



SUMMARY AUDIT REPORT

AGL Guinea

16-4-2026 to 21-4-2026

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary Certification Audit Report

AGL Guinea

Conakry

16 – 21 April 2026

For

International Cyanide Management Institute

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Submission Date 1-6-2026

signature

Lead and technical auditor Ghassan Hussein

Page 1 of 31

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A handwritten signature in blue ink, appearing to be "Ghassan Hussein", is located in the bottom right corner of the page.

SUMMARY AUDIT REPORT

AGL Guinea

16-4-2026 to 21-4-2026

Catalog

1.0 Introduction.....	3
1.1 Company information	3
2 Audit scope	4
3 Location detail and description of operation:	4
Sodium Cyanide Transport Process and Logistics in Guinea Conakry	4
4 - List of Employees and Contractors Interviewed	6
5 transit and Storage.....	7
6 Auditor's Finding.....	7
X in full compliance	7
1. TRANSPORT: Transport cyanide in a manner that minimizes the	9
*The operation is X in full compliance with Transport Practice 1.1	9
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. ...	11
*The operation is X in full compliance with Transport Practice 1.2	11
*The operation is X in full compliance with Transport Practice 1.3	13
*The operation is X in full compliance with Transport Practice 1.4	15
*The operation is X in full compliance (NOT APPLICABLE) with Transport Practice 1.5	17
*The operation is X in full compliance with Transport Practice 1.6	18
2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.....	21
*The operation is X in full compliance (NOT APPLICABLE) with Transport Practice 2.1	21
3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities	22
*The operation is X in full compliance with Transport Practice 3.1	22
*The operation is X in full compliance with Transport Practice 3.2	24
*The operation is X in full compliance with Transport Practice 3.3	26
*The operation is X in full compliance with Transport Practice 3.4	28
*The operation is X in full compliance with Transport Practice 3.5	30

Submission Date 1-6-2026 signature

Lead and technical auditor Ghassan Hussein

Page 2 of 31

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SUMMARY AUDIT REPORT

AGL Guinea

16-4-2026 to 21-4-2026

1.0 Introduction

1.1 Company information

Name of Operation: AGL Guinea

Name of Operation Owner: AGL Guinea

Name of Operation Operator: AGL Guinea

Name of Responsible Manager: **Mariama-Cire Sall**
QHSE Director

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SUMMARY AUDIT REPORT

AGL Guinea

16-4-2026 to 21-4-2026

2 Audit scope

The audit scope is Certification for AGL CK of cyanide road transport from Conakry to mine site for solid sodium cyanide

3 Location detail and description of operation:

AGL Guinea Conakry became a Signatory to the International Cyanide Management Code on 17-11-2025 as part of the repeated requests by companies to transport Cyanide to various mines in West Africa.

AGL Guinea operations is based in Conakry, AGL Guinea have a cyanide operation yard, the yard is located 30 or 60 km from the Main port based on the route taken

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Sodium Cyanide Transport Process and Logistics in Guinea Conakry

Packaging and Shipping

Sodium cyanide in briquette form is packaged in Intermediate Bulk Containers (wooden IBCs), which are then loaded into 6-meter (20-foot) freight containers. Each freight container holds up to 20 wooden IBCs, with a maximum product weight of 20 tons.

- The sodium cyanide is shipped by sea from the consignor to the Port of Guinea Conakry.
- Independent shipping companies, coordinated by the consignor, handle the transportation to the port.

Port Handling and Pre-Clearance

- Before the shipment reaches Guinea Conakry, AGL Guinea ensures that all shipping documentation is in order and that the containers are pre-cleared for prompt processing at the Conakry terminal.
- Upon arrival, containers are directly transferred from the vessel onto AGL Guinea's vehicles they are not stored at the port terminal.
- The stevedoring company, under the Conakry Port Authorities, manages the unloading of containers from vessels and loading onto trucks.
- AGL Guinea collects the containers within 24 hours of vessel arrival and transports them to its yard in Conakry for a short period, where they remain loaded on trailers, prepared for departure to the mine site the following morning.

Transport Route and Escort

- AGL Guinea AGL Guinea transports containerized sodium cyanide from Conakry Port to Siguiri, covering a distance of 821 KM.
- The trucks are escorted from:

Submission Date 1-6-2026 signature

Lead and technical auditor Ghassan Hussein

Page 4 of 31

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SUMMARY AUDIT REPORT

AGL Guinea

16-4-2026 to 21-4-2026

1. Conakry Port Terminal to the AGL Guinea Yard
2. AGL Guinea Yard to the Mine Site

- Escort teams include:
 - AGL Guinea Escort Team
 - police

Contractual Agreements

- AGL Guinea has a contract agreement with Orica to handle logistics, including sodium cyanide transportation from Conakry Port to Siguiri .
- The transportation aspect is Managed by AGL , which provides vehicles and drivers. AGL Guinea retains full control over the movement of the cyanide convoys, ensuring compliance with safety protocols.
- Africa Global Logistics (AGL) acts as a cyanide transporter for Orica and other suppliers, transporting solid cyanide briquettes by road to Siguiri Mines.

Compliance and Due Diligence

- Cyanide shipments arrive in 20-foot containers, each containing 20 one-ton boxes of solid briquette cyanide.
- Stevedores offload containers at the port and directly load them onto trucks.
- Orica has conducted due diligence on the AGL operation, which must be renewed every three years to maintain compliance with the Cyanide Code.
- AGL Guinea 's responsibility under the Cyanide Code begins once the containers are collected from the port.
- Containers are delivered under Tackle (direct transfer from ship to truck).
- Stevedores handling the cyanide shipments comply with IMDG/IMODG Code requirements.

Transport Management and Safety Measures

- AGL Guinea vehicles collect the containers with all necessary documentation and manage transport under a jointly agreed Transport Management Plan (TMP) between the supplier and the mine.
- The containers are transported in escorted convoys to the mine site.
- Each convoy includes:
 - 2 escort vehicle
 - 2 safety officers
 - Each truck is operated by a driver and accompanied by an assistant.
 - Safety officers manage communication between the trucks, escort vehicles, and the convoy manager.

