

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	Nsele
Date of site visit	04-Nov-25
Assessment team	Freddy Shamwana
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	<p>Nsele is located near Mitwaba and operates in a legal grey area, as it sits on a concession belonging to COMINIÈRE. In practice, the site is tolerated, and government authorities such as SAEMAPE and the Division des Mines accept material from it.</p> <p>Earlier in 2025, a landslide reportedly resulted in one miner's death (see ITSCI Incident HK-2025-0045 or reference B139 below). There have been no observed cases of child labour, but there is a reported risk, particularly during school holidays. When such situations arise, the Police of Mines intervene to remove children from the site. Poor health and safety practices have been reported and observed, including the lack of appropriate PPE.</p> <p>There is also a risk of misrepresentation of mineral origin, not at Nsele itself, but when miners sell untagged minerals from Nsele to external buyers to obtain better prices. The main driver is price, not active attempts of concealing origin; misrepresentation of origin is a secondary effect. ITSCI is aware of these issues and has repeatedly raised them as incidents (see ITSCI Incident HK-2024-0102 or reference B139 below).</p>
Next steps/recommendations	<ol style="list-style-type: none"> 1) Share the findings with Thaisarco's suppliers providing material from Nsele and request they follow up with suppliers to establish and improve health and safety practices, including the provision of PPE. 2) Report tagging irregularities to ITSCI.

Questions or checks	Findings
Company and site name	Cooperatives CEMDI, CML, COMIDU, COMIDEC, COMBEAK. Site name is Nsele.
Address and location	Nsele is very close to Mitwaba, Coordinate: 22 ^o N: 8 ^o 37'42" S 27 ^o 19'46" E; Altitude 1560 m
Name of parent company and/or significant shareholders	Multiple Cooperatives are operating in Nsele, President of Cooperative CEMDI is Mr Makofi Tareq Sabra.
Overview	The ASM operations at Nsele are located within the COMINIÈRE concession. COMINIÈRE is a state-owned mining company. ASM activities are tolerated because it is widely recognised that attempts to shut down operations could trigger social unrest and mass protests.
Number of employees, number of contractors, temporary workers	>800 workers
Description of site access	Vehicle or motorbike access. Nsele is an active underground mine with multiple cooperatives and numerous pits.

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.	Tin mining operations
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	No formal plan; mining permit held by COMINIÈRE (state-owned).
Site owned or leased?	Arrangements at the site fall within a legal grey area. In theory, the concession belongs to COMINIÈRE, and ASM activities should not occur. However, in practice, these activities are tolerated, and COMINIÈRE currently has no plans to mechanise the site.; Cooperatives pay COMINIÈRE 0.3% per production.
When was the site first brought into use?	Operational since 2005; under COMINIÈRE permit PE 12457 since 2011
Annual production data	Output: 350–600 kg/day; 1,400–2,400 kg/month; 16,800–28,800 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?	All cooperatives operating in Nsele lack the leadership needed to implement policies that enforce human rights and labour laws on site.
Which specific laws and standards are being followed?	Labour law on working conditions and age permits work only for individuals over 18 years.
Who is responsible for ensuring compliance?	Chiefs of pits or mines, cooperatives, SAEMAPE, and Mine Police.
Have there been any complaints, issues, or official investigations related to compliance?	Cases of child labour have occurred on site during school holidays and during disputes between miners; in such instances, the Police of Mines and Hydrocarbons (PMH) intervene to restore order.
Working Conditions	
What are the standard operating hours (number of shifts, hours per shift)?	Yes, miners are independent; therefore, working hours are limited to 8 hours maximum – operating time (07:30–11:30) and a 2-hour break (14:00–17:00).
Has the company established maximum working hours for staff?	40 hours.
How many hours per week do workers typically work? (Review sample timesheets/logs)	48 hours – no access to logbooks/timesheets; no logging in/out system.
What is the highest number of recorded working hours for any employee?	Unknown.
How is salary calculated, and what is the payment structure?	Salary is based on production. Workers sell their output to buyers (cooperatives) and receive cash payments without paying taxes.
Are there any pay disparities between demographic groups (gender, race, etc.)?	No disparities. There is an equal payment policy. Workers share proceeds equitably after sales.
Have there been any claims or allegations of workplace discrimination?	No reports of discrimination onsite.
Does the site provide loans to staff? If yes:	Yes, cooperatives/buyers provide loans to miners who supply products to them if they have trusted relationships.
— For what purposes?	Loans are typically for social needs such as medical care, tuition fees, and food.

