INTERNATIONAL CYANIDE MANAGEMENT INSTITUTE

Transportation Summary Certification Audit Report

Africa Maritime Agency Guinea

(AMA Guinea)

Guinea

20th – 23rd July 2015

Submitted to:

International Cyanide Management Institute,

1400 I Street, NW, Suite 550, Washington, DC 20005,

USA

AMA Guinea

Signature Lead Auditor 3rd August 2015

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**Location detail and description of operation:**

AMA Guinea is a logistics company serving several mine sites in Guinea (bauxite, iron, manganese, gold, phosphate, uranium). AMA has ISO 9001 certification and is authorized by the Guinea government to transport hazardous materials, including explosives, within the territory of the Republic of Guinea.

The company is contracted as a cyanide transporter for Lero SMD to transport solid cyanide (briquettes) by road from Conakry to Lero mine. AMA Guinea's main operations are located at Cité Chemin de Fer - Immeuble Kassa, located approximately 1 km from the port of Conakry, in Guinea.

Cyanide is received at the port of Conakry by sea in containers, each of which holds 20 boxes of one ton of solid cyanide briquettes. The containers are offloaded at the ports by a stevedoring company. A due diligence was done by Samsung for Lero mine as a part of the ICMI audited supply chain of the cyanide producers and consignors bringing the cyanide into Guinea. For the purposes of Cyanide Code transportation compliance, AMA Guinea's Code responsibilities commence on collection of the containers from the port.

The audit covers road transport exclusively from the port of Conakry to Lero mining site (Société Minière de Dinguraye / SMD Nordgold).
Containers are delivered from the Quays to the port Container Depot where they are loaded directly onto trucks. AMA Guinea’s Cyanide Code responsibilities commence once they take the containers from the port area. AMA Guinea clears the consignment and AMA Guinea’s vehicles collect the containers with the documentation and manage them under a Transport procedure (jointly agreed between the mine, and AMA Guinea).

The containers of cyanide are then transported in convoy by AMA Guinea and a Guinean customs official to the mine sites. There is neither storage nor interim storage during the delivery journey.

Each truck has a driver, who is accompanied by a safety officer. The safety officer manages the communications between the trucks, the escort vehicles and the convoy manager, and monitors the driver. The convoy includes a convoy manager, assistant convoy manager, a cyanide first aider, a mechanic, and cyanide emergency response equipment for spills and releases and cyanokit or medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations and ingestions). The convoys include an armed customs escort through Guinea.

According to the regulations of the port of Conakry, hazardous materials are delivered directly under hoist, there is no interim storage allowed. If the carrier/Transporter fails to present the vehicles to collect the dangerous goods, then the cargo is not discharged and returns to the shipper on the same boat.

There is only one suitable route from Conakry to the site at Lero, a distance of 675 km.
This operation is

X in full compliance
in substantial compliance *(see below)
not in compliance

with the International Cyanide Management Code.

Audit Company: Safety Transport & Logistics Solution    Audit Team Leader: Ghassan Hussein
E-mail: ghass@stlsgh.com

Names and Signature of Transportation Auditor:

Name: Ghassan Hussein    Signature

Date: 3rd August 2015

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

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

Date of audit: 20th – 23rd July 2015

Signed
Lead Auditor: Ghassan Hussein

Date 3rd August 2015

AMA Guinea    Signature Lead Auditor

3rd August 2015

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1. TRANSPORT:  
Transport cyanide in a manner that minimizes the potential for accidents and releases.

Transport Practice 1.1 Select cyanide transport routes to minimize the potential for accidents and releases

X in full compliance

The operation is in substantial compliance with Transport Practice 1.1

not in compliance with

Summarize the basis for this Finding Deficiencies Identified:
Procedure # 3 includes a sample of the road hazard mapping from Conakry to Lero. AMA Guinea completed a road risk assessment & route selection based on the level of risk. However, AMA Guinea also determined the road to be used to each mine. AMA Guinea has a permit to transport hazardous chemicals and has a cyanide specific transport permit. The routes selected and approved by the Ministries of Security and Civil Protection & of Transport, are included in permit # 1665/M1/CAB/SGG/2015 and the Ministry of Security and Civil Protection permit #033/mspc/cab/14, issued until 15 May 2016. Route Risk Assessment from Conakry to Lero mine SMD Guinea highlighted all the black spots, and other hazards on that road. AMA Guinea developed a 55 question feedback report on the road condition that the drivers fill after each trip and these questions are scored and assessed to monitor the risk of transport if increasing or reducing on a specific road.