Submission Date 1-6-2026 signature

Lead and technical auditor Ghassan Husseini

Page 5 of 31

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SUMMARY AUDIT REPORT

AGL Guinea

16-4-2026 to 21-4-2026

Convoy Team Composition and Emergency Preparedness

- Convoy personnel include:
 - Convoy Manager and Assistant Convoy Manager
 - Cyanide First Aid Personnel
 - Safety Officers
 - Mechanic
 - Emergency response equipment for cyanide spills and releases
 - Medical equipment for treating cyanide exposure (splashes, inhalation, ingestion, skin contact)
- Government Agency Personnel in Each Convoy:
 - 2 police Officers

Government-Regulated Escort Requirements

- It is mandatory for all cyanide transporters and end-users to use government agencies for escorting hazardous materials.
- The escort agencies operate under the Ministry of Security, and escort charges apply per convoy.
- A fixed number of escort personnel is assigned per convoy, regardless of whether it consists of a single truck or multiple trucks.
- Formation of the Escort Agencies:
 - EPA are the government body in charge of chemical handling in Guinea .
 - These agencies are now responsible for monitoring all hazardous material (HAZMAT) cargo within Guinean territory to ensure safe and compliant transportation.

4 - List of Employees and Contractors Interviewed



SUMMARY AUDIT REPORT

AGL Guinea

16-4-2026 to 21-4-2026

INTERVIEW ATTENDANCE SHEET			
NAME	POSITION	CELL	EMAIL
OUSMANE KANTE	COORDINATEUR HSE	+224-622356338	ousmane.kante@aglgroupe.com
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5 transit and Storage

The scope of the audit do not cover interim storage or storage

AGL Guinea operation is to transport from port to mine site within west Africa

AGL Guinea trucks passes through the yard just to fuel and do final check before departure

6 Auditor's Finding

This operation is

X in full compliance

- ☐ in substantial compliance
- ☐ not in compliance

with the International Cyanide Management Code.

This operation has not experienced compliance problems during the previous three year audit cycle.

Audit Company: Crown Transport & Logistics

Audit Team Leader: Ghassan Hussein

E-mail: ghass@ctlwa.com

Name and Signature of Lead & Technical Transport Auditor:



Name Ghassan Hussein

Signature

Date 1-6-2026

Submission Date 1-6-2026 signature

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SUMMARY AUDIT REPORT

AGL Guinea

16-4-2026 to 21-4-2026

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

Date of audit: 16-4-2026 to 21-4-2026



Ghassan Hussein

Lead Auditor

Date 1-6-2026



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 X in full compliance with Transport Practice 1.1**

Summarize the basis for this Finding/Deficiencies Identified:

Regulatory Framework and Route Selection

AGL Guinea operates under a dual-approval framework where technical safety assessments are validated by strict Guinean government mandates.

Mandatory Government Permits: All cyanide transport is authorized via Ministry of Transport Permit for dangerous cargo #0506-MT-DNTT2025 and Ministry of Security Permit #076/MSPC/CAB/DGRI/2023 also EPA gives an authorization .

Because cyanide is a duty-exempt cargo, the Ministry dictated corridor is the only legal route. police officer officials escort each convoy, and formalities (stamps) must be completed at every customs barrier to verify the route's integrity.

The Conakry port terminal has undergone successful due diligence by ICMC auditors to ensure a safe interface for convoy departures.

The Route Risk Assessment (Form AGL-COR-HSE-F-0010) is the core document used to identify and mitigate "black spots" along the 821 km route.

Every bridge (evaluated for 36–46 ton capacity), railway crossing, hairpin bend (e.g., Km 147 with 8% gradient), and school zone is documented with GPS coordinates and photographs.

The RRA is organized by Location, Identified Hazard, and Mandatory Recommendation (e.g., specific gear selection or speed caps).

The RRA differentiates between Sealed (Tarred) and Rough (Laterite) roads to determine vehicle handling requirements.

To manage the hazards identified in the RRA,

AGL Guinea enforces the following "Golden Rules" via the Transport Management Plan (AGL-GIN-TRU-MAN-0001):

Road Type/Zone Maximum Speed Limit

Tarred (Sealed) Roads 60 km/h

Open Country Laterite (Rough) 40 km/h

Villages / Built-up Areas 20 km/h

Work Zones / High Gradients 20 km/h

Strategic Bridge Crossings 10 km/h

Village and Bridge Crossing Procedure (AGL-COR-HSE-PRO-0009) mandates the use of yellow gyrophares (rotating beacon or revolving warning light) and audible horns in populated areas.

Convoys must stop if crowds are too dense.

Submission Date 1-6-2026 Signature Lead Auditor 27-6-2026 Page 9 of 31

Lead and technical auditor Ghassan Husseini

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SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

A minimum distance of 25 meters is maintained in normal conditions, increasing to 100 meters in high-dust (Harmattan) conditions to ensure visibility.

Guinea's extreme weather requires specific tactical adjustments documented in the Emergency Response Plan (AGL-GIN-TRU-MAN-0002).

Dusty conditions can drop visibility below 50 meters.

The Escort Commander is authorized to suspend travel entirely if conditions are unsafe.

Procedures for crossing major rivers (e.g., the Niger River) include a "maximum of six trucks on a bridge simultaneously" to manage structural stress.

Heavy rains trigger an immediate route status review to assess laterite degradation and bridge stability.

Every convoy is protected by an 2 police officers :

police officer police officer : Physical security and cargo protection.

Fire Service & EPA Guinea: Technical experts trained in cyanide neutralization and public safety.

police officer : Armed escort to prevent cargo diversion.

AGL Guinea maintains an active community safety stance through formal engagement:

AGL uses flyers in French and local languages explaining the nature of cyanide and emergency protocols (e.g., "do not use river water" until cleared).

Signed acknowledgment records (March 2026) from community leaders confirm receipt of safety information.

Hospitals along the route (Conakry/Siguiri regions) are provided with MSDS for Sodium Cyanide (AGL-COR-HSE-F-0578) and consulted on treatment capabilities.

