide incident.

SNIAF Logistics Training Plan has made provision for mock drill to be conducted twice a year. Mock drill was done on 1/08/25 and the company has a plan to conduct cyanide incident simulation twice/year. The company intends to continue with the mock drills when it commences delivery of cyanide. Three drivers and escort team members interviewed on the mock drills gave positive feedback on the mock drill organized on 1/08/25 and the role the played in the drill. Mock drill report dated 2 August 2025 and attendance register was sighted by auditor.

The ERP makes provision for periodically reviewing and evaluating the plan's performance as well as after an incident. Debriefing meetings will be held after emergencies and mock drills to evaluate which parts of the plans should be improved. The incident investigation process also has similar requirements to evaluate the plan's performance following an actual incident.

**END OF REPORT**