

***INTERNATIONAL CYANIDE
MANAGEMENT INSTITUTE***

Transportation Summary

Certification Audit Report

Alpha Services Mauritania (ASL)

Mauritania

17th to 22nd February 2020

Submitted to:

International Cyanide Management Institute

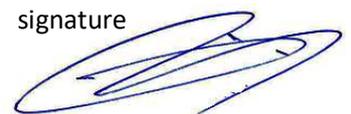
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SUMMARY AUDIT REPORT

Alpha Services

17-22 Feb 2020

Name of Operation: Alpha Services Limited (ASL)

Name of Operation Owner: Alpha Services Limited (ASL)

Name of Operation Operator: Alpha Services Limited (ASL)
Name of Responsible Manager: Mr Baham Mohamed Laghdaf

Cyanide co-ordinator

Address: Module F #39 Route NDB Tevragh Zeina 16km away from port of Nouakchott

Country: Mauritania

Telephone: Mobile: +222-27289001

E-Mail: baham.mohamedlaghdaf@alpha-services-mauritania.com

Location detail and description of operation:

ASL (Alpha Services Limited) is a Logistics, freight forwarding and transport Company Operating in Mauritania.

The company was incorporated in 2013 and since then has served multinational companies with operations in Mauritania.

ASL has the ISO 9001 certification and is authorized to transport hazardous materials, and any other cargo to mining and Oil & Gas industries .

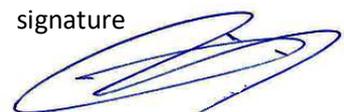
The company is contracted as a cyanide transporter for Tasiast to transport solid cyanide (briquettes) by road from Nouakchott port to Tasiast mine.

ASL Provides Customs Clearance and domestic trucking international trucking and freight forwarding services to their clients.

ASL has gradually expanded list of services over the years and developed an extensive network of contacts as they are the exclusive agent for DSV, Panalpina in Mauritania.

This continuous progress has allowed us to be awarded with our first Major Contract for Domestic trucking in 2019.

ASL Mauritania 's main operations Module F #39 Route NDB Tevragh Zeina 16km away from port of Nouakchott



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Cyanide is received at the port of Nouakchott 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 audit was done by ORICA as part of the ICMI audited supply chain of the cyanide producers and consignors bringing the cyanide into Mauritania the due diligence was done by Golder and associates 2011.

For the purposes of Cyanide Code transportation compliance, ASL Mauritania's Code responsibilities commence on collection of the containers from the port.

The audit covers road transport exclusively from the port of Nouakchott to Tasiast mine site (Kinross).

Containers are delivered from the Quays to the port Container Depot where they are loaded directly onto trucks.

ASL Cyanide Code responsibilities commence once they take the containers from the port area.

ALPHA Services clears the consignment and ASL vehicles collect the containers with the documentation and manage them under a Transport procedure (jointly agreed between the mine, and ASL Mauritania).

ASL clears the consignment and ASL Mauritania's vehicles collect the containers with the documentation and manage them under a Transport procedure (jointly agreed between the mine, and ASL Mauritania).

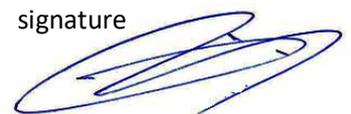
The containers of cyanide, are then transported in escorted convoy by ASL and a Mauritania customs official to the mine sites. There is neither storage nor interim storage during the delivery journey.

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/ paramedic, a mechanic, cyanide emergency response equipment for spills and releases and cynokit or medical equipment to treat cyanide exposures (splashes, skin exposures, inhalations and ingestions).

There is only one suitable route from Nouakchott to the site at Tasiast , a distance of 338 km.



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Acronyms:

RA= Risk Assessment

ER= Emergency Response

HSE= Health Safety & Environment

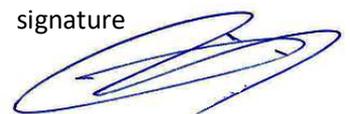
SGS= Societe General De Surveillance

UMOE= Union Economique et Monétaire Ouest Africaine

BIVAC= Bureau Veritas

HF= High Frequency

BL= Bill of Lading



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Auditor's Finding

This operation is

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

with the International Cyanide Management Code.