The safety framework is updated through a three tier cycle:

The Mission Update Form (AGL-COR-HSE-F-0576) captures driver/escort feedback after every trip (55-question tool).

A formal update of the RRA and TMP every year.

A comprehensive, ground-up reassessment of the entire corridor every five years.

Key Compliance Evidence:

GPS Tracking: All units monitored via GEORIS GPS 24/7.

Documentation: Verified presence of Journey Plans ,RRA and Pre-Departure Toolbox Meeting Records for every mission.



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 X in full compliance with Transport Practice 1.2**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Guinea maintains a strict separation of duties to ensure specialized oversight across the supply chain:

AGL does not manage the loading, unloading, or de-stuffing of containers.

Port stevedoring is managed via strict ICMC Audit due diligence.

Containers are sealed at the port and remain undisturbed until they reach the mine, where authorized mine staff perform the final unloading.

AGL retains full authority over the journey, drivers and vehicles, AGL maintains exclusive control over convoy management, specialized training, and safety oversight.

AGL's accompanying emergency team (safety officers and medical staff) is solely responsible for managing incidents or releases according to the established Training Matrix.

To ensure only trained operators handle hazardous cargo, AGL enforces a rigorous recruitment policy :

Licensing: Drivers must possess a valid government-issued Category "E" license (required for heavy trucks >19 tons).

These are physically verified by the Administration or HR Department before every mission.

Experience & Education: Candidates must have a minimum of five years' experience operating heavy trailer trucks, hold a PRIMARY SCHOOL Leaving Certificate, and be fully literate to interpret Material Safety Data Sheets (MSDS) and emergency protocols.

The induction process includes theoretical tests, road sign comprehension, alcohol/narcotics screening, and a practical road test. AGL retains the right to terminate any driver who fails these standards.

AGL utilizes a centralized Training Matrix to track eight core competencies required for all personnel:

Cyanide Hazard Training : Mandatory annual training covering toxicity, symptoms of poisoning (vertigo, respiratory distress), and exposure routes.

Emergency Response & Spill Management : Focuses on neutralizing residues with 10% sodium hypochlorite, solid briquette recovery, and the use of HONEYWELL gas detectors.

Medical First Aid: Training in the administration of medical oxygen (OXYVIVA at 10 L/min) and the strict protocol that Cyanokit antidotes must only be administered by medical personnel.

Defensive Driving: Certified every two years at the HSEC Training Center.

Additional Competencies: Includes Fire Prevention (with the Groupement des Sapeurs-Pompiers), Accident Investigation, Road Risk Assessment (RRA), and proper PPE use.

Submission Date 1-6-2026 Signature Lead Auditor 27-6-2026 Page 11 of 31

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SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

Beyond theoretical training, safety is validated through active field protocols:

simulations evaluate the Emergency Response Plan's effectiveness. These involve drivers, AGL staff, and external responders (police officer /Fire Service), followed by a formal evaluation to identify areas for improvement.

Before every departure, a mandatory briefing is held. Attendance is recorded and signed to ensure all participants understand their mission-specific roles.

HR provides drivers with formal warnings four months and three months prior to the expiration of any professional permit or license.

On-Board Computers (OBC) and SKY GPS track speed, location, and rest periods to ensure adherence to the Transport Management Plan (TMP).

AGL maintains high-fidelity records to ensure ongoing competency:

Compliance has been verified for active drivers (e.g., Barry Mamadou, Diallo Hassimou) with certifications for Defensive Driving and ICMI Training updated as recently as February 2026. Mass Cyanide training sessions (notably 16-2-2026) ensure that both AGL staff and external emergency responders are prepared for a unified response.

Key Reference Documents:

- Recruitment Policy
- Training Matrix
- Cyanide Hazard Training
- Emergency Response Plan
- Mock Drill Record
- Transport Management Plan



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

***The operation is X in full compliance with Transport Practice 1.3**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Guinea utilizes a specialized, heavy-duty fleet engineered for the high-risk transport of cyanide while ensuring infrastructure preservation.

The fleet consists of SINOTRUK HOHAN models in two primary configurations:

6x4 Tractors (3 axles): 540 HP, used for heavier multi-container loads.

4x2 Tractors (2 axles): 430 HP, used for single-container transport.

Trailer Specifications: AGL operates 15 cyanide -specific skeletal trailers (chassis) equipped with twist locks.

These are available in 2-axle (single container) and 3-axle (dual container) configurations.

Standardized Loading: To prevent overloading, each 20-foot container is pre-loaded by the producer with a fixed net load of 20 tons (20 IBCs).

The gross weight per container (cargo + tare) is consistently 23 metric tons.

AGL strictly adheres to the ECOWAS/UEMOA Regulation No. 14/2005/CM/UEMOA to protect regional infrastructure.

Axle Load Limits the legal maximum in the ECOWAS region is 11.5 tons per axle.

Single Container (4x2): Total GVW of ~36–38 tons.

Results: Due to optimized axle configurations (up to 7 axles), actual loads range from 9 to 10.5 tons per axle, remaining well below the 11.5-ton legal threshold.

Terminal Weighing: Conducted at Conakry both before and after loading.

Axle Declaration: The Convoy Manager completes a Formulaire de Déclaration de la Charge-Essieux prior to port entry.

En Route Weighing: Formal verification at government-approved weighbridges (Afrique Pesage Guinea).

AGL enforces a "zero-defect" policy through a multi-layered maintenance and inspection framework.

Preventive Maintenance: Scheduled every 250 operating hours or 5000km or 90 days or 10,000 KM and logged in the Maximo System.

Post-trip maintenance is mandatory after every mission.

Subcontractor Management: While the Sinotruk agent handles major repairs, Structural integrity and lifting equipment are inspected biannually by BIVAC International.

A rigorous checklist is completed before every departure, signed by the Inspector, the Driver, and the Convoy Manager.

A strict "No Recaps" policy is in place. Only new tires with a minimum 3mm tread depth are permitted to prevent blowouts.

Technical reliability is matched by trained driver standards to minimize the risk of a hazardous release.

