Summary Audit Report

International Cyanide Management Code

Movis Côte d’Ivoire Transport Recertification Audit

Submitted to:
International Cyanide Management Institute
1400 I Street, NW – Suite 550
WASHINGTON, DC 20005
UNITED STATES OF AMERICA

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19122093-003-R-Rev0
February 2020
Distribution List

1 copy – ICMI (+ electronic)

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APPENDICES

APPENDIX A
Important Information
1.0 INTRODUCTION

1.1 Operational Information

Name of Transportation Facility: Movis Côte d'Ivoire

Name of Facility Owner: Not Applicable

Name of Facility Operator: Movis Côte d'Ivoire

Name of Responsible Manager: Koffi Gildas Frank Kloutsey, Directeur des Transports

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2.0 CYANIDE TRANSPORTATION

2.1 Movis Côte d'Ivoire

Movis Côte d'Ivoire (Movis CI) acquired Trident Shipping during the recertification audit period. Trident Shipping had been transporting mining equipment and general and hazardous goods throughout Côte d'Ivoire for over 20 years.

Movis CI transports cyanide that is imported to Côte d'Ivoire through the Port of Abidjan. Movis CI (previously known as Trident Shipping) transported cyanide between the Port of Abidjan and the Tongon Gold Mine in the Côte d'Ivoire. Transportation of cyanide by Movis CI ceased in early 2017 and at the time of the audit Movis CI was preparing to recommence cyanide transportation activities for new customers in October 2019.

Movis CI transports solid sodium cyanide as a >95% pure white briquette. The cyanide briquettes are packaged in Intermediate Bulk Containers (IBCs) with a capacity of 1000 kg or 1200 kg. The briquettes are stored within a woven polypropylene bag, sealed with a polyethylene plastic liner, within a wooden crate. Consignments of stock are transported in standard shipping containers (sea containers) of up to a maximum of 24.2 tons.

2.2 Trans-shipping and Interim Storage

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol.
2.3 Auditors Findings and Attestation

Movis CI is: ☒ in full compliance with The International Cyanide Management Code

☐ in substantial compliance with

☐ not in compliance with

No significant cyanide exposures or releases were noted to have occurred during Movis CI recertification audit.

Audit Company: Golder Associates Pty Ltd
Audit Team Leader: Mike Woods, Exemplar Global (113792)
Email: mwoods@golder.com.au

2.4 Name and Signatures of Other Auditors

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Signature</th>
<th>Date</th>
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<tbody>
<tr>
<td>Mike Woods</td>
<td>Lead Auditor and Transport</td>
<td></td>
<td>18 February 2020</td>
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<td>Technical Specialist</td>
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2.5 Dates of Audit

The ICMC Recertification Audit was conducted over two days on 12 and 13 August 2019 at Movis CI facilities in Abidjan, Côte d'Ivoire.

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 Cyanide Transportation Verification Protocol for the International Cyanide Management Code and using standard and accepted practices for health, safety and environmental audits.
3.0 CONSIGNOR SUMMARY

3.1 Principle 1 – Transport

Transport Cyanide in a manner that minimises the potential for accidents and releases.

3.1.1 Transport Practice 1.1

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

☐ in full compliance with

☐ in substantial compliance with

☐ not in compliance with

Movis CI is

Transport Practice 1.1

Summarise the basis for this Finding/Deficiencies Identified:

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

Movis CI has implemented a procedure for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases.

Movis CI has implemented the Route Selection and Risk Assessment Procedure to guide the selection and review of transport routes. Section 6.1 of the procedure requires the initial planning of the transport route selection and review to include the following:

- Assessment of the various routes available for the transportation by conducting a review of the route by using maps
- Proximity to rivers and water
- Proximity to schools
- Number of villages and towns to be involved
- Number and location of hospitals and clinics for emergency response
- Type and number of bridges and condition and suitability
- Communication blackout areas
- Steep gradients and sharp corners
- Road surface type and condition
- Construction or detours
- Potential impacts of inclement weather
- Suitable stopping positions
- Distance
- Traffic levels
- Police check points

Movis CI

Name of Facility

Signature of Lead Auditor

December 2019

Date
- Additional road infrastructure such as T-junctions, ramps, toll gates and pedestrian crossings
- Identification and assessment of health and environmental risks.