Audit Company: Crown Transport & Logistics Audit Team Leader: Ghassan Husseini

E-mail: ghass@ctlwa.com

Names and Signature of Transportation Auditor:



Name: Ghassan Husseini

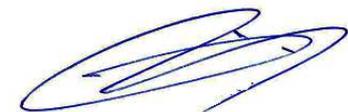
Signature

Date: 5-3-2020

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: 17th – 22nd February 2020



Signed

Lead Auditor: Ghassan Husseini



Date 5-3-2020



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:

ASL do only road transport and have developed road risk assessment & Risk Matrix that shows the level of risk dated 20-1-2018, and reviewed on 20-1-2019 redone completely every 4 years.

This was done by ASL from Nouakchott port to Tasiast mine site.

There is one route that is approved by government since the cargo is exempt cargo.

The route is mostly tarred of a total distances of 330km for both routes.

The untarred is managed with a maximum speed of 50 km per hour for a 60km distance.

There are multiple sections of the route which have, high risk section

high risks which were identified in the road risk assessment.

Mitigation measures such as reduced speed, convoy management, added attention, police blocking road to facilitate and control the convoy and stopping for condition checking have been identified.

Further medium risks were also identified with specific types of mitigation, specifically during passage where the convoy leader informs the convoy of the area and the extra attention needed to pass through.

Tasiast there was an audit to ASL by the mine auditors confirming the route selection and development of a route risk assessment and the route risk assessment shows the level of risk on that route and bearing in mind the cyanide exposure per route.

Further the mine auditor did a due diligence on Nouakchott port submitted to ICMI on Tasiast certification also on ORICA certification 2011.

the selection is based on the risk level.

ASL has a permit from Mauritania government to transport hazmat material issued by the Ministry of environment

Also due to the nature of the cargo, a permit is given by the ministry for the transport .

Procedure risk assessment plan route take into account the following:

detailed route,

rest stops

road hazards such

Customs barriers,

road construction,

traffic congestion,

standard caution,

cattle crossing,

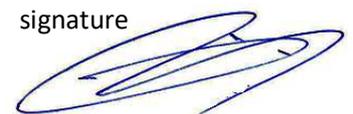


children,
bridges or fords ,
water bodies
dangerous gases
Population concentrations and built-up areas are identified,
as concentrations of children or school ,
parks ,
pedestrian activity,
cyclists and animals.
describes roads and road conditions,
wildlife crossings,
speed limits,
roundabouts and ramps,
rumble strips/speed humps,
dirt roads,
pedestrian crossings
condition of roads.
pitch grade
the **selected are approved by**
Ministry of security & civil protection
Ministry of transport,
Ministry of environment
black spots, warnings of hazards highlighted.
ASL are using specified routes due to the fact that the convoys need to be escorted by
government authorities.

Also the risk assessment covers evaluation of the condition of the roads including in terms of
quality, drive-ability and safety.
Also states the condition of road, tarred or rough road, and the distance of the rough road and the
recommended speed to be used.
The RA is updated after each convoy.
The RA addresses Sand storm or dust more than the possibility of fog that causes poor or limited
visibility and counter measures are for abnormal situation the convoy will stop near the closest
police or custom station until visibility is back to normal.
For emergency the ER plan is activated

Rain has not been an issue for the transport operation for 3 years there is no rain the maximum
rain seen is 3 days per year, and there are no bridges or fords on that route are mostly oued is
more of a concrete slab that the trucks pass on it or go through not a bridge that water passes
beneath it.
The bridges or fords in Mauritania is for traffic management not for water purposes.
Rain and water bodies are rare as most of the time conditions are dry and hot since it is a desert.

There is the Harmattan (hot , cold , dry, dusty and windy) during the dry seasons which
reduces visibility for travellers.



