

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	Makata
Date of site visit	11-Nov-25
Assessment team	Alain Ngoy; Freddy Shamwana, guide Kalenga from CMDI
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	Makata is a remote site rarely visited by SAEMAPE or ITSCI due to its isolation. Minerals are not tagged at the site ; instead, they are transported by CEMDI, the cooperative that informally leases the site from COMINIÈRE, to Mwema village, approximately 28 km away. Although CEMDI pays a lease to COMINIÈRE, the site lacks an official mining title or identification number. There are no health and safety policies in place, and mining activities consist mainly of open pits and scattered sites along the riverbank.
Next steps/recommendations	<p>1) 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.</p> <p>2) Engage with ITSCI to clarify how traceability can be ensured for minerals originating from Makata, given that they are transported untagged over a distance of approximately 28 km.</p>

Questions or checks	Findings
Company and site name	Cooperatives: CEMDI
Address and location	Makata- 28km from Mwema Village and 95 km from Mitwaba, Coordinate: 180° S : 8° 16' 31" S 27° 27' 2" E; Altitude 1110 m. Mwema village is a market place for Makata mineral productions. Coordinates of Mwema village is 327° NO : 8° 18' 12" S 27° 29' 54" E; Altitude 1220 m.
Name of parent company and/or significant shareholders	The site is operated by the CEMDI Cooperative, with COPROCO serving as the primary buyer.
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)	Tareq Sabre, CEMDI chairman and president of independent miners
Number of employees, number of contractors, temporary workers	>600 workers (400 men and 200 women)
Description of site access	Vehicle and motorbike access is available. The site consists of actively operating open-pit and alluvial mines. The Makata mine site is managed by CEMDI and features multiple open pits and mining areas along the watercourse banks.

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 COPROCO; they are considering to sell to new buyers (La société LUMA Congo et STANNUM NEXUS).
Planned future developments or construction on site, or change in type of activities	CEMDI has not outlined any plan for the semi-industrialisation of mining activities at this site. Furthermore, the mine does not possess a valid mining title such as ZEA or a comparable licence. As a result, the location currently operates as an informal mining site managed by a cooperative, with its application still pending approval.
Site owned or leased?	Lease from COMINIÈRE by CEMDI, who pays 0,3% of production. Makata 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 was brought into use in 2011. The site is a mine site without a mining title from Cadastre Minier. The ministry of mine has not yet issued a mining title or a mining license.
Annual production data	300-400 kg/ week; 1200-1600 kg/ month; 14400 kg- 19200 kg/ year
Extraction method	Artisanal mining using rudimentary tools; no heavy equipment.

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?	The CEMDI Cooperative has implemented policies that outline a commitment to 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?	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?	10 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?	60 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.
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.
What preventive measures have been implemented?	No.
Living Conditions	
Do any workers live on-site?	No, the workers live in a nearby settlement, about 1-2 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 Makata/ Mwema village 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 reported environmental risks affecting community rights. Makata is a very remote site.

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.

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.
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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 fore 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 third-party minerals were purchased at the Makata site.
Are there any tolling agreements in place?	NA
What is the structure of the mineral supply chain? Overview of all involved actors.	SAEMAPE agents do not regularly visit Makata. As a result, minerals from Makata are transported untagged by CEMDI to Mwembe village, located approximately 28 km from the Makata site. Typically, the mine buyer is CEMDI. However, there are isolated cases in which miners sell their products to other buyers. From Mwembe, the official transportation route then proceeds via Mitwaba, where the mineral receives its tag négoce before being transported to Lubumbashi. However, there are reports that minerals from Makata 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 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	Makata has several pits on the river bank. During the dry season the production is increased while in rainy season there is a fall of production.
Observe mineral reception and handling procedures on-site	CEMDI transports the minerals to Mwema village and where it is tagged by SAEMAPE.
Are all minerals processed on-site, or is there off-site processing/storage?	Initial processing takes place in Makata. Minerals are transported to depot in Mwembe village by CEMDI.
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)?	There is no reported or observed mixing with external minerals in Mwema, the market place of CEMDI. H
What transportation methods are used for minerals?	Motorbike
What controls prevent external mineral infiltration during transport?	NA
Traceability And Documentation	
Does the site participate in any formal minerals' traceability scheme?	Yes, the Makata 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 Makata / Mwema.
Review records of due diligence activities. Has the site conducted on-the-ground assessments?	The site does not conduct on ground assessment. However, management is willing to be trained on due diligence activities.
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?	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?	Makata site is located 97 km from Mitwaba and has both alluvial and rock mineralisation. Production increases during the dry season due to more miners.
Have there been any incidents? If yes, what were they, and have they been resolved?	ITSCI reported incidents in the Makata sub-sector operated by the CEMDI cooperative, including the loss of eight mine tags (TM7465663–TM7465670). During an analysis of mine and négociant logbooks from CEMDI/Novcorp, discrepancies were noted in recorded weights between the mine and négociant levels. Both incidents were resolved in 2024.
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 July 2021.
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 Makata at once every 3 weeks.
Has ITSCI raised any concerns or identified any issues at the site?	Yes, ITSCI does raise 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 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 miners working on an alluvial mining site.
Photo 2: This photo shows a group of workers who are leaching minerals.
Photo 3: This photo shows Kalume Ngongo river before Mwema village.
Photo 4: This photo shows miners transporting minerals to the market place.
Photo 5: This photo shows access road leading to Makata site.
Photo 6: This photo shows assessors and chief of land of Makata Ilunga Fwifwi in Mwema village.
Photo 7: This photo shows assessors interviewing CEMDI supervisor in Mwema; the collection point of minerals from Makata mine site.

