



Auditee name: Malcomines Minor Metals Ltd

Location:

- Mine site – Northern Bauchi State, Nigeria
- Warehouse – 1 Naraguta Junction, Jos Plateau State, Nigeria

Product: Tin, Tantalum, and Tungsten

Business Type: Mine (LSM) & Exporter

Interviewee:

- Murtala Ahmad Laushi (Owner)
- Jamil Ahmed (Mine Manager)

Audit Dates: 21-22 Aug, 2024

Background: Malcomines Minor Metals is a miner & exporter of non-ferrous minerals and concentrates. Established in 2014 and start to export in 2019, they initially focused on Tin and Tungsten concentrates. They have their own mine (Large scale mine) and they are also be an aggregator

Facility in Scope: Mine site, processing facility, and warehouse

Production process:

- **Mine site and processing facility** The mine is open-pit, the material will be upgrade at the first stage at site by crushing, shaking table, and packed for delivery to their warehouse
- **Warehouse** the material will be upgraded by air shaking table and magnetic separator here then transported to loading port for onward ocean vessel freight

Due Diligence/ Traceability:

- After 1st upgrading process at the mine site, the material will be weighed and recorded then kept in the storage room waiting for deliver to the warehouse. The bags of materials will be weighed again before loading into the trucks and recorded on the truck waybill. The staffs at the warehouse will check the weight for each bag against the record on truck waybill if they found any discrepancy, the material will be hold for investigation
- Although the storage room and trucks are securely locked and monitored by their security team, there is room for improvement in Malcomines' traceability processes. Enhancements such as sealing bags, recording the name of the responsible person at each stage of the handling process, and implementing a clear tracking system would provide greater accountability and reduce the risk of loss or tampering

Management Systems:

- There are currently no established code of conduct, supply chain policy, or human rights policy in place
- There is no available evidence or documentation of training records for their staffs

Occupational Health and Safety:

- The PPE is provided to staff members to ensure their safety on the job, including helmets, gloves, safety goggles, and protective footwear. However, despite these provisions, a significant number of employees fail to consistently wear the equipment
- The OSL should be provided to the worker who work with the high R/A contained material
- The new canteen is under construction, it will be available for the staffs by the early of 2025
- Malcomines provide the first AID kit at the mine site and warehouse, ensuring that all necessary medical supplies are readily available in case of emergencies, including bandages

Human rights/ Child labour/ Forced labour:

- Upon investigation, no evidence of child labor or forced labor was found at Malcomines. All workers appear to be of legal working age
- There is no formal procedure or policy in place to address critical issues such as human rights violations, child labor, or forced labor, leaving the organization without clear guidelines or preventive measures to protect vulnerable workers and ensure compliance with international labor standards
- Malcomines provide the staff ID card to their staffs but they have no any staffs registration record

CSR

- Sponsoring the local football tournament
- Providing the water pump to the villagers who live in surround area of mine
- To build the church for village
- Providing the scholarship to the students



Mine Site



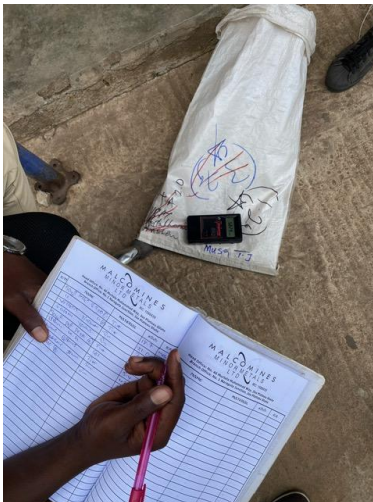
Storage room at mine site



First AID kit



Warehouse



Weight record



Staff ID card



RCS audit team/ Malcomimes/ Thaisarco



Auditee name: Rutongo Mines

Location: Northern Province, Rwanda

Product: Tin

Business Type: Mine (LSM) & Exporter

Interviewee:

- Jeone Jande (Group Supply Chain Manager)
- Uwase M. Rachel (EHS Officer)
- Ryumugabe Sam (Group Sustainability Manager)

Audit Dates: 26 Aug, 2024

Background: Rutongo Mines, a Rwandan mining company and a part of the Trinity Metals Group, holds a 25-year large-scale mining license from the Government of Rwanda to operate the Rutongo mines. The mines are estimated to contain about 54,000 metric tons of recoverable tin. Currently, they produce approximately 80 metric tons per month, with projections to increase to 100 metric tons per month in 2025 and 160 metric tons per month in 2026. They are 1 of 2 tin mine in Rwanda who use “Better Mining” traceability program.

