

**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	Kabinungi
Date of site visit	05-Nov-25
Assessment team	Freddy Shamwa and Alain Ngoy, guides COMITU (local cooperative) representative and 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	<p>Kabinungi is operated by the COMITU cooperative, which does not purchase third-party material. All production is sold to MMR, a private mining company that also holds the permit for Kabinungi's operations. MMR provides security and occasional transport of minerals from the site (if the threshold of 300 kg of minerals is reached).</p> <p>In 2023, ITSCI reported an incident involving child labour at the site; this was escalated to the local CLS (Comité Local de Suivi, French for Local Monitoring Committee) and government authorities. The incident has since been marked as resolved. During the recent visit, no child labour was observed. The site's remote location, around 7 km from Camp Sowe village, creates a natural barrier that reduces the likelihood of children being present. ITSCI and cooperatives have trained workers on labour laws, and leaders now maintain complete lists of workers.</p> <p>There have been reported cases of miners attempting to smuggle minerals from the MMR concession to Mitwaba, the nearest market town, approximately 32 km away, to sell at a higher price (see B99 for details). In one incident, an unarmed MMR security guard was killed while trying to stop an illegal trespasser (see B56 for details).</p> <p>There are no systems or policies in place for on-site worker health and safety; PPE is not enforced, and workers report a lack of basic PPE. ITSCI is reported to be on-site about once a week and to be involved in community education sessions, with a particular focus on labour laws.</p>
Next steps/recommendations	<ol style="list-style-type: none"> <li>1) Share findings with Thaisarco's suppliers (including MMR) providing material from Kabinungi and request they follow up with suppliers to establish and improve health and safety practices, including the provision of PPE.</li> <li>2) Follow up with MMR on measures to prevent smuggling from Kabinungi and confirm security staff training and screening against VPSHR standards.</li> </ol>

Questions or checks	Findings
Company and site name	Kabinungi is a mining site operating under an MMR mining title, with MMR as the title holder. The site belongs to MMR but is managed by COMITU (Cooperative Minière Tumaini), which leases the concession from MMR. All production is delivered to MMR. Access to the site is through an MMR-controlled security gate located outside Camp Sowe village. This means miners can travel from the village to Kabinungi without passing through any control point.

Address and location	Kabinungi is located approximately 7 km from Camp Sowe village and about 32 km from Mitwaba; Coordinate: 28° E: 8° 34'51" S 27° 30'8" E; Altitude 1310 m.
Name of parent company and/or significant shareholders	COMITU is the only cooperative operating in Kabinungi. Kabinungi operates under an MMR mining title.
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)	President of Cooperative COMITU is Mr ERIC.
Number of employees, number of contractors, temporary workers	> 450 workers (men and women).
Description of site access	Vehicle or motorbike access. Kabinungi is an active underground mine with numerous pits. Miners typically access the Kabinungi site from the nearby village of Camp Sowe, travelling either on foot or by motorbike. Minerals are usually transported back to Camp Sowe; however, when the quantity exceeds 300 kg, MMR dispatches a truck directly to Kabinungi

### 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.	Tin mining operations.
Service(s) provided or the commodity(ies) produced, processed, stored and shipped by the site	Supply of tin commodities to buyers.
Planned future developments or construction on site, or change in type of activities	MMR is envisaging a semi scale mining in future; mining permit held by MMR (privately owned)- Mining Permit- PEPM 11 179.
Site owned or leased?	Lease from MMR by COMITU; who pays 0.3% of production to MMR.
When was the site first brought into use?	Operational since 2011; under mining permit PEPM 11179.
Annual production data	Output: 800–900 kg/week; 3,200–3,600 kg/month; 38,400–43,200 kg/year.
Extraction method	Artisanal mining using rudimentary tools and semi 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?	COMITU has a written policy on labour law and human rights, overseen by its chairman. In collaboration with ITSCI, they have conducted community sessions to educate people on labour rights. A dedicated coordinator organises these meetings, ensuring regular engagement. As a result, residents of Camp Sowe appear well informed about labour rights.
Which specific laws and standards are being followed?	Labour law concerning working conditions and worker age permits employment for individuals over 18 years old.
Who is responsible for ensuring compliance?	Chiefs of the pits or mines, Cooperative- COMITU, SAEMAPE and Mine Police.

