

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	Lula
Date of site visit	07/11/2025
Assessment team	Assessors Freddy Shamwana, Alain Ngoy and ERIC representative of COMITU; guide- Eulalie Bakatubenga 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	The site employs a large mining workforce, resulting in significant production capacity, as reflected in ITSCI baseline reports. Although the mine does not have formal health and safety policies, MMR (the permit holder) undertakes topsoil removal using machinery to improve safety during mineral access. There is a notable lack of personal protective equipment (PPE).
Next steps/recommendations	Share the findings with Thaisarco's suppliers (including MMR) providing material from Lula and request they follow up with suppliers to establish and improve health and safety practices, including the provision of PPE.

Questions or checks	Findings
Company and site name	Lula is a mining site operating under an MMR mining title. The site belongs to MMR but is managed by COMITU (Cooperative Minière Tumaini), which leases the concession from MMR. All production is delivered to MMR. Access to the site is through an MMR-controlled security gate located outside Camp Sowe village.
Address and location	Lula is approximately 7 km from Bunkululu village and 38 km from Mitwaba, Coordinate: 350° N : 8°34' 55" S 27° 28' 17" E; Altitude 1420 m
Name of parent company and/or significant shareholders	The Cooperative COMITU leases the concession from MMR. The president of COMITU Mr Roger is based in Lubumbashi but has overall control of COMITU.
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 Eric: COMITU's chief or operations/main on-site coordinator.
Number of employees, number of contractors, temporary workers	>700 workers (400 men and 300 women)
Description of site access	Access by vehicle and/ or motorbike. The site is open pits and underground pits in full operations. Lula mine site is under management of COMITU Cooperative and has many open pits and underground pits/galleries.

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 processing and selling of minerals.
Service(s) provided or the commodity(ies) produced, processed, stored and shipped by the site	Supply of tin commodities via COMITU to MMR.
Planned future developments or construction on site, or change in type of activities	There is a plan to semi industrialise of mining activities by the owner of Mining Permit MMR- PEPM 11 179

Site owned or leased?	The site belongs to MMR but is managed by COMITU (Cooperative Minière Tumaini), which leases the concession from MMR. COMITU pays 0,3% of production as a lease.
When was the site first brought into use?	Mine was brought into use in 2011 and 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 with rudimentary tools and semi scale mining

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?	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?	The chief of the Cooperative . Compliance is enforces through random checks by COMITU and SAEMAPE.
Have there been any complaints, issues, or official investigations related to compliance?	No.
Working Conditions	
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?	Yes, 12 hours maximum.
How many hours per week do workers typically work? (Review sample timesheets/logs)	48 hours. 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 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 reported on site.
Does the site provide loans to staff? If yes:	Yes, the Cooperative COMITU 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 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?	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 on site, and PPE requirements are not enforced. Workers have expressed concerns about the lack of basic PPE.
Review incident register: frequency, severity, and types of accidents	No major incidents have been reported. However, the site currently lacks a formal health and safety register or structured procedures. A reporting system is in place, allowing major incidents to be reported to ITSCI or SEAMAPE.
What preventive measures have been implemented?	MMR is in the process of potentially mechanising a mine near Lula. As part of this, equipment has been brought to the site to remove soil and provide easier and safer access to the mineral. The site is very well organised.
Living Conditions	
Do any workers live on-site?	No. The workers reside in a camp or village, located approximately 4-5 km from the mine site, Camp Sowe.
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 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?	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, MMR Security, PMH, SEAMAPE, and ITSCI perform regular on-site inspections.
Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programme has been put in place in the Lula mine site.
Community Relations	
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 major disputes recorded in the last years. Sometimes there are minor conflicts, often after pay days, when some workers spend their earnings on alcohol, leading to intoxication and occasional fights, a pattern familiar across ASM sites, especially during periods of high production with frequent pay days.
What mechanisms are in place to respect community rights?	COMITU encourages collaboration through an advisory committee to prevent unnecessary conflicts with communities. 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. 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
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. There is no direct engagement between COMITU and MMR's security team.
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

Misrepresentation of origin of minerals

Questions or checks	Findings
Supply Chain Overview	
Does the site purchase minerals from external third parties?	No third-party minerals were purchased at the Lula site; only products extracted by miners identified by buyers and Cooperative - COMITU were accepted.
Are there any tolling agreements in place?	NA
What is the structure of the mineral supply chain? Overview of all involved actors.	Minerals are typically tagged by SAEMAPE on site at Lula and then sold from COMITU to MMR. MMR transports the minerals to its depot and processing centre in Mitwaba, where they are combined and 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 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	Lula production increases during the dry season and decreases in the rainy season due to flooding in some underground pits.
Observe mineral reception and handling procedures on-site	COMITU and SAEMEPE handle 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?	Motorbike and Vehicle
What controls prevent external mineral infiltration during transport?	MMR Security and Mines Police offer convoy and escort services.
Traceability And Documentation	

Does the site participate in any formal minerals' traceability scheme?	Yes, the Lula site does participate with ITSCI
What documentation systems track mineral origin and chain of custody?	COMITU database-Logbook- Tag mine by SAEMAPE- MMR 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.
Third-Party Due Diligence (applicable if sourcing minerals from third parties)	There is no third party sourcing of minerals in Lula.
What due diligence procedures (e.g., KYC) are applied to third-party sources?	NA
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
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ITSCI

Questions or checks	Findings
What are ITSCI's findings regarding the site?	Lula is a mine site located in the MMR concession. It is about 38 Km from Mitwaba. It is the most populated mine site under COMITU management. The site is an open mine site and underground mine with no risk of being exposed to child labour activities. The production is very high because of the big work force. No incident report during on ground assessment in Lula.
Have there been any incidents? If yes, what were they, and have they been resolved?	No incidents were reported.
If any incidents were identified, what corrective actions (if any) were put in place?	NA as ITSCI has not reported any incidents.
When was the last baseline report completed?	The last baseline report was completed in July 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?	The personnel visit a site at least every two weeks.
Has ITSCI raised any concerns or identified any issues at the site?	No.
Has ITSCI worked with the site to close the incidents or supported in developing corrective actions?	Not with regards to site-specific incidents, but ITSCI works with local stakeholders to resolve issues and is also involved in organising community training sessions on labour rights.
Do the circumstances on site match the findings on the baseline report?	Yes.

Photos
Photo 1: Entrance to an underground pit, featuring a ventilation pipe supplying oxygen.
Photo 2: Assessors positioned at the underground shaft.
Photo 3: Entrance to an ASM mine shaft equipped with a ventilation system. ASM shafts are typically 60–80 metres deep. Note: Miners often lack appropriate footwear.
Photo 4: Notice board displaying tin mineral sale prices: 1 kg sold at 27,000 Congolese Francs (exchange rate: \$1 = 22,000 FC).
Photo 5: Agent purchasing minerals from miners at the marketplace.
Photo 6: Miners resting at their shelter.
Photo 7: Scale used for weighing minerals.
Photo 8: Assessor and COMITU representative visiting the site.
Photo 9: Wagon used for underground pit operations. The pit has been active since 1939.
Photo 10: Entrance to an underground mine shaft scheduled for reopening for large-scale extraction. This project is a joint venture between MMR and Chinese investors.

