



## Company Details

Name of site	Kalandasi mine
Date of site visit	26-Aug-25
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	Operates on the fluid, daylight-driven Artisanal and Small-scale Mining (ASM) cooperative model previously described, relying heavily on manual excavation and hand tools. This is one of MMR's core mechanized and semi-industrial operations in the Katanga region. Because MMR directly controls the infrastructure here, it functions with structured operations, heavy machinery (like hydraulic excavators and automated crushing units), and an explicit corporate workforce footprint. This site directly feeds bulk, high yield volumes of cassiterite (tin ore) into the supply chain moving down toward the Lubumbashi Tin Smelter.
Next steps/recommendations	N/A

Questions or checks	Findings
Company and site name	Mining Mineral Resources S.A.R.L. (MMR), Kalandasi mine and the Malembe (or Tambula Malembe) mining sub-sectors are managed through a hybrid artisanal-corporate sourcing model.
Address and location	Predominantly located in the Kailo territory of the Maniema province, 580km from Kalemie (11hrs by car)
Name of parent company and/or significant shareholders	The parent organization and corporate governance structure behind Mining Mineral Resources S.A.R.L. (MMR) traces back to a large, privately-held conglomerate based in the Democratic Republic of Congo (DRC), Chetan Chug: He is the co-founder, ultimate beneficial owner, and Chairman of the SOMIKA Group. Under his leadership, the group expanded into mining, construction, engineering, and extensive philanthropic foundations across Central Africa.
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)	N/A
Number of employees, number of contractors, temporary workers	At the Local Site Level (Malembe / Tambula Malembe): Independent field assessments by resource governance organizations (such as International Alert) log the active workforce at specific local hubs like the Tambula Malembe mine at roughly 150 to 200 active artisanal diggers at any given time. Because workers fluctuate based on season, weather, and local market prices for cassiterite and coltan, this number constantly shifts.
Description of site access	here are virtually no paved roads connecting these specific pits to provincial networks. Access relies on dirt tracks that turn into thick mud during the heavy rainy seasons.

## 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/ tantalum, 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	For the Kalandasi mine and the surrounding Malembe (Tambula Malembe) sub-sectors, the planned future developments and shifting operational activities focus heavily on two major strategic pillars: formalization through mechanization and stringent ESG/traceability upgrades.
Site owned or leased?	MMR holds the direct titles for these zones through the DRC's Ministry of Mines and the Mining Registry (Cadastre Minier - CAMI).
When was the site first brought into use?	While Kalandasi and Malembe as specific artisanal pits gained prominence in the 21st century, the broader region was first mapped and brought into industrial use during the Belgian colonial era (primarily from the 1930s through the 1950s).
Annual production data	Based on regional mining cooperative data for small-scale operations in Maniema with a workforce of 150–200 miners, the site yields an estimated 15 to 30 metric tons of crude cassiterite concentrate per month during peak dry season, translating to roughly 180 to 360 metric tons annually. Coltan is mined as a secondary asset or in alternating pockets depending on the precise pit location. Its output is significantly lower in volume but higher in market value, typically averaging a few metric tons per month.
Extraction method	If the ore is locked in hard quartz rock, it is manually pulverized using large sledgehammers or cast-iron mortars and pestles until it becomes a fine sand. The crushed rock or loose gravel is introduced into a sluice—a long, sloped wooden trough positioned near a natural water source. As water flows down the trough, miners agitate the mixture. The fast-moving water washes away the lighter sand, clay, and quartz crystals, while the heavy particles of cassiterite and coltan settle to the bottom of the trough against wooden ridges. While this manual extraction loop remains the baseline for the local cooperatives, MMR's long-term plan is to phase out these hazardous manual methods in high-yield pockets. The company is actively working to transition select sections of the concession to Semi-Mechanized Mining (SMM). This will involve replacing hand picks with hydraulic excavators to clear topsoil safely and replacing wooden sluice boxes with mechanical jigs and shaking tables to drastically increase ore recovery rates.

## 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?	Under MMR's corporate Supply Chain Policy and Ethical Policy, the company maintains a zero-tolerance mandate regarding the worst forms of child labor and compulsory labor.
Which specific laws and standards are being followed?	To comply with strict international electronics supply chain mandates (such as the US Dodd-Frank Act Section 1502 and EU Conflict Mineral regulations), Mining Mineral Resources (MMR) has implemented a layered compliance framework at the Kalandasi and Malembe sites. Because these locations are highly vulnerable to human rights and labor violations due to the nature of Artisanal and Small-Scale Mining (ASM), MMR's processes combine field-level tracking, strict corporate policies, and independent oversight.