Have there been any complaints, issues, or official investigations related to compliance?	There were no observed or reported cases of child labour in Kabinungi.
<b>Working Conditions</b>	
What are the standard operating hours (number of shifts, hours per shift)?	8 hours and often 1 shift. Miners can do overtime if they wish to do so.
Has the company established maximum working hours for staff?	The miners work under COMITU supervision, with a maximum 8-hour shift from 7:30 to 11:30 and 14:00 to 17:00, including a 2-hour lunch break.
How many hours per week do workers typically work? (Review sample timesheets/logs)	40 hours
What is the highest number of recorded working hours for any employee?	48 hours - we did not have access to log book/ timesheets. No logging in/out system.
How is salary calculated, and what is the payment structure?	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.
Are there any pay disparities between demographic groups (gender, race, etc.)?	Salary is based on production: workers keep 60% of sales, COMITU keeps 40%, and miners receive their earnings in cash tax-free.
Have there been any claims or allegations of workplace discrimination?	There are no disparities. An equal pay policy is in place. Compensation received from sales is distributed equitably among all workers.
Does the site provide loans to staff? If yes:	No discrimination observed or reported on site.
— For what purposes?	Yes, the Cooperative COMITU provides loans to their miners who are supplying products to them.
— What are the terms of repayment?	Typically for social issues such: medical care, tuitions fees, food.
Does the site retain employee documents (ID, passports, etc.)?	Terms are discussed amicably between the parties and loans are deducted from production in accordance to the agreement- with more flexibility on payment terms.
Are women employed at the site? If yes:	There are no cases of retaining worker's ID or passports.
— In which roles do they work?	Women are employed at site for leaching of mineral ore. They are not allowed to work in a pit or extracting mineral ore underground.
— What safety measures are in place for them?	Leaching and transporting mineral ore to buyers (COMITU) from the pit to the market place at camp Sowe for sale.
Can workers freely leave the site and terminate employment without restrictions?	Not working in any high-risk workplace such as in a pit or underground mine.
	Workers can freely leave the site without restrictions.
<b>Health And Safety</b>	
What systems are in place to ensure worker health and safety?	There are no systems or policies in place for worker health and safety on site, PPE is not enforced, and workers report a lack of basic PPE.
Review incident register: frequency, severity, and types of accidents	MMR security personnel at the gate were conducting routine patrols and monitoring when they intercepted an individual carrying a 40 kg bag of minerals. The individual refused to have the bag tagged on-site, stating they intended to take it to Mitwaba. It appears the individual attempted to smuggle the minerals out without declaring them. When security stopped the person at the gate and requested they leave the minerals behind, the individual refused to cooperate. A physical altercation ensued, during which a security officer was killed. This incident occurred in September/October, prior to the visit.
What preventive measures have been implemented?	No preventive measures have been put in place.
<b>Living Conditions</b>	
Do any workers live on-site?	No.
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

#### Child Labour

Are individuals under age 16 present at the site?	No, under age of 18 years are allowed to work on site.
Document any activities performed by children (direct mining participation or support services)	None observed.
What age verification procedures are in place for younger workers?	ID card verification is required as the site is open to anyone over 18 who wants to work. Applicants must register with the chief of pit, and workers live in communities. PMH, SEAMAPE, and ITSCI regularly check compliance with minimum working age requirements.
Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programme has been put in place in the Kabinungi mine site.

