



January 2013

INTERNATIONAL CYANIDE MANAGEMENT
CODE CYANIDE TRANSPORTATION AUDIT

**Bolloré Africa Logistics Ghana
Certification Audit Summary
Audit Report**

Submitted to:

International Cyanide Management Institute
888 16th Street, NW - Suite 303
Washington, DC 20006
UNITED STATES OF AMERICA

Bolloré Africa Logistics Ghana
Commercial Warehouse Road,
Main Harbour Area, Tema,
GHANA

REPORT



Report Number. 127643037 005 R Rev2

Distribution:

- 1 Copy - International Cyanide Management Institute (+1 Electronic)
- 1 Copy - Bolloré Africa Logistics Ghana (+1 Electronic)
- 1 Copy - Bolloré Africa Logistics (+1 Electronic)
- 1 Copy - Golder Associates Pty Ltd





Table of Contents

1.0 INTRODUCTION.....	1
1.1 Operational Information	1
1.2 Description of Operation	1
1.2.1 Bollore Africa Logistics and AL Ghana.....	1
1.2.2 Sodium Cyanide Transportation.....	1
1.2.3 Transit Storage	2
1.3 Auditors Findings and Attestation	3
1.4 Name and Signatures of Other Auditors:	3
1.5 Dates of Audit:	3
2.0 CONSIGNOR SUMMARY.....	4
2.1 Principle 1 – Transport.....	4
2.1.1 Transport Practice 1.1	4
2.1.2 Transport Practice 1.2.....	5
2.1.3 Transport Practice 1.3.....	5
2.1.4 Transport Practice 1.4.....	6
2.1.5 Transport Practice 1.5.....	7
2.1.6 Transport Practice 1.6.....	8
2.2 Principle 2 – Interim Storage	9
2.2.1 Transport Practice 2.1	9
2.3 Principle 3 – Emergency Response.....	10
2.3.1 Transport Practice 3.1	10
2.3.2 Transport Practice 3.2.....	11
2.3.3 Transport Practice 3.3.....	11
2.3.4 Transport Practice 3.4.....	12
2.3.5 Transport Practice 3.5.....	12

APPENDICES

APPENDIX A

Limitations



1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: Bolloré Africa Logistics Ghana
Name of Facility Owner: Bolloré Africa Logistics
Name of Facility Operator: Bolloré Africa Logistics Ghana
Name of Responsible Manager: Christian Devaux, QHSE & Organisation Manager, Bolloré Africa Logistics
Address: Bolloré Africa Logistics
Tour Bolloré
31-32 Quai de Dion Bouton
State/Province: 92811 Puteaux Cedex
Country: FRANCE
Telephone: +33 1 46 96 48 61
Fax: +33 1 46 96 4043
E-Mail: devaux.christian@bollore.com

1.2 Description of Operation

1.2.1 Bolloré Africa Logistics and AL Ghana

The Bolloré Group was founded in 1822. From its historic beginnings in thin papers, the Group set about diversifying its product ranges and services. It is now involved in plastic films for capacitors and packaging, electric batteries, thin papers, transportation in Africa (freight forwarding and stevedoring, railways) and international logistics, fuel distribution and dedicated terminals and systems.

The Africa transportation arm of the Group is managed by Bolloré Africa Logistics which has been established for more than 50 years in 41 countries. The company has established some 200 agencies and is a key player in port activity, terrestrial transport and tailor-made logistics solutions. Bolloré Africa Logistics is actively expanding its integrated logistics network in Africa and is now the biggest transport and logistics operator in Africa.

Bolloré Africa Logistics Ghana (AL Ghana) is a subsidiary of Bolloré Africa Logistics based in Tema, Ghana. AL Ghana conducts freight forwarding and transportation activities within West Africa. In 2012, a number of subsidiaries of Bolloré Africa Logistics' operations in Ghana were grouped under the AL Ghana name. These subsidiaries included SDV Ghana Limited and the Antrak Logistics Group (Antrak). Many of AL Ghana's procedures and documents still refer to SDV Ghana and Antrak, as noted throughout this audit report.

