

**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	Kaziba
Date of site visit	10-Nov-25
Assessment team	Freddy Shamwana, Alain Ngoy; a guide Kalenga CEMDI representative
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	The Kaziba site sources minerals from two concessions: Kaziba (granted to SOMIMI, fully managed by COMINIÈRE) and Ntompwe (TSM concession). Kaziba lacks official mining title identification numbers; however, SAEMAPE continues tagging because artisanal mining occurs there, placing its legal status in a grey zone where ASM is tolerated. Reports indicate that minerals from Kaziba are sometimes transported to Malemba Nkulu or Manono rather than to Mitwaba. Tagging processes on these alternative routes could not be verified during the site visit as these locations were not inspected. Additionally, CML shows a lack of leadership, with no formal approach to human rights or occupational health and safety (OHS). Miners primarily organise themselves independently.
Next steps/recommendations	1) Share the findings with Thaisarco's suppliers, providing material from Kaziba, and request they follow up with suppliers to establish and improve health and safety practices, including the provision of PPE. 2) Share findings with ITSCI and check how ITSCI handled the fact that the site doesn't have an official mining registration number and operates in a legal grey zone.

Questions or checks	Findings
Company and site name	Cooperatives: CML; site name: Kaziba (SOMIMI/COMINIÈRE concession) and Ntompwe (TSM concession). Kaziba has a lower mineral grade, and production from Ntompwe exceeds Kaziba's. Miners from both sites sell their output to the Kaziba-based CML cooperative. Material produced in Ntompwe is sold and recorded under Kaziba.
Address and location	Mitwaba_ KAZIBA- Ntompwe_Village 25 km from Mwema Village and 115 km from Mitwaba, Coordinate: 33 <sup>o</sup> NO : 8 <sup>o</sup> 12' 12" S 27 <sup>o</sup> 30' 30" E; Altitude 1320 m
Name of parent company and/or significant shareholders	Kaziba is operated by CML under a concession granted to SOMIMI. SOMIMI is fully managed by COMINIÈRE, meaning COMINIÈRE effectively holds the mining title. Previously, SOMIMI was a joint venture between COMINIÈRE and Chemaf, but it is now entirely controlled by COMINIÈRE. The main buyer is COPROCO. Ntompwe is a mining pit located within TSM's concession.
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 the independent miners and the representative of CML ( Mr Kilufia and Lweshia)
Number of employees, number of contractors, temporary workers	>350 workers (200 men and 100 women)

Description of site access	The site is accessible by vehicle and/or motorbike. It comprises open-pit and underground mines in full operation. Kaziba and Ntompwe mine sites are operated by independent miners who sell their mineral products to CML and occasionally to other buyers. These two sites are located at the far end of Mitwaba in Haut Katanga Province, near Malemba Nkulu in Haut Lomami Province. Minerals from Ntompwe, a site under TSM ownership, are tagged together with mineral products from Kaziba.
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### 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 and processing activities.
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 are no plans to semi-industrialise mining activities.
Site owned or leased?	Kaziba does not have official mining title identification numbers. Nevertheless, SAEMAPE (the state authority) continues to tag these sites because artisanal mining is occurring there.
When was the site first brought into use?	Mine has been in use since 2006.
Annual production data	Production: 75–120 kg/week; 300–450 kg/month; 3,600–4,400 kg/year.
Extraction method	Artisanal mining using rudimentary tools, no semi-industrial scale activities.

### 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 CML Cooperative to implement policies that respect human rights and labour law in Kaziba.</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 Chairman of independent miners 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)?	8 hours per shift; miners may work overtime voluntarily, including night shifts.
Has the company established maximum working hours for staff?	Yes, 8 hours maximum (07:30–11:30 hrs) with a 2-hour lunch break (14:00–18:00 hrs).
How many hours per week do workers typically work? (Review sample timesheets/logs)	8 hours.
What is the highest number of recorded working hours for any employee?	48 hours per week – on site we did not have access to logbooks/timesheets.
How is salary calculated, and what is the payment structure?	60 hours including voluntary overtime for day shift, with 10 hours maximum per day.
Are there any pay disparities between demographic groups (gender, race, etc.)?	Salary calculated per production; most workers are independent and sell minerals to buyers (CML cooperative), receiving cash without paying taxes. Taxes are paid by cooperative.

