



June 2016

INTERNATIONAL CYANIDE MANAGEMENT CODE

Bolloré Africa Logistics Ghana Re-Certification Audit, Summary Audit Report

Submitted to:

International Cyanide Management
Institute
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UNITED STATES OF AMERICA

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REPORT



Report Number. 1542476-009-R-Rev0

Distribution:

- 1 Copy (+1 Electronic) – International Cyanide Management Institute
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- 1 Electronic Copy – Golder Associates Pty Ltd





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APPENDIX A

Important Information



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: Patrick Banoeyelle, QHSE Manager,
Bolloré Africa Logistics Ghana
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Country: Ghana
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1.2 Bolloré Africa Logistics and Bolloré

The Bolloré Group was founded in 1822. From its beginnings in thin papers, the Group has diversified 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. The company is involved in port activity, terrestrial transport and logistics solutions. Bolloré Africa Logistics is one of the largest transport and logistics operator in Africa.

Bolloré Africa Logistics, Ghana conducts freight forwarding, stevedoring and transportation activities within West Africa.

1.1 Sodium Cyanide Transportation

At the time of the audit, cyanide transported by Bolloré originated from Australian Gold Reagents Pty Ltd (AGR) cyanide production facility at CSBP Limited's 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.

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

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

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1.2 Transit Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the CTV Protocol. Storage in transit does occur at the Port of Tema for four to five days, under the control of the Port, 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 by Bolloré and taken to Bolloré's Transport Depot at Tema where they are stored on the truck overnight in preparation for convoy departure at 0500 hours the following morning. Cyanide is not removed from the trucks or containers prior to unloading at customer mine sites. The unloading is undertaken by the customer.

1.3 Auditors Findings and Attestation

in full compliance with

Bolloré Africa Logistics is: in substantial compliance with **Cyanide Management Code**

not in compliance with

No cyanide incidents were noted as occurring during the audit period.

Audit Company: Golder Associates Pty Ltd

Audit Team Leader: Ed Clerk, Exemplar Global (105995)

Email: eclerk@golder.com.au

1.4 Name and Signatures of Other Auditors:

Name	Position	Signature	Date
Ed Clerk	Lead Auditor and Technical Specialist		14 June 2016

1.5 Dates of Audit

The ICMC Certification Audit was conducted over two days on 14-15 March 2016.

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 Pre-Operational Verification Protocol for Cyanide Transportation Operations* and using standard and accepted practices for health, safety and environmental audits.

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2.0 CONSIGNOR SUMMARY

2.1 Principle 1 – Transport

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

Bolloré Ghana is

in substantial compliance with

Transport Practice 1.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

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. Bolloré has implemented the procedure and conducted route surveys for the selected routes.

Hazards identified during the route survey are risk assessed using either the Bolloré Africa Logistics Risk Evaluation Matrix or assessment tools depending on customer requirements. Once risk assessed, the *JHA Management* procedure guides the development of prevention and/or protective measures which mitigate risks.

The Performing Road Survey procedure requires routes to be risk assessed and identified management measures to be documented within a Transport Management Plan. Bolloré has developed Transport Management Plans for routes to Syama and Youga Gold Mines.

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

Bolloré 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. 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 Bolloré personnel present with the convoy. 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.

Prior to 2015, Bolloré Ghana contracted Bolloré Burkina Faso to conduct escort duties for its cyanide convoys. Bolloré Burkina Faso conducted the escort duties in accordance with the procedures established by Bolloré Burkina Faso. Bolloré Burkina Faso is managed by the same Bolloré entity (Bolloré Africa Logistics) as Bolloré Ghana. Bolloré Burkina Faso's was certified as being compliant with the ICMC on 26 September 2013.

Bolloré Ghana has conducted its own escort duties using its own staff and procedures since the beginning of 2015.

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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.

in full compliance with

Bolloré Ghana is

in substantial compliance with

Transport Practice 1.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré 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.