1.2.2 Sodium Cyanide Transportation

At the time of the audit, cyanide transported by AL Ghana originated from the AGR cyanide production facility at CSBPs Kwinana complex. At AGR, solid sodium cyanide is packaged in intermediate bulk containers (IBCs), which are in turn packed into a freight (shipping) container to be transported by sea from the Port of Fremantle to the Port of Tema, Ghana. A maximum of 20 IBCs are packed into a freight container with a maximum gross weight of 28 tonnes.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



Shipping between the Port of Fremantle and the Port of Tema is conducted by independent shipping companies.

Prior to the arrival at the Port of Tema, AL Ghana ensures that the shipping documentation is in order and the goods are pre-cleared to allow prompt handling of the product through the Port. Upon arrival at the Port of Tema, the off loading of all containers is performed by MPS. AL Ghana collects the containers within 24 hours of arrival and transports the containers to the designated area at AL Ghana's Transport Depot at Tema, where the containers are stored on the trailer in preparation for departure to the customer mine sites the following morning.

At the time of the audit, the only mine site serviced by AL Ghana comprised the Prestea Sankofa Gold Mine, owned by Prestea Sankofa Mine Limited, a subsidiary of Ghana National Petroleum Corporation. Prestea Sankofa Gold Mine is located in the western region of Ghana approximately 340 km by road from Tema.

1.2.3 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit does occur at the Port of Tema for four to five days, under the control of MPS, while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port of Tema Dakar by AL Ghana and taken to AL Ghana's Transport Depot at Tema where they are stored on the truck overnight in preparation for convoy departure at 0500 hours the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites. The unloading is undertaken by the customer.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



1.3 Auditors Findings and Attestation

in full compliance with

The International Cyanide Management Code

AL Ghana is: in substantial compliance with

not in compliance with

Audit Company: Golder Associates
Audit Team Leader: Tom Carmichael, RABQSA (14544)
Email: tomcarmichael@golder.com.au

1.4 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Tom Carmichael	Lead Auditor and Technical Specialist		7 January 2013

1.5 Dates of Audit:

The Certification Audit was undertaken within two days (2 person-days) on 27 and 28 July 2012.

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.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

The Code requires the consignor to “transport Cyanide in a manner that minimises the potential for accidents and releases”.

2.1.1 Transport Practice 1.1

Select cyanide transport routes to minimise the potential for accidents and releases.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 1.1 requiring cyanide transport routes to be selected to minimise the potential for accidents and releases.

AL Ghana, through its parent company Bolloré has developed and implemented a procedure to guide the selection of transport routes to minimise the potential for accidents and releases or the potential impacts of accidents and releases. AL Ghana has implemented the procedure and conducted route surveys for the selected routes.

The route used by AL Ghana from Tema to the customer (Prestea Sankofa mine) via Takoradi, was selected over alternatives, via Kumasi, on the basis of minimising risks.

Hazards identified during the route survey are risk assessed using either the Bolloré Risk Evaluation Matrix or client risk assessment tools depending on customer requirements. Once risk assessed, prevention and/or protective measures are identified and implemented to make the resulting risks more acceptable.

AL Ghana has implemented a procedure requiring annual route surveys and has a process of obtaining feedback on route conditions after each convoy.

AL Ghana has documented measures taken to address risks identified with the selected routes within a Transport Risk Management Plan.

AL Ghana has consulted as necessary with stakeholders and applicable governmental agencies in the selection of routes and development of cyanide management measures.

Convoys and police escorts are used as a means of managing the risks of the road conditions and responding to emergencies. AL Ghana’s Project Division Manager indicated that security is not usually a significant issue.

Cyanide is delivered in convoy over a nine month campaign each year during the dry season.

In the event of an incident, primary emergency response is coordinated by AL Ghana personnel present with the convoy.

In the event of an incident, the duties of primary responders include immediate notification to government authorities and medical facilities (as necessary). The roles of Ghana public responders (police, ambulance and fire brigades) are defined in the Transport Management Plan and have been communicated both verbally and in writing to the public responders.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



AL Ghana does not use subcontractors within the scope of this audit.

