



REPORT

International Cyanide Management Code

Stellar Logistics, Recertification Audit

Summary Audit Report

Submitted to:

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

Godfred Boakye
QHSE Manager
Stellar Logistics

Email: Godfed.boakye@stellar-africa.com

Submitted by:

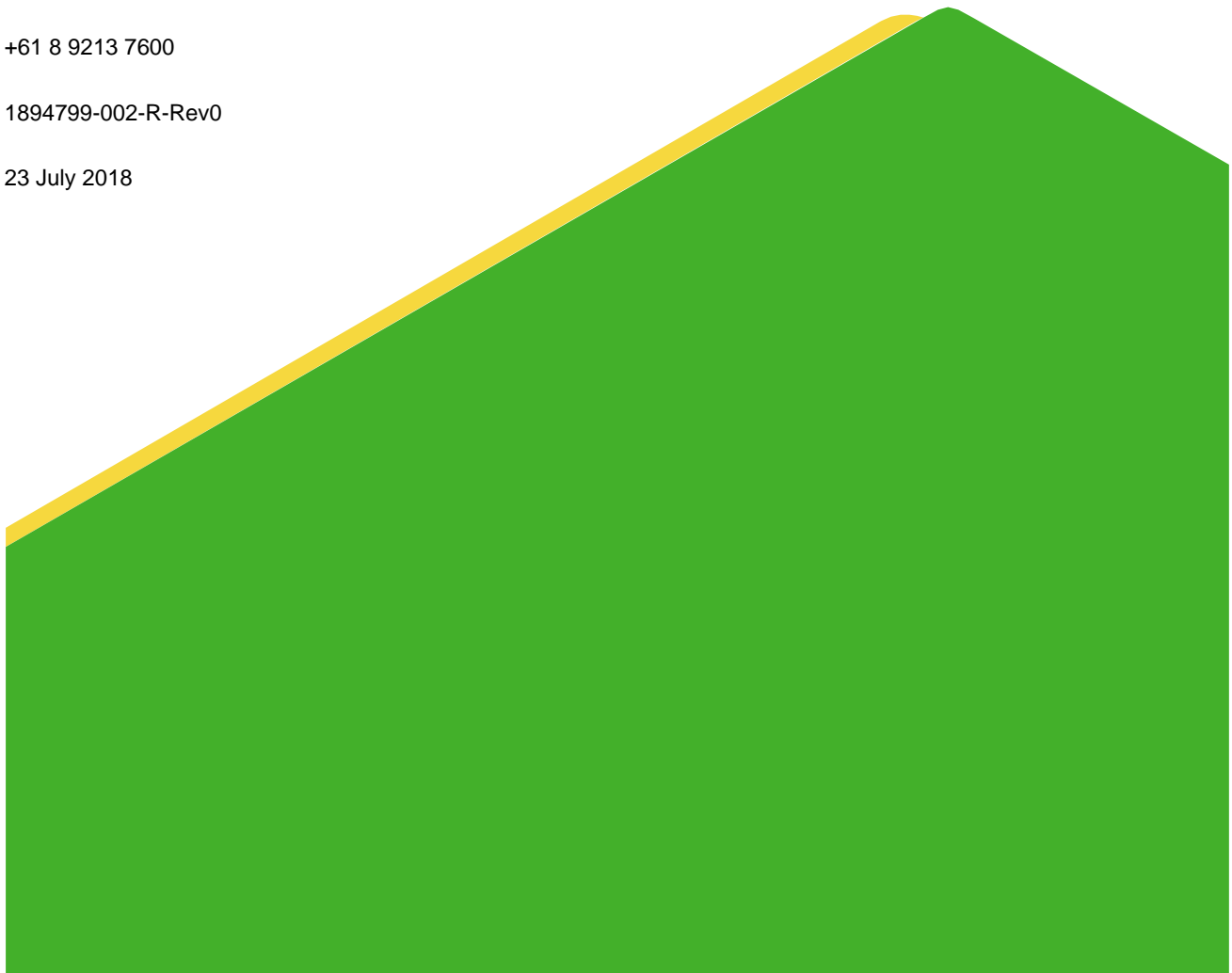
Golder

Level 3, 1 Havelock Street West Perth, Western Australia 6005 Australia

+61 8 9213 7600

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23 July 2018



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APPENDICES

APPENDIX A
Important Information

1.0 INTRODUCTION

1.1 Operational information

| | |
|---|--|
| Name of Transportation Facility: | Stellar Logistics Limited |
| Name of Facility Owner: | Not Applicable |
| Name of Facility Operator: | Stellar Logistics Limited |
| Name of Responsible Manager: | Godfred Boakye |
| Address: | Stellar Logistics Limited Stellar Group Head Office Millennium Heights Building Liberation Link |
| State/Province: | Accra Airport |
| Country: | Ghana |
| Telephone: | +233 (0) 31 2025356 |
| Email: | Godfred.boakye@stellar-africa.com |

