

Introduction and context: These site assessments were conducted by a Kumi associate (a dual DRC/UK national) on behalf of Thaisarco to evaluate the sites and review and evaluate ITSCI practices. This work forms part of Thaisarco's Responsible Minerals Initiative (RMI) certification process. The visits were conducted in Swahili, Lingala, and Tshiluba, with notes subsequently translated into English for the site visit reports. While every effort was made to ensure accuracy, minor translation or grammatical errors may remain. Languages used during the visits included French, English, Swahili, Lingala, and Tshiluba.

Company Details

Name of site	Bunkululu
Date of site visit	07-Nov-25
Assessment team	Freddy Shamwana, Alain Ngoy and a guide Eulalie Kabatubenga
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	Bunkululu is a remote site. Three different cooperatives primarily source from this location, which results in limited leadership and oversight. ITSCI has reported suspected cases of material from Bunkululu and other sites being transported untagged and sold to unofficial 'negociant' traders. While the assessor heard rumours of such practices in the area, the on-site visit did not confirm whether this is occurring at Bunkululu. As with other visited sites, a lack of PPE and inadequate health and safety practices was observed.
Next steps/recommendations	1) Share the findings with Thaisarco's suppliers providing material from Bunkululu and request they follow up with suppliers to establish and improve health and safety practices, including the provision of PPE.

Questions or checks	Findings
Company and site name	The miners at Bunkululu operate independently and are not organised under a single cooperative. Several cooperatives purchase minerals from Bunkululu, including COMIDEK, COMBEAK, CEMDI. The miners are primarily from Bunkululu village, located just 2-3 km from the site.
Address and location	Bunkululu is 8 km from Lula and 39 km from Mitwaba, Coordinate: 323° NO : 8° 35' 7" S 27° 27' 3" E; Altitude 1430 m
Name of parent company and/or significant shareholders	There are three main cooperatives that buy from the site: COMIDEK, COMBEAK and CEMDI. The cooperatives typically sell the material to COPROCO, the biggest local trader in Mitwaba (négociant).
Key site contacts (Principal contact responsible for the visit, heads of function: Operations, Production, Warehousing, Logistics, Procurement, External Affairs, Finance, Human Resources, Security, Safety, Environment and Community)	The workers are independent but have elected Mr Kisubi Matthieu as their spokesperson.
Number of employees, number of contractors, temporary workers	>200 workers (140 men and 60 women)
Description of site access	The Bunkululu mine site is accessible by vehicle or motorbike. The site is very remote and challenging to get to. It features several active open and underground pits.

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.	Mining exploitation of tin, including initial processing.
Service(s) provided or the commodity(ies) produced, processed, stored and shipped by the site	Supply of tin commodities
Planned future developments or construction on site, or change in type of activities	There is a plan to semi-industrialise mining activities by COMINIÈRE, the owner of the mining permit PE 12 448.
Site owned or leased?	The buying cooperatives, COMIDEK, COMBEAK, and CEMDI, have an arrangement with COMINIÈRE and pay 0,3% of the production as lease.
When was the site first brought into use?	Mine was brought into use in 2011, the site is covered by Mining Permit of COMINIÈRE PE 12 448
Annual production data	300-400 kg/ week; 1200-1600 kg/ month; 14400 kg- 19200 kg/ year
Extraction method	Artisanal mining with rudimentary tools; no semi scale mining activities

Human rights and labour practices

Questions or checks	Findings
Compliance With National Laws and Human Rights Standards	
What processes does the site have to ensure compliance with labour and human rights laws?	The three Cooperatives lack leadership to implement policies respecting human rights and labor laws at the Bunkululu site.
Which specific laws and standards are being followed?	It follows labour laws that stipulates that only individuals aged over 18 years are permitted to work and regulations concerning working conditions.
Who is responsible for ensuring compliance?	The chairman of independent miners is responsible for compliance. SAEMAPE conducts random checks.
Have there been any complaints, issues, or official investigations related to compliance?	Disputes occasionally occur among miners, often after pay day, when some individuals spend their earnings on alcohol, leading to altercations. In severe cases, the Police of Mines and Hydrocarbons (PMH) may be called in to intervene and restore order.
Working Conditions	
What are the standard operating hours (number of shifts, hours per shift)?	The typical shift lasts up to 8 hours (between 7:30 hr–17:00 hr) with a 2-hour lunch break. Usually, there is one shift per day, but miners can choose to work overtime at night.
Has the company established maximum working hours for staff?	Yes, 12 hours maximum.
How many hours per week do workers typically work? (Review sample timesheets/logs)	48 hours - on site we did not have access to log book/ timesheets
What is the highest number of recorded working hours for any employee?	72 hours including voluntary overtime for day shift with 12 hours max per day.
How is salary calculated, and what is the payment structure?	Salary is paid per production. All workers are independent and may sell their mineral products to whichever cooperative offers the best price; miners receive cash payments without tax deductions.
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 reported discrimination on site.
Does the site provide loans to staff? If yes:	Cooperatives sometimes offer loans to their regular suppliers with whom they have an established and trusted relationship.
— For what purposes?	Typically for social issues such: medical care, tuitions fees, food.

