



Company Details

Name of site	Tawansangthong Mining Limited (TST Mining)
Date of site visit	21-Aug-25
Assessment team	Warit Choovaree (Procurement Director of Thaisarco) and Ra-pee Jutaporn (Procurement Manager of Thaisarco)
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, and completing the assessment checklist. Finally, post-assessment activities included debriefing with stakeholders, compiling findings into a structured report (this document).
Key findings	Tawansangthong Mining Limited (TST Mining) operates an isolated, fully mechanized environment backed by an official Large-Scale Mining License (# 37937-HQ-LML). The site implements a closed-loop chain of custody via a single point of entry controlled strictly by Material Handling Controllers. This structure effectively mitigates the high-level risk of "mineral laundering"—preventing unverified, third-party, or child-labor-fueled artisanal ore from infiltrating the export pipeline. Workplace safety, hours, and security forces are aligned with national statutory frameworks to prevent exploitation and abuse. TST submits Quarterly Labour Returns to the Zambian Ministry of Labour, strictly enforcing a maximum 48-hour standard workweek and capping total overtime. Security units are overseen by the site Environmental & Safety Officer to ensure compliance with human rights and safety codes. This transparent data trail provides documented proof that the operations do not utilize forced or underage labor, satisfying key human rights indicators under global due diligence checklists.
Next steps/recommendations	1) To provide mineral reception and handling procedures on-site and training the workers 2) To issue policies and procedures regarding bribery and anti-money laundering

Questions or checks	Findings
Company and site name	The company and its group of companies (TST) were formed in 2013 with a long-term strategic vision for safe, responsible mineral production and delivery of socioeconomic benefits to host communities. TST has its corporate roots in Thailand. To fully commit to their African operations, the primary owners and management relocated their families to Zambia to oversee the projects directly. Before expanding into Zambia, the management spent over 10 years operating and trading in tin and tantalum mining within Thailand and Myanmar (starting in 2012 with localized tin mining operations yielding 1 to 5 tons per day). The company has a reserved estimation of 100,000 tons for its Zambian tin projects. A total flagship capital commitment of \$25 million USD allocated over a 5-year project advancement timeline.
Address and location	Situated within the Southern Province of Zambia. The mine site is located approximately 80 kilometers away from Choma town, near lake Kariba. The headquarters for corporate communications and administration, located in the capital city at: #689 off Main Street, Meanwood Ihex Hill, Lusaka, Zambia.
Name of parent company and/or significant shareholders	100% Own by Mr. Kananoth Patreepor

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. Kananath Patreepor, CEO
Number of employees, number of contractors, temporary workers	> 120 workers (men and women) (Thai and Zambian)
Description of site access	The actual mine site is located approximately 80 kilometers out of Choma town. Accessing the site requires branching off the primary T1 highway onto regional unpaved or semi-graded dirt roads that lead deeper into the mineralized zones of the Southern Province. Heavy machinery, haulage vehicles, and supply trucks utilize these regional unpaved access roads to transport equipment (such as the open-cast machinery shipped over from the warehouse) from the main transport arteries directly to the site. Access to the mine is strictly controlled. All incoming delivery trucks must present verified purchase orders and bills of lading to the Material Handling Controllers at the gate to verify quality and quantity before entry.

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 to buyers.
Planned future developments or construction on site, or change in type of activities	<p>On-Site Gravity Separation Processing Plant: Rather than relying solely on open-cast pit extraction, plans include constructing a localized processing layout. This utilizes gravity concentration systems to upgrade raw tin and tantalum ore to industrial-grade concentrates directly at the Choma site before hauling.</p> <p>Heavy Machinery Workshop Expansion: Engineering mandates highlight the rollout of an on-site fabrication and prototype testing workshop. This involves upgrading the footprint for Mechanical Engineers to run stress testing, maintenance, and diagnostics on heavy-duty processing lines, engines, and automated sorting feeds without needing to transport components back to Lusaka.</p> <p>Civil Infrastructure & Road Grading: The company is systematically restructuring the internal haulage network. This includes transitioning temporary access tracks into heavily graded, multi-tier haul roads capable of sustaining continuous routes for high-tonnage lowbeds and heavy articulated dumpers.</p>
Site owned or leased?	Own