2.0 CYANIDE TRANSPORTATION

2.1 Stellar Logistics Limited

Stellar Logistics Limited (Stellar Logistics) is a division of the Stellar Group of Companies. Stellar Logistics is a wholly owned Ghanaian entity that was established in 2007 to provide freight forwarding and logistics services. The Company's head office is located in Accra, with branches in Takoradi, Accra, Tema, Ouagadougou, Burkina Faso and Lagos, Nigeria.

The Group of companies provides logistics, hospitality, travel, power, ship broking, and property maintenance and retail services. The logistics arm transports bulk dangerous goods and containerised products to the mining industry in Ghana.

Stellar Logistics currently transports solid sodium cyanide manufactured by Orica Australia Pty Ltd (Orica), in 20' general purpose shipping containers or bulk sparge isotainers from the Port of Takoradi, Ghana to Orica's Cyanide transfer facility in located in Tarkwa, Ghana and/or to end user destinations within West Africa by road.

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.

Storage in transit may occur at Stellar Logistics Takoradi Depot in the event that receipt at the port is delayed. In this event, containers are not removed from the trailers and the vehicles are parked for a maximum of 24 hours.

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2.3 Auditors Findings and Attestation

in full compliance with

Stellar Logistics is: in substantial compliance with

The International

Cyanide Management Code

not in compliance with


No significant cyanide exposures or releases were noted to have occurred during Stellar Logistics 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:

| Name | Position | Signature | Date |
|------------|---|--|--------------|
| Mike Woods | Lead Auditor and Transport Technical Specialist |  | 23 July 2018 |

2.5 Dates of Audit

The ICMC Recertification Audit was conducted over two days between 26 and 27 March 2018 at Stellar Logistics facilities in Takoradi, Ghana with the Detailed Audit Report being finalised in 18 June 2018.

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.

Stellar Logistics

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Signature of Lead Auditor

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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
Stellar Logistics is in substantial compliance with **Transport Practice 1.1**
 not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar Logistics has implemented a process for selecting transport routes that minimises the potential for accidents and releases or the potential impacts of accidents and releases.

Stellar Logistics has implemented the *Procedure for Route Assessment* to guide the selection and review of transport routes. The *Procedure for Route Assessment* prompts the persons undertaking the route assessment to document:

- Route identification
- A description of the route road/highway sequence
- Identified hazards along the route, including:
 - Waterways located along the route
 - Areas of population density
 - Areas considered as a cause for concern
 - Details of the identified hazard or potential hazard and basic remarks
 - Suggested control/s to mitigate the identified risk
- Contact details of personnel in the event of a major disruption for the identified route
- A contact list for the identified route including:
 - Stellar Logistics emergency contacts
 - Emergency Services including Police, Fire and Ambulance
 - Medical facilities along the route

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The Route Risk Assessments incorporating the above were observed. The risk assessment is captured in the route assessment form which details the assessment for individual hazards identified along the route. Control measures are summarised in the journey management plan section and controls section of the route assessment and against each hazard identified. Stellar Logistics reviews the routes on an annual basis and the revision table included at the front of the route assessment document details the changes made during each revision.

Drivers provide feedback via the Journey Management Plan (JMP) log sheets which includes a comments section on the form for drivers to complete. Samples of completed forms were reviewed and comments were provided in the forms addressing route conditions.

Stellar Logistics has also undertaken an annual review of the risk assessment which is facilitated by the QHSE Manager. A review of route assessments and interviews with personnel confirmed the annual review is undertaken. Stellar Logistics does document the measures taken to address risks identified with the selected routes. Control measures are summarised in the journey management plan section and controls section of the route assessment and against each hazard identified.

The overall controls to be applied to cyanide transport are documented in the Transport Management Plan (TMP) and in the Convoy Management Procedure.

