



ICMC CERTIFICATION–SUMMARY AUDIT REPORT

INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

SUMMARY Transportation Certification Audit Report

MLL LOGISTICS COTE D'IVOIRE

Date of audit: 8th July – 10th July 2026

For the

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1.0 INTRODUCTION

1.1 Operational information.

Name of Transport Company	:	MLL Logistics, Cote d'Ivoire
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Name of facility operator.	:	MLL Logistics, Cote d'Ivoire
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1.2 LOCATION OF COMPANY AND BACKGROUND OF THE TRANSPORTATION OPERATION

MLL Logistics Cote d'Ivoire (CI) is a subsidiary of MLL Logistics Ghana Limited. MLL Logistics CI serves as a key logistics gateway for West Africa. With Abidjan one of the region's busiest and most efficient ports, Côte d'Ivoire is a critical transit and trade hub for both coastal and landlocked countries such as Mali, Burkina Faso, and Niger. MLL CI presence in Côte d'Ivoire allows them to provide fast, secure, and integrated logistics solutions across a variety of sectors.

MLL Logistics Cote d'Ivoire purchases sodium cyanide from Samsung C & T and sells to Endeavour Ity mine and Lafigue mine. MLL Logistics has a supply contract with Endeavour mines in Cote d'Ivoire to supply them with product from Samsung C & T. In the agreement Samsung C & T and MLL agreed for the transportation to be supported by AGL Cote d'Ivoire which was recertified in 24th April 2025. MLL Logistics has its own trucks which in addition to cyanide deliveries, also does deliveries of other mining items such as grinding media and reagents to the two Endeavour mines.

1.3 Audit Scope

The audit covers the transportation of cyanide in shipping containers from the ports of Abidjan, Cote d'Ivoire to mining companies within the country. This certification audit was conducted through on-site observations, reviews of records and procedures, and interviews with drivers, escort team members and selected management staff. The auditor used the ICMI Cyanide Transportation Verification Protocol (2021 Revision) to confirm International Cyanide Management Code (Cyanide Code) compliance. During the audit, procedures, condition of equipment and sampled records were evaluated.

1.4 Audit Schedule

This Transportation Certification Audit was conducted from 8th to 10th July 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 MLL Logistics CI 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 8th to 10th July 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.

Signature of Lead Auditor

Date: 10 August 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**

○ **in substantial compliance**

○ **not in compliance**

Summarize the basis for this Finding/Deficiencies Identified:

MLL Logistics Côte d'Ivoire has established and implemented Route Selection Procedure to ensure the safe selection of cyanide transportation routes. The procedure requires the Operations Manager and the escort driver to conduct route surveys by driving the proposed route, identifying hazards, assessing road conditions, recording distances, photographing hazards, inspecting bridge conditions and road restrictions, evaluating alternative routes where available, and implementing appropriate risk control measures.

The procedure also requires consideration of key risk factors, including population density, villages, schools, markets, road geometry, infrastructure (such as railway crossings, slopes, toll booths, and bridges), proximity to water bodies, areas prone to fog, sandstorms, and other environmental conditions. The procedure further requires all transportation routes to be reassessed annually.

Route survey reports for the Abidjan Port–Endeavour Ity Mine route and the Abidjan Port–Endeavour Lafigué Mine route dated 1 August 2025 were reviewed. The reports included photographs documenting road infrastructure, schools, markets, sharp curves, water bodies, and the overall condition of the routes, demonstrating that the required route assessments had been completed.

MLL Logistics Côte d'Ivoire has implemented Risk Assessment Procedure to evaluate and manage the risks associated with selected cyanide transportation routes. Route Risk Assessments (RRAs) have been completed for the transport routes from Port Autonome d'Abidjan to Endeavour Ity Mine and Endeavour Lafigué Mine. The assessments classify



identified risks using a colour-coded system: Red (high risk), Yellow (medium risk), and Green (low risk).

The procedure requires RRAs to be reviewed annually or whenever significant changes occur on the route. The assessments identify appropriate risk mitigation measures, including maintaining safe following distances, operating in escorted convoys, defensive driving, restricting travel to daylight hours (6:00 a.m.–6:00 p.m.), complying with speed limits, and reducing speed at curves and other hazardous locations.