Submission Date 1-6-2026 Signature Lead Auditor 27-6-2026 Page 13 of 31

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SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

Licensing and Vetting: All drivers must hold a Class C Permit (heavy vehicles >19 tons). Recruitment requires a PRIMARY SCHOOL Leaving Certificate, full literacy, and a minimum of five years' experience with heavy trailers.

Cyanide Awareness & ER: Annual modules provided by the manufacturer.

Defensive Driving: Required every two years via the HSEC Training Center.

Annual emergency simulations (e.g., the 2025 drill) involve drivers and external responders to test the Emergency Response Plan (ERP).

All trucks feature GEORIS GPS tracking to monitor speed, location, and adherence to the Transport Management Plan (TMP).

AGL maintains clear boundaries of accountability to ensure specialized oversight:

AGL Core Responsibility: Retains full authority over convoy management, specialized training, and emergency response.

Subcontractor Role: Provides the maintenance team for repairs and manages vehicle maintenance subject to AGL audit.

Port/Mine Operations: AGL does not manage the loading or de-stuffing of containers. Port operations are covered by ICMC Auditor due diligence.

Key Reference Documents:

Inspection Procedure

Transport Management Plan

Emergency Response Plan

Regional Standards: ECOWAS/UEMOA Regulation No. 14/2005/CM/UEMOA

Verified by: Maintenance Manager, QHSE Manager, and Convoy Manager.



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

***The operation is X in full compliance with Transport Practice 1.4**

Summarize the basis for this Finding/Deficiencies Identified:

AGL to control exposure and moisture ingress, AGL Guinea utilizes a rigorous four-stage packaging protocol:

Briquettes are sealed in PVC bags, then enclosed in woven polypropylene bags.

Bags are placed in custom 1-tonne plywood Intermediate Bulk Containers (IBCs), steel-strapped and palletized.

20 IBCs are loaded into a 20-foot sea freight container (Net load: 20 tonnes).

Containers are certified sea-worthy by BIVAC International and comply with IMDG regulations.

Because cyanide is duty-exempt, strict security and "No-Open" protocols are mandated by Guinean Customs.

Unique producer seals are recorded on the Bon de Livraison

Seals are inspected at departure, every rest stop, overnight parking, and final delivery.

Convoys are escorted by a POLICE team under the Ministry of securite , protection Civil .

Containers are secured to skeletal trailers via twist locks. For the Guinean laterite terrain, heavy-duty iron chains are wrapped around the container in a crossed form as a redundant fail-safe.

AGL ensures all configurations comply with ECOWAS/UEMOA Regulation No. 14/2005/CM/UEMOA (11.5 tonnes/axle limit).

Utilizing SINOTRUK HOHAN tractors (4x2 and 6x4) with 3-axle skeletal trailers.

A typical 6x4 configuration carrying 46 tonnes of cargo maintains an actual axle load of 9–10 tonnes, well below the legal limit, to preserve road infrastructure.

Convoys are weighed at the Conakry Terminal and at government weighbridges (Afrique Pesage Guinea) en route.

Maintenance is managed via the Maximo Asset Management System to ensure a 100% reliable fleet.

Mandatory servicing every 250 operating hours, 5,000 km OR 10,000 KM or 90 days.

All equipment undergoes a comprehensive structural and mechanical inspection by BIVAC International every six months.

Tires must have a minimum 3mm tread depth.

Pre-Departure Inspection check (Engine, Brakes, Leaks, Safety Gear, etc.) must be passed.

Any "Non-Compliant" finding at a Stop Point results in immediate vehicle immobilization.

AGL fatigue controls are very rigorous primarily governed by Procedure .

Driving Limits Laterite Roads: Max 2 hours driving / 30-minute rest.

Asphalt Roads: Max 3 hours driving / 30-minute rest.

Night Prohibition: Driving is strictly prohibited between 18:00 and 06:00.

Zero-tolerance policy with random breathalyzer testing.

Submission Date 1-6-2026 Signature Lead Auditor 27-6-2026 Page 15 of 31

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AGL Conakry

16-4-2026 to 21-4-2026

The Convoy Manager is empowered to suspend transit for visibility <50m (Harmattan dust), civil unrest, or infrastructure failure.

AGL enforces a high-visibility policy to facilitate emergency identification:

All four sides of the container must display UN 1689, Class 6 (Toxic), and Marine Pollutant markers.

The lead and trailing vehicles utilize gyrophares (flashing lights), and the final truck displays a large "CONVOI EXCEPTIONNEL " banner.

Real-time monitoring via the GEORIS GPS system tracks speed, location, and rest stop adherence 24/7.

All safety records (inspections, training, telemetry, and maintenance) are retained for 5 years per

All procedures are verified by the Maintenance Manager, QHSE Manager, and Convoy Manager through regular interviews and audits.

Key Reference Documents:

Vehicle Checklist

Container Integrity

Fatigue Policy

Emergency Response



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

***The operation is X in full compliance (NOT APPLICABLE) with Transport Practice 1.5**

Summarize the basis for this Finding/Deficiencies Identified:

AGL are not responsible nor contracted to manage cyanide consignment by sea the scope of this audit is only land transport from port to destination..

AGL is not involved in managing sea nor ensuring compliance with IMO and IMDG

AGL is responsible for cyanide, land transport only.

AGL does not manage the loading, unloading or DE stuffing of containers. or stevedoring .

however this requirement is covered by the due diligence done by diligence done by ICMC AUDITORS .

and it is visible on the container on all the 4 sides the following

1- 1689 placard

2-marine pollutant placard

3-class 6 toxic placard



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

***The operation is X in full compliance with Transport Practice 1.6**

Summarize the basis for this Finding/Deficiencies Identified:

AGL ensure that the cyanide shipments are effectively tracked to prevent losses during transport.

Communication and Coordination -Each vehicle in the convoy can communicate with the Convoy manager ,

who can relay messages to road transport officer , the transport company.

road transport officer can then reach the mining operation, and emergency responders when needed.

The vehicles transporting cyanide are equipped with multiple communication channels, ensuring constant connectivity with Siguiri head office, emergency responders, and the mining operation:

- Radios (Walkie-Talkies): Installed in vehicles and the Convoy Manager responsible for convoy supervision.