When was the site first brought into use?	<p>TST first entered the Zambian mining landscape when they were granted a 10-year Exploration and Operation Gold Mining license by the Zambian government.</p> <p>The company officially expanded into the Choma region after successfully securing specialized Tin exploration licenses in 2023, making them one of the few dedicated tin license holders in that specific corridor.</p> <p>October 2023: The company began establishing its physical footprint and community presence on the ground, notably participating in regional Independence Day celebrations with the Choma/Southern Province community.</p> <p>Late 2023 / Early 2024: The site was actively brought into physical use for logistical preparation. The first heavy batches of specialized open-cast mining machinery were shipped from their international hubs, arrived at the local warehouses, and were cleared for deployment to the site.</p> <p>June 2024: The site officially transitioned from an exploratory layout to a large-scale industrial asset. The Ministry of Mines and Mineral Development formally approved and granted TST their Large-Scale Mining License (License No: 37937-HQ-LML) covering a substantial area across Choma, Kalomo, and Sinazongwe.</p>
Annual production data	Still on pilot operation, The company has a current production target of 2,000 tons of ore explicitly.
Extraction method	<p>Open-Cast (Surface) Mining.</p> <p>Gravity Concentration: The processing plant relies entirely on physical gravity separation methods. Because tin ore (cassiterite) and tantalum have a significantly higher specific gravity (density) than the surrounding waste quartz and silicate sands, they are separated using water and mechanical movement.</p> <p>Processing Infrastructure: This typically involves industrial sizing screens, log washers to break down sticky clay matrices, and automated shaking tables or jig concentrators to wash away lighter sands, leaving behind high-grade, industrial-ready metal concentrates.</p>

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?	Tawansangthong Mining Limited (TST Mining) manages labour and human rights compliance through structured internal procedures, formal statutory compliance, and localized Community Social Responsibility (CSR) initiatives. Because the site operates under a Large-Scale Mining License approved by the Zambian Ministry of Mines and Mineral Development, the company incorporates several specific processes to align with Zambian labour laws and global human rights best practices.
Which specific laws and standards are being followed?	Zambian labour laws and global human rights best practices.
Who is responsible for ensuring compliance?	Zambian Ministry of Mines and Mineral Development
Have there been any complaints, issues, or official investigations related to compliance?	There were no observed or reported cases of child labour at mine site.
Working Conditions	
What are the standard operating hours (number of shifts, hours per shift)?	only 1 shift per day, typically 8 hours per shift, 8:00 AM to 5:00 PM day shift (Not fully operation yet), Monday-Saturday. It has mentioned on contract of employment for each employee.
Has the company established maximum working hours for staff?	Full-time staff are limited to a standard maximum of 48 hours per week
How many hours per week do workers typically work? (Review sample timesheets/logs)	Full-time staff are limited to a standard maximum of 48 hours per week

What is the highest number of recorded working hours for any employee?	48 hours per week, the OT is not applied yet at this state.
How is salary calculated, and what is the payment structure?	For roles such as Mine Managers, Geologists, Environmental & Safety Officers, and Mechanical Engineers, salaries are calculated as a fixed monthly base rate. or the local Zambian workforce (over 100 employees handling material control, excavation, and gravity separation plants), compensation is calculated based on a daily or hourly base rate. This rate tracks actual shift hours logged via time-attendance setups at the Choma site gates
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 observed or reported on site.
Does the site provide loans to staff? If yes:	No.
— For what purposes?	N/A
— What are the terms of repayment?	N/A
Does the site retain employee documents (ID, passports, etc.)?	There are no cases of retaining worker's ID or passports.
Are women employed at the site? If yes:	Yes.
— In which roles do they work?	They are employed for housekeeper, kitchen, and also Environmental & Safety Officers and Geologist
— What safety measures are in place for them?	Not working in any high-risk workplace such as in a pit
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?	Document no. TST-HSE-3
Review incident register: frequency, severity, and types of accidents	N/A
What preventive measures have been implemented?	N/A
Living Conditions	
Do any workers live on-site?	Yes.
If yes, conduct accommodation inspection to verify:	Shipping container home
— Adequate space per person	7 m2
— Access to clean water and sanitation	Yes.
— Safety and security provisions	Yes.
— Basic amenities	Yes, Canteen for Thai food/ Canteen for Local food/ Clean toilet, drinking water, Sauna, vegetable garden.
Child Labour	
Are individuals under age 16 present at the site?	No, under age of 18 years are 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?	ID card verification is required as the site is open to anyone over 18 who wants to work. Applicants must register with the HR manager (Patson Monde) who is complied with ZIHRM Act No.3 of 2022 and regularly check compliance with minimum working age requirements.

Are there any apprenticeships or vocational programs for youth?	No apprenticeship or vocational programme has been put in place at the site
Community Relations	
What is the relationship with surrounding communities?	The relationship is good. They live in peace, with a spirit of mutual aid.
Have there been any conflicts or disputes with local communities?	No disputes recorded in the last years.
What mechanisms are in place to respect community rights?	Tawansangthong Mining Limited (TST Mining) anchors its community rights framework on the core principle of "shared prosperity and zero long-term degradation." Because the owners relocated their families directly to Zambia to manage operations, they have built mechanisms designed to weave the local Choma community into the lifecycle of the mine.
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 the community has been observed.

Non-state armed groups

Questions or checks	Findings
Please describe the general security situation in the area.	The general security situation at the Tawansangthong (TST) Mine Site in Choma is characterized by structured internal protocols and a highly regulated operating environment, matching its status as a licensed large-scale industrial operation.
Describe the general site security infrastructure (CCTV, perimeter fence, controlled access etc.)	Gate Control & Material Tracking: The site operates a single-point entry system with restricted perimeter fencing. All incoming and outgoing vehicle movements are managed by Material Handling Controllers. For security and quality control, delivery trucks must match digital manifest logs and verified purchase orders before entering or exiting the industrial zones. CCTV has set up covers all areas of their premise.
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.