Before each journey, toolbox meetings are conducted with drivers to review route hazards and any newly identified risks. Sampled records of toolbox were reviewed during the audit. In addition, the ICMI-certified third-party transporter was confirmed to implement the same risk management protocols, and a site visit to the transporter's premises verified compliance.

MLL Côte d'Ivoire has implemented a process to periodically re-evaluate the risks associated with cyanide transportation routes and to capture feedback from drivers and convoy leaders following each delivery. Route surveys are conducted at least annually and whenever changes in road conditions warrant reassessment.

Following every delivery, the Operations Manager prepares a feedback report, while the third-party transporter also submits route feedback reports. These reports document issues such as traffic congestion, road construction, potholes, adverse weather conditions and the overall condition of the route. The control measures implemented by the transporter include speed control, driver training, journey management, defensive driving, maintaining appropriate following distance, monitoring weather conditions, and postponing journeys where road or weather conditions present unacceptable risks.

The findings are reviewed with drivers during toolbox meetings before subsequent cyanide deliveries to ensure that emerging risks are communicated and managed. Records of feedback reports and reports from the third-party transporter were reviewed during the audit.

The Convoy Leader is responsible for organizing the toolbox meetings and recording route observations using Feedback Report Form. Toolbox meetings are attended by the drivers, escort team, CIAPOL (Centre Ivoirien Anti-Pollution), and the police, demonstrating a structured process for communicating and addressing route-related risks.

MLL Logistics has documented the risks identified on its selected cyanide transportation routes and the corresponding mitigation measures within its Route Risk Assessments (RRAs) and Route Survey Reports. The auditor reviewed RRAs for the transport routes from the Port of Abidjan to the mine sites, together with route feedback reports, confirming that identified risks and control measures were appropriately documented.

Appropriate control measures to mitigate or eliminate identified risks are documented within the RRA, while additional measures arising from route feedback are recorded on feedback report forms and discussed during toolbox meetings. Records reviewed by the auditor



demonstrated that route risks, mitigation measures, and follow-up actions are systematically documented and communicated, providing an effective process for managing transportation route risks.

The Convoy leader is responsible for organizing the toolbox meetings and also notes the feedback on the road on the feedback report form. The toolbox meetings are attended by the drivers, escort team, CIAPOL and the police.

MLL Logistics Côte d'Ivoire consulted relevant government agencies, emergency response organizations, security authorities, and medical facilities during the selection of cyanide transportation routes and the development of cyanide management measures. Stakeholders consulted include CIAPOL, the Ministry of Interior, the National Civil Protection Office, SPCIAAC (Secrétaire Permanent de la Commission pour l'Interdiction des Armes de Destruction Massive en Côte d'Ivoire), CHU Treichville Hospital, and Tiassalé Hospital. The auditor reviewed notification letters sent to these organizations, together with their responses, confirming that the required consultations had been undertaken.

With the exception of the medical facilities, the consulted government organizations assign personnel to accompany cyanide transport convoys during deliveries to the mine sites, providing additional oversight and security. The auditor also confirmed that the ICMI-certified third-party transporter has conducted similar stakeholder consultations in support of its transportation activities.

MLL Logistics Côte d'Ivoire has implemented the use of convoys, escort vehicles, and additional safety and security measures for all cyanide deliveries to mine sites. The Transport Management Plan requires all cyanide shipments to be transported in convoy, while the Convoy Management Plan defines the convoy composition, including an escort vehicle, assistance vehicle, escort leader, five truck drivers, and representatives from CIAPOL, SPCIAAC, Civil Protection, and the Ministry of Interior (Military).

Convoys operate only during daylight hours (6:00 a.m. to 6:00 p.m.), and each participating government agency provides its own vehicle to escort the convoy throughout the journey to the mine sites. These measures provide enhanced safety, security, and emergency response capability during cyanide transportation.

MLL Logistics Côte d'Ivoire engages, an ICMC-certified transporter, to support its vehicle in the transportation of cyanide to Endeavour Ity and Endeavour Lafigué mines. Based on the records reviewed, the auditor confirmed that the third-party transporter complies with the requirements of Transport Practice 1.1 of the International Cyanide Management Code.

**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

MLL Logistics Côte d'Ivoire employs trained, qualified, and licensed drivers to operate its cyanide transport vehicles. Drivers are required to hold valid Class B, C, D, and E driving licenses, be at least 24 years old, have a minimum of five years' driving experience, and successfully complete both verbal and practical driving assessments before employment, in accordance with the Driver Recruitment and Selection Procedure.