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The Road Risk Assessment (RRA) has identified the risk levels and methods of mitigation based on location, surroundings and the type of hazard of the product that is being carried (cyanide). The high risk areas are also being identified as well as medium risk and low risk and for each there are specific mitigation measures.

Also identify 3 types of emergency response:- level 1, level 2 or level 3.

level one is meant for in-house response,

level two is district response.

level three is for national and international responders further.

The HSE officer also sends advice of all new hazards on the road if permanent, mobile, and temporary;

also accident or potential hazard on road.

The convoy is obliged to pass a specific road identified by the Ministry and prior diversion is only allowed with the consent of the Ministry because the escorting custom officer has to sign the document at every barrier.

Convoy Leader reports are completed after every convoy and reviewed by the Transport Manager. Some of the Convoy Manager's core duties on the convoy are to direct OR inform the safety officers on board of the trucks of all incoming hazards to be communicated to the drivers, including when to overtake, any oncoming vehicles or if there is a barrier ahead. Transport operations for other cargo is carried out between Nouakchott and Tasiast on a daily basis.

Since ASL transports other Hazmat products.

Most of the updating is done by the convoy manager and some input comes from the drivers,

A review is also done every year,

The drivers' feedback on route are registered in the convoy managers log book and if the hazard is permanent, the RRA is amended and the info inserted.

However, if the hazard is not permanent, it is inserted only during the review

The feedback document addresses

road accidents,

road conditions,

population,

side erosion,

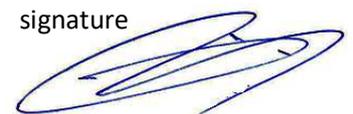
poor visibility

area time of transit,

where delay came from and possible solution to expedite the delivery if any of the aforementioned are encountered.

The feedback document has 11 points that take into consideration everything from departure and arrival time and a section to describe in details the convoy, highlighting any dangers, delays and deterioration in the route, as well as possible solutions.

The data from this sheet is transferred into an excel sheet and analysis is done to review and revised the level of risk on the road and if the risk or the number of hazards is increasing or reducing and control measure.



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Some of core duties of the Convoy Manager on the convoy are to direct/inform the safety on board of the trucks of all incoming hazards to be communicated to the drivers, including when to overtake, any oncoming vehicles or if there is a barrier ahead, coordinate with external responders on the journey and during incidents.

There is also an customs escort supporting the transport load security because the cargo is under exemption.

The EPA official that escorts the cargo has as his core duty, to ensure that the cargo is not tampered with and, in case of an incident, to ensure there is no impact to people, property, and environment.

The state ensures the cargo security to destination and the customs officers are aware of the dangers of cyanide and its implications.

Not all communities are directly consulted about cyanide handling and transport but where relevant, communities are involved through discussions and meetings as referred to in the document from the local governor stating that Alpha through Hakem (government rep) arranged a seminar with the locals to make the population aware of cyanide and to take their opinion on the use of the route, including 2 clinics Chiva and Ibn Sina.

the local governor in consultation with the local community approved by government is referred to as HAKEM

ASL uses convoy 1 cont 20ft per truck total of 13 trucks for all its deliveries

An customs official is sent along to ensure the cargo arrives at its destination.
it is mandatory , according to the government regulations, that all cyanide transport operations are escorted by

armed gendarmerie

fire service

EPA

Ministry of transport

Customs

The Emergency Response equip on the convoy have

spill kits,

Cyanide antidote Kit

Safety escort equipment

The convoy is made up of

1 service and emergency truck with fire tender

1 pilot car ambulance,

1 convoy manager

1 assistant convoy manager

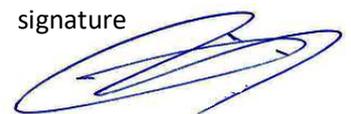
4 safety officers

1 paramedic,

1 mechanic

1 auto electrician,

13 drivers



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1 EPA officer,
1 Customs officer
2 Armed gendarmerie escort
1 officer from the ministry of transport
2 fire service personnel.
15 radio equipment
The external responders are
EPA

the civil protection authorities ,
police,
armed gendarmerie-
Clinics Ibn Sina and Chiva

the security agencies stated above involvement is limited to the government permit they are not empowered to exceed their mandate .

generally the community involvement is limited to their abilities and as allowed by the government permission, the community does not get involved with the cyanide incidents as is to be addressed by government -

The local authorities are informed of their responsibilities during a spill with their task is to isolate the site and prevent further external escalation.