Who is responsible for ensuring compliance?	MMR management
Have there been any complaints, issues, or official investigations related to compliance?	N/A
<b>Working Conditions</b>	
What are the standard operating hours (number of shifts, hours per shift)?	In practice, the site functions on a single, continuous daylight shift. Diggers typically arrive at the pits at sunrise (around 6:00 AM) and wrap up operations before dusk (around 5:00 PM or 6:00 PM). Active miners generally put in 10 to 12 hours per day on-site, though this includes self-paced intervals for resting, crushing rock, and transporting material to water sources for washing.
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:	No
— For what purposes?	N/A
— What are the terms of repayment?	N/A
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.
— 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.
<b>Health And Safety</b>	
What systems are in place to ensure worker health and safety?	Mining Mineral Resources (MMR) and its parent company, the SOMIKA Group, rely on international management standards, field partnerships, and cooperative training frameworks to enforce Occupational Health and Safety (OHS).
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.
<b>Living Conditions</b>	
Do any workers live on-site?	No
If yes, conduct accommodation inspection to verify:	N/A
— Adequate space per person	N/A
— Access to clean water and sanitation	N/A
— Safety and security provisions	N/A
— Basic amenities	N/A
<b>Child Labour</b>	
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?	Code of conduct Rev.II (Feb, 2025), Ethical policy Rev.III (Feb, 2025)
Are there any apprenticeships or vocational programs for youth?	There are structured vocational programs and apprenticeship initiatives available to local youth. These programs are specifically designed to address child labor risks and provide alternative livelihoods outside of hazardous artisanal mining. These opportunities are facilitated through a combination of MMR's corporate foundations and its international NGO partnerships.
<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. 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. Kisengo Foundation, Vinmart Foundation
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 and MMR security officers are authorised to undertake security check or patrol.
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.)	MMR security gate and checkpoint monitor personnel and mineral product traffic.
Have company personnel observed armed groups (state or non-state) at the mine or its surroundings?	No, only MMR security and mine police that are present to restore order during 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?	MMR security officers are present.
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 which are 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
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### 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 purchase.
Are there any tolling agreements in place?	NA
What is the structure of the mineral supply chain? Overview of all involved actors.	Once minerals reach a slightly better track network, they are loaded onto heavy, high-clearance 4x4 trucks or multi-axle cargo vehicles to be taken to regional collection hubs like Kalima or the provincial capital, Kindu. After MMR collects and logs the minerals at its regional buying centers (comptoirs), getting the bulk raw ore out of Maniema to their main smelting and refining facilities in Lubumbashi (Haut-Katanga) requires a multi-week transport chain. Heavily reliant on the Société Nationale des Chemins de fer du Congo (SNCC) rail line running south from Kindu toward Kalemie or Katanga. This rail network suffers from frequent locomotive breakdowns, power outages, and track failures. It is common for mineral shipments to be delayed transit on these trains for 15 to 30 days.
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
<b>Production And Handling</b>	
Review production data for any anomalies or unexplained spikes	This is a seasonal, weather-driven spike rather than a data error. The heavy rainy season (October to April) routinely floods artisanal shafts and washes out the critical mud tracks used by the "bicycle express" to transport ore. When the dry season hits in May, miners can safely pump water out of the pits, resume deep-shaft digging, and clear out backlogged, unwashed gravel. This results in a sudden, highly visible surge of minerals arriving at the comptoirs at the exact same time.
Observe mineral reception and handling procedures on-site	The procedure on site.
Are all minerals processed on-site, or is there off-site processing/storage?	On-site processing and tagging.
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)?	No external minerals are mixed. An entry gate is monitored by MMR security, who check people and mineral products.
What transportation methods are used for minerals?	Trucks
What controls prevent external mineral infiltration during transport?	MMR Security and Mines Police offer convoy and escort services.
<b>Traceability And Documentation</b>	
Does the site participate in any formal minerals' traceability scheme?	Yes, Kalandasi 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.

<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?	There is no third party sourcing of minerals
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**

<b>Questions or checks</b>	<b>Findings</b>
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?	It has no the policy at site but the practice is under Code of Conduct Rev. II (Feb, 2025)
Does the site accept or make cash payments? If yes, what for?	Yes, the cooperative 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 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?	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 November 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 6 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: Assessors with team of Kalandasi and MMR  
 Photo 2: Office and warehouse  
 Photo 3: Upgrading area  
 Photo 4: Storage