Following recruitment, drivers and escort personnel undergo annual competency training in defensive driving, basic first aid, firefighting, cyanide awareness, and emergency response, including mock drills. The auditor reviewed training attendance records and competency assessment results for these programs, confirming that the required training had been completed. All training was delivered by Eureka Transport Consulting in Abidjan, demonstrating that personnel responsible for cyanide transportation are appropriately trained and competent.

MLL Logistics Côte d'Ivoire ensures that drivers complete Cyanide Awareness and Emergency Response training, as well as Defensive Driving training, before being assigned to transport cyanide. In accordance with Section 5.3 of the Transport Management Plan (TMP), the training covers key transportation activities, including the safe loading of cyanide containers at the port and offloading at mine sites.

A review of training records against the company's Training Matrix confirmed that drivers and escort personnel had successfully completed the required training programs. Interviews conducted by the auditor further demonstrated that the personnel involved in cyanide transportation were competent and knowledgeable in the safe handling of cyanide. Training attendance records were available and verified as evidence of compliance. The contents of each training were scrutinized by auditor and training found to cover relevant topics.



MLL Logistics CI does not contract the activities listed in Transport Practice 1.2 except the training programs which are handled by Eureka Transport Consulting based in Abidjan, Cote d'Ivoire.

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

MLL Logistics Côte d'Ivoire uses HOWO 371 HP (Horse Power), 6×4 trucks coupled with 3-axle skeleton or flatbed trailers, each designed to transport one 20-foot container of cyanide, as specified in the Transport Management Plan (TMP). Its ICMC-certified third-party transporter operates HOWO, DAF, and Shacman 6×4 trucks with 4-axle flatbed trailers, each capable of carrying two 20-foot cyanide containers. Vehicle specifications and maintenance programs are designed to ensure that transport equipment maintains adequate load-bearing capacity for the intended loads.

The company has implemented Maintenance Procedure which establishes routine and preventive maintenance requirements, including engine servicing, trailer maintenance, and tyre management. Vehicles are inspected before departure and upon return by the driver and the Operations Assistant. Any identified defects are documented through a job order and repaired by an approved third-party workshop (Garage PK, Abidjan). Following repairs, vehicles are tested and the work is formally signed off by both the workshop mechanic and the Maintenance Manager. Garage PK provides maintenance and repair services for both trucks and trailers. The maintenance procedure also requires that truck tyres be replaced with new ones every six months, demonstrating a systematic approach to maintaining vehicle safety and reliability.

MLL Logistics Côte d'Ivoire uses transport vehicles with configurations and load capacities appropriate for cyanide transportation. Its 6×4 trucks with 3-axle trailers are designed to carry one 20-foot cyanide container with an approximate gross weight of 23 tonnes, while the ICMC-certified third-party transporter uses 6×4 trucks with 4-axle trailers capable of transporting two 20-foot containers.

The auditor verified during a workshop visit that vehicle load capacities are controlled by ensuring compliance with the manufacturers' Gross Vehicle Weight Rating (GVWR), Gross



Combination Weight Rating (GCWR), and axle load limits. In addition, brake performance testing is conducted to confirm that vehicles can safely operate at their rated capacity. Records of brake performance tests dated 18 January 2026 and 5 June 2026 were reviewed, confirming that vehicle performance is regularly verified.

MLL Logistics Côte d'Ivoire has implemented procedures to prevent the overloading of vehicles used for cyanide transportation. Trucks are weighed by the Port of Abidjan Authority before departure and are subject to additional checks at government-operated weighbridges along the transport route. The auditor reviewed weighbridge tickets for MLL vehicles and the third-party transporter's fleet, confirming that vehicle weights were routinely monitored and verified.

The company's 6×4 truck and 3-axle trailer configuration, which carries a single 20-foot cyanide container with an approximate gross weight of 23 tonnes, complies with the ECOWAS axle load limit of 11.5 tonnes per axle, with an actual axle load of approximately 7.8 tons. Based on the review of weighbridge records, the auditor concluded that the transport vehicles were operating within the permitted load limits and were not overloaded.