Flyers describing cyanide handling and dangers and the Emergency Response have been given to the community. There have also been communications with the relevant medical service facility. The Minister of the Environment of Guinea is consulted on routes, especially regarding the emergency response support issues. Not all communities are directly consulted but where relevant, communities are involved through discussions and meetings. All cyanide deliveries are conducted using a convoy system with Customs escort, due to the exemption that the mines enjoy. An armed customs official is sent along to ensure the cargo arrives at its destination and is not diverted. The Emergency Response Team on the convoy has spill kits, medical staff, a mechanic and safety officers. The lead auditor accompanied the convoy and checked procedures for part of the total journey. Stakeholders, neighbors, Customs, ONG/NGOs, Fire Service, Chamber of Mines, Mines representatives, hospitals and port authorities were briefed on the Emergency Response Plan. The Ministry of Security have also granted permission for the transport of dangerous goods.

Transport Practice 1.2 Ensure that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

X in full compliance with

The operation is in substantial compliance with Transport Practice 1.2
not in compliance with

Summarize the basis for this Finding Deficiencies Identified

All truck drivers have C permits which allow the drivers to drive trucks above the weight of 19 tons. AMA Guinea developed a training matrix which includes all the requirements of training for the transporting of cyanide.

4 basic training modules have been identified as key training for AMA operation:

1. Fire-fighting
2. Transportation of hazardous materials training
3. Cyanide transport training & emergency response
4. First aid training

Other training

1. Road risk assessment
2. Accident investigation
3. Defensive driving course

Immediately after recruitment, an induction list is added to the driver’s staff file, identifying strengths and weaknesses and the requirements for employment. AMA Guinea require the driver to have at least 5 years driving experience, a professional driving license (code "e"), they should be able to read and write, and hold at least a Middle School Leaving Certificate. An internal test is done to confirm that the applicant is literate. Furthermore, a basic requirement in road sign comprehension is required. For the final stage, the driver is tested on road, in theory and practice, after he finishes a defensive driving course. All drivers are required to undergo a Defensive Driver training program provided by TOTAL Guinea.

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

X in full compliance with

The operation is in substantial compliance with Transport Practice 1.3

not in compliance with

Summarize the basis for this Finding Deficiencies Identified:

AMA Guinea uses a tractor head and skeleton or flatbed trailers with 6 axles in total to carry only 1 x20 foot container of sodium cyanide with a total weight of 25 tons. These truck and trailers are inspected biannually by BIVAC Guinea to confirm their condition. If there is any failure, the truck is sent for repairs and another inspection is done. There is a planned maintenance program in place for the tractors, trailers and lifting equipment and inspections are carried out biannually and maintained biannually by BIVAC International. Brake testing and other inspections are undertaken by a third party specialist or by the vehicle manufacturer agent, and BIVAC, at their premises. Maintenance carried out on site is monthly maintenance. The on-board computer on the truck dictates the maintenance frequencies, form and type of service required.
Transport Practice 1.4: Develop and implement a safety program for transport of cyanide

X in full compliance with

The operation is in substantial compliance with Transport Practice 1.4

not in compliance with

Summarize the basis for this Finding Deficiencies Identified:

AMA Guinea take custody of the sea containers from the port to mine site. Due to the exemption the mine enjoys, the cargo is transported from the port directly to mine site with armed Customs escort. The containers are not opened or tampered with and are sent with the original seal from port to mine site. The integrity of the boxes and containers can only be compromised if there is an accident. The container is sealed by the producer and only opened at the mine. The cargo is escorted by armed customs official to the mine site. Furthermore, a Container Interchange Report is completed and jointly signed by the shippers' representatives and the cyanide transporter's representatives to agree on any damage that may be sighted on the container. The Vehicle Trip Checklist is completed and signed at the mine confirming the condition, on delivery, of the container and a section reports on container seals, labelling and general container condition. This checklist is counter signed by the mine representative.

A pre-trip checklist, further checked by the company inspector, is completed for the truck and trailer before the vehicle is loaded with the cyanide containers. In addition, a pre-trip inspection is done and counter-signed by the mine. The Auditor met with and discussed pre-trip inspections and the biannual inspection with staff of BIVAC, the external inspection body.