Stellar Logistics seeks input from stakeholders and applicable governmental agencies as necessary in the selection of routes and development of risk management measures. In 2016 the route to Newmont Ahafo mine was altered and a new route implemented. Stellar identified external agencies along the route and sent copies of the TMP and Emergency Response Plan (ERP) to these agencies. Stellar also sought comment from the mine site and from the supplier on the route assessment. Stellar Logistics also provide annual updates to identified stakeholders (fire, police) along each of the routes and this is recorded in the distribution register.

As part of the assessment Stellar Logistics consulted with local police along the route to assess security. Stellar Logistics has completed route assessments and no special safety or security concerns have been identified for the currently operated routes. Operating procedures include an escort vehicle as standard at the front of the convoy.

Stellar Logistics has advised external responders, medical facilities and communities of their roles and/or mutual aid during an emergency response. Stellar has consulted with medical providers along the route and Stellar Logistics personnel would accompany victim and provide information to the medical practitioner.

The supplier (Orica) would provide technical assistance in the event of an emergency. There are no roles for communities identified in the plan

Stellar Logistics does not subcontract the transport and handling of cyanide.

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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.

Stellar Logistics 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:

Stellar Logistics 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.

Stellar Logistics does only use trained, qualified and licensed operators for its transport vehicles. All drivers undertaking cyanide transport must have a government issued current driver's license with relevant category along with mandatory internal training.

Stellar Logistics does a driving assessment during the recruitment process and drivers are also provided training in defensive driving once they are employed. Additional information and instruction is provided on convoy procedures, equipment checks and Stellar Logistics procedures. A review of training records and driver's licenses confirmed that drivers transporting cyanide hold the necessary class of license and training is provided.

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

Stellar Logistics has developed a training program and training materials for their operators that covers driving safety, equipment checks, convoy procedures and chain of custody. Training is provided by the Health Safety & Environment (HSE) department and involves verbal assessment of driver understanding of the training materials. Interviews with drivers confirmed that training is provided.

Stellar Logistics 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.

Stellar Logistics 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:

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

Stellar Logistics only uses equipment designed and maintained to operate within the loads it will be handling when transporting cyanide. Vehicles are prime mover and trailer with greater than 30 tonne capacity and a single container is transported per vehicle, well within the load capacity of the vehicles.

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The fleet maintenance procedure outlines the inspections and servicing to be completed, the records to be retained, checklists and frequency. Records are retained in the Fleet Manager (IMS) software system. Servicing triggered at 8000 km with detailed inspection record and Daily/Pre-trip inspections are completed by the drivers and checked by HSE team.

A review of maintenance records, pre-departure checks and interviews confirmed that systems are implemented and maintained. There are procedures to verify the adequacy of the equipment for the load it must bear. Stellar has implemented a *Fleet Maintenance Plan* procedure. This procedure requires preventive maintenance (PM) inspections and services to follow the recommended intervals by the manufacture guidelines.

Procedures are in place to prevent overloading of the transport vehicle being used for handling cyanide. Vehicles are prime mover and trailer with greater than 30 tonne capacity and a single container is transported per vehicle, well within the load capacity of the vehicles. This is detailed in the Transport Management Plan.

Stellar Logistics 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.

in full compliance with

Stellar Logistics is

in substantial compliance with

Transport Practice 1.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar Logistics has procedures in place so that cyanide is transported in a manner that maintains the integrity of the producer's packaging. Packaging of the cyanide is undertaken by the producer. Stellar Logistics undertake a visual inspection of the container or isocontainer for signs of damage and the visual inspection includes checks on the seals to the container. The seals on the containers are the primary means of maintaining the integrity of the producers packaging. Seals are checked and the unique numbers records on the delivery documentation prior to departure. Checks en route and at the point of delivery are completed and signed off. Stellar Logistics uses placards or other signage to identify the shipment as cyanide, as required by local regulations and international standards. Vehicle placarding consists of the following:

- Diamond placards are placed at the front, the sides and the rear end of the trucks
- The UN number of the chemical is clearly displayed on the container and isocontainer

An inspection of vehicles confirmed that placards were in place on the vehicles and containers.