MLL Logistics Côte d'Ivoire performs all activities required under Transport Practice 1.3 using its own transport fleet, with the exception of vehicle maintenance, which is subcontracted to Garage PK. The auditor also confirmed that the ICMC-certified third-party transporter independently carries out all applicable transportation activities under Transport Practice 1.3, demonstrating compliance with the Code's requirements.

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:

Section 2.1 of MLL Logistics' Transport Management Plan describes the handling and security of sodium cyanide during transport. The supplier packages 95% pure solid sodium cyanide in 1-tonne polyethylene-lined sacks, which are enclosed in plywood boxes with pallets, with 20 boxes loaded into each 20-foot container. Containers are sealed at the point of loading, and the seals remain intact until they are broken by mine personnel upon delivery.



Container and seal numbers are recorded on waybills, which are signed and stamped by mine representatives to confirm receipt of shipments in good condition. The auditor verified several signed delivery waybills for shipments to Endeavour Lafigue and Endeavour Ity mines.

During transport, container seals and the condition of the containers are inspected at every rest stop. MLL Logistics notifies the mine before trucks depart the port, while the third-party transporter provides hourly location updates to both MLL and the mine via email and WhatsApp. GPS tracking systems installed in both MLL and third-party transport vehicles provide continuous monitoring of the convoy until it reaches the mine site.

The cyanide manufacturer labels each container on all four sides in accordance with the IMDG Code, using the required Hazard Class 6, Skull and Crossbones, UN 1689, and Marine Pollutant placards. In addition, both MLL Logistics and its third-party transporter display Toxic Class 6, Skull and Crossbones, and Marine Pollutant placards on the front and rear of their trucks. The Transportation Management Plan requires all cyanide containers to carry the appropriate hazard signage. The auditor verified that the required placards and signage were correctly displayed, ensuring compliance with international transport standards.

MLL Logistics CI has implemented a comprehensive transportation safety program covering vehicle inspections, preventive maintenance, and driver fatigue management.

Before each trip, all vehicles and escort equipment undergo documented pre-departure inspections using standardized checklists. Any defects identified are repaired before departure through a third-party mechanical workshop (Garage PK), while the third-party transporter follows a similar inspection and corrective maintenance process. The auditor verified completed inspection records and confirmed that escort vehicles and equipment were inspected as required.

The company also implements a preventive maintenance program under its Maintenance Procedure which covers routine vehicle servicing, trailer maintenance, and tyre management. Vehicles are serviced every 10,000 km interval in accordance with the manufacturer's recommendations, with maintenance records and work orders verified by the auditor. Trailers are serviced when performing servicing of the tractor units. The third-party transporter maintains its own fleet through a scheduled maintenance program. Vehicle mileage is recorded during pre-departure inspections to ensure timely servicing. MLL replaces tyres every six months, while the third-party transporter replaces tyres when tread depth reaches 5 mm or less. Maintenance of freight containers remain the responsibility of the shipping companies which own them.

MLL Logistics CI has established operational controls to ensure the safe transport of cyanide. The transporter has established a Fatigue Management Plan which restricts driving to daylight hours between 6:00 a.m. and 6:00 p.m. to reduce driver fatigue and enhance transport safety. The operation's Fatigue Management Plan limits driving to a maximum of 10 hours per day, requires a 30-minute rest after every five hours of driving, and mandates a



minimum of 10 hours' rest before resuming work. MLL Logistics CI also maintains its own journey plan to record convoy movements and stoppages of the convoy.

To ensure load security, drivers and escort leaders verify that containers are properly secured with twist locks before departure and inspect them during rest stops. These checks are documented on vehicle inspection checklists and were verified by the auditor.

The Transportation Management Plan also requires convoys to stop in a safe location during severe weather, poor visibility, flooding, or civil unrest. The decision to resume the journey is made by the Convoy Leader in consultation with MLL's office and the mine.

MLL enforces a Drug and Alcohol Policy that prohibits the use of alcohol and drugs during work and provides for disciplinary action, including suspension or dismissal, for violations. Random alcohol testing is conducted using Ethylotest kits, and the auditor verified completed test records.

MLL maintains comprehensive transportation records, including vehicle and equipment inspection checklists, bills of lading, and waybills, in accordance with its Document Control Procedure, which requires records to be retained for a minimum of five years. The auditor verified compliance with these record-keeping requirements.

