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

ICMC CERTIFICATION–SUMMARY AUDIT REPORT

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

SUMMARY
Transportation Certification Audit Report

GROUP EGF SARL, BURKINA FASO

Date of audit: 28th April – 30th April 2026

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

Table of Contents

INTRODUCTION

1.1 Operational information.

Name of Transport Company	:	Group EGF Sarl, Burkina Faso
Name of Transport owner	:	Group EGF Sarl, Burkina Faso
Name of facility operator.	:	Group EGF Sarl, Burkina Faso
Name of responsible manager	:	Denis T. Sebego
Address	:	Avenue Oumarou KANAZOE Secteur 02, 11 BP 1494 CMS
Town	:	Ouagadougou
Country.	:	Burkina Faso
Telephone.	:	+22625 33 19 03
E-mail.	:	denis.sebego@groupegfsa.com

1.2 Location details and operation description

Group EGF SARL is a leading Burkinabè supplier specializing in mining equipment, Personal Protective Equipment (PPE), industrial tools, and chemical products, with operations established since 2008. The company is located in Ouagadougou and Bobo Dioulasso, Burkina Faso and a subsidiary in Abidjan, Cote d'Ivoire. Burkina Faso is a landlocked country located in West Africa and uses the port of Tema, Ghana for its shipments.

The company is also involved in the transportation of its chemicals including sodium cyanide and other items to some mines within Burkina Faso. Based in Ouagadougou, they serve the mining, BTP (construction), cement, and brewery sectors. The company provides comprehensive industrial solutions, including safety gear and electrical tools. The company has a total workforce of 70 workers.

1.3 Cyanide Transportation Operations

Group EGF supplies sodium cyanide to Orezone Bombore mine, Iamgold Essakane mine, Endeavour Mining Hounde and Mana mines from Orica Pty Ltd and Samsung C&T. The company delivers cyanide to the aforementioned mines using its own vehicles and partly supported by a third-party transporter Movis Logistics Ghana Ltd under the strict supervision of Group EGF.

The operation has developed its own internal Standard Operating Procedures in accordance with the ICMC protocols. EGF has secured permits from the Ghana Environmental Protection Agency and Burkina Faso Ministry of Environment to transport cyanide.

1.4 Audit Scope

The audit covers the transportation of cyanide in shipping containers from the ports of Tema, Ghana to mining companies in Burkina Faso. The ICMI protocols were used as guidelines in conducting this transportation certification audit.

1.5 Audit Schedule

This Transportation Certification Audit was conducted from 28th April to 30th April 2026.

1.6 Auditor's Finding.

This operation is

X in full compliance

in substantial compliance

not in compliance

with the International Cyanide Management Code.

The result of this certification audit show that Group EGF's cyanide transportation activities are in FULL COMPLIANCE with the Transportation protocols of the International Cyanide Code.

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 28th April to 30th April 2026.

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: 20th May 2026

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

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Group EGF developed and implemented a Transport Management Plan and a Route Selection Procedure to guide the safe selection of transport routes from Tema Port, Ghana to mining sites in Burkina Faso. During the Route selection the transporter considered factors such as water bodies, foggy areas, population density, infrastructure, schools, hospitals, towns and villages, and road pitch and grade to minimize the potential impacts of accidents and releases.

Prior to route approval, the Escort Supervisor conducted physical inspections of the roads to assess road conditions, bridges, slopes, medical facilities, and nearby communities. The route survey process included recording distances, photographing hazards, checking road restrictions, documenting bridges, assessing population density, and informing stakeholders about road conditions.

The route surveys were conducted to identify road risks, implement measures to minimize risks, educate drivers on identified hazards, and notify the Burkina Faso Ministry of Environment and Ministry of Transport about the selected routes.

Route Survey Reports reviewed included routes from Tema Port to Orezone Bombore Mine, Endeavour Hounde Mine, Endeavour Mana Mine, and Iamgold Essakane Mine.

Group EGF has implemented a process for evaluating and managing risks associated with selected cyanide transport routes through the use of a Risk Assessment Table. The assessment details identified road risks, potential consequences, control measures to eliminate or reduce risks, and the risk ratings for each identified hazard.