Facility in Scope: Mine site, processing facility, and warehouse

Production process: All production is from underground mine, the material will be weighed and tagged at site by Better mining staff under witness by security and miner then the material will be delivered to upgrading plant. The tag and weight will be re-checked there, if the staff found any discrepancy. Rutongo will investigate on that incident and the material will be passed to upgrading process when that non-conformance is closed

Due Diligence/ Traceability:

- The Company abides by the principles set out in the 2016 OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from conflict-affected and high-risk Areas
- The traceability system electronically logs key details such as the weight, purity, and tag numbers of mineral bags, along with the names of stakeholders and tunnel supervisors involved in the production process. This information is verified at each step of the supply chain, all the way to export. Materials are sourced exclusively from Rutongo mining operations—no external sources are used for purchasing, receiving, or acquiring minerals. The upgrading process occurs on Rutongo’s premises, overseen by Rutongo’s employees and a Better Mining field agent. With complete traceability in place, mineral concentrates are packed, tagged, and recorded before being directly exported from Rutongo’s facilities

Management Systems:

- Please see the list of policies & standards as follow;
 - Code of conduct policy
 - Anti-Bribery and corruption policy
 - Environmental policy
 - Human rights policy
 - Asset protection policy
 - Communication policy and procedures
 - OHS policy
 - Whistleblowing policy
 - Due Diligence report
 - ESG policy (that is in progress, they expected to complete it within 2024)

Occupational Health and Safety:

- Development, implementation and maintaining an OHS Management system to systematically and effectively manage identified risk exposures
- Implementing and maintaining a Behaviour Based Care (BBC) process to advance the care and prevention culture
- The PPE that provided to the staffs will be changed for every 6 months
- Investigation and determination of root causes of all OHS incidents to prevent recurrence and inform opportunities for improvement of the OHS Management system

Human rights/ Child labour/ Forced labour:

- Rutongo has a strict recruitment policy, and only recruits employees aged 18 years old and above as mentioned on their policy HR rev. 05. No child is allowed in its mining operations
- Provide training on Voluntary Principles on Security and Human Rights for senior corporate leadership and operations management
- To ensure that their stakeholders, including the communities where they operate, fully understand our human rights responsibilities and commitments, they will actively communicate our human rights policy both internally and externally. This includes regular training and awareness programs for employees, clear communication through company channels, and outreach efforts to engage local communities
- Upon investigation, no evidence of child labor or forced labor was found at Rutongo. All workers appear to be of legal working age

CSR

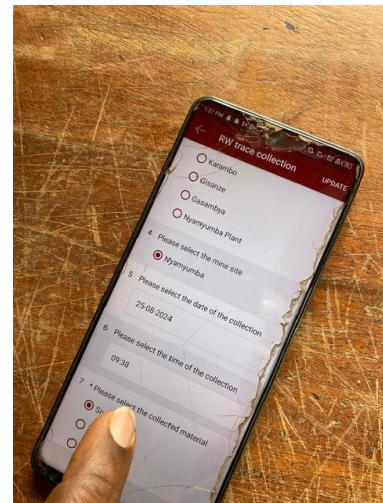
- Providing medical insurance for more than 3,000 residents annually
- Rehabilitating more than 30km of community roads
- Rutongo is dedicated to assisting vulnerable families in their communities through tailored initiatives. These efforts involve rebuilding and renovating homes, providing fruit tree seeds, and creating community vegetable gardens to tackle childhood malnutrition and growth stunting. They also support students by covering school fees and supplying necessary educational materials to help them thrive
- Rutongo set up the first graduation of children from Rutongo ECD (Early Childhood Development Center) in partnership with Isooko Community Center. The Isooko ECD center has had a significant positive impact on Rutongo's women miners, offering them a safe and reliable place to leave their children while they go to work. This milestone celebrates the progress of the children and highlights the continued support and empowerment of Rutongo's women



Thaisarco/ BM staff/ Rutongo



BM staff at site



BM traceability system-record data



Facilities at mine site



Early Childhood Development Center



Auditee name: SOCIETE NBB & Freres Sarl

Location: Bukavu, DRC

Product: Tin, Tantalum, Tungsten

Business Type: Exporter

Interviewee: Nkombera Namuniga (Traceability)

Audit Dates: 27 Aug, 2024

Background: NBB is established in 2018 in Bukavu, expand their business to Goma in 2020 and Kalemie in 2024

Facility in Scope: Processing facility, and warehouse

Production process: the material from mine will be crushed by jaw crusher and upgrading by magnetic separator at their facility before export

Due Diligence/ Traceability:

- Their Due Diligence team visit the mines who deliver the material to NBB by quarter, any incident/ finding that they found on the ground will be reported to the involved parties
- The incident report by iTSCi will be checked by them as monthly basis, if it has any incident that related to their supply chain then their Due Diligence team will visit the mine site and work on corrective action plan
- When the materials have deliver to their facility, all of mine tags will be checked against iTSCi log book and the tags will be cut by CEEC. If NBB found any discrepancy, the materials will be hold/ rejected then it will be investigated by CEEC/SEAMAP

Management Systems:

- The Due Diligence policy is in place, NBB has communicate to their suppliers when they deliver the material for the first time anyway we have not found any record of communication
- The Law of child labour has published at their facility

Occupational Health and Safety:

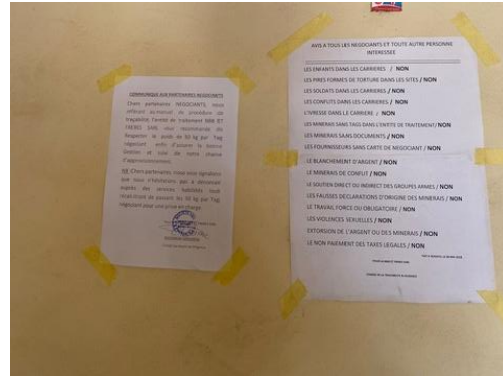
- The PPE has been properly provided to all staff members, ensuring they are equipped with the appropriate gear to protect them from workplace hazards and ensure their safety during daily operations

Human rights/ Child labour/ Forced labour:

- All of staffs have registered and the copies of ID have kept at their facility
- Upon investigation, no evidence of child labor or forced labor was found at NBB. All workers appear to be of legal working age



Tagged material



DD policy and labour laws



NBB facility



NBB/ Thaisarco



Auditee name: AGRO

Location: Bukavu, DRC

Product: Tin, Tantalum, Tungsten

Business Type: Exporter

Interviewee:

- Doreen Umwari (Operations Manager)
- Musana Emmanuel (Traceability & Due Diligence Officer)

Audit Dates: 27 Aug, 2024

Background: AGRO is established in 2021 in Kalemie, expand to Bukavu in March 2024

Facility in Scope: Processing facility, and warehouse

Production process: the material from mine will be crushed by jaw crusher, they just set up the facility in Bukavu just a few month before we visited. To separate the Fe content, the process has done by human only however AGRO has a plan to invest on magnetic separator in 2025

Due Diligence/ Traceability:

- AGRO never visit the mine sites by themselves however all of required docs by iTSCi and DRC laws have checked by them once the materials arrived at their facility
- When the materials have deliver to their facility, all of mine tags will be checked against iTSCi log book and the tags will be cut by CEEC. If AGRO found any discrepancy, the materials will be hold/ rejected then it will be investigated by CEEC/SEAMAP
- CEEC will be at AGRO facility once a week for checking on the balance of tags and intakes
- AGRO also has the internal tags system for the material which still under upgrading processes/ negotiation with their suppliers

Management Systems:

- AGRO has no Due Diligence/ Supply chain policy, they just practice under iTSCi procedure and laws of DRC
- They have trained about Due Diligence by iTSCi on 26/8/2024
- The Law of child labour has published at their facility

Occupational Health and Safety:

- The PPE has been properly provided to all staff members, ensuring they are equipped with the appropriate gear to protect them from workplace hazards and ensure their safety during daily operations

- For the benefit of their staff, AGRO has established a canteen along with access to clean, potable drinking water throughout the workday. This initiative supports the health and well-being of employees

Human rights/ Child labour/ Forced labour:

- All of staffs have registered and the copies of ID have kept at their facility
- Upon investigation, no evidence of child labor or forced labor was found at AGRO. All workers appear to be of legal working age



Staffs with proper PPE



Office for CEEC agent



Canteen



Tags for internal traceability



Thaisarco/ AGRO



Auditee name: Brailee Trading Ltd

Location: Kigali, Rwanda

Product: Tin, Tantalum, Tungsten

Business Type: Exporter

Interviewee: Doreen Butera (Manager)

Audit Dates: 28 Aug, 2024

Background: Brailee is established in 2020 in Kigali, now they can export the tin concentrates around 1 container in 2 months

Facility in Scope: Processing facility, and warehouse

Production process: the material from mine will be crushed by crusher and upgrading by magnetic separator at their facility before export

Due Diligence/ Traceability:

- Brailee has visited their suppliers (mine site) by themselves before dealing the business, now they have 5 mines which they deal with
- We found 1 incident in July 2024 that issued by iTSCi due to the number of tags are not relevant with their supplier's production so they have visited that mine site on 26/8/2024 and the report will be submitted to iTSCi within 2/9/2024
- When the materials have deliver to their facility, all of mine tags will be checked against iTSCi log book and the tags will be cut by RMB. If Brailee found any discrepancy, the materials will be hold/ rejected then it will be investigated by them with iTSCi

Management Systems:

- The Due Diligence/ supply chain policy is not in place, Brailee just practice under iTSCi procedure and laws of Rwanda
- Brailee had a meeting with iTSCi team and their miners on 23/11/2024 to review on the due diligence processes
- Their tolerance's standard for receiving the material is 2 kg/bag, the material will be rejected if the weight discrepancy for each bag is over/under 2 kg. (70kg/bag)
- If the material has delivered after 5 p.m., it will be kept in the container at their premise and the container will be locked by 2 lockers; 1 key hold by Brailee and another one hold by supplier. Brailee will change the lockers for every 3 months as per their security procedure. And the material will be continued on the processes by the next day

Occupational Health and Safety:

- The PPE has provided to their staffs properly, the PPE will be kept at their facility. The staffs need to return all PPE before back home. If any PPE is in not good condition, Brailee will change the new one to their staffs promptly
- Brailee has set up the closed room for crushing with soundproofing sheets in order to prevent the noise pollution to their neighborhoods
- The facility is well maintained; clean, all machines are in good condition, providing the rest area for their suppliers, etc.

Human rights/ Child labour/ Forced labour:

- All of staffs have registered and the copies of ID have kept at their facility
- Upon investigation, no evidence of child labor or forced labor was found at Brailee. All workers appear to be of legal working age



Facility



Checking on mine site visit report



Storage at facility



Thaisarco/ Brailee



Auditee name: Gamico Ltd

Location: Kigali, Rwanda

Product: Tin

Business Type: Mine (LSM)

Interviewee: Jean Philippe Ngagijimana (Owner)

Background: Large scale mining which is located near the downtown of Kigali, their production is around 75MT for 2 months. The material is a single origin, Gamico has not bought the materials from other mines. However, Gamico is not the exporter, they sell the materials to another exporter in Kigali

Audit Dates: 29 Aug, 2024

Facility in Scope: Mine site, processing facility, and warehouse

Production process: All is underground mine, the elementary washing plants have set up at the front of tunnel (1 washing plant for 2-3 tunnels) then the material will be delivered to upgrading plant for crushing, re-washing, drying, and magnetic separating

Due Diligence/ Traceability:

- The production from the mine site will be sealed with the mine tag, separated the bag of materials by tunnel's name, and kept in their storage room as a daily basis
- All of materials are originated from Gamico, that's an advantage for them if they would like to change the traceability scheme or develop it by themselves

Management Systems:

- The Due Diligence policy, human rights policy are in place

Occupational Health and Safety:

- The PPE has been properly provided to all staff members, ensuring they are equipped with the appropriate gear, such as helmets, gloves, safety goggles, and high-visibility clothing, to protect them from workplace hazards and ensure their safety during daily operations
- A fully equipped first aid room has been set up at the site, ensuring that essential medical supplies and resources are readily available to address any workplace injuries or emergencies. The room is designed to provide immediate care, featuring necessary equipment such as bandages, antiseptics, and first aid kits, with staff trained to respond effectively in urgent situations

- There is a well-equipped canteen at the site where workers are provided with complimentary lunch and dinner. This initiative helps support their well-being, boosts morale, and ensures they have the energy needed to perform their tasks efficiently and safely
- Safety signs, the organization's safety policy, the names of the tunnels, as well as the corresponding levels, shafts, and distances, have been clearly labeled throughout the working area. Additionally, emergency contact numbers are prominently displayed, ensuring that workers can easily access critical information and act quickly in case of an emergency

Human rights/ Child labour/ Forced labour:

- All staff members have been officially registered, with their personal and employment details recorded in the system. This ensures that their information is up-to-date and accessible for tracking purposes, and maintaining accurate records for operational and safety compliance
- Upon investigation, no evidence of child labor or forced labor was found at GAMICO. All workers appear to be of legal working age

CSR

- Construction of the Genocide Memorial at Ruliba
- To give raincoats and torches to 217 local securities of Kigali sector
- Donation of a vehicle to Kigali sector to be used for security and hygiene
- 150 goats have been donated to disadvantaged families
- Supporting the Kiziguro school handball club
- Sponsoring the Kwibohora football tournament
- Contributing to the construction of houses for families living in high-risk zones
- Participating in activities organized by the local government and the local communities
- Supporting vulnerable families in Kigali sector



Facility



Tagged material



Storage at facility



Upgrading plant



First AID room