MLL Logistics does not subcontract any activities under Transport Practice 1.4, except for vehicle maintenance, which is carried out by Garage PK under a signed Memorandum of Understanding (MOU).

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:

MLL Logistics CI does not ship cyanide by sea. This provision does not apply to transportation of cyanide by road using trucks. The supplier's Africa Supplies Chain was certified by ICMI on 9 August 2024.

**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:

MLL Logistics CI uses multiple communication systems, including mobile phones, walkie-talkies, WhatsApp, email, and GPS tracking, to maintain communication with Endeavour Mining, Samsung, emergency responders, and internal personnel during cyanide transportation. All MLL Logistics vehicles and the third-party transporter vehicles are equipped with GPS systems that are monitored continuously. Emergency contact lists containing the phone numbers of relevant stakeholders and responders are maintained, and communication equipment is inspected before each trip using escort equipment checklists.

The transporter ensures that all communication equipment, including cell phones and GPS tracking devices are inspected and tested before each convoy departs. The Convoy Leader is responsible for verifying that all communication equipment is functioning properly and for completing the escort equipment checklist in accordance with the transporter's Communication Policy. The auditor confirmed the effectiveness of these measures by reviewing real-time GPS tracking reports for selected vehicles, verifying GPS functionality on sampled trucks, and examining completed escort emergency equipment checklists. The third-party transporter also equips its trucks with GPS devices, walkie-talkies, and cell phones, with evidence of completed equipment inspections available for review.

MLL Côte d'Ivoire has identified communication black-out areas along the transport routes to Endeavour Ity and Lafigue mines through its Route Survey, and drivers demonstrated awareness of these locations during interviews with the auditor. To maintain reliable communication, MLL Logistics CI uses multiple mobile network service providers, with the Orange network providing nationwide coverage. Where one network has no reception, the convoy switches to an alternative service provider to ensure continuous communication. Orange, Moov and MTN phone service networks are used.

The transporter uses a real-time GPS tracking system, monitored by a dedicated Tracking Supervisor, to oversee the location and operational status of cyanide transport vehicles. The



supervisor monitors vehicle movements, speed limits, driving hours, rest stops, idling times, fuel consumption, and responds to alerts or anomalies. Before each shipment, the MLL Côte d'Ivoire Operations Manager notifies the receiving mine by email, providing the convoy composition, truck and escort vehicle registration numbers, number of containers, and estimated time of arrival. The mines receive hourly location updates until the convoy arrives, while the Convoy Leader reports any overnight stops to the Operations Manager in accordance with the Transport Management Plan.

The auditor verified shipping documentation, including Bills of Lading and waybills, which accurately record shipment details such as container and seal numbers, gross weight, shipper and consignee information, packaging description, and chemical details. Individual waybills are prepared for each container and are signed and stamped by the mine site representative upon receipt to confirm delivery in good condition. Copies of waybills and shipping line documents were reviewed as evidence of proper shipment documentation and chain of custody documentation.

The transporter receives copies of the Bills of Lading from the supplier before shipment, which specify the container weights. The auditor verified sampled Bills of Lading, packing lists, and the supplier's Safety Data Sheets (SDS), confirming that these documents accompany each convoy to the mine sites. Copies of the SDS are also kept in the truck cabins to ensure that safety information is readily available during transport.

MLL Logistics Côte d'Ivoire performs all activities under Transport Practice 1.6 using its own personnel and resources and does not subcontract any of these activities.

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:

MLL Logistics CI does not have a cyanide trans-shipment depot or interim storage site. Shipments of cyanide are delivered directly from the port of Abidjan, Cote d'Ivoire to the mining clients.

**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:

MLL Logistics Côte d'Ivoire has developed and implemented an Emergency Response Plan for cyanide transportation. The plan includes procedures for spill containment, recovery and decontamination, soil neutralization, anticipated emergency scenarios, emergency contacts, roles and responsibilities, emergency communications, and notification of significant incidents to ICMI. The auditor reviewed the plan and confirmed that it contains the necessary information to effectively manage cyanide transportation emergencies.

The Emergency Response Procedure is specifically designed for the road transportation of solid sodium cyanide from the Port of Abidjan to Endeavour Ity and Lafigue mines. It provides detailed information on the physical and chemical properties of sodium cyanide, packaging specifications, hazard identification, transport methods, and emergency response requirements. The ERP is based on transporting sealed 20-foot containers of cyanide using appropriately configured vehicles, with route risk assessments and surveys addressing infrastructure such as bridges, rail crossings, water bodies, towns, and road conditions. It also describes the truck configurations used by MLL Côte d'Ivoire and its third-party transporter.