Have there been any claims or allegations of workplace discrimination?	No disparities; workers share proceeds equitably after sale.
Does the site provide loans to staff? If yes:	No discrimination on site; everyone is welcome to work.
— For what purposes?	Yes, the cooperative/buyers provide loans but only to miners who regularly supply minerals to them and with whom they have a trusted relationship.
— What are the terms of repayment?	Medical care, food, and assistance provided if needed for individual miners.
Does the site retain employee documents (ID, passports, etc.)?	Loans typically for social needs such as medical care, tuition fees, and food.
Are women employed at the site? If yes:	Terms agreed amicably; repayments deducted from production with flexible payment terms.
— In which roles do they work?	No retention of workers' IDs or passports.
— What safety measures are in place for them?	Women handle washing/leaching of tailings and transport mineral ore to buyers from site to marketplace for sale. No work in high-risk areas such as pits or underground mines; women are prohibited from approaching open pits or underground sites.
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?	There is no system or policies addressing Health and Safety of workers on site by CML. PPE use is not enforced, and workers have raised concerns about lack of basic PPE.
Review incident register: frequency, severity, and types of accidents	There is no incident register, but management stated they would report incidents to SAEMAPE.
What preventive measures have been implemented?	No preventive measures have been implemented to address identified potential risks.
<b>Living Conditions</b>	
Do any workers live on-site?	No. Workers live near the site in a camp/village about 1–3 km from the mine site. The nearest market is in Mwema village, approximately 25 km away.
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, individuals under 18 years of age are allowed to work on site.
Document any activities performed by children (direct mining participation or support services)	Not observed.
What age verification procedures are in place for younger workers?	There is no formal ID verification system; however, workers live in the same communities and know each other's ages. PMH, SAEMAPE, and ITSCI conduct regular on-site checks.
Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programme is in place at Kaziba mine site.
<b>Community Relations</b>	
What is the relationship with surrounding communities?	The relationship is good. Miners come from the local community.
Have there been any conflicts or disputes with local communities?	No disputes recorded in recent 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?	No presence of soldiers; only mines police officers are present.
Does the site work with private security forces? If yes, what kind of payment agreement does the site have with those forces?	No presence of private security forces.
Are there other private security forces on site or near the site?	No presence of any other security force.
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?	No third-party minerals purchased by the site; only products extracted by miners at Kaziba and Ntompwe are sold to buyers (CML Cooperative).
Are there any tolling agreements in place?	No
What is the structure of the mineral supply chain? Overview of all involved actors.	Minerals are initially tagged at the Kaziba site. The official transportation route then proceeds via Mitwaba, where the mineral receives its tag négocié before being transported to Lubumbashi. However, there are reports that minerals from Kaziba are sometimes shipped to Malemba Nkulu or Manono territories due to their proximity and because better prices are offered, bypassing Mitwaba. It remains unclear how the tagging process is managed along these alternative routes.
Who oversees the management of the mineral supply chain?	SAEMAPE, Department of Mines, Mines Police, Centre d'Expertise d'Evaluation et de Certification (CEEC).
What level of awareness/understanding does the site demonstrate regarding responsible sourcing requirements?	Basic awareness and sensitisation provided by SAEMAPE, ITSCI, PMH and Department of Mines.

<b>Production And Handling</b>	
Review production data for any anomalies or unexplained spikes	During the dry season, production decreases due to water scarcity; in the rainy season, production increases in Kaziba.
Observe mineral reception and handling procedures on-site	Buying minerals by CML Cooperative and tagging by SAEMAPE.
Are all minerals processed on-site, or is there off-site processing/storage?	From mine site to marketplace by SAEMAPE; from processing centre by Department of Mines.
If off-site locations are used, what measures ensure chain of custody integrity?	Department of Mines is responsible for off-site tagging and ensuring chain of custody.
Are the site's minerals ever mixed with external minerals (during trading or processing)?	No mixing with external minerals. Isolated cases reported where independent miners sell to other buyers in Malemba Nkulu or Manono, often choosing buyers offering better prices.
What transportation methods are used for minerals?	Motorbike.
What controls prevent external mineral infiltration during transport?	Mines Police and SAEMAPE provide convoy/escort services.
<b>Traceability And Documentation</b>	
Does the site participate in any formal minerals' traceability scheme?	Yes, Kaziba site operates under ITSCI (minerals from Ntompwe are tagged within Kaziba batches).
What documentation systems track mineral origin and chain of custody?	Cooperative database → logbook → tag mine by SAEMAPE → processing centre → logbook → tag negoce by Department of Mines.
How are records maintained, and for what duration?	Records and logbooks maintained by SAEMAPE and Department of Mines; archived documents; CEEC issues tags for export.
<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?	No third-party sourcing of minerals in Kaziba.
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, Société Minière de Mitwaba (SOMIMI) and COMINIÈRE 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?	Kaziba site is very remote, approximately 117 km from Mitwaba. It is a seasonal mine site with higher miner presence during the dry season, resulting in significantly increased production. Kaziba is exposed to product misrepresentation due to its proximity to Malemba Nkulu and Manono; miners can easily smuggle minerals to Haut Lomami. Miners are independent and free to sell their products to buyers offering the best market price.
Have there been any incidents? If yes, what were they, and have they been resolved?	Yes, ITSCI reported an incident where nine tags (10840190 to 10840199) were duplicated (incident HK-2024-0036). The incident was investigated and resolved with SAEMAPE. The duplicated tags and logbook were cancelled.
If any incidents were identified, what corrective actions (if any) were put in place?	Follow up with SAEMAPE and cancellation of affected tags.
When was the last baseline report completed?	The last baseline report was produced in October 2023.
What is the site's experience and involvement with ITSCI?	ITSCI is involved in implementing the scheme with miners and other stakeholders.
How often does ITSCI personnel visit the site?	Personnel visit the site once a week.
Has ITSCI raised any concerns or identified any issues at the site?	Yes, ITSCI raises concerns when identified and initiates 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.

Photo 1: The photo shows assessors in focus group discussion with miners in Kaziba village.

Photo 2: The photo shows miners engaging with assessors on their working conditions.

Photo 3: The photo shows communities in discussion with assessors.

Photo 4: The photo shows women in focus discussion group with assessors.