No sub-contracting undertaken.

Due to the nature of the cargo and the regulation given by the ministry of transport

ASL is not allowed to subcontract any of its transport operation

the only operation that is subcontracted is the stevedoring

and this is covered by the due diligence done by the mine Tasiast and by Orica 2011.

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:

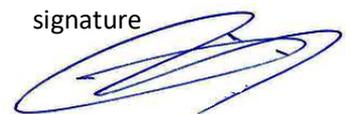
All truck drivers have permit C and are tested by the company.

They train their drivers on first aid, use of extinguishers and hazardous materials.

ASL prepares a training plan, and training matrix to ensure none of the staff misses any of the obligatory training which includes

all the needed training for the transporting of cyanide which are done by third party: Precision health, safety and environment as referred

the list of the training are :



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- 1) eco driving- economical to reduce carbon emission for drivers
- 2) defensive driving training for drivers
- 3) premier fire training and process to all staff.
- 4) HAZMAT transport and Cyanide
- 5) road risk assessment feedback
- 6) general HSE induction
- 7) general cyanide awareness
- 8) Hazard indication
- 9) Accident or Incident investigation
- 10) Emergency response
- 11) First aid
- 12) Cyanide transportation
- 13) Authorized gas tester

No sub-contracting undertaken.

Due to the nature of the cargo and the regulation given by the ministry of transport ASL is not allowed to subcontract any of its transport operation the only operation that is subcontracted is the stevedoring and this is covered by the due diligence done by the mine Tasiast .

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:

ASL trucks carries 1 x20 ft container per truck.

The weight of the truck trailer and cyanide meets Mauritania regulation and UMOEA .

all the trucks are owned by ASL .

ASL has 14 cyanide specific trucks only 13 is used in the convoy the latter one a spare , the trucks & trailers that comply with Mauritanian regulation , all of which meet the above mentioned specifications.

There is a planned maintenance program in place for the tractors and trailers

The tractors are maintained by the agent as all the trucks are brand new

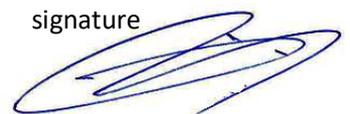
Serviced by the agent every 10,000km or every three month anyone comes first

Also the tractors are inspected biannually by third party SGS and before every trip.

Trailers which are inspected biannually by SGS and maintained biannually by ASL as referred to in maintenance program.

the company does third party inspection using SGS done annually and a visit from

MOT(ministry of transport once a year apart from this all repairs and maintenance are done by the agent as the trucks are still under warranty



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in case of brake down on road the convoy mechanics manage the problem until they reach mine site or it reaches the agent.

For major breakdown agent is called to address the breakdown and another units is sent as replacement

Brake testing and other inspections are undertaken by the company itself.

The on-board computer on the truck dictates the maintenance frequencies, form and type of service required.

The trailers are consistently operated at load levels below their legal and design maximums. The design load maximum capacity of the trailers are 44 ton.

The cyanide is delivered in standard sea containers which are fitted on a flatbed trailer. It is not possible to overload the trailers because the containers are loaded by the producer with a set number of boxes with a set weight of 20 ton total of container and product is 23 tons.

The containers are sea worthy with BIVAC inspection approval all containers comply with the IMDG regulations.

No sub-contracting undertaken.

Due to the nature of the cargo and the regulation given by the ministry of transport

ASL is not allowed to subcontract any of its transport operation

the only operation that is subcontracted is the stevedoring

and this is covered by the due diligence done by the mine Tasiast and by Orica 2011.