Following the initial assessment, the routes are compared to determine the preferred route. If necessary, Movis CI Shipping seeks assistance from the mine site and the Centre Ivorien Anti-Pollution (CIAPOL) and AFRILOG (Distributor) to determine the best possible route.

A Route Risk Assessment incorporating the above was observed for the previous route from the Port of Adibjan to the Tongon Mine and for the new routes from the Port of Abidjan to the Agbaou and ITY mines.

Movis CI has implement a procedure to evaluate the risks of selected cyanide transport routes and take the measures necessary to manage these risks.

Hazards identified during the route assessment and selection process are risk assessed using the process detailed in the Route Selection and Risk Assessment Procedure as follows:

In conducting the risk assessment the following process will be followed:

a) Identifying the hazards (route assessment or survey)
b) Analysing the risks (including health and environmental risks)
c) Evaluating the risks (including health and environmental risks)
d) Identifying all control measures
e) Implementing the control measures
f) Re-evaluating the risks
g) Monitoring and review of risks.

This process is conducted by the Transport Officer and HSE Manager and includes both people travelling the selected transport route to do a route survey that physically assesses and records the hazards. Each identified hazard is then risk assessed and controls implemented to mitigate the risks. The Environment ministry issues a permit for the commencement of the transport operation.

A Route Risk Assessment incorporating the above was observed for the identified routes.

Movis CI does implement a process or procedure to periodically re-evaluate routes used for cyanide deliveries and also has a process for getting feedback on route condition from the transporters’ operators.

The transportation of cyanide ceased in early 2017 and had not recommenced at the time of the audit. The chief escort completes are report on each completed convoy which includes details of the issues or problems with the route. Copies of convoy documentation were reviewed for the period where cyanide was transported, and reports were available.

Section 6.3 of the Route Selection and Risk Assessment Procedure provides that the transport route risk assessments to be reviewed and updated twice per year, or when there is a significant change to a transport route. New route assessments have been completed for the new customer sites.

Movis CI does document the measures taken to address risks identified with the selected routes. The measures are detailed within the route risk assessment documents and in the Convoy Management Plan (CMP).

Movis CI does seek input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures.
Movis CI has identified the following stakeholders:

- Supplier/distributor
- Government Ministries and Departments
- Mine site customer.

The Route Selection and Risk Assessment Procedure requires the review and assessment of available transportation routes. Following the Route Risk Assessment, the route is agreed to by relevant parties (Government, mine and supplier). Authorisation for each convoy is required from SPCIAC (Military Department – Chemical).

Movis CI utilises road convoys to address safety concerns during transport.

The Convoy Management Plan (CMP) includes the following requirements of transport in convoys:

- Transportation of cyanide at night is prohibited.
- Within towns or villages, the speed limit is 30 km/h and 60 km/h on highways.
- A convoy is allowed a maximum of 5 trucks and is required to move in a chain format with each truck numbered. The trucks are to maintain a set distance which is reduced when driving through villages.
- Trucks in convoy maintain radio or cell phone communication as necessary. In case of blackout areas a satellite phone may be used by the convoy escort personnel.
- Escort personnel follow the Call Points along the route by calling the Logistics Officer in Abidjan.
- During stopover points the vehicles are locked and not left unattended.

The TMP states that all transport vehicles shall be equipped with effective communication (mobile phone) and global positioning system (GPS) tracking systems.

Movis CI has advised external responders and medical facilities of their roles during an emergency response.

The ERP identifies responsibilities for the Police, Fire Service, Ambulance, CIAPOL, and the Mine Site as external responders. Movis CI has advised these external responders and medical facilities of their roles during an emergency response. The Police, Fire Service and CIAPOL are engaged with through the permit process and involvement in the convoy. Medical facilities are engaged with through the route assessment process.

