



## Company Details

Name of site	BUKENA SI
Date of site visit	30-Aug-26
Assessment team	Warit Choovaree (Procurement Director of Thaisarco) and Ra-pee Jutaporn (Procurement Manager of Thaisarco)
Methodology	The on-the-ground assessment methodology comprised four phases. Pre-assessment preparation involved reviewing documents, engaging stakeholders, and planning logistics and safety measures. During onsite activities, the team conducted visual inspections, observed operations, interviewed management and workers, and evaluated safety and risk factors. Data collection focused on capturing photographic evidence, recording GPS coordinates, and completing the assessment checklist. Finally, post-assessment activities included debriefing with stakeholders, compiling findings into a structured report (this document), and cross-checking information against ITSCI data for accuracy.
Key findings	On Mining License PE 13081 in Manono, Crown Mining focuses on extracting cassiterite and tantalite from alluvial (riverbed), eluvial (weathered surface soil), and shallow pegmatite veins.
Next steps/recommendations	1) Share the findings with the trader/ exporter and request they follow up with suppliers to establish and improve health and safety practices, including the provision of PPE, Human rights policy, and bribery and anti-money laundering policy. 2) Report tagging irregularities to ITSCI.

Questions or checks	Findings
Company and site name	Crown Mining SARL/ BUKENA SI
Address and location	BUKENA SI is located in Manono area. Approximately 90 Km from Manono and 552Km from Lubumbashi
Name of parent company and/or significant shareholders	Kamal Srour, he is designated as the Associate Manager (Associé Gérant) and primary shareholder, holding an estimated 47.5% direct stake in the company.
Number of employees, number of contractors, temporary workers	<200 workers
Description of site access	Access by vehicle and/ or motorbike. The site is an open pit in full operation.

## Company activities

Questions or checks	Findings
Type of general activities undertaken at the site. This may include the type of mining, processing, accommodation and ancillary operations etc.	Exploitation of tin and tantalum
Service(s) provided or the commodity(ies) produced, processed, stored and shipped by the site	Mining and selling to buyers.
Planned future developments or construction on site, or change in type of activities	Expand the production area, upgrading on the dressing processes
Site owned or leased?	Leased (long-terms)
When was the site first brought into use?	Crown Mining SARL was originally founded and operated under different family ownership before a formal restructuring in 2018. In the early 2012 corporate filings of the DRC Official Gazette, Ahmed Tajideen (Tajeddine) was listed as the statutory director alongside Ali Tajideen as partners and foundational shareholders. Official records from June 2018 note that Ahmed and Ali Tajideen officially ceased their partnership and exited the company, transferring operational management and control over to Kamal Srour.
Annual production data	800- 900 kg/ week
Extraction method	Artisanal mining- rudimentary tools- no small scale mining.

## Human rights and labour practices

Questions or checks	Findings
<b>Compliance With National Laws and Human Rights Standards</b>	
What processes does the site have to ensure compliance with labour and human rights laws?	<b>There is a lack of leadership within Crown mining to implement policies that respect human rights and labour law.</b>
Which specific laws and standards are being followed?	Labour law regarding working conditions and age of workers: minimum age is over 18 years.
Who is responsible for ensuring compliance?	Oversight by Site Manager and random checks from SAEMAPE and ITSCI.
Have there been any complaints, issues, or official investigations related to compliance?	Disputes occasionally occur among miners, often after payday, when some individuals spend their earnings on alcohol, which can lead to fighting. In severe cases, the Police of Mines and Hydrocarbons (PMH) may be called in to intervene and restore order.
<b>Working Conditions</b>	
What are the standard operating hours (number of shifts, hours per shift)?	There are no formally recorded working hours. Miners typically work in 8-hour shifts; however, when they encounter high-grade ore, they often work overtime to maximise the benefit and prevent others from reaching the deposit first. In such cases, individuals have reported working extended hours, but these are self-organised and voluntary, not imposed by an employer
Has the company established maximum working hours for staff?	12 hours per day.
How many hours per week do workers typically work? (Review sample timesheets/logs)	48 hours - on site we did not have access to the log book/ timesheets
What is the highest number of recorded working hours for any employee?	72 hours including voluntary overtime.
How is salary calculated, and what is the payment structure?	Salary is paid per production. Workers are independent but sell their products to Crown Mining receive cash without paying taxes.
Are there any pay disparities between demographic groups (gender, race, etc.)?	There are no disparities. Compensation received from sales is distributed equitably among all workers.
Have there been any claims or allegations of workplace discrimination?	No reports of discrimination on site.
Does the site provide loans to staff? If yes:	No
— For what purposes?	NA
— What are the terms of repayment?	NA
Does the site retain employee documents (ID, passports, etc.)?	There is no case of retaining worker's ID or passports.
Are women employed at the site? If yes:	Women are employed at the site for mineral ore leaching, known as sakalate. They are not permitted to work in pits or extract mineral ore.
— In which roles do they work?	Their responsibilities include leaching and transporting mineral ore from the pit to the marketplace for sale.
— What safety measures are in place for them?	Employment in higher-risk workplace is prohibited.
Can workers freely leave the site and terminate employment without restrictions?	Yes, workers can freely leave the site without restrictions.
<b>Health And Safety</b>	
What systems are in place to ensure worker health and safety?	<b>There are no health and safety policies in place, and PPE use is not enforced. Workers have expressed concerns about the lack of basic PPE on site.</b>
Review incident register: frequency, severity, and types of accidents	No major incidents reported to have occurred on site.
What preventive measures have been implemented?	None identified.
<b>Living Conditions</b>	
Do any workers live on-site?	No workers live on site. The village is just around 2-4 km from the site.
If yes, conduct accommodation inspection to verify:	NA
— Adequate space per person	NA
— Access to clean water and sanitation	NA
— Safety and security provisions	NA