- Cell Phones: Each driver carries a personal cell phone for communication, but usage while driving is strictly prohibited per company policy.

The Convoy Manager has a dedicated cell phone to contact the Conackry office and emergency responders.

- GEORIS GPS tracking (GEORIS are type): Every vehicle is fitted with a 24/7 monitored GPS system,

also the convoy manger has iridium satellite phone for extreme emergency

GEORIS GPS tracking allows real-time monitoring of:

- Vehicle speed
- Precise location
- Stop durations

The convoy's locations are continuously monitored and updates are sent every three hours to relevant stakeholders, including the mine site.

AGL CK s Transport Officer is responsible for sending location updates via email, keeping all parties informed before and during cyanide deliveries.

Live tracking has confirmed that the GPS system functions effectively and provides accurate real-time data.

Radios and cell phones are fully charged before departure.

A Safety and Communication Pre-Departure Checklist is completed to ensure all communication devices are operational.

Emergency contact numbers, including government emergency responders, mine contacts,

AGL CK s head office, police, police officer , hospitals, and ambulance services, are listed in the Emergency Response Plan (ERP).

No significant network blackout zones have been identified along the transport route.

Submission Date 1-6-2026 Signature Lead Auditor 27-6-2026 Page 18 of 31

Lead and technical auditor Ghassan Hussein

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SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

In case of a network failure, alternative cell service providers (MTN, Orange) are available. The Convoy Manager carries multiple SIM cards for backup communication.

AGL CK's Shipping Department is responsible for clearing shipments, which include bon de livraison and Material Safety Data Sheets (MSDS).

These documents contain:

Container and seal numbers

Gross weight of each freight container

Shipper and consignee information

Chemical details, MSDS and packaging description

the Convoy Manager issues a Delivery Note (Identification Du Convoi) containing:

Tractor unit and trailer numbers

Driver's name

Upon arrival, the mine representative signs the Delivery Note to confirm that the shipment has been received

in good condition and that all containers remain intact.

Copies of the MSDS for sodium cyanide are kept in the escort vehicles for reference in case of emergencies.

The responsibility for GPS monitoring is shared between AGL CK and , each using separate tracking platforms.

- Clearing, delivery note management, and inventory control are handled by AGL CK to ensure full traceability of shipments.

To ensure constant connectivity across the Guinean terrain, AGL utilizes a multi-layered system designed to bypass local infrastructure "blackout" zones.

The Convoy Manager is equipped with a high-powered ULTRA HIGH FREQUENCY /UHF radio.

This provides a direct, infrastructure-independent link to the Conakry head office, serving as the critical backup when cellular signals fail.

The Convoy Manager carries active SIM cards from all major Guinean providers (MTN, Orange,) to leverage the strongest available regional signal.

AGL provides a dedicated mobile phone package to the Convoy Manager and the Safety Officers stationed in each truck. This CUG allows for unlimited communication between AGL staff.

Drivers are strictly prohibited from using communication equipment while the vehicle is in motion. All coordination is handled exclusively by the Safety Officers and the Convoy Manager.

All hardware is tested before departure and recorded on the Inventaire Matériel de Communication .

AGL implements a rigorous reporting schedule and dual-tracking technology to monitor the convoy's progress 24/7.

Reporting Frequency :

AGL Head Office: Check-in every 180 minutes to report position and status.

Siguiri Mine: Status update every 3 hours.

Submission Date 1-6-2026 Signature Lead Auditor 27-6-2026 Page 19 of 31

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SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

Logging: Every call and location update is documented on the Communication pendant le trajet log.

Dual GPS Tracking: All vehicles are fitted with systems: GEORIS GPS. This provides real-time data on precise location, route adherence, speed, braking events, and stop durations.

The AGL IT Officer and Transport Manager actively monitor this data.

All tracking logs are archived for 12 months for safety analysis and audits.

The communication system is the backbone of AGL's Emergency Response Plan (ERP).

The Convoy Manager maintains direct lines for AGL/Mine management, regional police officer posts, specialized HAZMAT responders EPA, and hospitals/ambulances along the route.

The Convoy Manager is authorized to halt the convoy due to adverse weather (e.g., Harmattan dust or heavy rain), insecurity, or infrastructure damage.

They must use the UHF or cellular system to coordinate with Conakry and relocate the vehicles to pre-identified "Safe Zones."

Communication protocols are physically reinforced to prevent cargo diversion and ensure tax-exempt compliance.

A Guinean Customs official accompanies every convoy to ensure the tax-exempt cyanide reaches the mine site.

This official must stamp the Identification du Convoi at every customs barrier.

Safety Officers and the Convoy Manager perform physical seal checks at every rest stop and overnight parking area.

Upon arrival at Siguiri, the mine representative verifies the seals and signs the manifest. Only then is the AGL communication log for that mission formally closed.

The communication framework is supported by strict technical and behavioral standards.

Trucks undergo servicing every 250 hours, 5,000 km, or 10,000 km or 90 days, with all actions logged in the Maximo system.

Driving is strictly limited to the hours of 06:00 to 18:00 to manage fatigue and enhance safety. Drivers must rest for 30 minutes after 2 hours of driving on laterite (unpaved) roads or 3 hours on asphalt.

The Convoy Manager conducts random alcohol testing using a breathalyzer, recorded on AGL-GIN-HSE-F-0039.

Verified Evidence of Compliance:

- Reference Checklist: (Communication Equipment).
- Communication Log: (In-transit reporting).
- Contact Directory: (Emergency responders).

Verified by: Maintenance Manager, QHSE Manager, and Convoy Manager.



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.

***The operation is X in full compliance (NOT APPLICABLE) with Transport Practice 2.1**

Summarize the basis for this Finding/Deficiencies Identified:

Within the scope of this audit, there are no trans-shipping depots or Interim storage sites, as defined in the audit protocol.

Following collection from the Port, the containers are sent to client site.

At no stage is cyanide removed from the trucks or containers prior to unloading at EPA /police mine sites.

N/A There are no situations where interim storage occurs

since the cargo is under the authority custody and the authority doesn't allow the cargo to park or be sent anywhere apart from the approved route.