Route Risk Assessments (RRAs) were conducted for transport routes from Tema Port, Ghana to Orezone Bombore Mine, Iamgold Essakane Mine, Endeavour Hounde Mine, and

Endeavour Mana Mine. Each identified road hazard was assessed and appropriate control measures implemented.

Control measures included adherence to road signs and speed limits, driving according to road conditions, use of escorted convoys, and restricting driving to daylight hours only. Section 2.1 of the Risk Assessment Table states that RRAs are conducted annually. The results of the RRAs are shared with drivers and escort teams and discussed during toolbox meetings. RRAs for all mine sites were reviewed and scrutinized by the auditor.

Group EGF periodically re-evaluates risks on its cyanide transport routes through annual Route Risk Assessments (RRAs) and a feedback system involving drivers, mine sites, and other relevant stakeholders. The RRAs ensure that new hazards are identified and appropriate control measures implemented.

The assessments considered various hazard types, road infrastructure, and road conditions. To support continuous monitoring, the transporter uses the Fishe D'actualisation Mission (Feedback Report Form) to document road conditions and trip reports. Sample feedback reports for deliveries to the four mining sites were reviewed during the audit. Feedback reports are discussed during toolbox meetings attended by drivers, escort teams, and police officers. Records of toolbox meetings were sighted during the audit.

Group EGF has implemented a system to document measures taken to address risks identified on selected cyanide transport routes. Road conditions such as sharp curves, potholes, diversions, and dusty roads have been properly documented. Records maintained by the transporter include Route Survey Reports, Route Risk Assessments (RRAs), feedback reports, and toolbox meeting records. Preventive actions aimed at mitigating or eliminating identified route risks are incorporated into the RRA documents. Documentation reviewed during the audit confirmed that the transporter effectively records and implements control measures to minimize transportation risks on the selected routes.

Group EGF sought input from relevant stakeholders and governmental agencies during the selection of transport routes and the development of risk management measures for cyanide transportation. Notifications and permits were obtained from various institutions, including the Ministry of Environment of Burkina Faso, Ministry of Transport, hospitals, fire services, ambulance services, police authorities in Ghana and Burkina Faso, and the Ghana Environmental Protection Authority (EPA). A response letter from the Ministry of Security dated was also reviewed. The auditor verified the notification letters and permits, confirming that stakeholders and external emergency responders had been adequately informed. Community consultations in Ghana and Burkina Faso are conducted through the Ghana EPA and the Burkina Faso Ministry of Environment respectively.

Group EGF uses convoy systems, escort vehicles, and security measures to transport cyanide safely to mining clients. According to Section 4.1 ("Les Convois cyanure"), all cyanide deliveries to mines must travel in escorted convoys. Convoys with three transport vehicles require one 4x4 escort vehicle, while convoys with nine vehicles require two 4x4 escort vehicles.

The procedure further specifies that each escort team is composed of:

- One escort leader
- Two escort drivers
- Two police officers

Military escorts are additionally used within Burkina Faso for security purposes. The military personnel join the convoy at the Burkina Faso side of the border and accompany the transport team.

These measures are intended to enhance the safety, security, and control of cyanide transportation operations.

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

Group EGF employs trained, qualified, and licensed operators to handle cyanide transportation vehicles. Drivers are required to possess the appropriate heavy-duty driving license, specifically a Category “E” license, to operate trucks. In Burkina Faso, the license is valid for 10 years before renewal, while drivers of the transport contractor in Ghana also require a Category “E” license, which is valid for 5 years and renewable thereafter. Sample licenses of selected drivers were reviewed during the audit.

The company applies strict recruitment criteria for drivers, including possession of a valid Category “E” license, a minimum of two years’ driving experience, successful background checks, a minimum age of 20 years, and passing a practical driving test. Shortlisted applicants are interviewed before employment.