The Emergency Response Plan (ERP) provides comprehensive response procedures for a range of anticipated cyanide transportation emergencies, including vehicle fires, accidents with or without spills, minor and major spills on dry ground, rollovers into water bodies, and incidents involving cyanide exposure to people. The plan outlines the appropriate response actions and neutralization methods for each scenario and includes procedures for recognizing and managing cyanide poisoning, including administering medical oxygen to stabilize affected persons before transferring them to the nearest hospital.



Section 20 of the Emergency Response Plan clearly defines the roles and responsibilities of MLL Côte d'Ivoire personnel and external emergency responders during a cyanide transportation incident. The Convoy Leader coordinates the on-site emergency response, including incident management, decontamination, and administering oxygen to cyanide-exposed persons, while the QHSE Manager, Operations Manager, mining clients, and authorities are notified through established communication channels. External responders including the Police, Gendarmerie, Fire Service, Ambulance Service, Civil Protection, CIAPOL, hospitals, the military, and the receiving mine have defined responsibilities for traffic control, rescue, firefighting, medical treatment, environmental protection, site security, and recovery operations. Irrespective of the distance from the mine, the mine provides mutual assistance and support in recovery efforts in the event of a road incident, as it is the end user and has a responsibility to ensure that the cyanide is received safely at the site. Community communication is managed through government representatives (Prefets), while the supplier provides technical support. The auditor confirmed that the assigned roles and responsibilities are appropriate and well defined.

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:

MLL Logistics Côte d'Ivoire conducts annual emergency response refresher training for drivers and escort personnel in accordance with its Training Matrix. The auditor verified training attendance records and confirmed that the training covers key emergency response topics, including management of minor and major cyanide spills and response to cyanide exposure incidents. Participant competency is assessed in French, and the training is delivered by an external HSE consultant, Eureka Transport Consulting, based in Abidjan.

The Emergency Response Plan clearly defines and documents the specific emergency response duties and responsibilities of both internal personnel and external responders in the event of an incident. These roles are comprehensively detailed in Standard of Transport Practice 3.1 above, ensuring that all responders understand their responsibilities during an emergency.

The transporter maintains a comprehensive inventory of emergency response equipment, which is stored in the Operations Manager's office when no cyanide deliveries are in progress. The equipment includes personal protective equipment, spill response materials, communication devices, an HCN gas detector, an oxygen resuscitator, and



Hydroxocobalamin for emergency treatment. The Hydroxocobalamin is accompanied with the patient to the nearest hospital to be administered by the medical doctor. The antidote is stored at 25 degrees Celsius as per the manufacturer's recommendation. The HCN gas detector and oxygen resuscitator are routinely inspected and maintained to ensure readiness, while the Operations Assistant is responsible for their safekeeping and inspection of the escort equipment. The composition of the oxygen resuscitator is gauge, mask and the tubing. The Convoy Leader is trained in the use of the HCN gas detector and oxygen resuscitator, ensuring an effective response to cyanide emergencies.

MLL Logistics Côte d'Ivoire provides appropriate Personal Protective Equipment (PPE) as part of its escort equipment for cyanide transportation. The auditor verified the availability of full-face respirators with ABEK canisters, disposable Tyvek overalls, rubber boots, and PVC gloves. Drivers and escort personnel have been trained in the proper use of this PPE to ensure safe and effective emergency response.

MLL Logistics Côte d'Ivoire has implemented Procedures to ensure the inspection, maintenance, and availability of emergency response equipment. The Convoy Leader inspects all emergency equipment before each delivery and completes an Emergency Response Equipment Checklist, with any defective or obsolete items replaced immediately. When not in use, the equipment is securely stored in a designated locked office and inspected monthly. The auditor verified completed pre-departure and monthly inspection records, confirming that there is safekeeping and regular inspection of the emergency response equipment to assure its availability when required.

MLL Logistics Côte d'Ivoire performs all activities under Standard of Practice 3.2 using its own personnel and resources, with the exception of emergency response training, which is subcontracted to Eureka Transport Consulting.