#### Community Relations

What is the relationship with surrounding communities?	The relationship is good. They live in peace, with a 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?	There is an advisory committee in Camp Sowe composed of respected local community leaders, often referred to as “wise men” with strong reputations. This committee serves as a trusted advisory group and can intervene in social matters when needed. For example, if miners become intoxicated and cause disturbances, the committee steps in to provide guidance and resolve issues. The Camp Sowe Advisory Committee acts as a link between cooperatives and miners, fostering communication and harmony. All miners come from the surrounding communities, so ASM operations are deeply integrated into community life.
How does the site engage with and respond to community concerns?	There is a consultation and engagement procedure with communities.
Are there any environmental risks that could affect community rights?	No environmental risk that may affect the community 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 check.
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.)	No security infrastructure set up in the area.
Have company personnel observed armed groups (state or non-state) at the mine or its surroundings?	No, only the MMR security personnel and 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 in Mitwaba.
Does the site work with private security forces? If yes, what kind of payment agreement does the site have with those forces?	Yes, MMR security is on 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. Only MMR private security guards. MMR security is unarmed
Does the site implement the Voluntary Principles on Security and Human Rights?	MMR security officers are not under the control of the mine site. Unclear how MMR implements the VPSHR.
Does the site carry out screening/background checks of individuals or security fore units?	Responsibility of MMR. Unknown how they approach screening of individuals.
Is the site aware of any public or private security forces who illegally control mine sites and transportation routes or illegally	No

**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 Kabinungi site; only products extracted by miners identified by buyers and Cooperative - COMITU were accepted.
Are there any tolling agreements in place?	NA

<p>What is the structure of the mineral supply chain? Overview of all involved actors.</p>	<p>Miners sell their production to COMITU, the cooperative responsible for managing and leasing the mining site. All minerals must ultimately be sold to MMR, and tagging is done under the MMR name.</p> <p>Materials are typically tagged at Camp Sowe. If production reaches approximately 300 kg, COMITU arranges for a truck to transport the minerals, and sometimes minerals would be tagged at Kabinungi in those cases; otherwise, they are moved by foot or motorbike over a 7 km route to Camp Sowe.</p> <p>Security and Gate Control: The MMR security checkpoint is located beyond Camp Sowe, ensuring that all minerals pass through controlled tagging and verification before leaving the area.</p> <p>Source and Organisation: Minerals processed at Camp Sowe may originate from Kabinungi, Lula, Bunkululu, and Kalumne Ngongo 2, all MMR sites. Camp Sowe maintains well-organised procedures for mineral handling, including detailed registers that record the exact origin of each batch. Since payment structures are linked to producers, there is a strong incentive to maintain accurate provenance.</p> <p><b>Identified risk:</b>  In principle, and in accordance with local requirements, minerals from Kabinungi should be sold to MMR and tagged at Camp Sowe. However, there have been instances where miners attempt to smuggle material from Kabinungi or Camp Sowe to Mitwaba, the nearest market town. The primary driver for this behaviour is the price differential:  Mitwaba market price: 31,000–32,000 Congolese francs per kg (≈ \$15/kg)  Camp Sowe onsite price: 27,000 Congolese francs per kg (≈ \$13/kg)</p> <p>For example, if a miner manages to transport 10 kg to Mitwaba, they could earn an additional \$20. These incidents can therefore result in minerals from Kabinungi being mislabelled or incorrectly tagged as originating from another mine, creating traceability and compliance challenges. ITSCI and local government officials are aware of these issues (see recent incident report HK-2024-0102) . Given that the material from Kabinungi originates from authorised sites monitored by ITSCI, and the primary driver for misrepresentation is cash flow rather than concealing links to unlawful extraction, the overall impact of such misrepresentation is lower than it might initially appear.</p>
<p>Who oversees the management of the mineral supply chain?</p>	<p>SAEMAPE, Department of Mines and Mines Police</p>
<p>What level of awareness/understanding does the site demonstrate regarding responsible sourcing requirements?</p>	<p>Basic level of knowledge, it has increased its awareness after being sensitised by SAEMAPE, ITSCI, PMH and Department of Mines</p>
<p><b>Production And Handling</b></p>	
<p>Review production data for any anomalies or unexplained spikes</p>	<p>In Kabinungi, anomalies or unexplained spikes are attributed to two factors: when rainfall increases, production rises significantly due to the increased availability of water for leaching. Miners no longer need to travel far to find water. Additionally, the irrigation system functions effectively when watercourses bring water to the mine.</p>
<p>Observe mineral reception and handling procedures on-site</p>	<p>NA</p>
<p>Are all minerals processed on-site, or is there off-site processing/storage?</p>	<p>On site mines (SAEMAPE) and on the processing centre of the Department of Mines</p>
<p>If off-site locations are used, what measures ensure chain of custody integrity?</p>	<p>The Department of Mines is responsible for handling off site tag.</p>
<p>Are the site's minerals ever mixed with external minerals (during trading or processing)?</p>	<p>The site's minerals are not mixed with external minerals at Kabinungi. The current risk is very low.</p>