The Fleet Preventative Maintenance Policy states that preventative maintenance is performed every month on each vehicle. PM tasks are identified as broadly: - Inspection, preventative maintenance, oil changes and tune-ups. These tasks are identified in the TMS (Time Maintenance System) manufacturer's manual (truck). The Maintenance procedure includes detailed maintenance requirements (preventive and breakdown maintenance) for tractors and trailers. However any major work is done by the manufacturer's agent. The trailer maintenances done every 3 month or as need be. The site has a pre-and post-trip maintenance check, in addition to the standard 6 monthly checks. Truck and trailer maintenance records were sampled and reviewed. Company policy specifies the maximum hours of duty during any 24 hour period (12 hours); maximum driving hours on duty in any 24 hour period (8 hours extendable to 10 hours up to twice per week); minimum period of continuous driving (4 hours); minimum daily breaks from driving during period of 12 hours on duty is 60 minutes (split into four 15 minute breaks. Maximum weekly on duty hours (72 hours), maximum weekly driving hours (48), working week to be a maximum of 6 consecutive days to be followed by a minimum weekly rest of at least 36 hours. The Auditor checked daily driving timings and stopping at barriers during convoy travel and reviewed records of previous trips and compared the convoy manager trip record and the GPS tracking device record. The convoy manager controls the driving and operating hours and on the return they are also controlled and the trip is closed by the convoy manager. Cyanide boxes come from the producers and the containers are not opened. The box sizes are such that the boxes fit tightly in the container and do not move. The container matches the trailer size and additional iron chains have been wrapped around the container, locked onto the trailers to provide additional support to prevent movement in transit. The chains over the containers are put in a cross form one lateral and one horizontal. Other security related issues are covered in detail in the Operational Risk Assessments (copies carried by convoy leaders) which would be used by the convoy leaders, in consultation with AMA Guinea management, to make appropriate decisions, depending upon circumstances in consultation with Guinea customs. AMA Guinea do alcohol testing and drug testing randomly and there is a briefing before every trip on the use of alcohol and drugs and this is also a part of
the risk assessment of the pre-trip inspection clearly stating alcohol and drugs are prohibited. The driver also signs that he accepts the results in case there is a test for alcohol or a drug test. The policy also covers random testing and searches. The policy and company recognizes alcohol and drug dependence as a treatable condition and will provide appropriate support and assistance within the bounds of the policy.

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

X in full compliance with

The operation is in substantial compliance to Transport Practice 1.5

not in compliance with

Summarize the basis for this Finding Deficiencies Identified
This section is not applicable as no modes of air or sea transport are used.

Transport Practice 1.6 Truck cyanide shipments to prevent losses during transport.

X in full compliance with

The operation is in substantial compliance with Transport Practice 1.6

not in compliance with

Summarize the basis for this Finding Deficiencies Identified
The AMA Guinea transport management system and Guinea customs officials control the cyanide from port to destination. AMA Guinea has a GPRS tracking device on all the trucks and the convoy escort vehicles. Communication with vehicles in the cyanide convoy is undertaken using mobile phones and short-wave radio. The convoy manager uses short wave radio for long distance communication giving him the ability to communicate with the head office in Conakry in case of emergency or in case there is no mobile phone coverage. The accompanying safety officer in each truck communicates with the convoy leader and support vehicles. The safety officer also has mobile phone that can call the head office for free. This phone package provided by the phone service company is called a Close user group so they can have a free communication between the staff of AMA Guinea and these phones are only held by the safety officers. Convoy managers have all the appropriate telephone numbers to communicate with AMA Guinea head office and appropriate emergency responders and emergency services on the convoy route and the mine.

All communication equipment is tested prior to departure of convoy. There is also a continuous use contract with the radio communication company for servicing of the equipment and immediate replacement for mobile phones. The cyanide from the port of entry to destination is under the control and the responsibility of the customs official because the load is under exemption and AMA Guinea transports and delivers sealed containers. A waybill accompanies the convoy which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, Packing list, Bill of lading.
customs declarations, and producer invoice. A procedure is in place on the process of how to handle and manage the cargo chain of supply and each person's responsibilities. Checks are carried out at customs posts and borders, and at the mine site. Convoy stops include the inspection of container seals. MSDSs are placed in all vehicles. All shipping documents are with the escorting customs officer and a copy of the documents are also kept with the convoy manager during transit.

2. INTERIM STORAGE: Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent releases and exposures.

Transport Practice 2.1 Store cyanide in a manner that minimizes the potential for accidental releases

X in full compliance with

The operation is in substantial compliance to Transport Practice 2.1

not in compliance with

Summarize the basis for this Finding: Deficiencies Identified.
Not Applicable. There are no situations where interim storage occurs since the cargo is under the customs custody and customs does not allow the exempt cargo to park or be sent anywhere apart from the approved route.

3. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

Transport Practice 3.1 Prepare detailed emergency response plans for potential cyanide releases

X in full compliance with

The operation is in substantial compliance with Transport Practice 3.1

not in compliance with

Summarize the basis for this Finding: Deficiencies Identified.
Emergency Response Plan (ER) procedure #53. The plan gets updated yearly or when the ER plan is activated or in case of a Drill feedback that needs to amend the Emergency response plan. The emergency response plan has addressed several scenarios from accident without spill, to accident with spill, to security, and accident near water body. Each scenario is being addressed and the required steps that the incident controller needs to take and the method of recovery. The contact numbers are all available in the
ER plan and the process of collection and neutralization is addressed.

There is no interim storage but the ER Plan covers different scenarios and different routes specified by the Ministry in Guinea. The routes are from the port to AMA Guinea and from AMA Guinea to clients. As all cyanide deliveries are made in convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan unless more support is needed in which case they will report to head office or external responders. The Plan only deals with solid cyanide (cyanide briquettes), and if they are spilled into water. However, currently the only form of cyanide that is transported is solid. AMA Guinea only undertakes road transport and all risk assessments cover road transport. Route risk assessments are fully reviewed every year and redone every 5 years but feedback given done on every trip. AMA Guinea only uses skeleton and Flatbed trailers to transport containers containing boxes of cyanide briquettes in seaworthy containers. They do not use tanks. The majority of scenarios will be responded to by the convoy’s own dedicated emergency response team. Any outside additional assistance would be requested or coordinated through the Ministry of Security. The possibility of using outside medical responders has been considered and a communication through leaflet and letters with representatives of these bodies was held.

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

X in full compliance with

The operation is in substantial compliance with Transport Practice 3.2

not in compliance with

Summarize the basis for this Finding: Deficiencies Identified:
AMA Guinea main Yard inventory of emergency equipment is available in the yard in case of need to mobilize for an incident. The procedure also lists the equipment needed and available per convoy. The equipment is checked per trip and monthly expiry and test are done per inspection. Stocks of 2 tons ferrous sulphate available in the yard and 2 tons are kept at the mine sites. All necessary equipment, including 100kg of ferrous sulphate per convoy, is carried with the convoys. The Auditor checked emergency equipment based on the list whilst on the convoy inspection trip. The Convoy escort vehicles carry all the necessary emergency response equipment that may be required for cyanide emergencies during the convoy routing. All members of the convoy team (escort vehicle and drivers and safety officers) are trained in the Emergency Response Plan and receive regular refresher training. Occasional mock drills are also held. The pre-trip briefing includes refresher of emergency procedures. Convoy equipment is checked and tested before the convoy moves. AMA Guinea yard equipment is tested and checked monthly. The HCN gas detector is also tested and sent to the manufacturer when due for calibration every 12 months. The current HCN monitor was purchased on 30-6-2013 from Drager. The dicobalt edetate cyanide antidote was purchased on 30-6-2015 and valid for 18 months.

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

X in full compliance with

The operation is in substantial compliance with Transport Practice 3.3
not in compliance with

Summarize the basis for this Finding Deficiencies Identified:
AMA Guinea has developed procedures for internal and external responders, including roles and responsibilities. Contact information with the IFM card are laminated and put in the vehicles. The convoy manager will communicate with the base who will regulate communications to interested and affected parties. AMA Guinea also developed a flyer for cyanide awareness and some basic information about emergency response. AMA Guinea, with the consent of the Ministry of Security, disseminated this document to most of the community that AMA Guinea operations might affect.

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

X in full compliance with

The operation is in substantial compliance with Transport Practice 3.4
not in compliance with

Summarize the basis for this Finding Deficiencies Identified:

Recovery, treatment of Spills. Neutralization or removal of soils. Treatment and or disposal of soils; reclamation of Sodium Cyanide. Transport of contaminated materials. Neutralization; and Water Resource Treatment have all been addressed in the ER plan. The Plan also prohibits the use of treatment chemicals in water bodies.

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

X in full compliance with

The operation is in substantial compliance with Transport Practice 3.5
not in compliance with

Summarize the basis for this Finding Deficiencies Identified:

There are 3 conditions for revision specifically stated within the ER plan. They are as follows: 1- after an accident to add the learning points. 2 - after a drill where there was variation in the implementation, and 3 - the yearly review or procedural yearly review. - Mock drill procedure states that a mock drill shall be held once a year. The first drill AMA Guinea undertook was carried out on 6 July 2015. The scenario was a truck accidentally hit one of AMA Guinea trucks but with no spill. The feedback form from attendees and observers was reviewed.