

**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	Kidi Bulongo
Date of site visit	12-Nov-25
Assessment team	Freddy Shamwana; Alain Ngoyi and a guide Mr Kalenga of CEMDI
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 site is managed and operated by the CEMDI cooperative, which sells material to COPROCO. There are plans to formalise operations through a joint venture between CEMDI and Bandera Mining, expanding under Bandera's permit (PR 15 355). While CEMDI has some health and safety policies, enforcement is weak; PPE use is not mandatory, and workers have raised concerns about inadequate basic protective equipment.
Next steps/recommendations	Share the findings with Thaisarco's suppliers, providing material from Kidi Bulongo, and request they follow up with suppliers to establish and improve health and safety practices, particularly the provision of PPE.

Questions or checks	Findings
Company and site name	Cooperative: CEMDI, Site Kidi Bulongo, Research Permit PR N0: 15 355
Address and location	Mitwaba_Kidi Bulongo- 7km from Mubidi Village and 54 km from Mitwaba, Coordinate: 237° SW : 8° 33' 0" N 27° 35' 23" E; Altitude 1408 m
Name of parent company and/or significant shareholders	The site is managed by the CEMDi cooperative. CEMDI sells material to COPROCO.
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 CEMDI, Mr Tareq
Number of employees, number of contractors, temporary workers	>700 workers (500 men and 200 women)
Description of site access	The Kadi Bulongo mine site, managed by CEMDI, is accessible by vehicle or motorbike and consists of several active open pits and shallow underground mines.

## 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 to CEMEDI and the buyer COPROCO
Planned future developments or construction on site, or change in type of activities	A plan has been proposed to semi-industrialise mining operations through a joint venture between CEMDI and Bandera Mining. The plan would be to expand on Bandera Mining permit - PR 15 355.
Site owned or leased?	Full ownership of CEMDI.
When was the site first brought into use?	Mine was brought into use in 2011 and the site has been under management of CEMDI since 2021.
Annual production data	300-400 kg/ week; 1200-1600 kg/ month; 14400 kg- 19200 kg/ year
Extraction method	Artisanal mining using rudimentary tools and semi scale mining activities (removal of top soil with heavy equipment)

### 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?	CEMDI Cooperative has policies in place that promote the respect human rights and labour laws.
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?	CEMDI is responsible for ensuring compliance. SAEMAPE conducts random checks.
Have there been any complaints, issues, or official investigations related to compliance?	Disputes occasionally occur among miners and CEMDI security personnel, 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.
<b>Working Conditions</b>	
What are the standard operating hours (number of shifts, hours per shift)?	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
Has the company established maximum working hours for staff?	12 hours per day.
How many hours per week do workers typically work? (Review sample timesheets/logs)	48 hours - on site we did not have access to the log book/ timesheets
What is the highest number of recorded working hours for any employee?	72 hours including voluntary overtime.
How is salary calculated, and what is the payment structure?	Salary is based on production. Workers are affiliated with CEMDI, allowing them to sell minerals directly to cooperative buyers offering the best price, and receive cash without paying taxes.
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 reports of discrimination on site.
Does the site provide loans to staff? If yes:	Yes, the cooperative does provide loans but only to the miners who supply minerals to them on a regular basis with an established and trusted relationship.
— For what purposes?	Typically of 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.
— 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?	The cooperative has policies for worker health and safety, but PPE use is not enforced for miners. Workers are concerned about inadequate basic PPE on site.
Review incident register: frequency, severity, and types of accidents	No major incidents have occurred on site.
What preventive measures have been implemented?	The cooperative uses machinery to remove topsoil for mineral ore extraction at Kadi Bulungo.
<b>Living Conditions</b>	
Do any workers live on-site?	No, the workers live near to site in a camp/village of Kadi Bulungo, which is about 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	NA
<b>Child Labour</b>	
Are individuals under age 16 present at the site?	No, individuals under 18 years of age 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, CEMDI security, PMH, SEAMAPE, and ITSCI perform regular on-site inspections. SAEMAPE and the Department of Mines are also based in Kadi Bulungo to undertake their respective duties.
Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programme put in place in Kadi Bulungo 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 the last years. Miners do engage in minor disputes when they are drunk in the village, but not on the mine site.
What mechanisms are in place to respect community rights?	CEMDI security personnel are present both on site and in camp to help prevent conflicts with local communities.
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?	There are no environmental risks affecting community rights.