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.
Does the site work with private security forces? If yes, what kind of payment agreement does the site have with those forces?	Yes, TST security is on site. TST provides the contract of employment that's included the details of remuneration. The terms and conditions of employment and service which is effectived on 1/5/2025 is provided.
Are there other private security forces on site or near the site?	There is no presence of security forces at the site. Only TST private security guards. TST security is unarmed

Does the site implement the Voluntary Principles on Security and Human Rights?	Grievance and disciplinary code of conduct procedure (effective 1/4/2025), sexual harassment policy are in place.
Does the site carry out screening/background checks of individuals or security force units?	Security personnel are subjected to strict background vetting to ensure no prior history of stock theft, mineral smuggling, or illegal artisanal mining.
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?	Single source, all materials are operated from TST concession area.
Are there any tolling agreements in place?	No
What is the structure of the mineral supply chain? Overview of all involved actors.	TST isolates its operations under a verified Large-Scale Mining License (No: 37937-HQ-LML) and enforces a strict single-point entry managed by Material Handling Controllers, they can prove a closed-loop chain of custody.
Who oversees the management of the mineral supply chain?	Mr. Kananath Patreepor, CEO
What level of awareness/understanding does the site demonstrate regarding responsible sourcing requirements?	TST structures its material logs, export certifications, and origin declarations to withstand the rigorous due diligence checks required by these international, RMI-compliant buyers. TST's internal procurement policies strictly align with the Geological and Minerals Development (Local Content) Regulations enacted by the Ministry of Mines and Mineral Development.
Production And Handling	
Review production data for any anomalies or unexplained spikes	TST's core differentiator is its "Organic Mining" approach—a circular sequence where topsoil is stripped, stored, bio-inoculated, and then laid back over washed tailings for immediate agricultural use.
Observe mineral reception and handling procedures on-site	No.
Are all minerals processed on-site, or is there off-site processing/storage?	Only on-sites for all processes.
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
What transportation methods are used for minerals?	By truck from the pit to processing plant. After get the final product, TST will arrange the trucks with container to collect the cargoes at site.
What controls prevent external mineral infiltration during transport?	The container has locked with proper sealed during the transportation from mine site till final destination.
Traceability And Documentation	
Does the site participate in any formal minerals' traceability scheme?	No, it's a single source. TST has no policy to purchase the material from off-site.
What documentation systems track mineral origin and chain of custody?	Mass balance to control the materials from the pit-upgrading plant-final product. TST also contact "Nolands consultant" to do the mine assessment aligned with OECD at their site.
How are records maintained, and for what duration?	Hard copy and electronic, the storage period >=3 years

Third-Party Due Diligence (applicable if sourcing minerals from third parties)

What due diligence procedures (e.g., KYC) are applied to third-party sources?	N/A
Review records of due diligence activities. Has the site conducted on-the-ground assessments?	N/A
Are all third-party sources subject to the same level of scrutiny?	N/A
Have any third-party sources been identified with political, military, or criminal connections?	N/A
Have site personnel observed child labour at the facilities of third-party sources? If yes, which locations and what actions were taken?	N/A
Have armed groups (state or non-state) been observed at locations of third-party sources?	N/A
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?	N/A
How does the site verify minerals are from legally authorised sources?	N/A
Is there evidence or risk of fraudulent misrepresentation of mineral origin? If suspicious transactions are identified, request management explanation	N/A

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, only for the wages of miners at the site.
What taxes, fees and other royalties does the site pay to governments? Are these payments disclosed in line with the EITI?	Taxed at a flat 5% of the norm value (the realized market price free-on-board at the point of export or delivery). The Zambia Extractive Industries Transparency Initiative (ZEITI) monitors the reconciliation of payments made by mining entities against the revenues officially received by the state.
Are there any disputes around taxes, fees or other royalties paid to the government?	TST's corporate mining operations are subject to the standard national mining corporate income tax rate of 30% on taxable profits.
How does the company communicate its anti-bribery / anti-corruption / anti-money laundering policy(s) to staff?	N/A

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?	N/A
Have there been any incidents? If yes, what were they, and have they been resolved?	N/A
If any incidents were identified, what corrective actions (if any) were put in place?	N/A
When was the last baseline report completed?	N/A
What is the site's experience and involvement with ITSCI?	N/A
How often does ITSCI personnel visit the site?	N/A
Has ITSCI raised any concerns or identified any issues at the site?	N/A
Has ITSCI worked with the site to close the incidents or supported in developing corrective actions?	N/A
Do the circumstances on site match the findings on the baseline report?	N/A
<p>Photo 1: Entrance at the mine site</p> <p>Photo 2: Weight checking and record at the site before deliver to upgrading plant</p> <p>Photo 3: PPE sign</p> <p>Photo 4: Thaisarco team, Tawansaengthong team</p> <p>Photo 5: Safety polict is in place</p> <p>Photo 6: Annoucement for the PPE</p>	