— Basic amenities	NA
<b>Child Labour</b>	
Are individuals under age 16 present at the site?	No, only individuals above the age of 18 are allowed to work on site.
Document any activities performed by children (direct mining participation or support services)	No activities observed.
What age verification procedures are in place for younger workers?	Identification card verification is carried out, and workers live together in close-knit communities, which helps ensure that everyone is aware of who is of legal working age. Additionally, PMH, SEAMAPE, and ITSCI perform regular on-site inspections.
Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programme put in place.
<b>Community Relations</b>	
What is the relationship with surrounding communities?	The relationship is good. They live in peace, with spirit of mutual aid.
Have there been any conflicts or disputes with local communities?	No disputes recorded in the last years.
What mechanisms are in place to respect community rights?	They have local discussion groups. They communicate through meetings or public consultations
How does the site engage with and respond to community concerns?	
Are there any environmental risks that could affect community rights?	No environmental risks identified that may affect community rights.

#### Non-state armed groups

Questions or checks	Findings
Please describe the general security situation in the area.	There is no presence of soldiers in the area. Only mines police officers are authorised to conduct security checks or patrols.
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.)	No security infrastructure has been put in place.
Have company personnel observed armed groups (state or non-state) at the mine or its surroundings?	There are no soldiers present in the area. Only the mine police officers are authorised to undertake security checks or patrol.
Does the site make payments to those groups, or has the site ever been approached by armed groups demanding payment?	No such case has been recorded on site.

#### Public or private security forces who illegally control aspects of the tin supply chain

Questions or checks	Findings
Are military forces, police or other state security present on site or near the site? If yes, what kind of payment agreement does the site have with those forces?	There is no presence of military forces, only mine police officers.
Does the site work with private security forces? If yes, what kind of payment agreement does the site have with those forces?	There is no presence of security forces at the site.
Are there other private security forces on site or near the site?	There is no presence of security forces at the site.
Does the site implement the Voluntary Principles on Security and Human Rights?	NA
Does the site carry out screening/background checks of individuals or security fore units?	NA
Is the site aware of any public or private security forces who illegally control mine sites and transportation routes or illegally	NA

