

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	Kifinga
Date of site visit	14-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	Kifinga is a remote site operated by CML. Reports indicate that CML experiences periodic cash flow issues, preventing timely payment for minerals. In such cases, miners may sell untagged minerals to other buyers—not primarily to conceal origin, but due to financial constraints. ITSCI has previously reported smuggling of untagged material and recently reopened an incident concerning sales to unauthorised négociants. Furthermore, CML is reportedly lacking strong leadership, and no health and safety procedures are in place at the site.
Next steps/recommendations	<p>1) Share findings with Thaisarco's suppliers, providing material from Kifinga, and request they follow up with suppliers to establish and improve health and safety practices, including the provision of PPE.</p> <p>2) Monitor ITSCI incident HK-2024-0102 regarding tagging irregularities.</p>

Questions or checks	Findings
Company and site name	Kifinga is operated by the CML cooperative. CML sells to SOMIMI.
Address and location	Mitwaba_ Kifinga - 60 km from Mubidi Village and 95 km from Mitwaba, Coordinate: 27° NO : 8° 33' 0" N 27° 38' 24" E; Altitude 1430 m
Name of parent company and/or significant shareholders	Cooperative - CML, the buyer is Societe Miniere de Mitwaba (SOMIMI).
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)	Mr Mwamba Wa-Ile is the CML management representative and President of independent miners.
Number of employees, number of contractors, temporary workers	>400 workers (300 men and 100 women)
Description of site access	The Kifinga mine site, managed by the CML Cooperative, features multiple open and underground pits in active operation. Vehicles and motorbikes can access the site.

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 the buyers: usually SOMIMI but sometimes also to COPROCO.

Planned future developments or construction on site, or change in type of activities	The Mining Company SOMIMI, with the mining permit COMINIÈRE-PE 12 448, has proposed a plan to partially industrialise mining operations.
Site owned or leased?	Lease from SOMIMI.
When was the site first brought into use?	Mine was brought into use in 2011. The site is under Mining Permit of SOMIMI/ COMINIÈRE-PE 12 448
Annual production data	400-600 kg/ week; 1600-2400 kg/ month; 19200 kg- 28 800 kg/ year.
Extraction method	Artisanal mining using rudimentary tools, no semi-industrial scale activities.

Human rights and labour practices

Questions or checks	Findings
Compliance With National Laws and Human Rights Standards	
What processes does the site have to ensure compliance with labour and human rights laws?	There is a lack of leadership within CML Cooperative to implement policies that respect human rights and labour law.
Which specific laws and standards are being followed?	Labour laws with regard to working conditions and the age of workers, only allowing work to individuals over 18 years old.
Who is responsible for ensuring compliance?	The chairman of independent miners is responsible for compliance. SAEMAPE conducts random checks.
Have there been any complaints, issues, or official investigations related to compliance?	Disputes occasionally occur among miners, 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.
Working Conditions	
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 paid per production. Workers are independent but sell their products to CML Miners 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:	No
— 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.
— 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.
Health And Safety	

What systems are in place to ensure worker health and safety?	There are no health and safety policies in place, and PPE use is not enforced. Workers have expressed concerns about the lack of basic PPE on site.
Review incident register: frequency, severity, and types of accidents	No major incidents reported to have occurred on site.
What preventive measures have been implemented?	None identified.
Living Conditions	
Do any workers live on-site?	No, the workers live near to site in the village of Kifinga, 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
Child Labour	
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, PMH, SEAMAPE, and ITSCI perform regular on-site inspections.
Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programme put in place in Kifinga mine site.
Community Relations	
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 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.
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 is no presence of soldiers in the area. Only the mine police officers are authorised to undertake security checks or patrol.
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.)	No security infrastructure has been established in the area.
Have company personnel observed armed groups (state or non-state) at the mine or its surroundings?	No, only the mine police who restore order in case of incidents. However, there isn't a police station in Kifinga. The nearest police station is in Mubidi about 25 Km away.
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 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
Supply Chain Overview	
Does the site purchase minerals from external third parties?	No.
Are there any tolling agreements in place?	No.
What is the structure of the mineral supply chain? Overview of all involved actors.	Minerals are tagged at the Kifinga site before being transported to the CML depot in Mitwaba, where they receive their tag négoce before onward shipment to Lubumbashi. Identified risk: Reports suggest that CML, the sole cooperative, is underperforming due to frequent cash shortages, resulting in delayed payments to miners and, in some cases, smuggling of minerals to other areas.
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
Production And Handling	
Review production data for any anomalies or unexplained spikes	Kifinga's production rises in the dry season as more miners extract minerals, whereas output drops in the rainy season.
Observe mineral reception and handling procedures on-site	Cooperative- CML and SAEMAPE
Are all minerals processed on-site, or is there off-site processing/storage?	Initial processing and tagging by SAEMAPE in Kifinga. Tagging at the depots in Mitwaba by the Department of Mines.
If off-site locations are used, what measures ensure chain of custody integrity?	Not used.
Are the site's minerals ever mixed with external minerals (during trading or processing)?	No external minerals are mixed in the Kifinga mine site, it is located far from Mitwaba.
What transportation methods are used for minerals?	Motorbike and vehicles
What controls prevent external mineral infiltration during transport?	The Mine Police provide convoy and escort services.

Traceability And Documentation	
Does the site participate in any formal minerals' traceability scheme?	Yes, the Kifinga site does participate with ITSCI
What documentation systems track mineral origin and chain of custody?	Cooperatives database-Logbook- Tag mine by SAEMAPE- Processing Centre- 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.
Third-Party Due Diligence (applicable if sourcing minerals from third parties)	
What due diligence procedures (e.g., KYC) are applied to third-party sources?	There is no third-party sourcing of minerals in Kifinga
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, 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?	Miners do not make payments; only Cooperative-CML, SOMIMI, and COMINIERE 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?	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?	In July 2025, ITSCI re-opened incident HK-2024-0102 (issue first recorded in 2023), which impacts Kifinga and several other sites. According to ITSCI's findings, there are suspected cases of miners transporting untagged material and selling it to unofficial 'negociants'. Similar issues have been reported for Kifinga before. In response, ITSCI is conducting a sensitisation campaign with miners to discourage the sale of untagged minerals.
Have there been any incidents? If yes, what were they, and have they been resolved?	There has also be a case of reported nightwork in 2023, While following up on incident HK-2023-0057, ITSCI found that miners in the sub-sector work at night contrary to the mining code. ITSCI discussed the issue with PMH and SAEMAPE and provided OHS training for the miners and state agents in the region.
If any incidents were identified, what corrective actions (if any) were put in place?	NA
When was the last baseline report completed?	The last baseline report was produced in June 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?	ITSCI personnel visit a site at once a month due to the long distance.
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: photo shows assessors with chief of Kifinga village and guide from CEMEDI

Photo 2: photo shows focus discussion group in Kifinga

Photo 3: Photo shows a group discussion with men and women who are miners in Kifinga

