



Company Report

Step 5 Report

1.0. Company Information

- **Legal Entity Name:** Mining Mineral Resources S.A.S.
- **Registration Number:** CD/TRICOM/LSH/RCCM/14-B-01615
- **Registered Address:** 588, Kipushi Road, Lubumbashi, Haut-Katanga, Democratic Republic of Congo
- **Smelter Location:** 588, Kipushi Road, Lubumbashi, Haut-Katanga, Democratic Republic of Congo
- **Smelter ID:** CID004065
- Main Website & Responsible Sourcing Pages:
www.mmrdrc.com, [Download Centre](#)
- **Report Period:** January 1, 2024 - December 31, 2024

1.1 Overview of Tin Smelting Operations

Founded in 2009 in the Democratic Republic of Congo, Mining Mineral Resources (MMR) has been a pioneer in the exploration and production of tin, tantalum, and tungsten. Initially focused on trading and depot operations, MMR has evolved into a fully integrated smelting enterprise, committed to innovation, quality, and responsible sourcing.

MMR was the first in the country to implement an upstream traceability system and strictly adheres to OECD compliance standards. Our commitment to transparency and ethical sourcing is reinforced by RMI certification, ensuring sustainability across our supply chain.

MMR is strategically positioned across the entirety of the tin belt in the Democratic Republic of Congo, pioneering mechanized mining operations that set the standard for responsible and traceable tin production. Our mechanized mining sites drive efficiency, innovation, and compliance, ensuring an uninterrupted supply of ethically sourced tin. Alongside these operations, MMR maintains a network of trading branches that support our supply chain integration and traceability initiatives.

Our smelting facilities are equipped with two electric arc furnaces, certified by the Responsible Minerals Initiative, with an annual production capacity of up to 6,000 metric tons of LME-grade equivalent tin metal. Since 2022, MMR has produced advanced Grade A equivalent tin, reinforcing our leadership in ethical and efficient mineral processing.

MMR is deeply rooted in the heart of the Democratic Republic of Congo, embodying the resilience and innovation of Congolese industry. While our mechanized mining operations drive progress, our extensive network of trading branches empowers communities by creating opportunities for employment and economic growth. Through responsible sourcing and transparent supply chain practices, MMR positively impacts thousands of lives, fostering sustainable development across the tin belt.

1.2 Scope of Minerals and Materials

MMR Smelter processes high-quality tin concentrates sourced exclusively from large-scale mining operations and cooperatives engaged in artisanal and small-scale mining. MMR does not process secondary tin-bearing materials from recycling companies or accept other mineral by-products, partially processed materials such as slags, or any metals other than primary tin concentrates.

Sources of Minerals and Materials

MMR Smelter sources 100% of its minerals directly from MMR-owned mining permits. We operate nine active mechanized mines that drive responsible and sustainable tin production, ensuring efficiency and adherence to ethical standards. In addition to our mechanized operations, we maintain several trading branches that support traceability and community-driven economic development.

MMR ensures full traceability by maintaining comprehensive tag reports that document the origin of minerals from our mechanized mining operations. While we comply with ITSCI protocols to meet industry expectations, our focus remains on the integrity of our own supply chain, where we implement rigorous internal controls. Our commitment to responsible sourcing goes beyond third-party initiatives, as we proactively develop and refine our own traceability systems to uphold the highest standards of ethical mining.

1.3 Responsible Sourcing Commitments

MMR's sourcing processes align with Section 7.3 of the Tin Code, ensuring full traceability and transparency throughout our supply chain. As pioneers in responsible mining in the Democratic Republic of Congo, we go beyond compliance by implementing stringent internal controls that enhance industry standards and promote ethical mineral sourcing.

MMR follows the OECD's recommended five-step framework for mineral due diligence, continually refining our processes to ensure full accountability. Our approach is rooted in a commitment to verifiable and conflict-free sourcing, bolstered by direct oversight of our mechanized mining operations and trading branches.

As a conformant facility under the Responsible Minerals Assurance Process (RMAP), MMR meets and exceeds due diligence obligations under Articles 4, 5, and 7 of Regulation (EU) 2017/821. We implement cutting-edge traceability initiatives to document the journey of our tin from extraction to smelting, reinforcing confidence in our supply chain integrity.

While we align with ITSCI protocols for traceability, we have developed and maintain proprietary verification mechanisms that ensure all minerals processed at our smelter are fully documented. MMR successfully completed its first Tin Code independent assessment in 2023, demonstrating our leadership in responsible sourcing, and we are actively working toward further strengthening these standards in subsequent evaluations.