AGL does not manage the loading, unloading or DE stuffing of containers.
or stevedoring .

however this requirement is covered by the due diligence done by
diligence done by ICMC AUDITORS .

and it is visible on the container on all the 4 sides the following

1- 1689 placard

2-marine pollutant placard

3-class 6 toxic placard

4- last convoy vehicle has banner indicating dangerous goods

There is a procedure that prohibits eating or drinking near the cyanide .

Shipping records indicating the amount of cyanide in transit and Material Safety Data Sheets (MSDS) are available during transport.

The delivery documentation notes the container numbers, weights and seal numbers.

The ERP and TMP are also carried on the convoy along with an MSDS for cyanide and a list of emergency contacts between the port and site.

AGL implement chain of custody processes to prevent loss of cyanide during shipment.
confirmed by interview with



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 X in full compliance with Transport Practice 3.1**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Guinea operates a "direct-delivery" model with zero interim storage.

All cyanide is transported as solid briquettes from the Port of Conakry directly to client mine sites.

Primary Directive: Plan d'Urgence Transport de Cyanure), Revision 01, dated 16 February 2026.

Comprehensive annual review of all transport procedures include (ERP, TMP, RRA).

Revisions triggered by real-world incident activations or gaps identified during mock drills.

A ground-up, baseline reassessment of the Route Risk Assessment (RRA) every five years.

Operations are strictly road-based. There are no provisions for rail, air, or inland water transport. Safety is maintained through specialized vehicle configurations and continuous monitoring of the Guinean road network.

Only 6x4 and 4x2 Sinotrucks (420HP and 470 hp) are utilized, paired with Skeleton or Flatbed trailers.

Containers are secured via ISO-standard twist locks.

only solid briquettes in double-bagged IBCs within sea containers are transported.

The Conakry–Siguiri corridor is mapped for "Red Zones," including narrow passages, bridge load limits, and flood-prone areas.

All vehicles utilize GEORIS GPS for real-time telemetry.

Automatic alerts are triggered if a vehicle idles for more than 3 minutes or deviates from the approved path.

In GSM/GPRS "black spots," UHF (ULTRA HIGH FREQUENCY) radio is the mandatory primary backup for contact with the Conakry Head Office.

AGL operates under a mandatory state security umbrella coordinated by the Ministry of securite , protection Civil .

Personnel/Agency Primary Responsibility

Convoy Manager On-Scene Commander; primary link to Conakry Head Office.

Firefighters Technical containment, fire suppression, and first aid.

Police Armed security (8-person team); crowd and traffic control.

Customs Officials Legal custodians of duty-exempt cargo; monitoring for product diversion.

EPA (Guinean) Environmental hazard oversight and regulatory compliance.

Siguiri Mine Verification of shipment integrity and secondary logistical support.

Submission Date 1-6-2026 Signature Lead Auditor 27-6-2026 Page 22 of 31

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SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

The ERP defines six distinct tactical scenarios to ensure proportional response:

1. Scenario : Mechanical accident; no spill, no container damage. Focus on scene securing.
2. Scenario : Container tipped or damaged; no spill. Focus on structural integrity/uprighting.
3. Scenario 3: roll over with limited spill on the ground..

Scenario 4 Accident with major spill without casualties .

Scenario 5 accident roll over Major Spill with casualties .

Remediation focuses on physical recovery followed by targeted chemical neutralization.

100-Meter Isolation: Mandatory perimeter establishment for any confirmed or potential release.

Solid Neutralization: Physical recovery of briquettes followed by treatment of residues with a 10% sodium hypochlorite solution.

Spill Kits: Every escort vehicle carries PPE (Tyvek suits, neoprene gloves, respirators with A2-B2-P3 cartridges) and detection equipment (HCN gas detectors).

Waste Disposal: All contaminated materials (soil, PPE, debris) are transported to the mine site for final disposal in authorized facilities.

AGL Guinea follows a strict medical escalation process to prevent fatalities during exposure.

Immediate Action: Administration of 100% medical oxygen via OXYVIVA apparatus (10 L/min).

Evacuation: Transport to the nearest pre-vetted hospital identified in the RRA.

Antidote Administration: Cyanokit is carried in convoys but must be administered exclusively by a qualified medical officer at the hospital.

Symptom : Convoy staff are trained to recognize vertigo, respiratory distress, and other signs of poisoning.

Compliance is verified through field evidence and document audits:

Checklists Emergency Inventory.

Field Evidence: Presence of ERP manuals, MSDS, and OXYVIVA kits in all escort vehicles.

Interviews: Conducted with QHSE Managers, Convoy Managers, Drivers



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

***The operation is X in full compliance with Transport Practice 3.2**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Guinea operates under a rigorous "Manual of Authority" (M.O.A.) that mandates specific training and experience for every

"Critical Position" in the transport chain.

No personnel are deployed without meeting these benchmarks.

Digital Training Matrix : A dynamic system tracks real-time certification status for employees and subcontractors.

Mandatory Training :

Cyanide Awareness Toxicology and hazard ID.

Emergency Response Tactical spill containment.

Defensive Driving: Advanced vehicle control for Guinean terrain.

Medical/Safety: Basic First Aid, Firefighting, and Oxygen administration.

Continuous Learning: Includes Annual Refresher Training and a Mandatory Annual Mock Drill (Last conducted: 17-02-2026 ,) involving scenarios like rollovers and victim evacuations.

Emergency Response Plan (ERP) & Tactical Scenarios

The primary directive is (Plan d'Urgence Transport de Cyanure), updated annually or after drills/incidents.

Defined Command Structure

Convoy Manager (Incident Controller): On-scene commander; coordinates all internal and external notifications.

HSE Officer (Safety Coordinator): Manages the 100m exclusion zone and monitors HCN gas levels.

Fire Officer (Technical Responder): Handles chemical neutralization and medical oxygen.

Escort Drivers (Support Team): Manage traffic, crowd control, and perimeter security.

Convoy Mechanic: Provides technical recovery and structural assessments.

The ERP provides five step-by-step tactical guides for various scenario :

Rollover (Intact): Focus on vehicle recovery.

Rollover (Injury): Priority on medical evacuation.

