

**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	Kalumne Ngongo 2
Date of site visit	05-Nov-25
Assessment team	Freddy Shamwana, Alain Ngoie and a guide Eulalie Bakatubenga of ITSCI.
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>Kalume Ngongo 2 is a remote site. During the recent visit, no child labour was observed. The site's remote location, around 7 km from Camp Geo village, creates a natural barrier that reduces the likelihood of children being present. The main issues identified were the absence of health and safety procedures, a lack of personal protective equipment (PPE), and suspected instances of minerals being transported to Mitwaba without being tagged (see B105 for an explanation of the tagging issues).</p> <p>ITSCI is reported to be on-site about once every 2 weeks and to be involved in community education sessions, with a particular focus on labour laws.</p> <p>The site experienced a recent landslide (October 2025), but the affected pit was not in use at the time and no injuries were reported.</p>
Next steps/recommendations	<ol style="list-style-type: none"> <li>1) Share the findings with Thaisarco's suppliers (including MMR) providing material from Kalume Ngongo 2 and request they follow up with suppliers to establish and improve health and safety practices, including the provision of PPE.</li> <li>2) Report tagging irregularities to ITSCI.</li> </ol>

Questions or checks	Findings
Company and site name	Cooperative Miniere Tumaini (COMITU) and the site name is Kalume Ngongo 02, in MMR's concession.
Address and location	Kalume Ngongo 2 is approximately 7 Km from Camp Geo village, 15 km Camp Sowe and 35 km from Mitwaba, Coordinate: 349° N: 8° 34' 15" S 27° 29' 49" E; Altitude 1460 m
Name of parent company and/or significant shareholders	The Cooperative COMITU currently oversees the site and its workers. It operates under a concession of MMR.
Number of employees, number of contractors, temporary workers	>600 workers ( 400 men and 150 women)
Description of site access	Access by vehicle and/ or motorbike. The site is consists of an underground mine and an open pit in full operation. Kalume Ngongo 2 has between 10 and 20 active underground mine 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.	Exploitation of tin

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	In the future, MMR is planning to undertake both artisanal and semi scale mining.
Site owned or leased?	Lease from MMR by COMITU, who pays 0,3% of production
When was the site first brought into use?	Mine was brought into use in 2011, the site is under Mining Permit of MMR- PE 11 179
Annual production data	800- 900 kg/ week; 3200-3600 kg/ month; 38400 kg- 43.200 kg/ year
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?	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, works and members from communities appear well informed about labour rights.
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?	Chief of the pits or mine , Cooperative - COMITU and SAEMAPE
Have there been any complaints, issues, or official investigations related to compliance?	When disputes arise between miners, MMR security officers may intervene to restore order. These conflicts often occur after pay days, when some workers spend their earnings on alcohol, leading to intoxication and occasional fights, a pattern common across ASM sites, especially during periods of high production with frequent pay days. Community "wise men" typically step in first to mediate, with MMR security called upon if necessary.
<b>Working Conditions</b>	
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?	No, miners work under supervision of COMITU.
How many hours per week do workers typically work? (Review sample timesheets/logs)	72 hours including voluntary overtime for day shift with 12 hours max per day. We did not have access to log book/timesheets.
What is the highest number of recorded working hours for any employee?	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.
How is salary calculated, and what is the payment structure?	Salary is based on production: workers keep 60% of sales, COMITU keeps 40%, and miners receive their earnings in cash tax-free.
Are there any pay disparities between demographic groups (gender, race, etc.)?	There are no disparities. An equal pay policy is in place. Compensation received from sales is distributed equitably among all workers.
Have there been any claims or allegations of workplace discrimination?	No discrimination on site.
Does the site provide loans to staff? If yes:	No, the Cooperative/ buyers do not provide loans in Kalume Ngongo 2 because most miners are independents.
— 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 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?	Workers can freely leave the site without restrictions. It is an open mine site.
<b>Health And Safety</b>	
What systems are in place to ensure worker health and safety?	Kalume Ngongo 2 lacks Health and Safety policies and procedures for workers. PPE use is not enforced, and workers report that basic PPE is missing.
Review incident register: frequency, severity, and types of accidents	A landslide was reported to SEAMAPE in October 2025, and the affected pit shaft has been closed. No injuries or fatalities occurred as no workers were present at the time. Larger incidents would also be formally reported.
What preventive measures have been implemented?	No preventive measures have put in place in Kalume Ngongo 2.
<b>Living Conditions</b>	
Do any workers live on-site?	No workers live on site in Kalume Ngongo 2 as the site is within 5-8 km from Camp Geo village.
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?	The is not a verification of ID. PMH, SEAMAPE and ITSCI do the on ground check on regular basis.
Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programme has been put in place in the Kalume Ngongo 2 mine site.
<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?	There is an advisory committee 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 Advisory Committee serves as a liaison between cooperatives and miners, fostering communication and collaboration. 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 communities rights have been observed. The site is near to Mitwaba city- about 7 Km from Mitwaba.