What transportation methods are used for minerals?	Motorbike and Vehicle.
What controls prevent external mineral infiltration during transport?	MMR' security and Mines Police does offer services of conveyer / escort
<b>Traceability And Documentation</b>	
Does the site participate in any formal minerals' traceability scheme?	Yes, the Kabinungi site does participate with ITSCI.
What documentation systems track mineral origin and chain of custody?	Logbook- Tag mine by SAEMAPE- Processing Centre- Logbook- Tag negoce by the Department of Mines
How are records maintained, and for what duration?	Records log books are maintained by SAEMAPE and Mines Department and 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?	NA
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 the purchasing of mineral from miners at the site.

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 taxes. The Cooperative - COMITU and MMR do pay royalties and taxes to the Revenue Department.
Are there any disputes around taxes, fees or other royalties paid to the government?	No.
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?	Kabinungi is the mine site located about 32 Km from Mitwaba. It is under management of COMITU.
Have there been any incidents? If yes, what were they, and have they been resolved?	ITSCI reported an incident in 2023 involving a 13-year-old working on site. The matter was reportedly addressed with CLS, and preventive measures have since been implemented. During the site visit, no evidence of child labour was observed.
If any incidents were identified, what corrective actions (if any) were put in place?	In the event of an incident, ITSCI raises the issue with relevant stakeholders such as SAEMAPE, Civil Society, Tribunal, and the chief of land. ITSCI is involved in sensitising the miners on good working practices.
When was the last baseline report completed?	The last baseline report was completed in April 2024.
What is the site's experience and involvement with ITSCI?	ITSCI is involved in the execution of the scheme with miners and other stakeholders.
How often does ITSCI personnel visit the site?	The personnel visit a site at least once a week.
Has ITSCI raised any concerns or identified any issues at the site?	Yes, ITSCI does raise concerns once identified to make corrective measures.
Has ITSCI worked with the site to close the incidents or supported in developing corrective actions?	Yes, ITSCI works with local stakeholders to resolve issues and is also involved in organising community training sessions on labour rights.
Do the circumstances on site match the findings on the baseline report?	Yes.
<p>Photo 1: Assessment team with COMITU and MMR representatives by the leaching facilities in Kabinungi.</p> <p>Photo 2: Assessment team, COMITU coordinator, and a miner at an open pit.</p> <p>Photo 3: Assessment team holds a focus group discussion with women on site.</p> <p>Photo 4: Miners dry tins during mineral dewatering.</p> <p>Photo 5: Close-up of raw cassiterite in a 300kg bag after processing, ready for shipping and tagging.</p> <p>Photo 6: Minerals being dried as an ancillary activity.</p> <p>Photo 7: Woman washing cassiterite collected directly from the canal before sorting.</p> <p>Photo 8: Kabinungi miners' camp (Camp SOWE/Village) serves as a marketplace for tin trading</p>	