1.4 Joint Initiative(s) Alignment

MMR is an active leader in global responsible sourcing initiatives, reinforcing our commitment to ethical mineral production and traceability. As a board member of the International Tin Association (ITA) and the Tantalum-Niobium International Study Center (TIC), we play a strategic role in shaping industry policies, promoting best practices, and fostering responsible supply chain management.

We also align with the Responsible Minerals Initiative (RMI), where we actively participate in shaping due diligence frameworks for responsible mineral sourcing. Our engagement with the OECD enables us to contribute to global policy discussions, ensuring that due diligence guidance remains effective and adaptable to the realities of sourcing in high-risk regions like the Democratic Republic of Congo.

While we acknowledge the role of ITSCI in supporting supply chain transparency, we have taken proactive steps beyond industry norms by developing and implementing proprietary traceability mechanisms. These internal initiatives ensure full visibility and accountability across our mechanized mining operations and trading branches, setting a higher benchmark for ethical sourcing.

MMR continues to strengthen its leadership in responsible mineral production, integrating best practices from these global initiatives while maintaining the highest level of compliance and integrity in our operations. Our commitment to transparency and innovation ensures that we contribute meaningfully to the sustainability and credibility of the global tin and tantalum supply chain. MMR actively collaborates with international and regional initiatives to enhance responsible sourcing and traceability in the tin supply chain. As a leading Congolese mining enterprise, we align with globally recognized frameworks while developing and refining our own industry-leading traceability mechanisms.

Our participation in initiatives such as the Responsible Minerals Initiative (RMI) and the International Tin Supply Chain Initiative (ITSCI) helps reinforce compliance with OECD due diligence guidance. However, MMR has gone further by implementing proprietary upstream monitoring systems that ensure full visibility across our mechanized mining operations and trading branches. We work closely with governmental authorities and industry stakeholders to strengthen risk assessment protocols and improve the integrity of mineral sourcing in the Democratic Republic of Congo.

MMR remains committed to setting higher standards for responsible mineral production, ensuring that our engagement with joint initiatives complements our internal controls. By continuously improving our due diligence efforts, we contribute to a more transparent, ethical, and sustainable global tin supply chain.

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MMR follows the OECD's recommended five-step framework for mineral due diligence, continually refining our processes to ensure full accountability. Our approach is rooted in a commitment to verifiable and conflict-free sourcing, bolstered by direct oversight of our mechanized mining operations and trading branches.

As a conformant facility under the Responsible Minerals Assurance Process

(RMAP), link to the most recent publicly available audit report :

<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Mining%20Mineral%20Resources%20SARL%20Public%20Report.pdf>

Summary assessment report

The flagship program of the RMI, the Responsible Minerals Assurance Process (RMAP), formerly the Conflict-Free Site Program (CFSP), takes a unique approach to helping companies make informed choices about responsibly sourced minerals in their supply chains. Focusing on a “pinch point” (a point with relatively few actors) in the global metals supply chain, the RMAP uses an independent third-party assessment of facility/refiner management systems and sourcing practices to validate conformance with RMAP protocols and current global standards. The assessment employs a risk-based approach to validate facilities' company level management processes for responsible mineral procurement. Companies can then use this information to inform their sourcing choices. For more information, please visit: www.responsiblemineralsinitiative.org.

The audit period: 01/31/2022 - 04/30/2023

Audit activities and methodology

- The objective of the assessment is to assess the facility's level of conformance with the Responsible Minerals Assurance Process Tin Standard of Tin 2017
- The assessment consisted of collecting and reviewing objective evidence including documentation, management and employee interviews, facility walk-through, and other observations demonstrating that the facility/refiner's due diligence management system conforms, in all material aspects, to the requirements of the applicable Standard.

Audit conclusions

- The assessment was conducted in accordance with ISO19001:2011 Standard, taking into account the guidance provided by the Responsible Minerals Assurance Process. The assessor verified the scope, selected samples, and gathered objective evidence through documentation review, interviews, and visual observations

The assessor found that the facility's due diligence system are in conformance, in all material aspects, with the requirements of the Responsible Minerals Assurance Process Tin and Tantalum / Tungsten / Gold Standard of 2017, Cobalt Standard of 2021, Mica Standard of 2021, Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of 2021, Global Responsible Sourcing Due Diligence Standard for Mineral Supply Chains All Minerals of 2021, and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.