### 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.

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?	The Mine Police are based in Mitwaba. There is also a security checkpoint at Camp Sowe on the main road. This checkpoint is for general security purposes only and is not involved in mineral control or handling.
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
<b>Supply Chain Overview</b>	
Does the site purchase minerals from external third parties?	The site did not purchase minerals from third parties. Evidence shows minerals from Kalume Ngongo 2 is sometimes tagged in Mitwaba, where mixing with minerals from other sources is likely.
Are there any tolling agreements in place?	NA
What is the structure of the mineral supply chain? Overview of all involved actors.	Tagging takes place at a dedicated COMITU-owned depot in Camp Sowe, or, when mineral stock is sufficient, directly in Camp Geo. Miners deliver their production to storage facilities/depots in Camp Sowe or Camp Geo until sufficient quantities are accumulated. At that point, COMITU calls SAEMAPE and ITSCI to tag the minerals. COMITU maintains strict traceability, knowing the exact origin of each batch and assigning different tag numbers linked to financial records. The cooperative manages a well-organised system, including a register of approximately 600 miners, ensuring transparency and accountability. Once minerals are tagged in Camp Sowe, they are transported to Mitwaba, where MMR has a processing/trading depot, where they 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 Mine Police
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	COMITU operates a mineral reception and handling point at Camp Sowe.
Are all minerals processed on-site, or is there off-site processing/storage?	Minerals undergo basic processing, such as leaching/washing, near the point of extraction to remove soil and impurities. Once cleaned, the materials are transported to Camp Geo or Camp Sowe, where ITSCI and SAEMAPE tag them. After tagging, the minerals are moved to Mitwaba, typically by MMR trucks. At Mitwaba, MMR operates a processing centre where minerals receive their official “négociant” tags, as material from different sites is consolidated.
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)?	Minerals from Kalume Ngongo 2 are typically sold by miners to the on-site cooperative and tagged at the point of origin. However, in certain cases, particularly when the cooperative COMITU experiences cash flow constraints, the minerals are transported to Mitwaba and tagged there instead. This practice introduces a risk of misrepresentation and mixing with external minerals, as the recorded origin may reflect Mitwaba rather than Kalume Ngongo.  In principle, and in accordance with local requirements, minerals from Kalume Ngongo 2 should be sold to MMR and tagged at Camp Geo or Camp Sowe. However, there have been instances in which miners have attempted to smuggle material 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)  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 Kalume Ngongo 2 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. From an ITSCI perspective, such incidents would not necessarily be flagged as an issue for Kalume Ngongo 2, since minerals tagged as Kalume Ngongo 2 are likely to originate there. The concern arises when untagged Kalume Ngongo 2 material is introduced at other sites and falsely declared as originating from those locations. In other words, the risk of misrepresentation lies with illegal actors willing to buy untagged minerals, not with Kalume Ngongo 2, where operations are reported to run smoothly. Given that the material 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.
What transportation methods are used for minerals?	Foot, motorbikes and vehicles.
What controls prevent external mineral infiltration during transport?	<b>No controls.</b>
<b>Traceability And Documentation</b>	
Does the site participate in any formal minerals' traceability scheme?	Yes, Kalume Ngongo 2 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 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, COMITU compensates 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?	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?	NA
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?	Kalume Ngongo 2 is remote site within MMR concession. The site has both underground pits and open pits. The site has a low risk to child labour because the site is remote from Camp Sowe, the nearest village. The miners are under supervision of COMITU and MMR and the sale price is discussed and agreed between miners, COMITU and MMR.

Have there been any incidents? If yes, what were they, and have they been resolved?	No ITSCI incident reported during the audit period.
If any incidents were identified, what corrective actions (if any) were put in place?	No ITSCI incident reported during the audit period.
When was the last baseline report completed?	The last baseline report was produced in September 2024.
What is the site's experience and involvement with ITSCI?	ITSCI is involved in the execution of the scheme with miners and others stakeholders
How often does ITSCI personnel visit the site?	ITSCI personnel visit a site at least every two weeks.
Has ITSCI raised any concerns or identified any issues at the site?	ITSCI is involved in ongoing discussions with CLS and relevant stakeholders, where incidents such as mineral smuggling due to cash flow restraints at cooperative levels are discussed.
Has ITSCI worked with the site to close the incidents or supported in developing corrective actions?	Yes, ITSCI is very much involved in developing correctives measures where applicable.
Do the circumstances on site match the findings on the baseline report?	Yes.

**Photos**

Photo 1: This photo shows the landslide of a pit in Kalume Ngongo 2. The landslide occurred in October 2025.

Photo 2: This photo shows visit to a pit where the landslide occurred

Photo 3: This photo shows the Assessor observing the significance of the landslide

Photo 4: This photo shows visit of land slide pit by assessors, COMITU representative and ITSCI officer.