2.1.2 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**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 1.2 requiring that personnel operating cyanide handling and transport equipment can perform their jobs with minimum risk to communities and the environment.

AL Ghana uses dedicated AL Ghana drivers that have appropriate training and vehicle licences to transport cyanide.

Ghana does not have any dangerous goods legislation, despite this, dangerous goods training of all cyanide drivers is provided by Australian Gold Reagents Pty Ltd.

All personnel operating cyanide handling and transport equipment have been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures. The training of cyanide handling and transport equipment operators is provided by Australian Gold Reagents Pty Ltd.

2.1.3 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**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 1.3 requiring that transport equipment is suitable for cyanide shipment.

AL Ghana only uses equipment designed and maintained to operate within the cyanide loads it will be handling. Equipment consists of road vehicles (tractor – semi-trailers) that were purchased to a design specification appropriate for the cyanide transport task. Vehicle power, axle loadings and other parameters are set by the manufacturer and the loads are well within the legal capacities of the public roads.

All trailers dedicated to the cyanide delivery task are capable of carrying two fully loaded cyanide containers. No other load bearing equipment is used by AL Ghana for cyanide transport.

AL Ghana has implemented an “A, B, C” maintenance program that is based on truck engine hours as well as a maintenance request program for breakdowns. In addition to the workshop maintenance, the Convoy Leader and drivers conduct an inspection of all prime movers and trailers prior to departure.

The Convoy Leader and drivers inspect prime movers and trailers for overloading and signs of stress prior to departure.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



AL Ghana undertakes convoy management, emergency response and training of AL Ghana drivers.

2.1.4 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**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 1.4 requiring the operation develop and implement a safety program for transport of cyanide.

AL Ghana has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer’s packaging. These comprise checks at the port, on route and at the mine site prior to unloading.

AL Ghana transports cyanide for Code certified cyanide producers, who have systems in place to ensure their containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards. Ghana does not have any dangerous goods legislation. As a control measure, the cyanide is trucked in convoy under the escort of persons who have received training in cyanide emergency response and dangerous goods training.

AL Ghana has implemented a safety program for cyanide transport that includes:

- Vehicle inspections;
- Preventative maintenance;
- Limitations on operator or drivers’ hours;
- Procedures to prevent loads from shifting;
- Procedures to modify or suspend transport if conditions such as severe weather or civil unrest are encountered; and
- Drug abuse prevention.

Summary information of the safety program for cyanide transport is provided in the following.

AL Ghana has developed and implemented a procedure requiring that each vehicle, truck or machine be inspected before the start of each working day or shift, to reduce the risks of incidents/accidents due to mechanical or operating faults. Inspections are recorded on inspection checklists for trucks, trailers and light vehicles. The inspection items include key mechanical, electrical, hydraulic, fuel and truck body components.

The Check Lists note the container number and seal number on each truck.

AL Ghana has implemented a maintenance program that is based on truck engine hours. Every time a truck fills its tank, a record is made of the engine hours and kilometres. This information is used to schedule maintenance activities.

The trailers do not have a formal inspection sheet to prompt the maintenance activities, however the Workshop Manager stated that all trailers are brought into the workshop for a visual inspection at the completion of a cyanide delivery.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



Complementing the schedule preventative maintenance program, is a maintenance request program where faults can be logged and addressed.

The Convoy Leader and drivers conduct an inspection of all prime movers and trailers prior to departure. These checks are documented in the Vehicle Trip Checklist.

AL Ghana has specified limits on driver hours and mandated rest breaks. Transport routes have been appropriately planned with planned breaks and approved stop locations. Driving is conducted during daylight hours and does not typically exceed 6 hours.

Consignments of cyanide transported by AL Ghana have been produced by a Code certified cyanide producer. The cyanide is transported in UN approved composite IBCs (20 per container) that are stowed to minimise movement in transport.

Containers are secured using twist locks, which are designed and constructed to international transport standards. The twist locks are checked prior to departure and during rest breaks on journeys.

AL Ghana suspends operations in the event of inclement weather or problems on the route. Cyanide transport is not undertaken during the wet season.