Selected drivers undergo mandatory training programs, including:

- Defensive driving every five years
- Firefighting training every two years

- Cyanide awareness and emergency response training annually
- Basic first aid training every two years
- Mock drills annually

The fire-fighting training is conducted by Entreprise Technique et Commerciale de la Sécurité Incendie in Burkina Faso, while defensive driving training is provided by Centre de Formation en Transport Routiers et Activités Auxiliaires (CFTRA). Cyanide awareness and emergency response training is conducted by a hazardous materials training company and covers cyanide hazards, poisoning mechanisms, symptoms of exposure, personal protective measures, and first aid. Training certificates, attendance records, and first aid training records were reviewed by the auditor, who found the training content to be adequate and delivered by qualified trainers.

The company provides training to its personnel in cyanide handling and transport operations to ensure that their duties are carried out safely and in a manner that minimizes the risk of cyanide releases. All drivers are required to complete training and competency testing before being authorized to operate cyanide transport vehicles. The company implements a formal Training Matrix (Matrice De Formation Et Exercice), which includes the following training programs:

- Firefighting training
- Defensive driving
- Cyanide awareness training
- Emergency response training
- Basic first aid
- Correct use of personal protective equipment (PPE)
- Cyanide simulation mock drills

A review of driver and escort team training records confirmed that the required training programs had been completed in accordance with the training matrix. Interviews conducted with selected personnel, demonstrated that employees were competent and knowledgeable in their assigned responsibilities. The company's third-party transporter, is also committed to using qualified, trained, and experienced drivers for cyanide deliveries to mining sites.

Group EGF has its own procedures for employing drivers and escort team. Movis Logistics have been subcontracted partly to provide vehicles to support EGF in its transportation activities. Being an ICMI certified the third-party uses qualified, trained and competent drivers and have the required training in supporting EGF in carrying out the activities in 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

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified

Group EGF uses properly configured heavy-duty trucks for cyanide transportation, including Mercedes Benz, Actros, Daewoo Novus, and DAF XF 6x4 trucks coupled with 4-axle trailers, with load capacities ranging from 70 to 72 tons. Each truck carries two 20-foot cyanide containers, and vehicle load limits are clearly specified in manufacturer manuals and displayed on the trucks. The Transport Management Plan (TMP) includes detailed truck configurations.

The company has a maintenance contract with Technik Services in Ouagadougou, Burkina Faso, for preventive and periodic maintenance of all transport vehicles as per the company's maintenance procedure which is in line with the manufacturer's recommendations. Maintenance is carried out at regular intervals to ensure the adequacy of equipment to carry the specified loads (2x20ft containers).

The transporter uses appropriately configured 6x4 trucks with quadruple axle trailers to safely transport two 20-foot cyanide containers. Manufacturer manuals confirm that the vehicles and trailers have the required load capacities, and the Gross Vehicle Weight Rating (GVWR) is clearly displayed on plates located on the front left side doors of the vehicles. Verification confirmed that transporting two 20-foot cyanide containers using the 6x4 quadruple axle trailer configuration remains within the permitted axle load limits.

Procedures are in place to prevent overloading of cyanide transport vehicles during transportation from Tema Port, Ghana to Burkina Faso. Trucks are weighed before leaving Tema Port and again at weighbridges located at the Ghana–Burkina Faso border to verify compliance with load requirements. Samples of weighbridge tickets for several vehicles were reviewed as evidence of compliance.

The maximum axle load for the 6x4 trucks with 4-axle trailers is 7.1 metric tons per axle, which is below the ECOWAS regulatory limit of 10.5 metric tons per axle. The axle load of the trucks complies with the Economic Community of West African States (ECOWAS) axle load regulation. The weights of cyanide containers are also specified on the Bills of Lading

and used as a control measure to prevent overloading. Reviews of weighbridge records for both company-owned and third-party transport vehicles confirmed compliance with ECOWAS axle load regulations.

During a visit to the premises of the third-party contractor's operations it was evident that the third-party transporter complies with Transport Practice 1.3.

Transport Practice 1.4:

Develop and implement a safety program for transport of cyanide.