## Misrepresentation of origin of minerals

Questions or checks	Findings
<b>Supply Chain Overview</b>	
Does the site purchase minerals from external third parties?	No third-party minerals were purchased at the Lula site; only products extracted by miners identified by buyers and Cooperative - were accepted.
Are there any tolling agreements in place?	NA
What is the structure of the mineral supply chain? Overview of all involved actors.	Minerals are typically tagged by SAEMAPE on site at Crown Mining and then sold from Trader. Trader transports the minerals to Lubumbashi, the tax will be paid at Malemba, where they are combined and receive the official 'négociant' tags managed by the Department of Mines. Subsequently, the minerals are transported to Lubumbashi, where the Centre d'Expertise d'Évaluation et de Certification (CEEC) oversees the application of export tags.
Who oversees the management of the mineral supply chain?	SAEMAPE, Department of Mines and Mines Polices, Centre d'Expertise d'Evaluation et de Certification (CEEC)
What level of awareness/understanding does the site demonstrate regarding responsible sourcing requirements?	Basic level of knowledge, it has increased its awareness after being sensitised by SAEMAPE, ITSCI, PMH and Department of Mines
<b>Production And Handling</b>	
Review production data for any anomalies or unexplained spikes	Production peaks during the rainy season. Increased water availability boosts production because leaching occurs next to the pit.
Observe mineral reception and handling procedures on-site	Cooperatives collaborate with SAEMAPE and the Mines Department to carry out mineral reception and handling procedures.
Are all minerals processed on-site, or is there off-site processing/storage?	All minerals are processed on-site due to its remote location.
If off-site locations are used, what measures ensure chain of custody integrity?	N/A
Are the site's minerals ever mixed with external minerals (during trading or processing)?	There is no mixing with external minerals.
What transportation methods are used for minerals?	Motorbikes and vehicles
What controls prevent external mineral infiltration during transport?	N/A
<b>Traceability And Documentation</b>	
Does the site participate in any formal minerals' traceability scheme?	Yes, site does participate with ITSCI.
What documentation systems track mineral origin and chain of custody?	Logbook- Tag mine by SAEMAPE- Processing Centre- Logbook- Tag nego- by the Department of Mines. However, the cutted tags have found on the ground. Don't keep it properly.
How are records maintained, and for what duration?	Records of logbooks are maintained by SAEMAPE and Mines Department and are classified as archive documents
<b>Third-Party Due Diligence (applicable if sourcing minerals from third parties)</b>	
What due diligence procedures (e.g., KYC) are applied to third-party sources?	The site does not purchase any third-party material.
Review records of due diligence activities. Has the site conducted on-the-ground assessments?	NA
Are all third-party sources subject to the same level of scrutiny?	NA
Have any third-party sources been identified with political, military, or criminal connections?	NA
Have site personnel observed child labour at the facilities of third-party sources? If yes, which locations and what actions were taken?	NA
Have armed groups (state or non-state) been observed at locations of third-party sources?	NA

Do third-party sources make payments to armed groups? Are there allegations of abuses by armed groups at the locations of the third-party sources?	NA
How does the site verify minerals are from legally authorised sources?	NA
Is there evidence or risk of fraudulent misrepresentation of mineral origin? If suspicious transactions are identified, request management explanation	NA

#### Bribery, money-laundering, payment of taxes, fees and royalties

Questions or checks	Findings
Does the site have policies and procedures regarding bribery and anti-money laundering in place? How does the site ensure that no bribery or anti-money laundering is happening within its operations?	No formal policies exist, but the site reports to avoid bribery in its business activities.
Does the site accept or make cash payments? If yes, what for?	Yes, only for purchasing products from miners.
What taxes, fees and other royalties does the site pay to governments? Are these payments disclosed in line with the EITI?	Miners do not pay; only Cooperatives pay royalties and taxes to the Revenue Department.
Are there any disputes around taxes, fees or other royalties paid to the government?	NA
How does the company communicate its anti-bribery / anti-corruption / anti-money laundering policy(s) to staff?	By sensitising miners and Cooperatives with support from ITSCI.
Are there any indications (e.g. verbal reports, whistleblowing) that the mine site operator / owner is making payments to illegal or criminal organisations, or is making payments for the purposes of bribery to conceal the origin of minerals or to evade tax payments?	NA

#### ITSCI

Questions or checks	Findings
What are ITSCI's findings regarding the site?	N/A
Have there been any incidents? If yes, what were they, and have they been resolved?	N/A
If any incidents were identified, what corrective actions (if any) were put in place?	N/A
When was the last baseline report completed?	The last baseline report was issued in April 2026.
What is the site's experience and involvement with ITSCI?	ITSCI collaborates with miners and other stakeholders in implementing the scheme.
How often does ITSCI personnel visit the site?	ITSCI personnel typically visit the site 4 days a month.
Has ITSCI raised any concerns or identified any issues at the site?	Yes, ITSCI raises concerns when identified to enable corrective measures.
Has ITSCI worked with the site to close the incidents or supported in developing corrective actions?	Yes, ITSCI is actively involved in developing corrective measures where applicable.
Do the circumstances on site match the findings on the baseline report?	Yes.

**Photos**

Photo 1: Facilities at site

Photo 2: Reservoir

Photo 3: Storage

Photo 4: Assessment team, trader, crown mining