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

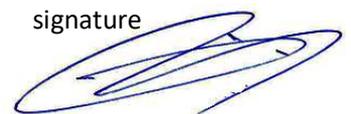
Summarize the basis for this Finding/Deficiencies Identified:

The transport is done with the packaging consisting of plastic lined wooden boxes packed into 20 foot containers and sealed by the producer with a specific seal number the container is not opened until it reaches mine site.

The integrity of the boxes and containers can only be compromised if they are damaged during handling or moisture/dust /liquids enter the containers or the boxes, in case of an accident on road.

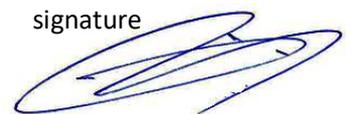
The container is sealed by the producer and only opened at the mine.

The cargo is escorted by customs officials to mine site because the cargo is exempt from duty so



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no one is allowed to open the container.
as well as the fact that the container is inspected by third party at Terminals before it leaves the port
there is visual inspection on all seals and containers at every rest stop .
There is also a checklist for the container and seals .
Mauritania has no transport regulations but normally reference is made to international regulations.
Required marking and placarding is according to international standard and to the Hazardous Materials Transportation Manual.
Also the container check list identifies the placarding to be on all sides of the container during transport full to mine site and to be moved on the way out.
In addition, the last truck in the convoy at the back and also escort vehicles in front and back, have red flags representing danger.
There is also placarding to identify that it is cyanide or hazmat convoy.
the placarding is removed when the truck is empty.
A pre-trip checklist is completed for the truck and trailer before the vehicle is loaded with the cyanide containers.
maintenance program available for trucks and trailers
however the trucks are brand new and under warranty
the truck are sent for preventive maintenance at the agent every 10,000km or every 3 month or any that comes first
the trailers are maintained and repaired by ASL .
ASL has ER equipment checklist for convoy escort vehicle checklist, truck checklist and container checklist.
ASL regulation state that the operational hours are 10 hours per day.
For total driving hours it is 8 hours but the driver drives 2 hours and rest 15 minutes.
It is not allowed to drive more than 2 hours continuously and the rest area is defined.
the maximum hours of availability during any 24 hour period (10 hours);
maximum driving hours on duty in any 24 hour period (8 hours);
maximum period of continuous driving (2 hours);
minimum daily breaks from operation during period of 10 hours on duty is 120 minutes (split into 15 minute breaks.
Maximum weekly availability hours (60 hours),
maximum weekly working /driving hours (40 hours),
working week to be a maximum of 5 consecutive days to be followed by a minimum weekly rest of at least 48 hours.
Cyanide boxes come from the producers in 20ft containers and the containers are not opened.
The box sizes are such that the boxes fit tightly in the container and do not move.
The cargo is secured using twist locks.
Cyanide Handling covers bad weather and civil unrest.
Other security related issues are covered in the Operational Risk Assessments.
if there is any civil unrest the convoy is to park at the nearest security agency.
The use of drugs and alcohol is prohibited in Mauritania and is not allowed,
there are no bars or pubs to serve alcohol in the country.
Such products are not allowed to enter the country from a religious, social and legal perspective.



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Further ASL has policy to prevent the use of drug and alcohol.
In case anyone is found with alcohol in the breath, the suspect will be sent to the lab for verification.
Test sheets are made before every single delivery, drivers are tested for alcohol and only positive records are kept.
No sub-contracting undertaken due to the nature of the cargo and the lack of safety standards by service providers.
ASL retain the full responsibility of their operation.
The only operation that is subcontracted is the stevedoring and this is covered by the due diligence done by supplier to Tasiast mine.

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:

ASL is not involved in managing sea shipments of cyanide
ASL is not involved in air shipments
but abides by the Dangerous Goods Code of the IMDG, where applicable.

Transport Practice 1.6: Track 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:

ASL transport management system and Mauritania customs officials control the cyanide from port to destination
Communication with vehicles in the cyanide convoy is undertaken using mobile phones as a secondary to the radios.
Base HF-wave radio are not portable but connected to the vehicle speakers.
As well as the use of VHF radios for communication within the convoy.
There is a safety officer who uses the radio communication.
All the radio can communicate with is the base in Nouakchott, in case of emergency



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or in case there is no mobile coverage.