The operation is:

✓ in full compliance with Transport Practice 1.4

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The operations Transport Management Plan describes the packaging of sodium cyanide in compliance with the IMDG Code. Cyanide briquettes weighing 15 g each are packed in 1-ton sacs lined with polyethylene to prevent moisture contact. The sacs are enclosed in plywood boxes mounted on pallets and loaded into sealed 20-foot shipping containers, each carrying approximately 22.3 tons of cyanide. The transporter has procedures to maintain the integrity of the producer's packaging during transportation. Section 4.3 of the TMP outlines pre-departure processes, including container and vehicle inspections using checklists. Inspections of the containers cover container seals, doors, corrosion, and overall condition. All containers are GPS-tracked by Inotech throughout the journey to the mine site, while Ghana Customs also installs tracking devices on truck doors until the Ghana–Burkina Faso border. Container seals remain intact throughout transport, with seal numbers recorded on waybills and Bills of Lading. Upon delivery, mine operators verify container integrity before signing and stamping the waybills, and sampled delivery records confirmed compliance with these procedures.

The Transport Management Plan (TMP) describes the signage used to identify cyanide shipments in accordance with international standards and the IMDG Code. Cyanide containers are clearly marked on all four sides with the required Hazard Class 6 Skull and Crossbones, UN Number 1689, and Marine Pollutant labels. The same placards are also displayed at the front and rear of the transport vehicles. The auditor verified that the required cyanide shipment signage was properly displayed and compliant with regulatory requirements.

Group EGF has implemented a comprehensive safety program for cyanide transportation operations to mining clients and other customers. The program includes detailed inspection, maintenance, driver management, load securing, and operational control procedures.

Before every trip, vehicles, containers, escort vehicles, and escort equipment are inspected using approved checklists, and records of completed inspections are maintained. Pre-departure inspections verify vehicle condition, container integrity, escort readiness, and availability of emergency equipment.

The company operates under a maintenance procedure for preventive and corrective maintenance and has contracted Technic Services to service vehicles, trailers, and tyres. Vehicles are serviced every 10,000 km in accordance with manufacturer recommendations, and maintenance activities are documented. Breakdown support is provided both in Burkina Faso and Ghana through service agreements, including support from TATA Africa Holdings in Ghana. Tyres are routinely inspected, replaced when tread depth reaches 3 mm, and re-treaded tyres are prohibited.

Driver fatigue management measures are also implemented. Escort procedures limit continuous driving to 3 hours followed by a 30-minute rest break, with a maximum of 10 driving hours per day and no night driving permitted. Journey plans document rest stops and travel schedules.

To prevent load movement during transportation, twist locks securing containers are inspected before departure and during all convoy stops. Escort and convoy leaders are responsible for verifying that the locks remain securely fastened throughout the journey.

The Transport Management Plan also requires suspension of convoy operations during civil unrest or severe weather conditions. In such situations, convoys must stop at a safe location until conditions improve, while the escort leader communicates with management and the mine site before authorizing continuation of the journey.

Group EGF has implemented a Drug and Alcohol Policy aimed at preventing drivers and employees from working under the influence of alcohol or drugs. The policy includes disciplinary measures for violations and requires random alcohol testing of staff before trips. Alcohol tests are conducted by the Escort Leader using an Ethylec Breathalyzer, with records of completed tests maintained. Suspected drug use cases are referred to medical facilities for testing. The Breathalyzer equipment is regularly calibrated, with calibration records verified during the audit.

The company also operates a Document Control Procedure, which requires operational records and documents, including inspection checklists and maintenance records, to be retained for five years before disposal. The audit confirmed that relevant records were properly maintained and available for review to demonstrate compliance with company requirements.

Group EGF has partially subcontracted activities under Transport Practice 1.4, specifically vehicle maintenance services, to Technic Services in Burkina Faso and TATA Holding in Ghana. Site visit confirmed that both companies have implemented the necessary measures and systems to meet the requirements of Element 4a of 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

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

EGF Group does not ship cyanide by sea. This provision does not apply to transportation of cyanide by road using trucks. The supplier's supplies chain from the countries of manufacture are certified by ICMI.

Transport Practice 1.6:

Track cyanide shipments to prevent losses during transport.

The operation is:

✓ in full compliance with Transport Practice 1.6

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Section 6.2.2 of the Transport Management Plan outlines the communication systems used between the transporter, mining companies, producers, and emergency responders. Communication is conducted through emails, mobile phones, and WhatsApp messaging, while satellite phones are used in areas with poor network coverage. Communication equipment forms part of the Escort Equipment checklist, and the Escort Leader maintains a list of emergency contact numbers for responders. Audit reviews confirmed the use of these communication systems through sampled email records and WhatsApp updates regarding convoy status shared with the mine and producer.