Rollover (Minor Damage): Container integrity check.

Rollover (Spill & Injury): High-risk breach with product release.

Rollover (Water Body): Critical environmental scenario (Spill into river/stream).

AGL Guinea maintains a dual-tier inventory system to ensure equipment readiness.

Main Yard (Conakry): Primary hub with a 2-ton stock of Ferrous Sulphate for large-scale remediation.

Mine Site (Sigiri): Strategic bulk stock of Ferrous Sulphate for immediate local response.



SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

Convoy-Level: Each convoy carries 100kg of neutralizing product and a "Spill Kit" verified via PROCEDURE .

Escort Vehicle Load-out (Mobile Emergency Unit):

PPE: 6 Tyvek suits, waterproof boots/gloves, and full-face masks (A2-B2-P3 cartridges).

Detection: HONEYWELL HCN detectors (calibrated annually) and pH paper.

Medical: OXYVIVA Oxygen System (100% medical O2) and Cyanokit (Antidote).

Note: Antidote is carried by AGL but administered ONLY by hospital medical officers.

Containment/Recovery: 12m tarpaulins, non-sparking plastic shovels, and reinforced garbage bags.

Communication: Satellite phones, UHF Walkie-Talkies, and multi-provider mobile phones.

AGL Guinea operates under a mandatory state security umbrella coordinated through the Ministry of security , protection Civil .

8-Person POLICE Escort:

2 Fire Service Chemical Division Officers (Victim assistance/Oxygen).

2 police officer Officers (Security and Crowd control).

2 Police Representatives.

2 EPA/Police Representatives (Environmental oversight).

Public Safety: AGL distributes flyers in French and local languages to villages along the route to educate them on the "Zero-Approach" rule and water safety after a spill.

Route Risk Assessment (RRA): Detailed surveys evaluate bridges, slopes, and GSM "black spots."

Speed Limits: Strictly enforced at 60 km/h on open roads and 20 km/h in villages/bridge crossings .

GEORIS GPS Tracking: Monitored 24/7 by Conakry Head Office; alerts for unauthorized stops or idling >3 minutes.

Pre-Trip Briefing: A formal Toolbox Meeting is held prior to every departure to review emergency procedures.

Solid Neutralization: Physical recovery of dry briquettes followed by treatment of residues with 10% sodium hypochlorite solution.

Environmental Control: Post-incident soil sampling and monitoring.

Subcontractor Boundary: Subcontractors provide only mechanical assets (tractors/trailers) and drivers; AGL Guinea retains total responsibility for escort, equipment, and incident command.

Verified by: QHSE Manager, Convoy Manager,



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

***The operation is X in full compliance with Transport Practice 3.3**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Guinea maintains a multi-tiered communication system to ensure real-time connectivity and immediate stakeholder notification during a cyanide incident.

Mandatory Notification Flow: Governed by the ER plan, the flow ensures a standardized chain of command.

Every convoy vehicle carries a laminated MSDS in the cabin, detailing first-responder contacts and immediate spill response actions.

Primary Contact: The Convoy Manager initiates all emergency communication with the AGL Guinea Base in Conakry, which acts as the central hub for coordinating with mines, government bodies, and local communities.

Communication is maintained via mobile and satellite phones to bypass cellular "black spots" identified during the Annual Route Risk Assessment (RRA).

Incidents are categorized under Gestion des Incidents - Accidents into three levels to dictate the urgency of the response:

Severity Level Definition Notification Timeline

Niveau 3 (High) Cyanide spill, human exposure, or release into water. Within 4 hours

Niveau 2 (Medium) Minor mechanical accident without product release. Within 24 hours

Niveau 1 (Low) Near-miss or minor mechanical breakdown. Within 24 hours

The Liste des Contacts – Numéros d'urgence is a live document serving as the central directory for responders.

Includes names, roles, and numbers for regional hospitals, ambulance services, fire brigades, police officer posts, and the Siguiri Mine.

The QHSE Manager is the primary authority responsible for validating this list.

Annual updated during the standard ERP revision cycle.

if new contact data found during road surveys is integrated immediately.

Per Section 5.5 of the ERP, the list is reviewed by the QHSE Manager for accuracy and then physically verified by the Convoy Manager before every convoy departure.

International Reporting (ICMI)

AGL Guinea is contractually obligated to notify the International Cyanide Management Institute (ICMI)

within 24 hours of confirming a "Significant Incident."

Significant Incident Triggers the revision of the ERP:

Human Exposure: Requiring decontamination or medical treatment.

Environmental Release: Cyanide entering natural surface waters (rivers/lakes).

Off-Site Migration: Release traveling beyond the controlled incident perimeter.

Transport Spills: Any release during transit requiring emergency response.

Wildlife Impact: Multiple fatalities where cyanide is the suspected cause.



SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

Product Loss: Theft or criminal diversion of cargo.

All events must be documented using the (Incident/Accident Report) for root-cause analysis.

Convoy Manager: Responsible for initial scene reporting and on-site coordination.

QHSE Manager: Responsible for verifying incident severity and preparing formal reports for ICMI.

AGL Management: Responsible for final authorization and international transmission of incident data.

Government Liaison: The police/police officer are responsible for consulting with potentially affected communities in coordination with AGL Guinea.
confirmation

ERP Revision was done 01, dated 16 February 2026.

Master Contact List: (Verified current as of 2026).

Verified through annual mock drills and interviews with the Fire Service Chief, QHSE Manager, and Convoy Manager.

Physical copies of the Emergency Communication Plan and Contact List are confirmed present in all transport vehicles.

Verified by: QHSE Manager, Convoy Manager, and Transport Manager.



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

***The operation is X in full compliance with Transport Practice 3.4**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Guinea maintains total responsibility for all cleaning and remediation operations following a transit incident.

These actions are governed by the Emergency Response Plan (ERP) and the Transport Management Plan (TMP).

The Convoy Manager acts as the Incident Lead, coordinating with embedded government agencies (Fire Service and police officer) to execute recovery and neutralization.

Minor Incidents: Managed by the internal Emergency Response Team (ERT).

Large-Scale Spills: The Convoy Manager activates the AGL Head Office and external responders via the Ministry of security, protection Civil.