The drivers do not use the communications equipment.

In each truck, the communication goes directly between the safety and the convoy manager and all communication is monitored and recorded at the base in Nouakchott.

Convoy managers have all the appropriate telephone numbers to communicate with ASL head office and appropriate emergency responders and emergency services on the convoy route and the mine.

The Convoy Manager is obliged to call ASL at every stop.

conversations during the trip are reviewed the HSE manager of ASL.

All communication equipment is tested prior to departure of convoy.

There is also a continuous use contact with the radio communication company for the servicing of the equipment and immediate replacement for mobile phones is in continuous use so no test needed.

the convoy leader has to inform base before entering mobile phone black out area and after exiting black out area.

there is no black out for Radio communication.

There is no blackout area for the HF radio as it is a radio communication type meant for long distance communication.

All convoys have radio communication use of short wave radio and also in case of GPRS black out areas.

ASL is permitted by Mauritania government to use a HF Radio.

This equipment covers the required communication all over Mauritania and this equipment is installed in all cyanide vehicles.

A recorder is also at the base so all communication is recorded.

The radio operators have a 12 hours roster when there is a convoy on road.

GPS monitors all convoys.

Also there is GPS & on board computers (OBC) on the trucks that can monitor the trucks.

There is a dedicated person that monitors the trucks.

The on board computer can do a play back after the trip in case there is no GPS coverage the data can also be stored on an excel sheet as raw data report where the close out of the journey is done

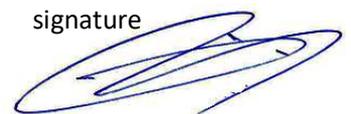
. GPS tracking is implemented for all convoy's vehicles and there is a camera in the cabin and another in front showing the road and the driver view the data produced is not sent through GPRS but rather is downloaded and kept for each delivery.

Convoy manager informs the base and the base informs the mine through email sighted tracking sheet for truck

The mine enters the convoy arrival details on the waybills and the container interchange proof of delivery are signed by the mine.

The cyanide from the port of entry to destination is under the control and the responsibility of the customs official and armed gendarmerie and EPA representative, the handover of the shipment is done between the customs escorting office and the mine customs resident officer.

Further ASL transports and delivers sealed containers, which are also inspected to verify the seals and make sure the container is in good condition according waybill accompanies the convoy which includes chain of custody data such as container numbers, waybill numbers, shipping documentation, Packing list, Bill of lading, customs



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declarations, and producer invoice.

There are Checks carried out at customs posts and barriers and at the mine site.

every Convoy stops have checklists which include the inspection of container seals as the other document like Declaration , BL , suppliers invoice and packing list oin simple all shipping document are with custom official and given to mine official when they arrive.

Another signed copy of the declaration is taken back by the custom official to prove the delivery is completed, the client provides a signed delivery note once the goods are received

The client has also access to the tracking system and the client can enter the data as and when the convoy arrived at the mine site for transparency and for container demurrage liabilities.

The mine enters the waybills and the truck numbers after signing and the container interchange proof of delivery are signed by the mine and there is container tracking on the item.

the emergency contact details and MSDS are placed in every vehicles.

A copy of the documents are with the convoy manager during transit.

The customs officer also manages all the customs barriers on the way.

No sub-contracting undertaken.

Due to the nature of the cargo and the lack of safety standard by service providers.

ASL retain the full responsibility of its operation the only operation that is subcontracted is the stevedoring and this is covered by the due diligence

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

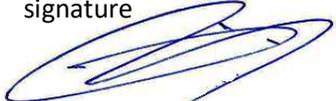
Summarize the basis for this Finding/Deficiencies Identified:

There are no situations where interim storage occurs since the cargo is under the customs custody and customs doesn't allow the exempt cargo to park or be sent anywhere apart from the approved route.

There is a procedure that prohibits eating or drinking near the cyanide and the Emergency response plan manages different scenarios on how to manage spill and contain releases.

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.