Bolloré only uses trained and competent operators to drive its trucks. Bolloré has dedicated Bolloré drivers that have appropriate training and vehicle licences to transport cyanide. Personnel operating cyanide handling and transport equipment have also been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

Bolloré uses dedicated Bolloré drivers that have appropriate training and vehicle licences to transport cyanide. Bolloré’s Training Matrix identifies the name of each driver and tracks their training against the following mandatory modules:

- Cyanide Awareness, Transport Management Plan, Route survey Risk assessment
- Defensive Driving Techniques
- Emergency Response Plan and Drill; PPE
- First Aid
- General Driving Rules.

A review of the Training Plan and Competency Matrix, training records and staff interviews confirmed that staff had been trained in the required modules.

Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

in full compliance with

Bolloré Ghana is

in substantial compliance with

Transport Practice 1.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré 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 within the legal capacities of the public roads.

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Trailers dedicated to the cyanide delivery task are capable of carrying two cyanide containers. No other load bearing equipment is used by Bolloré for cyanide transport.

Bolloré has implemented a preventative maintenance program that is based on truck engine hours. Upon returning to the transport yard, the information is entered into a maintenance database (GESPAR) and used to schedule maintenance activities. Complementing this is a maintenance request program where faults can be logged using a job card system.

All equipment is checked during the preventative maintenance programmes and vehicle inspections to verify the adequacy of the equipment for the load it must bear.

Bolloré has implemented a preventative 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 Escort Leader and drivers conduct an inspection of all prime movers and trailers prior to departure.

Bolloré has procedures in place to prevent overloading of the transport vehicle being used for handling cyanide. Bolloré mostly transports two containers on a 4-axel trailer, having a gross weight 70t. A single 3-axel trailer with a gross weight 67t is used if a single container is transported. This trailer cannot fit two containers and consequently cannot be overloaded.

2.1.3 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

in full compliance with

Bolloré Ghana is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer's packaging. These comprise checks on the container, twist locks and container seals at the port, on route and at the mine site prior to unloading.

Bolloré 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.

Bolloré has implemented a safety program for cyanide transport that includes:

- Vehicle inspections. Pre-start inspections are recorded and included as part of the Cyanide Trip Report.
- Preventative maintenance.
- Limitations on operator or drivers' hours. Bolloré limits the maximum time for continuous driving at three hours. Driver must take a break of fifteen minutes before continue the journey. The routes have been appropriately planned with breaks and approved stop locations. Driving is conducted during daylight hours and does not typically exceed six hours total.

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- Procedures to prevent loads from shifting. At the Port of Tema, containers are secured using twist locks. The Bolloré Pre-Trip Vehicle Inspection Checklist includes checking if the twist-locks holding the containers onto the trailers are secure.
- Procedures to modify or suspend transport if conditions such as severe weather or civil unrest are encountered. The Transport Management Plans note that if the weather is considered unsuitable a trip is cancelled after due assessment by the Convoy Leader. This is evident as cyanide is delivered in convoy over a nine month campaign each year during the dry season to avoid unsafe conditions as a result of the wet season.
- Drug abuse prevention. Bolloré has an Alcohol and Drug Policy. The Policy advises a zero tolerance drug and alcohol policy. Abuse of alcohol and drugs is managed by Bolloré through the 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. The Cyanide Trip Report documents alcohol testing conducted for the convoy.

Retention of records documenting that the above activities have been conducted. Records are maintained and were inspected for relevant parts of this element.

2.1.4 Transport Practice 1.5

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

in full compliance with

Bolloré Ghana 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 Bolloré.

2.1.5 Transport Practice 1.6

Track cyanide shipments to prevent losses during transport.

in full compliance with

Bolloré Ghana is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré 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.

Bolloré 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.

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Bolloré 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.

2.2 Principle 2 – Interim Storage

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.

in full compliance with

Bolloré Ghana is

in substantial compliance with

Transport Practice 2.1

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 Bolloré.

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 Bolloré Transport Yard where they are stored on the truck overnight in preparation for convoy departure at 0500 hrs the following morning. Cyanide is not removed from the trucks or containers prior to unloading at customer mine sites.

2.3 Principle 3 – Emergency Response

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.

in full compliance with

Bolloré Ghana is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

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

The Transport Management Plan and Emergency Response Plan are based on road transportation of solid sodium over the two routes

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 Bolloré to identify likely emergency scenarios:

- Scenario A – Vehicle Transport Incident (Sea container intact and no spill or product release from container)
- Scenario B – Vehicle Transport Incident (Vehicle falling into river– caused by driver veering off the narrow bridge. The driver, truck and sea container submerged in the river.)
- Scenario C – Vehicle Transport Incident (Sea container damaged resulting in spill of product released from container)
- Scenario D – Extreme Weather (poor visibility, road closure)
- Scenario E – Civil unrest, armed Robbery.