Personnel applying neutralizers must wear full-body protection, including Tyvek suits, waterproof gloves/boots, and full-face masks with A2-B2-P3 cartridges, as sodium hypochlorite is a hazardous corrosive.

Remediation follows a strict "Physical Recovery First" protocol to minimize chemical usage and environmental impact.

The priority is the physical collection of solid briquettes before any chemical treatment.

Tools: Non-sparking plastic shovels and brooms (Inventaire Matériel d'Urgence).

Containment: Briquettes are swept into reinforced high-density garbage bags, sealed, and labeled.

Protection: The site is covered with 12m waterproof tarpaulins to prevent wind-borne dispersion or reaction with rainwater during the process.

Neutralization is applied only to residues or contaminated soil after bulk solids are removed.

A 10% sodium hypochlorite solution is the primary agent. AGL also maintains a 50 lit of sodium hydroxide.

Applied via a 10-liter sprayer. Soil is mixed to ensure saturation and left to react for 1 to 2 hours.

The site is cleared only when:

HCN Detectors confirm atmospheric levels are below 4.7 ppm.

pH Paper (or Ferrous Sulphate test) confirms a neutral pH level.

AGL Guinea enforces a strict, zero-tolerance policy against using neutralizing chemicals in natural water sources.

It is strictly forbidden to use sodium hypochlorite, ferrous sulfate, or hydrogen peroxide in surface water, moving watercourses, or groundwater (ERP Sections 6.6 and 7.5).

Introducing these reactive chemicals into aquatic systems can cause secondary ecological toxicity far exceeding that of the original spill.



SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

"LE CYANURE TOMBÉ DANS L'EAU NE PEUT ÊTRE NEUTRALISÉ": Response is limited to physical containment and downstream notification.

The Convoy Manager must immediately halt chemical application and request instructions from the Conakry Head Office.

Immediate notification of local authorities and downstream communities is required to prevent human or livestock consumption.

Strict protocols prevent the spread of cyanide beyond the "Hot Zone" and ensure safe final disposal.

Contaminated tools (shovels, buckets, etc.) are washed with sodium hypochlorite followed by a copious water rinse (ERP Section 6.7).

A 22-liter field shower is available on the escort vehicle for immediate decontamination of personnel in cases of direct skin contact.

All debris (recovered cyanide, neutralized soil, used PPE) is consolidated into reinforced bags or sealed drums.

AGL does not dispose of waste at the incident site or depot.

All hazardous waste is transported under escort to the Siguiri Mine, which assumes responsibility for permanent disposal in authorized facilities.

The efficacy of these remediation and environmental protocols is maintained through continuous education.

Annual Training focuses on the environmental consequences of chemical neutralizers in water.

The 17-02-2026 Mock drill specifically validated the team's ability to manage water hazards without chemical intervention.

some of the toolbox meetings address "No Chemicals in Water" rule is a mandatory pre-departure briefing topic.

Verified Evidence of Compliance:

Master Procedure: ERP (Sections 6.6, 6.7, 7.3–7.5).

Equipment List.

• Personnel: Fire Service Chief, QHSE Manager, and Convoy Manager.



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

***The operation is X in full compliance with Transport Practice 3.5**

Summarize the basis for this Finding/Deficiencies Identified:

AGL Guinea operates under a strict "Live Document" mandate, ensuring safety protocols evolve with operational realities.

Per procedure Transport de Cyanure de Sodium (Section 5.4), the following core documents undergo a mandatory comprehensive review at least once per year:

Emergency Response Plan (ERP)

Transport Management Plan (TMP)

Emergency Contact List & Numbers

Route Risk Assessments (RRA).

The QHSE Manager is the sole authority responsible for these updates.

The current operational standard is Revision 01, dated 16 February 2026.

Beyond the annual cycle, immediate "high-priority" revisions are mandated by three specific triggers:

Post-Incident Analysis: Integrating "Lessons Learned" following any accident or near-miss.

Mock Drill Evaluation: Amending the ERP if a simulation (e.g., the 17-02-2026 exercise) reveals gaps between theory and field execution.

Operational/Infrastructure Changes: Triggered by new truck types, changes in external responders, or new route hazards (e.g., bridge damage) identified during the Annual Route Survey.

AGL Guinea maintains situational readiness through realistic annual simulations.

At least once per year AGL will do a mock drill

The last full-scale drill occurred on 17-02-2026 .

It tested cyanide spill containment, casualty evacuation with medical oxygen, and real-time communication with the Siguiri Mine.

Observers use Template to score 30 tactical actions on a scale of 1 to 10.

The 70% competency floor is critical, any task scoring below 70% (aggregate 7/10) triggers mandatory retraining for the entire team on that specific deficiency.

AGL uses 5M framework as investigation methodology for actual incidents or high-consequence near-misses,

AGL Guinea utilizes the 5M Methodology for root cause analysis:

Main d'œuvre (Manpower): Training and fatigue levels.

Méthode (Method): Specificity of the procedure used.

Machine (Equipment): Mechanical or tool integrity.

Matière (Material): Chemical packaging and briquette state.

Milieu (Environment): Road and weather conditions.



SUMMARY AUDIT REPORT

AGL Conakry

16-4-2026 to 21-4-2026

The Convoy Manager and ER team must physically verify the Emergency Contact List before departure to ensure local hospital and police numbers are active.

GEORIS GPS Tracking provides 24/7 telemetry and chain-of-custody monitoring .

Operations are supported by mandatory permits (Ministry of Transport) and an armed police/police officer escort.

AGL Guinea Conakry maintains a system fully compliant with ICMI Code requirements through:

Preventive vehicle maintenance at 250-Hour or 5000 km or 10,000 KM or 90 days intervals.

Strict adherence to the training matrix and annual cyanide awareness courses.

Detailed tactical guides for rollovers, spills, and water contamination (where chemical use is strictly prohibited).

Controlled circulation of updated plans to the Siguiri Mine, EPA, and police officer rie.

Verified by: QHSE Manager, Convoy Manager,

This summary report was prepared by:

Ghassan Hussein

Lead & transport Expert Auditor