Direct engagement of communities by Movis CI did not occur as the communities are not designated a role as part of the planned response to an emergency involving cyanide negating the need for community consultation on this issue.

Movis CI does not subcontract the transport and handling of cyanide.
3.1.2 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

Movis CI is ☐ in substantial compliance with ☐ not in compliance with

Transport Practice 1.2

Summarise the basis for this Finding/Deficiencies Identified:

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

Movis CI does only use trained, qualified and licensed operators for its transport vehicles. In order to drive a heavy duty truck the operator must hold a Class “F” Licence. All drivers are checked to confirm they have this licence before being employed and by Emergency Response Team Leader prior to each trip departure. The Emergency Response Team Leader also checks drivers have the required up to date training prior to departure. A review of drivers found them to have current Class “F” Licences.

The Côte d’Ivoire Police also carry out checks of licenses along the route and drivers would be subject to fines or other penalties if not appropriately licensed.

There is no requirement in Côte d’Ivoire for drivers to be licensed for dangerous goods transport.

All personnel operating cyanide transport equipment been trained to perform their jobs in a manner that minimises the potential for cyanide releases and exposures.

The CMP details training requirements for drivers and escort personnel including that all old and new employees must have the following mandatory training prior to transporting:

- Defensive driving
- Basic fire fighting
- General cyanide awareness and familiarisation
- Mock drill training.

A review of training files showed that all drivers had completed the mandatory training.

Movis CI does not subcontract the transport and handling of cyanide.
3.1.3 Transport Practice 1.3

Ensure that transport equipment is suitable for the cyanide shipment.

- in full compliance with
- in substantial compliance with
- not in compliance with

Movis CI is

Transport Practice 1.3

Summarise the basis for this Finding/Deficiencies Identified:

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

Movis CI only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. Movis CI has invested in a new fleet of Volvo 400 prime movers that will be used for the transport of cyanide.

The TMP states that Movis CI conforms with all regulations and codes as applicable to the transportation of dangerous goods. These include:

- Côte d’Ivoire Transport Regulations
- Côte d’Ivoire Environment Regulations
- Côte d’Ivoire Heal and Safety Regulations
- France ADR Dangerous Goods (Transport) Regulations by road.

The TMP states that prime movers and trailers shall be maintained to manufacturer’s specifications. There are no specific regulations and codes for the transportation of dangerous goods in Côte d’Ivoire. However the axle load regulation is applicable to all Economic Community Of West African States (ECOWAS).

The Côte d’Ivoire Government undertakes annual technical inspections of all trucks and trailers prior to issuing annual registrations.

Movis CI manages its preventative maintenance program and data using a maintenance software Movengins which was implemented in 2018.

Movis CI has procedures to verify the adequacy of the equipment of the load it must bear. The TMP states that prime movers and trailers shall be maintained to manufacturer’s specifications.

Movis CI has implemented a Maintenance Procedure. This procedure requires a preventative maintenance schedule to be established and followed for each vehicle, requiring preventive maintenance services to be undertaken at or before the manufacture’s recommended mileage intervals. The procedure also requires pre-departure checks to be completed at the start of each shift by a driver trained in the procedure.

The Escort Leader undertakes the pre-departure checks to verify that the trucks transporting the consignment are roadworthy. All vehicles (prime movers and trailers) are inspected using the Pre-Departure Checklist. Specific truck/trailer combinations are also inspected (for transport of consignments) so that no combination is overloaded before leaving the port. Defects identified are to be rectified prior to departure and signed off by Movis CI Escort Leader.
Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide. All vehicles (prime movers and trailers) are inspected using the Pre Departure Checklist. Specific truck/trailer combinations are also inspected (for transport of consignments) so that no combination is overloaded before leaving the port.

Trucks and trailers suitable for transporting consignments are authorized by the Logistics and Transport Managers. Movis CI operates 3-axle truck with skeleton trailers to carry one 20 foot containers with a total weight of approximately 23.2 tons well within the capacity of the vehicle.