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 Plans and Emergency Response Plans 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.

2.3.2 Transport Practice 3.2

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

in full compliance with

Bolloré Ghana is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Bolloré provides emergency response training of appropriate personnel. The cyanide awareness training is provided over two days (one day of theory and one day for a practical emergency response exercise) at the beginning of every convoy season. All Bolloré drivers and the escort team complete this training.

The training records were reviewed and discussions with Bolloré drivers and the escort team confirmed that they have completed the training.

The Emergency Response Plan identifies the specific emergency response duties and responsibilities of personnel for the five scenarios. Descriptions of the specific emergency response duties and responsibilities

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Bolloré 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.

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

Bolloré 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

Bolloré Ghana is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré 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 Plans contain procedures and current contact information for notifying the shipper, the receiver/consignee, outside response providers, and medical facilities of an emergency.

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

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

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

Bolloré Ghana is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Bolloré 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.

Bolloré 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 Emergency Response Plans contain a section titled Spill Management and Clean up and notes that further detailed information is in the Transport Management Plan. The Transport Management Plans addresses "Recovery and Treatment of Spills".

Bolloré prohibits the use of chemicals such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide to treat cyanide that has been released into surface water.

The Transport Management Plans cover water resource treatment. It states that "Neutralisation and cyanide destruction products such as sodium hypochlorite, ferrous sulphate and hydrogen peroxide MUST NOT be allowed to enter any natural body or surface water or groundwater."

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2.3.5 Transport Practice 3.5

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

in full compliance with

Bolloré Ghana is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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.

Mock drills were undertaken in July 2013 and August and November 2014. The drills were undertaken by Antrak Ghana Ltd and in August 2014 included outside responders (police, fire department and nurses). In addition to formal mock drills, the cyanide awareness training includes mock drill exercises. This course is provided at the beginning of every convoy season.

The training records were reviewed and discussions with Bolloré drivers and the escort team confirmed that they have completed the training.

The Emergency Response Plans include a requirement to arrange a meeting to review the incident, review the findings and update the plans, procedures or training if required.

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

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

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3.0 IMPORTANT INFORMATION

Your attention is drawn to the document titled – “Important Information Relating to this Report”, which is included in Appendix A of this report. The statements presented in that document are intended to inform a reader of the report about its proper use. There are important limitations as to who can use the report and how it can be used. It is important that a reader of the report understands and has realistic expectations about those matters. The Important Information document does not alter the obligations Golder Associates has under the contract between it and its client.

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Report Signature Page

GOLDER ASSOCIATES PTY LTD

A handwritten signature in black ink, appearing to read 'E. Clerk'.

Ed Clerk
ICMC Lead Auditor and ICMC Transportation Expert

JEJ/EWC/eh

A.B.N. 64 006 107 857

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APPENDIX A

Important Information



IMPORTANT INFORMATION RELATING TO THIS REPORT

The document (“Report”) to which this page is attached and which this page forms a part of, has been issued by Golder Associates Pty Ltd (“Golder”) subject to the important limitations and other qualifications set out below.

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Having regard to the matters referred to in the previous paragraphs on this page in particular, carrying out the Services has allowed Golder to form no more than an opinion as to the actual conditions at any relevant location. That opinion is necessarily constrained by the extent of the information collected by Golder or otherwise made available to Golder. Further, the passage of time may affect the accuracy, applicability or usefulness of the opinions, assessments or other information in this Report. This Report is based upon the information and other circumstances that existed and were known to Golder when the Services were performed and this Report was prepared. Golder has not considered the effect of any possible future developments including physical changes to any relevant location or changes to any laws or regulations relevant to such location.

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By date, or revision, the Report supersedes any prior report or other document issued by Golder dealing with any matter that is addressed in the Report.

Any uncertainty as to the extent to which this Report can be used or relied upon in any respect should be referred to Golder for clarification.

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