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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:

ASL developed an Emergency Response Plan.

the emergency response plan contains different scenarios for different types of emergencies, the scenarios from the emergency response plan are addressed as drills (they implement the scenario in a drill case)

occasionally they mix 3 scenarios in one drill

The ER PLAN gets updated yearly or

if there is new regulation

after a drill

when the client has some new inputs or

the ER plan is activated that needs to be amended

eg scenarios . Truck rollover on dry soil conditions, crash with another vehicle, spill, no spill , fire & spill etc.

As all cyanide deliveries are made in convoy, the accompanying Emergency Response Team will implement the Emergency Response Plan unless more support is needed.

Then they will report to head office or external responders whose responsibilities and obligations are stated in the Plan.

These also describe at what level each of these external responders should be called on.

in case of an emergency truck breakdown the escorting team will repair the vehicle

The only liquid covered is if the cyanide briquettes fall into a liquid medium.

Currently, the only form of cyanide that is transported is solid cyanide briquettes and the Emergency Response plan is based solely on solid cyanide briquettes

ASL prepared to respond, to manage and recover from any realistically foreseeable emergency associated with Alpha transport operation.

The Plan considers all aspects of road transport only, since sea air and railway are not part of the scope.

Due diligence was done by Kinross auditor to ensure the supply chain

ASL only uses Flatbed trailers to transport containers containing boxes of cyanide briquettes in sea worthy containers. They do not use tanks.

Furthermore, the trucks are actually owned by ASL .

the company does third party inspection using SGS done annually and a visit from MOT(ministry of transport once a year apart from this all repairs and maintenance are done by the agent as the trucks are still under warranty

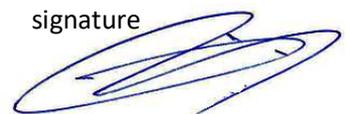
in case of brake down on road the convoy mechanics manage the problem until they reach mine site Brake testing and other inspections are undertaken by the company itself.

The on-board computer on the truck dictates the maintenance frequencies, form and type of service required.

ERP describes the drills and exercises to be performed for Alpha services and operations and propose a long-term planning schedule when these should occur.

The Plan also includes a series of likely scenarios: -

Truck breakdown;



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truck accident-no spill;
truck accident-spill;
driver injury or security risk-armed robbery and civil unrest ,
cancel of order and rejection of cargo by the mine all has been addressed.

Also external responders are detailed as there are 4 government escorts, armed gendarmerie EPA ,
ministry of transport and customs.

As all cyanide deliveries are made in convoy, the accompanying Emergency Response Team will
implement the Emergency Response Plan unless more support is needed and then they will report to head
office or external responders whose responsibilities and obligations are stated in that plan which also
describes what level each of the external responders should called upon.

drills are done in conjunction with

police

EPA

armed gendarmerie

Customs

Ministry of transport

members mentioned above are part of the drills and evaluation

where roles and responsibilities are discussed per stakeholder

all the scenarios that will be responded to by the convoy's own dedicated emergency response
team and the government officials on the convoy will take over the government communication
and external responders.

Any outside additional assistance would be requested or coordinated through the Ministry of
Security

ASL has developed a list of roles and responsibility attached to the critical tasks
for each party or person involved in the ER in case of an emergency for both Internal or external
responders

The possibility of using outside medical responders has been addressed by the communication
with the two clinics.

*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:

ASL has developed a list of roles and responsibility attached to the critical tasks
for each party or person involved in the ER in case of an emergency for both Internal or external
responders.

ASL has defined the critical task and critical position by a matrix that gives for each person his



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roles and responsibilities deriving from the training done for him and his skill set.
Competency frame work indicates the training and competency needs for all jobs includes emergency response.

the training done by third party Precision safety, health and environment
the ER plan highlights on the following positions

- 1-base controller
- 2-incident controller
- 3-press focal point
- 4-general manager
- 5-safety manager

the above positions have their roles and responsibilities defined during normal, abnormal and emergency situations

the inventory emergency response equipment are inspected regularly , on a monthly basis for the yard equipment, using inspection sheet for the yard and inventory of emergency response equipment inspection sheet for the convoy whose equipment is inspected before each convoy departure

there is no emergency equipment stored on road or in a interim area yet

there are emergency equipment available at the mine site Tasiast owned by the mine not ASL.