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

The operation is:

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

☐ **in substantial compliance**

☐ **not in compliance**

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has established a procedure for notifying and reporting emergencies to all relevant stakeholders. A comprehensive emergency contact list includes the names, phone numbers, and email addresses of internal and external responders, such as CIAPOL, Ambulance, Police, Fire Service, Civil Protection, the mines, and Samsung C&T. Community



notification is coordinated by the Prefet (community leader) and CIAPOL. Communication procedures specify the use of phone calls and emails to notify stakeholders. In the event of an incident, the Escort Leader reports to the Operations Manager, who then notifies the mining client, the media, and ICMI, while the Convoy Leader coordinates communication with external emergency responders and medical facilities.

The transporter has implemented Procedure to validate and maintain current contact information for internal and external emergency responders. Emergency contact lists are reviewed every three months, before commencing new contracts or using new transport routes, and whenever there are personnel changes within responding organizations. The Operations Assistant, with approval from the Operations Manager, is responsible for updating the notification and reporting procedures. Sampled contact phone numbers of CIAPOL, SPCIAAC, hospitals, and Civil Protection as well as other emergency responders confirmed that the emergency contacts are active and up to date.

The transporter's Emergency Response Plan (ERP) includes a procedure (Section 19) requiring all significant cyanide incidents, as defined by the International Cyanide Management Institute (ICMI), to be reported to ICMI within 24 hours. Significant incidents include human exposures requiring emergency response, unauthorized cyanide releases to surface water or off-site, on-site releases requiring emergency intervention, transport incidents involving cyanide releases, multiple wildlife deaths attributed to cyanide, and cyanide theft. The auditor reviewed the notification procedure and confirmed that it aligns with ICMI's definitions and reporting requirements. Since commencing cyanide transport operations in 2025, neither the transporter nor the third-party transporter has experienced or reported any significant incidents.

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

The operation is:

☒ **in full compliance with Transport Practice 3.4**

☐ **in substantial compliance**

☐ **not in compliance**

Summarize the basis for this Finding/Deficiencies Identified:

The transporter has established procedures for the recovery, neutralization, and remediation of cyanide spills, including decontamination of equipment and proper disposal of contaminated materials. For solid cyanide spills, the escort team will prevent the material from entering waterways, collects spilled briquettes into sealable containers, and neutralizes residues with ferrous sulphate monohydrate. Large spills are initially managed by the Escort Leader with support from external emergency responders. For spills on soil, contaminated



topsoil will be excavated after clean-up and neutralization and transported to the mine site for proper disposal. In the event of a spill into a water body, CIAPOL and the police are notified to warn downstream communities, provide alternative water supplies, and oversee regular water quality monitoring until the water is declared safe. The procedure prohibits the use of neutralizing chemicals in surface water. The auditor reviewed the procedures and found them to be appropriate and comprehensive.

The Transport Management Plan (Section 3.6.4) and the Emergency Response Plan (Section 11.6) clearly state that neutralizing chemicals, including ferrous sulphate, hydrogen peroxide, and sodium hypochlorite, must never be used to treat cyanide released into surface waters. The auditor reviewed and confirmed this requirement.

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:

Section 21 (Revision du Plan) of the ERP requires the Emergency Response Plan to be reviewed annually and following any major incident, route change, or changes in legal or regulatory requirements affecting cyanide transportation. The Operations Manager is responsible for conducting the review. At the time of the audit, the plan had not yet been reviewed, but the review was scheduled to be completed by the end of the year.

Section 17 (Formation et Exercices) of the ERP requires annual mock drills, as reflected in the Training Matrix. The drills covered anticipated emergency scenarios, including cyanide exposure and spill response, with simulations involving oxygen administration to cyanide victims and responses to inhalation, ingestion, and skin absorption exposures. Participants included CIAPOL, SPCIAC, the Military, drivers, the escort leader, and the escort team. Selected Mock drill reports dated 11 April 2025 and 15 June 2026 were reviewed, and records and interviews confirmed that the exercises were conducted as required. The auditor found the documentation and implementation to be satisfactory.

MLL evaluates the effectiveness of its Emergency Response Plan (ERP) after each mock drill through debriefing sessions and lessons learned. Corrective action plans are developed to address any identified gaps and are used to update the ERP where necessary. Following the reviewed mock drills, no revisions to the ERP were considered necessary.

END OF REPORT