The EGF Group's Escort Equipment checklist requires inspection and testing of all communication devices before convoy departure, including GPS units, satellite phones, walkie-talkies, and cell phones. These devices are checked to ensure they are fully functional, properly installed, and in the case of mobile phones, fully charged. The Escort Leader is responsible for verifying that all communication equipment is working effectively and

completing the checklist before departure. Audit review of selected records confirmed that these pre-departure inspections are consistently carried out and documented.

Blackout areas along the Ghana to Burkina Faso transport route were identified during route surveys conducted from the port to the mining sites in Burkina Faso. To maintain communication in these areas, the transporter uses satellite phones when mobile network coverage is unavailable. In addition, two mobile network providers, Telecel and Moov, are used to enhance communication reliability along the route.

The Inotech GPS tracking system is used to monitor cyanide shipments in real time, with the Fleet Manager reviewing convoy status hourly and notifying the mining client of truck locations. The system also provides overspeed alerts to improve safety. Shipping documentation, including Bills of Lading and packing lists, are issued by the shipping line and shared with Group EGF, along with vessel Expected Time of Arrival (ETA) and location updates.

Communication records between Group EGF and mining clients confirm coordination of deliveries, managed by the Sales Manager. Bills of Lading and waybills document container numbers, seal numbers, and container weights, ensuring traceability. Upon delivery, mine site personnel verify and stamp waybills to confirm receipt of intact containers. Audited records confirmed deliveries to the mining sites.

The transporter retains all shipping records, including Bills of Lading, which were reviewed for selected shipments. These documents contain key shipment details such as container numbers, seal numbers, gross weights, packaging description, chemical information, and both producer and consignee details.

In addition, individual waybills are issued for each container and handed to mine site representatives upon delivery. The representatives sign the waybills to confirm that the containers were received in good condition, ensuring proper custody documentation throughout the transport process.

The Escort Leader maintains shipping records and Safety Data Sheets (SDS) throughout the journey to the mine sites, ensuring documentation of cyanide quantities is available during transport. SDS documents from suppliers such as Orica and Samsung were verified, and sampled shipping records were reviewed and confirmed during audit.

Group EGF does not subcontract the activities listed in Transport Practice 1.6.

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 2.0

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Group EGF does not have a cyanide trans-shipment depot or interim storage site. Shipments of cyanide are delivered directly from the port of Tema, Ghana to the mining clients in Burkina Faso. Within the scope of this audit, there are no transhipment depots or interim storage sites as defined in the audit protocol.

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

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Group EGF has established an Emergency Response Plan (ERP) outlining procedures for managing cyanide-related emergencies. The plan covers spill containment, neutralization, and decontamination; use of personal protective equipment; properties of sodium cyanide; incident scenarios and response actions; communication protocols; roles and responsibilities of responders and stakeholders; and first aid and medical treatment. The plan was reviewed by an auditor and found to be adequate and appropriate.

Group EGF's ERP includes Route Risk Assessments (RRAs) that evaluate road conditions along cyanide transport routes from Tema Port to multiple mines in Burkina Faso. The plan details several approved routes, including distances ranging from about 1,095 km to 1,292 km.

The ERP also provides comprehensive information on sodium cyanide's physical and chemical properties, including its reactivity with acids and moisture, packaging requirements, and compliance labelling such as UN No. 1689 and Toxic Class 6 under international dangerous goods standards.

Transportation procedures are clearly defined, involving solid cyanide packed in Intermediate Bulk Containers (IBCs) inside 20ft containers, transported using 6x4 trucks with four-axle trailers. The plan considers road infrastructure features such as bridges, slopes, and curves, and specifies vehicle types including Mercedes Benz, Daewoo Novus, DAF, and Howo trucks.

Overall, the ERP integrates route safety assessments, transport methods, chemical hazard information, and infrastructure considerations, and confirms that no interim storage facility is used during transit.