Movis CI does not subcontract the transport and handling of cyanide.

3.1.4 Transport Practice 1.4

Develop and implement a safety program for transport of cyanide.

Movis CI 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:

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

Movis CI has procedures to ensure that the cyanide is transported in a manner that maintains the integrity of the producer’s packaging.

The Pre-Departure Checklist requires checks on the following information:

- Safety data sheets (SDS)
- Correct labelling (marine pollutant and 1689)
- Container door seals
- Twist locks – damage, rotation, wear and grease.

The CMP requires the following checks are to be completed prior to departure of each convoy:

- Verify container numbers or cross reference container seals and shipping documents
- Check that containers are undamaged and seals are in place
- Check that all placards are on the containers and replace where necessary
- Ensure that Pre-Departure Checklist is completed and that a copy of inspection sheets will be handed to mine on arrival.

Security seal checks are also undertaken throughout the journey from port to mine site.

Movis CI uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards. Movis CI’s Pre-departure Checklist requires a check for 1689 and marine pollutant labelling on containers.
Movis CI implements a safety programme for cyanide transport that includes:

a) **Vehicle inspections prior to each departure/shipment?**

Movis CI has a *Maintenance Procedure* that requires vehicles to be inspected with the *Pre-departure Checklist*. It is the responsibility of the Escort Leader to ensure that the trucks transporting the consignment have had the *Pre-departure Checklist* completed and are roadworthy.

b) **A preventative maintenance program?**

Movis CI has implemented a *Maintenance Procedure*. This procedure requires regular preventive maintenance services to be undertaken at or before the manufacture’s recommended mileage intervals. Services are undertaken by a qualified mechanic in accordance with the *Preventative Maintenance Service Chart* and the *Preventative Maintenance Checklist*.

A review of maintenance records for a sample of the fleet, interviews and inspections confirmed that preventative maintenance activities are undertaken.

c) **Limitations on operator or drivers’ hours?**

Movis CI CMP includes a Fatigue Management Policy that provides measures to control fatigue. This includes maximum daily driving hours of 10 hours, with maximum of 70 hours within rolling seven days and minimum 24-hour break in a seven-day period. There are also designated stopping points and breaks as a minimum every four hours.

d) **Procedures to prevent loads from shifting?**

Cyanide is stowed into the freight containers by the producer. Solid cyanide is packed into United Nations approved composite IBCs that are stowed to minimise movement in transport. The securing systems appear to be as effective as reasonably practicable. Containers are secured using twist locks, which are designed and constructed to international transport standards. Twist locks are inspected prior to each departure and periodically during the journey.

e) **Procedures by which transportation can be modified or suspended if conditions such as severe weather or civil unrest are encountered?**

Movis CI has a procedure to suspend operations for inclement weather or problems on the route.

The TMP notes that the Emergency Response Team Leader will manage the convoy suitably in adverse conditions. This will include adjusting convoy speeds due to bad roads, weather or dust conditions.

In the event of bad weather, the Escort Leader will determine if it is safe for a convoy to start or continue with travel. If they determine that the convoy cannot continue the following steps are to be taken:

- Make use of the alternative route if one exists that is not affected by the existing bad weather conditions.
- If no alternative route exists, the convoy shall return or remain in the depot/yard and await instructions from the mine or for the weather condition to pass and then inform the mine that the convoy will now precede.
Alternatively, Emergency Response Team Leader will identify a safe parking area that exists and that was recorded in the route selection procedure. The convoy will park off and await mine instructions or for the weather to clear.

f) A drug abuse prevention program?

Movis CI has a Zero Tolerance Drugs and Alcohol Policy. The policies objectives are to

- To promote zero (0) tolerance drugs and alcohol policy in the workplace
- To prevent drugs and alcohol problems by raising awareness and providing guidance on the symptoms, effects on work and health consequences of both drugs and alcohol
- To seek to identify a problem at an early stage and thus minimize risks to the health and safety of our employees and potentially safeguard the health and safety of fellow employees and others
- To recognize drugs and alcohol problems as medical conditions, which are potentially treatable and provide the means whereby those who have a problem can seek and be offered help in confidence by the company.