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Stellar Logistics implements a safety programme for cyanide transport that includes:

- Pre trip and pre start inspections are done and checklists completed by the driver prior to each trip. A review of convoy documentation confirmed that pre-start checks are completed. In addition to the driver, Stellar Logistics HSE personnel also conduct periodic checks on the forms and on the vehicles.
- A preventative maintenance program for prime movers and trailers. The vehicles are subject to servicing every 10,000 km. There is a detailed list for the inspection and maintenance to be performed. These include engine oil, filters, tyres and brakes. The trailers are also greased periodically to prevent rust.
- Drivers are mandated to stop and rest for a minimum of 15 – 30 mins after approximately every four hours of driving. In addition, the procedures limit driving hours to day time only from 6am to 6pm and this is monitored and enforced by the tracking system.
- Cyanide is stowed into the freight containers or isocontainers by the producer. Solid cyanide is packed into United Nations approved composite Intermediate Bulk Containers (IBCs) that are stowed within containers 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.
- There is a Transport Management Plan in place which includes procedures for severe weather or civil unrest are encountered. The procedure outlines the driver alerts the manager when such a condition is encountered. If the situation demands that the driver waits, such as in severe weather conditions, the client is informed of the possible delay and the driver parks at a safe location till the weather clears up. An alternate route may also be recommended if possible by the manager after a route assessment.
- There is a procedure in place prohibiting drug abuse whilst on duty. Per the procedure, the tolerance level for alcohol is set at 0.00 for all employees. Random alcohol tests are done using a breathalyser and samples of records were obtained for those alcohol checks.
- All employees including the drivers go through periodic medical checks for various medical conditions including the presence of drugs in the body. If drugs or any unwanted substance is detected, that employee is subject to disciplinary procedures.
- Records are maintained that the above activities have been conducted. Maintenance records, inspection and convoy records were sampled through the audit period.

Stellar Logistics does not subcontract the transport and handling of cyanide.

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3.1.5 Transport Practice 1.5

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

in full compliance with

Stellar Logistics 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 follow international standards for transportation of cyanide by sea and air is NOT APPLICABLE to Stellar Logistics.

Stellar Logistics does not and does not intend to transport consignments of cyanide by sea within the scope of this audit.

Stellar Logistics does not and does not intend to transport consignments of cyanide by 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

Stellar Logistics is

in substantial compliance with

Transport Practice 1.6

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar Logistics transport vehicles do have means to communicate with the transport company, the mining operation, the cyanide producer or distributor and/or emergency responders. The main form of communication is mobile phone provided by the company for official use only. The trucks are also fitted with duress alarms (when activated, it provides time, location and identification number).

The GPS is checked from the live tracking system to ensure signals are being received. In case no signal is being received, the tracker contacts the supplier of the GPS system to rectify any issue. Mobile phones provided to the drivers are for official use only and the drivers are responsible for ensuring that their phones are adequately charged for the journey.

Stellar Logistics ensure communication blackout areas along transport routes are identified and special procedures are implemented for within these blackout areas. This process is undertaken during the route assessment process and the QHSE Manager advised that blackout areas have not been identified on the routes to date.

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Stellar Logistics has procedures to track the progress of cyanide shipments. These include:

- GPS Tracking System
- Journey Management Plan
- Deployment Reports
- Periodic calls to drivers

The vehicles are equipped with tracking devices and a duress alarm. There is also a tracker dedicated person in charge of monitoring vehicles via the GPS system. When the duress alarm is pressed, it triggers an SMS alert to the manager and the tracker GPS monitoring personnel who can quickly track identify the location of the vehicle and/or contact the driver to investigate the issue at hand.

Stellar Logistics 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. These controls include the following:

- Consignments are identified and documented (individual IBCs are identified by number, and each freight container and each isotainer number is recorded).
- All containers are locked with seals and the seal numbers are recorded and checked by the consignee. Seals are also checked at transfer locations and on route.
- The shipments are weighed when leaving the production facility and again when arriving at the mine site.
- The identifying container numbers are transmitted to the consignee and are checked off by the representative (driver) and consignee at the point of delivery.

The controls in place would allow any loss of product to be promptly detected. The controls placed on empty containers on the return journey are the same as full ones.

Shipping records do indicating the amount of cyanide in transit and Safety Data Sheets are available during transport. A review of delivery documentation 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 Safety Data Sheet (SDS) booklet held within the cabin of each vehicle.

Stellar Logistics does not subcontract the transport and handling of cyanide.

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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

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

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

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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.

in full compliance with

Stellar Logistics is

in substantial compliance with

Transport Practice 3.1

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar Logistics does have an Emergency Response Plan (ERP) that has been developed for the road transportation of cyanide. The Plan outlines the purpose, roles and responsibilities, type of transport, notification and response actions in the event of an emergency during transport.

The ERP is appropriate for the selected transportation routes and Stellar Logistics does not operate an interim storage facility. The ERP covers all transport movements controlled by Stellar Logistics and together with the route assessment procedures provide a system that address the selected transport routes.