MMR meets and exceeds due diligence obligations under Articles 4, 5, and 7 of

Regulation (EU) 2017/821. We implement cutting-edge traceability initiatives to document the journey of our tin from extraction to smelting, reinforcing confidence in our supply chain integrity.

While we align with ITSCI protocols for traceability, we have developed and maintain proprietary verification mechanisms that ensure all minerals processed at our smelter are fully documented. MMR successfully completed its first Tin Code independent assessment in 2023, demonstrating our leadership in responsible sourcing, and we are actively working toward further strengthening these standards in subsequent evaluations.

2.0. Company Management System

MMR's company management system is structured to ensure comprehensive oversight and governance across all operational areas. This section outlines the policies, frameworks, and processes that guide our responsible sourcing, compliance, and risk management strategies. By integrating best practices in supply chain due diligence, MMR upholds its commitment to ethical mining and full traceability. The following subsections provide a detailed overview of our approach to supply chain policy, management structure, grievance mechanisms, information gathering, traceability systems, and adherence to global transparency initiatives.

2.1 Supply Chain Policy

MMR is committed to setting the benchmark for responsible mineral sourcing. Our supply chain policy is deeply embedded in the OECD Due Diligence Guidance for Responsible Supply Chains, ensuring compliance with Annex II risks to prevent human rights abuses, forced labor, and any form of exploitation. Our policy is publicly available: [MMR Supply Chain Policy](#).

We take a proactive approach by integrating industry-leading risk assessment and mitigation strategies to strengthen our supply chain resilience. Our policy prioritizes continuous engagement with suppliers and local stakeholders to drive ethical practices while fostering long-term economic development in the communities where we operate.

MMR does not just comply with industry norms; we actively shape them. We have signed the joint industry statement on the Extractive Industries Transparency

Initiative (EITI) and uphold its 12 principles through transparent reporting and ongoing policy development. Our commitment extends to a firm stance on disengagement from supply chain actors where severe abuses are identified, ensuring that our operations reflect the highest ethical standards.

While ITSCI provides monitoring frameworks, MMR independently enforces rigorous verification and due diligence protocols beyond standard requirements. We maintain direct oversight of our mechanized mining operations and trading branches, ensuring that final supply chain decisions are made internally. This demonstrates our role as an industry leader in ethical mining, reinforcing transparency, accountability, and traceability at every stage of our operations.

2.2 Management Structure

MMR operates with a robust and experienced management team, ensuring strong governance and adherence to ethical mining standards. Our leadership has been instrumental in shaping responsible sourcing policies and operational excellence. The Compliance Department is headed by a Senior Compliance Manager with over 14 years of expertise in mineral due diligence, holding a degree in Geotechnics and Hydrogeology from the University of Lubumbashi. His extensive experience spans various international organizations focused on responsible mineral supply chains.

Our Traceability Team plays a critical role in decision-making and includes department heads from different divisions. This team ensures continuous oversight of compliance measures and meets regularly to address strategic and operational challenges. The Branch Manager reports directly to the senior committee, reinforcing our commitment to responsible sourcing and operational transparency.

Each key sourcing personnel has a well-documented role, aligning with MMR's overarching strategy for ethical mineral production. The Trading Manager leads branch operations, developing risk mitigation strategies and overseeing sourcing activities. The Compliance Manager actively participates in on-the-ground assessments, OECD forums, and industry engagements, including workshops led by the Responsible Minerals Initiative (RMI) and International Tin Association (ITA). They also oversee major processes such as the Responsible Minerals Assurance Process (RMAP), Tin Code Report, and Limited Assurance Engagement.

Given the nature of our business, MMR maintains regular communication with suppliers through structured engagements, including scheduled meetings, email

correspondences, and risk assessment reviews. All significant decisions are well-documented, ensuring a structured and accountable approach to responsible sourcing.

2.3 Grievance or Whistleblowing Policy

MMR upholds ethical business practices and ensures that grievances and complaints are addressed transparently and equitably. Employees and stakeholders are encouraged to report concerns related to misconduct, wrongdoing, or risks within our supply chain. Our full grievance policy can be accessed here: [MMR Grievance Policy](#).

2.4 Information Gathering from Suppliers for Red Flag Review

MMR has implemented a rigorous and structured approach to evaluating mineral origins and identifying red flags in line with ITA-RMI Joint Assessment Criteria. Our due diligence framework ensures that all minerals sourced align with CAHRA regulations and OECD due diligence standards.