These objectives are managed by undertaking pre-employment and random alcohol testing in the workplace.

g) Retention of records documenting that the above activities have been conducted?

Records are maintained that the above activities have been conducted. Maintenance records, inspection and convoy records were sampled for the convoys undertaken in 2016 – 2017 and maintenance records for the new fleet as convoys had not recommenced at the time of the audit. Movis CI has implemented a new maintenance software system to schedule and record maintenance activities.

Movis CI does not subcontract the transport and handling of cyanide.

3.1.5 Transport Practice 1.5

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

- in full compliance with
- in substantial compliance with
- not in compliance with

Movis CI is

Transport Practice 1.5

Summarise the basis for this Finding/Deficiencies Identified:

Transport Practice 1.5 requiring the operation follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Movis CI. Movis CI does not and does not intend to transport consignments of cyanide by sea or air within the scope of this audit.
3.1.6 Transport Practice 1.6
Track cyanide shipments to prevent losses during transport.

☑️ in full compliance with
Movis CI is
☐ in substantial compliance with
☐ not in compliance with

Transport Practice 1.6

Summarise the basis for this Finding/Deficiencies Identified:

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

Movis CI transport vehicles do have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders.

The CMP includes a communication procedure for convoys travelling between ports and mine sites to ensure the safe arrival of product. The procedure requires loaded trucks to inform the mine site via email or cell phone of the planned departure time. The departure time must also be entered into a communication log sheet and journey plan by the Delivery Clerk before the convoy departs. While in convoy, trucks must maintain radio or cell phone communication. A satellite phone is used in areas of no or limited cell phone communication. Escort personnel must call the Logistics Officer in Abidjan at designated Call Points along the route and all calls are logged in the communication log sheet.

Each driver has a cell phone and the Team Leader, who is not driving, is able to communicate during the journey and then communicates any information to the drivers at rest stops. Movis CI Pre-Departure Checklist includes a check for phone and radio function.

GPS tracking is checked prior to and throughout shipments through the review of reports generated by the tracking system. The combined use of cell phones and satellite phones has eliminated blackout areas along the transport routes used. Also, all vehicles in the convoy have GPS tracking. The GPS tracking system continuously transmits position and other data from the convoy throughout the trip. Data collected includes speed, position/movements and duration of pauses/stop overs.

Blackout areas are also checked for during the route selection and risk assessment process.

Movis CI has implemented systems and procedures to track the process of cyanide. The CMP requires Escort personnel to follow the Call Points along the route by calling the Logistics Officer at designated points along the route. Movis CI utilises a GPS tracking system to monitor the convoy location. The GPS tracking system continuously transmits position and other data from the convoy throughout the trip. Data collected includes vehicle identification, local time, status (i.e. end drive, parked, drive), current location, course, speed and fuel consumption.

Movis CI has appropriate inventory controls and/or chain of custody documentation to prevent loss of cyanide during shipment. Inventory controls are the primary method of preventing product loss during shipment.
Following the initial inspection of each container, a way-bill is generated by Movis CI (for each container). The way-bill (duplicate and original) accompanies the Driver during the delivery. The way-bill notes:

- Customer’s name and address
- Date
- Driver's name
- Vehicle registration
- Contents and quantity
- Container and seal numbers
- Receiving authority and date of receipt.

The way-bill is signed by the Driver and receiver upon receipt. Upon signing, the customer representative is acknowledging that the consignment was received in good condition and unopened.

The container integrity is also monitored throughout each voyage.

Shipping records do indicate the amount of cyanide in transit and Safety Data Sheets are available during transport. A review of delivery documentation for the convoys completed in 2016-2017 together with pre-departure security checks confirmed that the amount of cyanide on each vehicle is recorded.

There is a copy of the emergency response plan with the SDS booklet held within the cabin of each vehicle.