The ERP does consider both the physical and chemical form of cyanide. The plan has been developed around the transport of sodium cyanide in solid form within IBCs within containers or within isocontainers. The plan does consider the design of the transport vehicle. The plans are based around the road transportation of isocontainers and IBCs within freight containers.

The plan includes descriptions of response actions, as appropriate for the anticipated emergency situation. It outlines the procedure for incident management and evacuation and a flow chart is provided that summaries the actions for drivers, escorts and Stellar Logistics Management.

There are response actions for possible sodium cyanide incident types which may require the response of emergency services and trained personnel. These include:

- Loss of Containment for Solid sodium cyanide
- Fires Close to Sodium Cyanide Due To Truck Breakdown And Other Off-Site Impacts
- Contact with Chemicals
- Natural Events

Steps to be taken are detailed for each scenario.

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The ERP details clean up and containment steps:

- General clean up requirements
- General Clean Up Requirements
- Neutralization Procedures
- Fire Hazards and Response
- Environmental Monitoring

Section 2.5 details roles and responsibilities of key personnel:

- Convoy Supervisor
- Primary and Secondary Incident Coordinators at Stellar Logistics Limited (SLL) base
- Escort Driver, Truck Driver and Truck Driver's mate
- Client (ORICA)
- Mine Site
- Local Police Service
- Local Ambulance Service
- Local Fire Service
- Environmental Protection Agency

The plan does identify the role of outside emergency responders. The ERP notes that external responders will not be required to undertake any activity that falls outside the scope of their outfit. However, if it becomes extremely necessary to seek extra input, the necessary toolbox meeting will be held before commencement of such duty. Convoy leader or emergency response coordinator will be responsible for ensuring this is carried out.

Section 6 of the ERP provides the contact details for:

- Client (ORICA)
- Mine Site
- Local Police Service
- Local Ambulance Service
- Local Fire Service
- Environmental Protection Agency

3.3.2 Transport Practice 3.2

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

in full compliance with

Stellar Logistics is

in substantial compliance with

Transport Practice 3.2

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar Logistics does provide emergency response training of personnel to fulfil the duties outlined in the ERP. Drivers and escorts 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.

The ERP does identify the specific emergency response duties and responsibilities of personnel for response in the event of an incident. Emergency response duties and responsibilities for internal personnel and external entities are detailed the ERP. These personnel/entities include:

- Convoy Supervisor
- Primary and Secondary Incident Coordinators at SLL base
- Escort Driver, Truck Driver and Truck Driver's mate
- Client (Orica)
- Mine Site
- Local Police Service
- Local Ambulance Service
- Local Fire Service
- Environmental Protection Agency

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 *Pre-Departure Vehicle Checklist* and the *Convoy Emergency Response Equipment Checklist*. *Appendix B* of the ERP provides a list for personal protective equipment (PPE) per Response Personnel and *Emergency Response Equipment List per Truck/Escort Vehicle*.

Stellar maintains a list of all its emergency response equipment that should be available during the transport route. The quantity and condition of the equipment is checked as part of the *Pre-Departure Vehicle Checklist* and the *Convoy Emergency Response Equipment Checklist*.

Completed convoy documentation that contain the checklists were viewed showing checks took place before each journey. Emergency response equipment was inspected during the site visit and appeared to be in good working condition.

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Stellar Logistics does provide initial and periodic refresher training in emergency response procedures. As noted in 1.2, Stellar has developed and implemented a training scheme for its Drivers and Convoy Supervisors. All drivers, as well as being licenced to drive, are required to be trained in the following, as specified in *Minimum Training Requirements* procedure:

- Specific Site Inductions
- Emergency Product Awareness
- Response Requirements
- First Aid
- Convoy Procedures.

The Populated Training Matrix also details minimum training requirements for Drivers, Escort Drivers and Driver's Mates which includes emergency response training. Interviews with drivers and escorts confirmed they were aware of the procedures and training had been provided.

Stellar Logistics does have procedures to check emergency response equipment. The quantity and condition of the equipment is checked as part of the *Pre-Departure Vehicle Checklist* and the *Convoy Emergency Response Equipment Checklist*. Interviews and inspections of the checklists by the Auditor indicate that the equipment inspections are occurring as stipulated.