Emergency contact is initiated in the event of extreme emergencies, ie security issues arise, eg coup, civil war or container door seals broken.

The Emergency Response Plan provides instructions on actions to be undertaken in the event of extreme weather conditions or civil unrest whilst the convey is on route. These actions comprise parking at the nearest safe parking area, switching off the engine, contacting the emergency number and awaiting instructions from AL Ghana prior to proceeding.

Bolloré Africa Logistics has an Alcohol and Drug Policy. The Policy advises that Bolloré has a zero tolerance drug and alcohol policy. Abuse of alcohol and drugs will be prevented by education of workers, refusing to admit personnel under influence of alcohol or drugs onto the work site, ensuring that personnel dismissed for drug and alcohol abuse are not eligible to return to any of the company's sites.

Bolloré Africa Logistics have adopted the International Labour Organisation SOLVE (**S**tress, **v**i**O**lence, **a**lco**o**L et drogue, **V**ih/sida, and **t**abagism**E**) training program aimed at raising awareness and managing stress violence, alcohol, drugs, HIV/Aids and tobacco. The AL Ghana doctor is a regional trainer for the SOLVE programme.

Records are maintained and were inspected for relevant parts of this element.

2.1.5 Transport Practice 1.5

Follow international standards for transportation of cyanide by sea and air.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 1.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation to follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to AL Ghana.

AL Ghana does not transport consignments of cyanide by sea or air within the scope of this audit. Consignments of cyanide transported by AL Ghana arrive in Ghana via the Port of Tema from AGR which is a Code certified cyanide producer. As a Code certified cyanide producer, AGR has systems in place to

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



ensure their containers are labelled in accordance with the International Maritime Dangerous Goods (IMDG) Code and as required by local regulations or international standards.

2.1.6 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

The operation is **in full compliance with** **Transport Practice 1.6**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 1.6 requiring the operation track cyanide shipments to prevent losses during transport.

All vehicles have communications systems that include cell phones and a GPS tracking system for trucks and cell phones for the escort vehicle.

Communication equipment is tested as part of a pre-start check to ensure it functions properly. The GPS tracking system signal is used continuously and is transmitted from each truck throughout the trip.

AL Ghana has not identified any cell phone communication blackout areas along transport routes.

The GPS tracking system continuously transmits position and other data from each truck throughout the trip.

AL Ghana implements chain of custody procedures to prevent loss of cyanide during shipment. The Escort Leader conducts inspections of the containers at the Port and at the conclusion of each break. Once delivered, a mine site representative signs a form acknowledging that the consignment was received in good condition and unopened.

Shipping papers and Material Safety Data Sheets accompany each cyanide convoy.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



2.2 Principle 2 – Interim Storage

The Code requires that the consignor “**design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures**”.

2.2.1 Transport Practice 2.1

Store cyanide in a manner that minimises the potential for accidental releases.

The operation is in full compliance with **Transport Practice 2.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 2.1 requiring transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures is NOT APPLICABLE to AL Ghana.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Storage in transit does occur at the Port of Tema for four to five days while formalities such as customs clearance and carrier releases are performed. Once formalities are complete, the cyanide containers are collected from the Port of Tema and taken to the AL Ghana Transport Yard where they are stored on the truck overnight in preparation for convoy departure at 0500 hrs the following morning. At no stage is cyanide removed from the trucks or containers prior to unloading at customer mine sites.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



2.3 Principle 3 – Emergency Response

The Code requires that the consignor “**Protect communities and the environment through the development of emergency response strategies and capabilities**”.

2.3.1 Transport Practice 3.1

Prepare detailed Emergency Response Plans for potential cyanide releases.

The operation is **in full compliance with** **Transport Practice 3.1**
 in substantial compliance with
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 3.1 requiring the operation prepare detailed Emergency Response Plans for potential cyanide releases.

AL Ghana has developed detailed documents to cover emergency response for potential cyanide releases for cyanide transportation within Ghana. The information is contained within an Emergency Response Plan and a route specific Transport Management Plan.