— What are the terms of repayment?	Terms are discussed amicably between the parties and loans are deducted from production in accordance to the agreement, with flexibility on payment terms.
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 underground.
— 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 workplaces, such as pits or underground mines, is prohibited.
Can workers freely leave the site and terminate employment without restrictions?	Yes, workers can freely leave the site without restrictions.
Health And Safety	
What systems are in place to ensure worker health and safety?	There are no health and safety policies on site, and PPE requirements are not enforced. Workers have expressed concerns about the lack of basic PPE.
Review incident register: frequency, severity, and types of accidents	No major incidents were reported during the site visit. There is no incident register.
What preventive measures have been implemented?	None.
Living Conditions	
Do any workers live on-site?	No. Workers reside in a camp or village located approximately 2–4 km from the mine 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	Most workers at Bunkulu live in the nearby village of Bunkululu. There are no facilities in Bunkulu itself, and the nearest small market is located in Camp Geo, approximately 7 km away.
Child Labour	
Are individuals under age 16 present at the site?	No, individuals under the age of 18 are not allowed to work on site.
Document any activities performed by children (direct mining participation or support services)	NA
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 has been put in place in the Bunkululu mine site.
Community Relations	
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. Miners do engage in small disputes when they are drunk in a village but not on the mine site.
What mechanisms are in place to respect community rights?	There is a policy that encourages collaboration through an advisory committee to prevent unnecessary conflicts with communities.
How does the site engage with and respond to community concerns?	Miners come from the surrounding communities, so ASM operations are deeply integrated into community life. Miners are self-organised and part of Bunkulu village, it's hard to distinguish a separate/non-mining community.
Are there any environmental risks that could affect community rights?	No environmental risk that may affect communities rights has been observed.

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 the mine police officers are authorised to undertake security checks or patrol.
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.)	There is no security infrastructure in place within the area. However, the road from Bunkululu to Mitwaba passes through the MMR security checkpoint. MMR security officers, however, do not visit Bunkululu.
Have company personnel observed armed groups (state or non-state) at the mine or its surroundings?	No, only the mine police who restore order in case of incidents.
Does the site make payments to those groups, or has the site ever been approached by armed groups demanding payment?	No such case 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 in the vicinity of the site.
Are there other private security forces on site or near the site?	There is no presence of security forces in the vicinity of 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 force 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
Supply Chain Overview	
Does the site purchase minerals from external third parties?	No third party purchase.
Are there any tolling agreements in place?	NA
What is the structure of the mineral supply chain? Overview of all involved actors.	The miners are independently organised and primarily sell materials to three cooperatives. Once they have extracted sufficient minerals, they contact SAEMAPE, which then tags the minerals on-site in Bunkululu village. The cooperatives purchasing these minerals typically sell them in Mitwaba to traders such as CORPOCO, the largest local trader in the area. In Mitwaba, the minerals are combined and receive the official 'négociant' tags managed by the Department of Mines. Subsequently, they 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 Mine Police, 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
Production And Handling	

Review production data for any anomalies or unexplained spikes	The primary factors influencing production fluctuations or anomalies in Bunkululu are rainfall and water availability, as well as price changes. A low sale price can significantly impact production levels.
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 in Bunkululu due to its remote location.
If off-site locations are used, what measures ensure chain of custody integrity?	NA
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?	The Mine Police provide convoy and escort services.
Traceability And Documentation	
Does the site participate in any formal minerals' traceability scheme?	Yes, Bunkululu site does participate with ITSCI
What documentation systems track mineral origin and chain of custody?	Cooperatives database-Logbook- Tag mine by SAEMAPE- Processing Center- Logbook- Tag negoce by Mines Department
How are records maintained, and for what duration?	Records log books are maintained by SAEMAPE, the Department of Mines and classified as archived documents.The CEEC issue Tag for exportation.
Third-Party Due Diligence (applicable if sourcing minerals from third parties)	
What due diligence procedures (e.g., KYC) are applied to third-party sources?	There is no third party sourcing of minerals in Bunkululu
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, all three cooperatives compensate miners in cash for the minerals they supply.
What taxes, fees and other royalties does the site pay to governments? Are these payments disclosed in line with the EITI?	Only the cooperatives and COMINIÈRE pay royalties and taxes to the Revenue Department; miners do not.
Are there any disputes around taxes, fees or other royalties paid to the government?	None reported.
How does the company communicate its anti-bribery / anti-corruption / anti-money laundering policy(s) to staff?	By spreading awareness to its miners and buyers with the support of 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?	Bunkululu has both underground and open-pit mines. The site uses an irrigation system to support mineral extraction. Production is tagged on-site by SAEMAPE. Miners in Bunkululu are independent and free to sell their products to cooperatives offering competitive prices. No major incidents related to artisanal mining were reported during the on-site assessment. ITSCI findings and incident reports align with the field assessment.
Have there been any incidents? If yes, what were they, and have they been resolved?	In July 2025, ITSCI re-opened Incident HK-2024-0102 (first recorded in 2023), which affects Bunkululu and other sites. ITSCI identified suspected cases of miners transporting untagged material and selling it to unofficial 'negociants'. Similar issues have previously been reported at Bunkululu. In response, ITSCI is conducting a sensitisation campaign to discourage the sale of untagged minerals.
If any incidents were identified, what corrective actions (if any) were put in place?	ITSCI is engaging with local authorities and has raised these concerns in the CLS (Comité Local de Suivi – Local Monitoring Committee).
When was the last baseline report completed?	The last baseline report was issued in May 2024.
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 every two weeks. Due to its remote location and difficult access, travel can be challenging, especially when ITSCI motorbikes break down.
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: Typical mineral shelter

Photo 2: Miners and assessors at Bunkululu

Photo 3: Miners and assessors at Bunkululu

Photo 4: Focus group discussion with miners at Bunkululu