The ERP outlines detailed response procedures for several anticipated emergency scenarios involving cyanide transport. These include a vehicle rollover without spillage, a rollover resulting in cyanide spill into a water body, a spill on dry ground due to rollover, and a hijacking incident involving a cyanide truck. The corresponding emergency response actions for each scenario are fully documented in the ERP.

Section 5.1 of the ERP defines the roles and coordination responsibilities of all emergency responders in a cyanide transport incident, including the escort leader, drivers, police, military, ambulance, hospitals, mine personnel, and the cyanide supplier. The escort leader serves as the main incident coordinator, immediately notifying management and external responders, administering oxygen to victims, and overseeing initial containment, neutralization, and decontamination. Drivers assist by securing the scene, keeping people away, and positioning them upwind of the incident. External responders play defined roles: fire services handle firefighting if required, ambulance services provide oxygen and transport casualties, and hospitals deliver medical treatment for cyanide exposure. Police and military manage traffic control, secure the scene, prevent intrusion, and take lead control in hijacking or security threats. Environmental authorities (Ghana EPA and Burkina Faso's Ministry of Environment) provide guidance on pollution control and public safety advisories, while the mine supports recovery operations, especially if incidents occur nearby, including receiving damaged containers. The cyanide supplier provides technical support throughout the response.

The community will not take an active response role but follows instructions from environmental authorities. The auditor reviewed and found the defined responsibilities for external responders appropriate.

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:

Group EGF maintains a Training Matrix (Matrice de Formation et Exercice that incorporates annual Emergency Response training. The auditor reviewed sampled Emergency Response Training attendance records confirming that training records are properly maintained. Driver and escort team competencies are assessed through both verbal and written evaluations. Interviews with selected drivers demonstrated adequate knowledge of cyanide handling and emergency response procedures, providing evidence that the drivers and escort team have been effectively trained in emergency response.

The Emergency Response Plan (ERP) clearly documents the specific emergency response duties and responsibilities of all relevant parties. The roles and responsibilities of the Escort Leader, escort drivers, Military, Fire Service, hospitals, Ambulance Service, Ghana EPA, and the Burkina Faso Ministry of Environment are comprehensively defined within the plan.

The ERP includes a comprehensive list of escort equipment, which is also documented in an Escort Equipment Checklist. The equipment includes HCN detectors, walkie-talkies, PPEs, spill response materials, firefighting equipment, first aid kits, full face respirators with ABEK canisters, oxygen resuscitators and cyanide antidote (Hydroxocobalamin). The equipment is stored in the office of the Escort Supervisor, who is responsible for its safekeeping and periodic inspection. The antidote is stored at the recommended temperature as per the manufacturer's specification. The transporter maintains a valid Cyanide Antidote (Hydroxocobalamin) as part of the escort equipment, with an expiry date of 31 March 2027. The ERP states that, during a cyanide incident, the antidote will be taken with the victim and administered by a medical doctor at the nearest hospital after the victim has been stabilized with 100% oxygen. Three HCN gas detectors were last calibrated on 10 October 2025 by Ultimate Resurgence Ltd in Ghana. The oxygen resuscitator is regularly inspected to ensure readiness. The oxygen resuscitator comprises of an oxygen bottle with regulator, tubing and oxygen mask. The Escort Leader has received training in the use of the HCN gas detector and oxygen resuscitator, and the auditor verified training attendance records.

The ERP provides a list of required emergency equipment and Personal Protective Equipment (PPE) as part of the escort equipment. The PPE includes PVC gloves, full-face respirators with ABEK canisters, Tyvek overalls, and rubber boots. Employees have been trained in the proper

use of the PPE, and the auditor verified training attendance records as evidence of the training conducted.

Group EGF has established and implemented procedures for the inspection and maintenance of emergency response equipment to ensure its availability when needed. Prior to each convoy departure, the Escort Leader inspects the emergency equipment and completes the Emergency Response Equipment Checklist. Any obsolete or defective equipment identified is replaced before the trip commences. In addition, monthly inspections are conducted using the Monthly Inspection Equipment Checklist when the items are not in use. The emergency equipment is securely stored in a designated locked office, and the auditor verified records of inspections of the escort equipment.