The Transport Management Plan and Emergency Response Plan are based on road transportation between the Port of Tema and the Sankofa Gold Mine at Prestea.

The plans are appropriate for the selected transportation route and they consider relevant aspects of the transport infrastructure. The route evaluation process, route hazard/risk assessment process, and operational experience was used by AL Ghana and AGR to identify three likely emergency scenarios:

- Transport incident – Vehicle Rollover caused by pulling over to stop on soft edge along a sealed road. Sea container intact with no spill or product release.
- Transport incident – Vehicle Rollover caused by crash or crash avoidance with another vehicle. Sea container intact with no spill or product release.
- Transport incident – Vehicle Rollover caused by crash or crash avoidance with another vehicle. Sea container damaged resulting in spill of product released from container.

Roles and responsibilities of AL Ghana, Police, Ambulance/Hospital, local government, the EPA and the Mine Site are listed where applicable for each of these scenarios.

The plans consider the physical and chemical form of cyanide and design of the transport vehicle. Storage facility emergency response plans were not developed, as cyanide is not stored at an interim storage facility between the Port of Tema and the mine site destination.

The Transport Management Plan and Emergency Response Plan include descriptions of response actions, as appropriate for the anticipated emergency situation. External responders identified in the documents are aware of their role in an emergency.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



2.3.2 Transport Practice 3.2

Designate appropriate response personnel and commit necessary resources for emergency response.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 3.2 requiring it designates appropriate response personnel and commit necessary resources for emergency response.

AL Ghana, via AGR, provides emergency response training of appropriate personnel. AGR provides a two day training course (one day of theory and one day of practical) at the beginning of every convoy season, which is yearly. All AL Ghana drivers and the escort team complete this training.

Records of the annual completed training were viewed from 2011 to 2012.

The Emergency Response Plan identifies the specific emergency response duties and responsibilities of personnel for the three scenarios. Descriptions of the specific emergency response duties and responsibilities AL Ghana Drivers and the Escort team are detailed within the Emergency Response Plan. The cyanide training provides additional detail of the responsibilities for each of the specific roles.

AL Ghana maintains a list of all of the emergency response equipment that should be available during the transport route. The equipment is check prior to departure of each convoy.

AL Ghana does not use subcontractors within the scope of this Audit.

2.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 3.3 requiring that they develop procedures for internal and external emergency notification and reporting.

The Emergency Response Plan contains procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.

The Emergency Response Plan details a communication flow chart and contact numbers. A list of the same numbers is also kept in the Escort Vehicle.

AL Ghana has procedures in place to ensure the contact numbers are kept current.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



2.3.4 Transport Practice 3.4

Develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 3.4 requiring that it develops procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

AL Ghana has procedures for remediation, such as recovery or neutralisation of solutions or solids, decontamination of soils or other contaminated media and management and/or disposal of spill clean-up debris.

The Transport Management Plans includes a section on recovery and treatment of spills. A copy of the Transport Management Plan specific to the convoy route is kept in each of the convoy trucks and in the escort vehicle.

The training program also contains requirements for remediation depending on the spill. All AL Ghana drivers and escort team receive this training yearly and a copy of the training information is also kept in the escort vehicle.

AL Ghana's Transport Management Plan prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

2.3.5 Transport Practice 3.5

Periodically evaluate response procedures and capabilities and revise them as needed.

in full compliance with

The operation is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

AL Ghana is in FULL COMPLIANCE with Transport Practice 3.5 requiring the operation periodically evaluate response procedures and capabilities and revise them as needed.

The Emergency Response Plan and Transport Management Plan contain provisions for periodically reviewing and evaluating the Plans' adequacy. These reviews are being implemented.

The Emergency Response Plan contains provisions for conducting mock drills and they are being implemented.

On 13 August 2011, an emergency mock was completed by AL Ghana in the AL Ghana transport yard. The drill scenario involved a collision of a light vehicle with a convoy truck causing a container rollover and spill. All drivers are covered in scenario training as part of the yearly training prior to each convoy season.