— What are the terms of repayment?	Terms are agreed amicably; loans are deducted from production as per agreement, with flexible repayment terms.
Does the site retain employee documents (ID, passports, etc.)?	No cases of retaining workers' IDs or passports.
Are women employed at the site? If yes:	Women are employed for ore leaching but are not allowed to work in pits or extract ore underground.
— In which roles do they work?	Women handle leaching and transport ore from pits to market for sale.
— What safety measures are in place for them?	No work in high-risk areas such as pits or underground mines.
Can workers freely leave the site and terminate employment without restrictions?	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 systems or policies in place to address workers' health and safety on site. The use of PPE is not enforced, and workers have raised concerns about the lack of basic PPE.
Review incident register: frequency, severity, and types of accidents	There was a landslide earlier this year with one fatality, which was reported and investigated by SAEMAPE. Management states that serious incidents would be reported to SAEMAPE (See also B139 below).
What preventive measures have been implemented?	No preventive measures have been implemented.
Living Conditions	
Do any workers live on-site?	No workers live on site in Nsele.
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)	None observed.
What age verification procedures are in place for younger workers?	There is no ID verification system as the site is open to anyone over 18 years who wishes to work. Applicants must register with the pit chief. Additionally, PMH, SAEMAPE, and ITSCI conduct regular on-site checks to ensure compliance with minimum working age requirements.
Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programmes are in place at the Nsele mine site.
Community Relations	
What is the relationship with surrounding communities?	The relationship between communities and the different mining cooperatives is good. Communities see cooperatives as employers and buyers.
Have there been any conflicts or disputes with local communities?	No disputes recorded for the last years.
What mechanisms are in place to respect community rights?	They have local discussion groups. They communicate through meetings or public consultations, often under the supervision of a counsellor or during the Comité Local de Suivi (CLS) monthly meeting, to address any concerns that may arise.
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?	No environmental risk that may affect communities 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 Mine Police officers are authorised to conduct security checks.
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.
Does the site make payments to those groups, or has the site ever been approached by armed groups demanding payment?	No such cases have 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 Mine Police officers are on site.
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 security forces present 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.	<p>Multiple cooperatives purchase minerals from Nsele. Once miners have extracted sufficient quantities, they contact SAEMAPE, which tags the minerals on site. The cooperatives then transport the minerals from Nsele to various depots (Centres de Négoce) in Mitwaba, where they are sold to different négociants/traders. At these depots, minerals are often combined and receive '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.</p> <p>There is a risk of misrepresenting the origin of minerals Given the proximity of Nsele to Mitwaba, miners may be tempted to transport untagged material to depots (Centres de Négoce) or sell to other buyers on the way if better prices are offered. The main driver for this risk is price.</p>

Who oversees the management of the mineral supply chain?	SAEMAPE, PMH
What level of awareness/understanding does the site demonstrate regarding responsible sourcing requirements?	Basic level of knowledge / awareness sensitised by SAEMAPE, ITSCI, PMH and Department of Mines
Production And Handling	
Review production data for any anomalies or unexplained spikes	None identified.
Observe mineral reception and handling procedures on-site	
Are all minerals processed on-site, or is there off-site processing/storage?	Minerals are typically processed on site and tagged by SAEMAPE before being transported to various depots (Centres de Négoce) in Mitwaba.
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 mixing of external material at Nsele. However, in some cases, as noted in B101, miners have sold untagged material from Nsele to external buyers outside Mitwaba, for example in Malemba Nkulu or Manono.
What transportation methods are used for minerals?	Motobike and Vehicle
What controls prevent external mineral infiltration during transport?	Mines Police does offer services of convoyer / escort
Traceability And Documentation	
Does the site participate in any formal minerals' traceability scheme?	Yes, the site is part of the ITSCI scheme
What documentation systems track mineral origin and chain of custody?	Logbook- Tag mine by SAEMAPE- Processing Center- Logbook- Tag negoce by Mines Department
How are records maintained, and for what duration?	Records log books are maintained by SAEMAPE and Mines Department and classified as archive documents
Third-Party Due Diligence (applicable if sourcing minerals from third parties)	
What due diligence procedures (e.g., KYC) are applied to third-party sources?	No third party mineral sourcing.
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 cooperatives report that they avoid bribery in their business activities.
Does the site accept or make cash payments? If yes, what for?	Yes, cooperatives pay cash when 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; cooperatives pay royalties and taxes to the Revenue Department and COMINIÈRE.
Are there any disputes around taxes, fees or other royalties paid to the government?	No.
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?	No.

ITSCI

Questions or checks	Findings
What are ITSCI's findings regarding the site?	Nsele is the mine site very at outskirts of Mitwaba. It is about 0 -7Km from Mitwaba. It is the most populated mine site due to its vicinity with Mitwaba city. The site is an open mine site exposed to child labour activities during the school vacation and school terms. The production is very higher because of because of big work force.
Have there been any incidents? If yes, what were they, and have they been resolved?	Yes, there was a landslide incident in which one miner reportedly died and another was injured (see ITSCI Incident HK-2025-0045). Additionally, a few unauthorised armed individuals were intercepted on site, and the soldiers were arrested. This incident occurred in August 2025. SAEMAPE closed the pit for investigation by raising a red flag. Following the investigation and observations by the Mine Department, the site was cleared to reopen. In July 2025, ITSCI re-opened Incident HK-2024-0102 (originally recorded in 2023), which affects Nsele and several other sites. ITSCI's findings indicate suspected cases of miners transporting untagged material and selling it to unofficial 'negociants'. Similar issues have previously been reported at Nsele. In response, ITSCI is conducting a sensitisation campaign with miners to discourage the sale of untagged minerals.
If any incidents were identified, what corrective actions (if any) were put in place?	When a red flag is raised, a working group comprising SAEMAPE, Civil Society, the Tribunal, the chief of land, and ITSCI engages miners to sensitise them on good working practices.
When was the last baseline report completed?	The last baseline report was completed in May 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?	The personnel visit a site at once a week.
Has ITSCI raised any concerns or identified any issues at the site?	Yes, ITSCI does raise concerns one identify to make a corrective measures.
Has ITSCI worked with the site to close the incidents or supported in developing corrective actions?	Yes, ITSCI is involved to resolve incidents and participates in local CLS to

Do the circumstances on site match the findings on the baseline report?

Yes.

Photos

Photo 1: This photo shows one of the assessors in front of a ASM mine shaft, the red and blue plastic cover is there to cover and protect material from rain.

Photo 2: This photo shows the entrance of an ASM mine shaft. Note that miners often do not wear appropriate footwear.

Photo 3 : The assessors at Nsele.

Photo 4: Surrounding area at Nsele.