Movis CI does not subcontract the transport and handling of cyanide.
3.2 **Principle 2 – Interim Storage**

Design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

3.2.1 **Transport Practice 2.1**

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

- ☒ in full compliance with

Movis CI 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 is NOT APPLICABLE to Movis CI that requires transporters design, construct and operate cyanide trans-shipping depots and interim storage sites to prevent release and exposures.

Within the scope of this audit, there are no trans-shipping depots or interim storage sites, as defined in the audit protocol. Once formalities are complete, the cyanide containers are collected from the Port of Abidjan and taken to the Movis CI transport storage yard where they are stored on the truck overnight in preparation for convoy departure at 0500 hrs the following morning. At no stage is the cyanide removed from the trucks or containers prior to unloading at the mine.

---

**Movis CI**

Name of Facility

Signature of Lead Auditor

December 2019

Date
3.3 **Principle 3 – Emergency Response**

Protect communities and the environment through the development of emergency response strategies and capabilities.

3.3.1 **Transport Practice 3.1**

Prepare detailed Emergency Response Plans for potential cyanide releases.

- **Movis CI is**  ☑ in full compliance with  
- ☐ in substantial compliance with  
- ☐ not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

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

Movis CI has developed an emergency response plan for potential cyanide emergencies.

The Sodium Cyanide Emergency Response Plan (ERP) details:

- **Purpose**
- **Scope**
- **Objective**
- **Response to a Cyanide Emergency/Incident**
- **Incident Management Objectives**
- **Incident Management Strategy**
- **Responsibilities**
- **Basic Incident Response Plan**
- **Decontamination of a Spill of Solid or Liquid Cyanide into Soil**
- **Use of Sodium Hypochlorite for Decontamination Purposes.**

The TMP also details emergency response actions and organisational arrangements and there is a guidance document that provides information in spill response, communication with authorities and controlling the scene of the incident.

The ERP is appropriate for the selected transportation route or interim storage facility. The ERP details incident types and it includes scenarios for truck transportation. It details the following scenarios:

- **Handling Wet Sodium Cyanide**
- **Roll-over of Shipping Container with spill**
- **Rollover of Cyanide container without spill.**

For each section it provides the response actions required.
A decontamination of a persons and equipment procedure is also included in the ERP.

The ERP does consider both the physical and chemical form of cyanide. The ERP is based around the transport of solid sodium cyanide and the potential for liberation of hydrogen cyanide gas if exposed to water.

The ERP has been developed specifically for road transportation. The TMP details the transport of solid sodium cyanide via truck. The response actions detailed in the ERP are related to solid cyanide within IBCs with shipping containers transportation by truck.

The consideration of transport infrastructure has also been undertaken by Movis CI through route risk assessments and route assessments. Route assessments detail the condition of the road, traffic hazards, intersections and issues to be managed by the driver along the route.

The \textit{Route Risk Assessment Procedure} considers the design of the intended transport vehicles:

\textit{Solid sodium cyanide packaged in Intermediate Bulk Containers (IBC’s) of 1000Kg capacity and containerised (20ft containers) will be transported by road using a 4 axle DAF trucks with skeleton trailer. The sodium cyanide solid briquettes are stored within a polypropylene bag and sealed within a wooden crate as per the International Maritime Dangerous Goods Code for group 1 hazardous goods. The quantity of solid sodium cyanide in each 20ft container is 20 tons.}

The ERP has been written up based on the outcomes of the \textit{Route Risk Assessment}.

The ERP includes a description of the response actions required for anticipated emergency situations.

The ERP contains a Specific Emergency Response Guide that details incident types and it includes scenarios for truck transportation. It details the following scenarios:

- Handling wet sodium cyanide
- Rollover of cyanide container with spill
- Rollover of cyanide container without spill.

A decontamination of a persons and equipment procedure is also included in the ERP.

The ERP details internal and external responsibilities in the event of an emergency. Responsibilities specific to the three emergency scenarios detailed in the ERP are also included in the Cyanide Response Guide.