Group EGF does not sub-contract any of the activities in clause 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

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has established a procedure for notifying key stakeholders, including the cyanide producer, mine sites, regulatory agencies, external emergency responders, and hospitals in the event of an emergency. The operation has an Emergency Responders Contact List, containing names, phone numbers, and email addresses and this was reviewed by the auditor. Copies of the contact list are carried by the Escort Leader during convoy operations, and emergency contact information is also displayed on stickers placed on the truck doors. Community consultations are conducted by the Ghana EPA and the Burkina Faso Ministry of Environment rather than directly by the transporter. The auditor verified the contact information and confirmed that selected phone numbers were active.

The ERP states that the emergency contact list for both internal and external responders is reviewed and updated annually, or whenever necessary, by the Escort Supervisor. Any changes in contact details are promptly amended. During the audit, the reviewed contact telephone numbers were confirmed to be current and accurate. The auditor also verified evidence of outdated 2025 contacts and reporting formats that had been updated. In addition, emergency contact details are verified and updated during the annual route survey process.

Section 4.1b of the ERP states that the Managing Director must notify ICMI of any significant incident as soon as possible within 24 to 48 hours. The ERP includes a table outlining incidents classified as significant in accordance with ICMI Definitions and Acronyms. These include human exposure requiring emergency response, unauthorized discharges into surface water, on-site or transport-related cyanide releases requiring emergency intervention, multiple wildlife deaths suspected to be caused by cyanide, off-site releases, and theft of cyanide. Group EGF has not recorded any cyanide transportation incidents since the commencement of its cyanide transport operations in August 2024.

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

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

Group EGF has established procedures for spill remediation, including recovery and neutralization of cyanide, decontamination of contaminated areas, and disposal of spill clean-up debris. The ERP describes the neutralization process using a diluted sodium hypochlorite solution, prepared by mixing 1 litre of sodium hypochlorite with 10 litres of water. Following the collection of spilled cyanide briquettes into sealable containers for return to the mine, the sodium hypochlorite solution is sprayed on contaminated dry ground to neutralize residual cyanide. The escort team is responsible for preventing spills from entering waterways, while contaminated debris is transported to the mine site for disposal.

In the event of a spill into a river or stream, the procedure requires notification of the Ghana EPA and the Burkina Faso Ministry of Environment, who will coordinate with affected communities to prevent use of contaminated water sources. Group EGF will arrange alternative water supply until the water is confirmed safe by the relevant authorities. Water samples will be regularly tested by the government agencies, and no neutralizing chemicals will be applied directly into rivers or streams. The auditor reviewed and scrutinized the procedure and its contents.

Section 8.2 (page 14 of 18) of the ERP clearly states that Ferrous sulphate, Hydrogen peroxide, and Sodium hypochlorite must not be introduced into surface water to treat cyanide releases under any circumstances. The auditor verified and confirmed this requirement during the audit.

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

o in substantial compliance

o not in compliance

Summarize the basis for this Finding/Deficiencies Identified:

The transporter conducts periodic reviews of the ERP to ensure its continued effectiveness and relevance. The plan is generally reviewed annually and following any accident. Findings from incident investigations, lessons learned, changes in legal requirements, and outcomes of mock drills are also used to evaluate and update the plan when necessary. The ERP was last reviewed in 2025.

Group EGF conducts annual cyanide mock drills as part of its emergency preparedness program. The Training Matrix (Matrice de Formation et Exercice # EGF-BFA-DC-DT-0006) includes annual mock drills involving drivers, the escort team, and the police. The auditor reviewed mock drill reports and training attendance records. The drills covered scenarios such as managing major and minor cyanide spills, moving people upwind, decontamination and neutralization procedures, responding to cyanide poisoning incidents, and the use of oxygen resuscitators for oxygen administration.

After each mock drill, debriefing meetings are conducted to review performance and identify areas for improvement. The drills are subsequently repeated to enhance the performance observed during the initial exercise. Corrective actions identified in the conclusions of the mock drill reports are used to evaluate and improve the ERP. Similarly, the incident investigation process includes requirements for assessing the effectiveness of the emergency response plan following actual cyanide-related incidents.

END OF REPORT