ASL has identified sodium hydroxide as a neutralizing chemical for cyanide and this is the chemical carried along and kept in the yard and it has been added to the inspection sheet

for cyanide antidote kits are sent along with the convoy brand cyanokit,

The equipment is checked per trip and on monthly basis to monitoring expiry date and testing the integrity.

The Convoy escort vehicles carry all the necessary emergency response equipment

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,

Pre-trip toolbox meeting includes refresher on emergency procedures.

Verification of the cyanide antidote kit is done pre-trip and post trip by the convoy manger and the record is maintained by the convoy manager. Checklists are available ER equipment checklist for convoy Communication checklist is part of the Convoy equipment that is checked and tested before the convoy moves.

The HCN detector is tested for its functionality before every convoy and is sent for calibration every 12 months

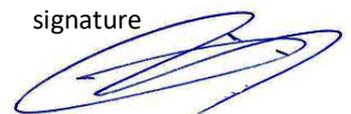
No sub-contracting undertaken due to the nature of the cargo and the lack of safety standards by service providers.

ASL retain the full responsibility of their operation.

The only operation that is subcontracted is the stevedoring and this is covered by the due diligence done by supplier to Tasiast mine.

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

X in full compliance with



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

Summarize the basis for this Finding/Deficiencies Identified:

ASL has developed procedures for internal and external responders include roles and responsibility.

Incident notification procedure contains contact information .

ASL communicated with the armed gendarmerie and with the medical service facility using the MSDS for discussion.

Further, the Minister of Transport, Not all communities are directly consulted but where relevant, communities are involved through discussions and meetings as referred to in the document from the local governor stating that Alpha had a seminar with the locals to make the population aware of cyanide and to take their opinion on the use of the route.

ASL got approval from the ministry of environment for the selection and use of the routes including 2 clinics Chiva and Ibn Sina.

the local governor in consultation with the local community approved the transport.

The convoy manager will communicate with the base who will regulate communications to interested and affected parties including client and other bodies that need to be communicated with.

The communication contact updated annually during yearly review or in case of emergency.

in case change

in mine site contact

in security and government agencies contact

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:

Any cyanide that is spilled on the soil is recovered & neutralized then sent to the mine for disposal or usage.

All actions of clean up and neutralization of soil and disposal is done by the convoy manager, the ER team and safety officer.

The only task for the driver based on the ER plan is to assist the police to secure the perimeters of the incident. The convoy manager provides the initial response to the incident.



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reference to the spill, contaminated or used items are sent to the mine for disposal by EPA approval

There is no much water 90% Mauritania's land is in the Sahara Desert , further to avoid cyanide seeping into underground water the process of neutralization is done at the mine and minor management is done at the point of accident.

ASL policy prohibits use of neutralizing or water treatment chemicals in water.

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:

ASL identified 5 specific conditions for revision of the ER

The conditions are:-

1. After an accident to add the learning points
2. After a requirement done by the Tasiast mine
- 3-drill where there was variation in the implementation
4. The yearly review or procedural yearly review
5. in case there is a change in the law or the regulations

any changes are communicated to the mine who must approve any changes especially when support is needed.

ASL conduct mock emergency drills that simulate transport-related exposures and releases.

ASL conduct 2 cyanide drills per year

Mock drill & evaluation are conducted

ASL conducted a Drill in conjunction with

Kinross

EPA

Customs

fire brigade

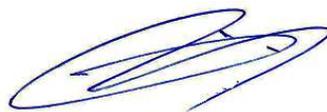
Ministry of transport

The plan was reviewed based on the findings of the assessment of the drill.

The evaluation sheet reviewed and the finding and the required amendment is added to the ER plan.

Furthermore, the cyanide training include a practical or desk top drill to ensure participants adhered to their training.

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