The ERP identifies the roles of outside responders and medical facilities in the event of an emergency. The role and responsibilities of the following personnel in the event of an emergency are outlined:

- Emergency Response Team (ERT) Leader
- Vehicle driver
- Emergency Response Team
- Police services
- Ambulance services
- Fire services
- CIAPOL
3.3.2 Transport Practice 3.2
Designate appropriate response personnel and commit necessary resources for emergency response.

☐ in full compliance with
☐ in substantial compliance with
☐ not in compliance with

Movis CI is _____________________ December 2019
Name of Facility Signature of Lead Auditor Date

Movis CI is in FULL COMPLIANCE with Transport Practice 3.2 requiring they designate appropriate response personnel and commit necessary resources for emergency response.

Movis CI does provide emergency response training of personnel to fulfil the duties outlined in the ERP.

Drivers are trained in the response actions to take in the event of an incident and a review of training records for drivers involved in cyanide transport confirmed that training had been provided. A review of training records showed that all drivers had completed the mandatory training.

The Emergency Response Team Leader checks drivers have the required up to date training prior to departure.

The escorts are involved in the mock drill exercises in addition to the cyanide awareness and convoy management training (which includes response to emergencies).

There are descriptions of emergency response duties and responsibilities in the ERP. These personnel/entities include:

- ERT Leader
- Vehicle driver
- Emergency Response Team
- Police services
- Ambulance services
- Fire services
- CIAPOL
- Mine Site.

Interviews with the Movis CI drivers and escort team confirmed that they knew their roles in the event of an accident.

The ERP does list the response equipment that should be available during transport. The quantity and condition of the equipment is checked as part of the Emergency Equipment Checklist, Pre-Departure Checklist and Escort Vehicle Pre-Trip Checklist.
It is the ERT Leader’s responsibility to ensure that all emergency equipment is checked and are up to manufacturer’s specification prior to convoy departure.

Appendix B of the ERP lists the Emergency Equipment Checklist.

Records are retained showing that checks of emergency equipment are being undertaken correctly prior to convoy departure. New equipment has been purchased for the recommencement of cyanide transport activities and a visual inspection was also made of the equipment to verify that it was present and in serviceable condition.

Movis CI does have the necessary emergency response and health and safety equipment, including personal protective equipment available during transport.

The quantity and condition of the equipment is checked as part of the Emergency Equipment Checklist, Personal Protective Equipment (PPE) Vehicle Pre-Trip Checklist and Pre-Trip Vehicle/Truck Checklist.

It is the ERT Leader’s responsibility to ensure that all emergency equipment is checked and are up to manufactures specification prior to convoy departure. Records are retained showing that checks of emergency equipment are being undertaken prior to convoy departure.

Movis CI does provide initial and periodic refresher training in emergency response procedures.

The TMP details training requirements for all drivers and personnel involved in the handling and transportation of cyanide including that all old and new employees must have the following mandatory training prior to transporting cyanide:

- Defensive driving
- Basic fire fighting
- General cyanide awareness and familiarisation
- Emergency response scenario (mock drill) training.

Movis CI has established the training program and a review of the Training Matrix indicated that the majority of drivers had completed the mandatory training for the recommencement of cyanide transport operations. The ERT Leader checks to confirm drivers have the required up to date training prior to departure.

Movis CI does have procedures to check emergency response equipment. The quantity and condition of the equipment is checked as part of the Emergency Equipment Checklist and Escort Vehicle Pre-trip Checklist.

It is the ERT Leader’s responsibility to ensure that all emergency equipment is checked and are up to manufacturer’s specification prior to convoy departure. Records are retained showing that checks of emergency equipment are being undertaken prior to convoy departure.

Movis CI does not subcontract the transport and handling of cyanide.
3.3.3 Transport Practice 3.3

Develop procedures for internal and external emergency notification and reporting.

☐ in full compliance with
☐ in substantial compliance with Transport Practice 3.3
☐ not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Movis CI has procedures and current contact information for notifying the shipper, the receiver/consignee, regulatory agencies, outside response providers, medical facilities and potentially affected communities of an emergency.