Stellar Logistics 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

Stellar Logistics is

in substantial compliance with

Transport Practice 3.3

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

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

Stellar Logistics 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 ERP contains an emergency contact flow chart and emergency contact details for:

- Internal Emergency Contacts:
 - General Manager
 - HSE Manager
 - Operations Manager
 - Logistics Manager

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- External Emergency Contacts:
 - Fire stations
 - Police
 - EPA
 - Local ambulance service
 - Water Resources Commission
 - West African Rescue Association

Contact details are provided in Appendix A of the ERP.

Stellar Logistics has provisions to ensure that internal and external emergency notification and reporting procedures are kept current.

The plan is reviewed annually as a minimum and the plan has been reviewed eight times since May 2015 as detailed in the Amendment Record of the plan.

3.3.4 Transport Practice 3.4

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

in full compliance with

Stellar Logistics is

in substantial compliance with

Transport Practice 3.4

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Stellar Logistics 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.

Stellar Logistics does have 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.

Part C of the ERP provides details on the clean-up requirements and the use and controls for Ferrous Sulphate and neutralisation procedures. Stellar Logistics in consultation with Orica would undertake the remediation activities with the recovered material to be transported to the mine customer. Stellar Logistics procedures do prohibit 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:

Stellar logistics limited prohibits the use of chemicals such as ferrous sulphate and similar chemical products to treat cyanide that has been released into surface water. These neutralizing chemicals must also not be allowed into runoffs that can end up in streams or rivers.

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3.3.5 Transport Practice 3.5

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

in full compliance with

Stellar Logistics is

in substantial compliance with

Transport Practice 3.5

not in compliance with

Summarise the basis for this Finding/Deficiencies Identified:

Stellar Logistics 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. Stellar Logistics have undertaken a number of drills during the audit period and the amendment record in the ERP indicates that the plan was updated following mock exercises in 2016 and 2017.

The ERP contains provisions for periodically conducting mock emergency drills and they are being implemented. Evidence was provided in the form of drill reports indicating that both desktop and mock drill exercises are being undertaken by Stellar Logistics and personnel interviewed detailed the process.

There is a procedure to evaluate the ERPs performance after its implementation and revise it as needed. The ERP states that:

Quality Health, Safety and Environment (QHSE) Manager and deputy (if applicable) are the nominated persons responsible for updating this plan when the following happens:

- Contact numbers change
- After an incident and the resulting investigation and evaluation deems it necessary
- Following exercises and mock drills
- Updated at least annually.

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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.

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Name of Facility



Signature of Lead Auditor

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Date

Signature Page

Golder Associates Pty Ltd



Mike Woods
ICMC Lead Auditor and ICMC Transportation Expert

MCW/EWC/hsl

A.B.N. 64 006 107 857

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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.

This Report constitutes or is part of services ("Services") provided by Golder to its client ("Client") under and subject to a contract between Golder and its Client ("Contract"). The contents of this page are not intended to and do not alter Golder's obligations (including any limits on those obligations) to its Client under the Contract.

This Report is provided for use solely by Golder's Client and persons acting on the Client's behalf, such as its professional advisers. Golder is responsible only to its Client for this Report. Golder has no responsibility to any other person who relies or makes decisions based upon this Report or who makes any other use of this Report. Golder accepts no responsibility for any loss or damage suffered by any person other than its Client as a result of any reliance upon any part of this Report, decisions made based upon this Report or any other use of it.

This Report has been prepared in the context of the circumstances and purposes referred to in, or derived from, the Contract and Golder accepts no responsibility for use of the Report, in whole or in part, in any other context or circumstance or for any other purpose.

The scope of Golder's Services and the period of time they relate to are determined by the Contract and are subject to restrictions and limitations set out in the Contract. If a service or other work is not expressly referred to in this Report, do not assume that it has been provided or performed. If a matter is not addressed in this Report, do not assume that any determination has been made by Golder in regards to it.

At any location relevant to the Services conditions may exist which were not detected by Golder, in particular due to the specific scope of the investigation Golder has been engaged to undertake. Conditions can only be verified at the exact location of any tests undertaken. Variations in conditions may occur between tested locations and there may be conditions which have not been revealed by the investigation and which have not therefore been taken into account in this Report.

Golder accepts no responsibility for and makes no representation as to the accuracy or completeness of the information provided to it by or on behalf of the Client or sourced from any third party. Golder has assumed that such information is correct unless otherwise stated and no responsibility is accepted by Golder for incomplete or inaccurate data supplied by its Client or any other person for whom Golder is not responsible. Golder has not taken account of matters that may have existed when the Report was prepared but which were only later disclosed to Golder.

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.

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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