### Non-state armed groups

Questions or checks	Findings
Please describe the general security situation in the area.	There are no soldiers stationed in the area. Security checks and patrols may only be conducted by authorised CEMEDI security personnel.
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.)	CEMEDI employs a security guard to maintain site safety.
Have company personnel observed armed groups (state or non-state) at the mine or its surroundings?	Only CEMEDI security personnel and the mine police may intervene 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 was 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 are no soldiers present at the site; only CEMEDI security personnel and mine police are on duty.
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. Only CEMEDI security personal.
Are there other private security forces on site or near the site?	No presence of security force.
Does the site implement the Voluntary Principles on Security and Human Rights?	Unknown.
Does the site carry out screening/background checks of individuals or security fore units?	Unknown.
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 minerals are purchased from third parties by the site. Only products extracted by the miners specifically identified by the buyer, the Cooperative CEMDI, are acquired.
Are there any tolling agreements in place?	NA
What is the structure of the mineral supply chain? Overview of all involved actors.	Minerals at Kidi Bulongo are processed and tagged onsite. CEMDI operates a processing depot in Mitwaba where the Division de Mines applies the tag négoce. From there, minerals are transported straight to buyers. CEMDI owns and manages the site with strong oversight, making the risk of mineral mixing highly unlikely.
Who oversees the management of the mineral supply chain?	SAEMAPE, Department of Mines and Mines Polices, 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>	Cooperatives, SAEMAPE and Divisions de Mines
Review production data for any anomalies or unexplained spikes	Production in Kidi Bulongo rises sharply during the dry season due to an increase in miners on site.
Observe mineral reception and handling procedures on-site	See B101.
Are all minerals processed on-site, or is there off-site processing/storage?	On-site.
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)?	No.
What transportation methods are used for minerals?	Motorbike and vehicles
What controls prevent external mineral infiltration during transport?	CEMDI Security and the Mines Police offer professional convoy and escort services.
<b>Traceability And Documentation</b>	
Does the site participate in any formal minerals' traceability scheme?	Yes, the Kadi Bulungo site does participate with ITSCI
What documentation systems track mineral origin and chain of custody?	Cooperative database-Logbook- Tag mine managed by SAEMAPE- Processing Centre- Logbook- Tag negoce managed 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?	No third-party sourcing of minerals in Kidi Bulungo
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
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### 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, the cooperative 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?	Only the cooperative pays royalties and taxes to the Revenue Department; miners do not.
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?	Through sensitisation of miners and buyers with ITSCI support.
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?	Kidi Bulongo is a remote site located 85 km from Mitwaba city and 7 km from Mubidi village, featuring both underground and open pits. There is no child labour on site, but children must walk 7 km to attend school in Mubidi. The miners are managed by CEMDI.
Have there been any incidents? If yes, what were they, and have they been resolved?	In 2022, ITSCI reported that state authorities requested, via telephone, the suspension of all mining activities in the Kidi Bulongo sub-sector. However, the request was not formalised in writing, creating uncertainty (see incident HK-2023-0082). The incident was closed in 2024, and operations were authorised to continue. According to ITSCI incident alerts from September 2025—the latest available data at the time of writing—no incidents have been reported for Kidi Bulongo.
If any incidents were identified, what corrective actions (if any) were put in place?	Follow up with involved stakeholders and CLS to understand happenings.
When was the last baseline report completed?	The last baseline report was produced in December 2023.
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?	ITSCI personnel visit the site at least every three week.
Has ITSCI raised any concerns or identified any issues at the site?	ITSCI addresses incidents by discussing them at CLS meetings and implementing corrective actions.

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 when applicable.
Do the circumstances on site match the findings on the baseline report?	Yes.

**Photos**

Photo 1: The photo shows the core policies of CEMDI on the notice board at the entrance of the site.  
 Photo 2: The photos shows the location of site near Mubidi village in Mitwaba  
 Photo 3: The photo shows assessors and guides on CEMDI base camp.  
 Photo 4: The photo shows assessors team standing on the road that cross a rocky water course to access Kadi Bulonga.  
 Photo 5: The photos shows Kadi Bulongo camp.  
 Photo 6: The photo shows a shop that provides basic needs of miners.  
 Photo 7 & 8 : The photo shows the shelters / homestead of miners.