The Emergency Response Plan (ERP) and Transport Management Plan (TMP) contain the following appendices:

- Appendix F: Emergency Communication Procedures
- Appendix G1: Emergency Call List
- Appendix G2 Medical Support and Emergency Equipment Contacts
- Appendix G3: Emergency Contacts of Other External Responders.

Emergency contact details for authorities, emergency responders and medical facilities are included in the above appendices. This includes internal emergency contacts, suppliers, mine site receivers, medical and emergency equipment contacts, and emergency contacts for other external responders.

Flow charts are included in Appendix F: Emergency Communication Procedures for identified emergency situations.

Movis CI has systems in place to ensure that internal and external emergency notification and reporting procedures are kept current. The emergency contact information is reviewed through the route risk assessment and re-evaluation process. Movis CI has recently completed route assessments for new customer locations in 2019 as part of the recommencement of cyanide transport operations. There are contact details provided for the mine sites and hospitals in Yopougon, N’Zianouan, Yamoussoukro, Divo and Guiglo which are along the transport routes.
3.3.4  **Transport Practice 3.4**

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

- [x] in full compliance with

Movis CI is
- [ ] in substantial compliance with Transport Practice 3.4
- [ ] not in compliance with

**Summarise the basis for this Finding/Deficiencies Identified:**

Movis is in FULL COMPLIANCE with Transport Practice 3.4 requiring that they develop procedures for remediation of releases that recognise the additional hazards of cyanide treatment.

Movis CI has a procedure 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 ERP includes descriptions of the response actions for an anticipated emergency situation. The ERP includes the following sections covering clean up and decontamination:

- Basic incident response plan
  - First response
  - Establishing control of the incident
- Basic decontamination of a spill of solid or liquid cyanide into soil
- Use of sodium hypochlorite for decontamination purposes
- Procedure on decontamination of people
- Procedure on decontamination of PPE
- Specific emergency response guide
  - Handling wet sodium cyanide
  - Rollover of cyanide container without spill
  - Rollover of shipping container with spill.

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

The ERP states:

*Sodium Hypochlorite and ferrous sulphate must never be used to treat cyanide that has been released into natural surface water bodies.*
3.3.5  **Transport Practice 3.5**

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

☑ in full compliance with

Movis CI is ☐ in substantial compliance with ☐ not in compliance with Transport Practice 3.5

**Summarise the basis for this Finding/Deficiencies Identified:**

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

The ERP contains provisions for periodically reviewing and evaluating the plan’s adequacy and they are being implemented. The *Evaluation of Plan’s and Review of Procedures* section of the ERP provides:

*In case of any transportation incident and investigation report issued, the company will review and revise the Emergency Response Procedures. Also, the ERP will be reviewed when necessary based on findings from yearly mock drills conducted by Movis CI.*

There have been no transport incidents during the audit period triggering a review and Movis CI have conducted two drills as part of recommencing cyanide transport activities and this have not triggered a review of the plans.

The ERP contains provisions for periodically conducting mock emergency drills and they are being implemented. The TMP provides for annual Cyanide Emergency Response Scenario Training (Mock Drill) for the Escort/Emergency Response Team. Two drills have been conducted in 2019 covering cyanide release and recovery scenarios and worker exposure and response as part of recommencing cyanide transport activities.

There is a procedure to evaluate the ERPs performance after its implementation. The ERP provides that: *In case of any transportation incident and investigation report issued, the company will review and revise the Emergency Response Procedures.* As noted previously, there has not been a need to implement the plan during the audit period.
4.0 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.
Signature Page

Golder Associates Pty Ltd

[Signature]

Mike Woods
ICMC Lead Auditor and ICMC Transportation Expert

MCW/JEJ/ds

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APPENDIX A

Important Information
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.

Where permitted by the Contract, Golder may have retained subconsultants affiliated with Golder to provide some or all of the Services. However, it is Golder which remains solely responsible for the Services and there is no legal recourse against any of Golder’s affiliated companies or the employees, officers or directors of any of them.

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.

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