The Transport Management Plans and the Emergency Response Plan contains provisions for conducting a review after an incident.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



BOLLORÉ AFRICA LOGISTICS GHANA SUMMARY AUDIT REPORT

Bolloré also has a procedure (Incident – Accident Management Procedure) requiring emergency documents to be updated after an accident.

Bolloré Africa Logistics Ghana

Name of Facility

Signature of Lead Auditor

7 January 2013

Date



Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'T. Carmichael', written over a horizontal line.

Tom Carmichael
ICMI Lead Auditor, Associate

TC/EWC/gf

A.B.N. 64 006 107 857

Golder, Golder Associates and the GA globe design are trademarks of Golder Associates Corporation.

c:\users\gformento\appdata\local\microsoft\windows\temporary internet files\content.outlook\j4au6gbp\127643037 005 r rev2 al ghana summary audit report.docx



APPENDIX A

Limitations



LIMITATIONS

This Document has been provided by Golder Associates Pty Ltd ("Golder") subject to the following limitations:

This Document has been prepared for the particular purpose outlined in Golder's proposal and no responsibility is accepted for the use of this Document, in whole or in part, in other contexts or for any other purpose.

The scope and the period of Golder's Services are as described in Golder's proposal, and are subject to restrictions and limitations. Golder did not perform a complete assessment of all possible conditions or circumstances that may exist at the site referenced in the Document. If a service is not expressly indicated, do not assume it has been provided. If a matter is not addressed, do not assume that any determination has been made by Golder in regards to it.

Conditions may exist which were undetectable given the limited nature of the enquiry Golder was retained to undertake with respect to the site. Variations in conditions may occur between investigatory locations, and there may be special conditions pertaining to the site which have not been revealed by the investigation and which have not therefore been taken into account in the Document. Accordingly, additional studies and actions may be required.

In addition, it is recognised that the passage of time affects the information and assessment provided in this Document. Golder's opinions are based upon information that existed at the time of the production of the Document. It is understood that the Services provided allowed Golder to form no more than an opinion of the actual conditions of the site at the time the site was visited and cannot be used to assess the effect of any subsequent changes in the quality of the site, or its surroundings, or any laws or regulations.

Any assessments made in this Document are based on the conditions indicated from published sources and the investigation described. No warranty is included, either express or implied, that the actual conditions will conform exactly to the assessments contained in this Document.

Where data supplied by the client or other external sources, including previous site investigation data, have been used, it has been assumed that the information is correct unless otherwise stated. No responsibility is accepted by Golder for incomplete or inaccurate data supplied by others.

Golder may have retained subconsultants affiliated with Golder to provide Services for the benefit of Golder. To the maximum extent allowed by law, the Client acknowledges and agrees it will not have any direct legal recourse to, and waives any claim, demand, or cause of action against, Golder's affiliated companies, and their employees, officers and directors.

This Document is provided for sole use by the Client and is confidential to it and its professional advisers. No responsibility whatsoever for the contents of this Document will be accepted to any person other than the Client. Any use which a third party makes of this Document, or any reliance on or decisions to be made based on it, is the responsibility of such third parties. Golder accepts no responsibility for damages, if any, suffered by any third party as a result of decisions made or actions based on this Document.

At Golder Associates we strive to be the most respected global company providing consulting, design, and construction services in earth, environment, and related areas of energy. Employee owned since our formation in 1960, our focus, unique culture and operating environment offer opportunities and the freedom to excel, which attracts the leading specialists in our fields. Golder professionals take the time to build an understanding of client needs and of the specific environments in which they operate. We continue to expand our technical capabilities and have experienced steady growth with employees who operate from offices located throughout Africa, Asia, Australasia, Europe, North America, and South America.

Africa	+ 27 11 254 4800
Asia	+ 86 21 6258 5522
Australasia	+ 61 3 8862 3500
Europe	+ 356 21 42 30 20
North America	+ 1 800 275 3281
South America	+ 55 21 3095 9500

solutions@golder.com
www.golder.com

Golder Associates Pty Ltd
124 Pacific Highway
St. Leonards, New South Wales 2065
Australia
T: +61 2 9478 3900