Our process includes a thorough evaluation of supplier credibility, transportation routes, and mine-site extraction data. MMR leverages real-time data tracking and verification systems to cross-check mineral provenance, ensuring that 100% of our minerals originate from verified and active mining operations under MMR ownership.

We continuously enhance our knowledge of supply chain risks, conducting on-the-ground assessments and engaging with stakeholders to maintain complete documentation and compliance. By integrating these proactive measures, MMR reinforces its commitment to transparency, ethical sourcing, and responsible mineral production.

2.5 Chain of Custody or Traceability System Description

MMR has implemented a comprehensive chain of custody and traceability system to ensure full transparency across our supply chain. Our process leverages a combination of digital tracking systems and on-the-ground verification to monitor the journey of minerals from extraction to processing and export.

We utilize our proprietary digital system, 'Tag Point,' which assigns unique identifiers to each mineral batch, allowing us to track every stage of the supply chain. This system works alongside ITSCI's reporting framework, ensuring compliance while reinforcing our independent traceability standards. Our traceability extends beyond regulatory requirements, incorporating real-time data monitoring, cross-referenced validation at processing points, and government-issued tagging mechanisms.

MMR also collaborates with government agencies to support local traceability efforts, ensuring all minerals sourced meet the highest ethical and environmental standards. Our Compliance Department performs rigorous verification of incoming shipments, verifying tag authenticity and cross-checking with our internal tracking records.

Additionally, we integrate Extractive Industries Transparency Initiative (EITI) data to enhance our oversight of supply chain actors, further strengthening our due diligence framework. Our active participation in international initiatives, combined with our own industry-leading monitoring systems, ensures MMR remains a benchmark for responsible mineral sourcing and full supply chain accountability.

2.6 Statement on EITI Principles and Reporting

MMR is fully committed to the Extractive Industries Transparency Initiative (EITI), recognizing transparency and accountability as fundamental pillars in the natural resources sector. We actively support and implement the 12 EITI principles, ensuring that our mineral sourcing and financial reporting align with global best practices.

As part of our dedication to responsible business practices, MMR publishes detailed reports on all payments made to the Democratic Republic of Congo's

government. In adherence to EITI Standard provision 2.5(c), we promote full disclosure of beneficial ownership for entities engaged in exploitation rights, processing, and export within the mining sector. This commitment reinforces our stance on eliminating opacity in resource governance and supply chain operations.

However, despite our compliance, the EITI-DRC website has not reported the necessary data for the designated period, highlighting gaps in broader implementation. We continue to engage with relevant authorities and industry partners to enhance transparency and advocate for greater accountability within the sector. For additional details on EITI implementation, refer to: [EITI Report on DRC](#).

3.0 Risk Assessment

MMR has established a comprehensive risk assessment framework designed to identify, evaluate, and mitigate risks within our supply chain. Our structured approach incorporates real-time data monitoring, in-depth supplier evaluations, and ongoing due diligence to prevent conflict financing, human rights abuses, and environmental concerns.

3.1 Red Flag Identification

MMR utilizes a detailed chain of custody and traceability system to assess risks associated with mineral origin and transportation, particularly within CAHRA-designated regions. Our internal traceability department continuously records and evaluates supply chain risks, holding weekly meetings to review discrepancies and ensure compliance with OECD Annex II standards. Any identified irregularities are escalated to a specialized traceability team, which includes key operational managers responsible for investigating and addressing concerns at extraction sites.

3.2 Record Keeping

MMR maintains meticulous records of all sourcing, due diligence processes, and supplier interactions. Our record-keeping system ensures:

- Secure storage of electronic and physical records, retained for a minimum of five years.
- Documentation of all due diligence assessments, risk evaluations, and mitigation strategies.
- Digital records of receipts, supplier data, and compliance reviews, ensuring full traceability and regulatory alignment.

3.3 On-the-Ground Assessments

MMR was the first company to implement ITSCI in Central Africa, leveraging this expertise to conduct field assessments and risk evaluations across conflict-affected regions. Our teams—including geologists, legal experts, and compliance officers—conduct thorough field visits, assessing security conditions, production levels, and adherence to responsible sourcing principles.

MMR also collaborates with cooperatives and regulatory bodies to provide policy guidance and training on risk management. Our operational branches house storage depots for concentrates, where field teams conduct real-time monitoring of incoming material. When risks are identified, we coordinate with key stakeholders, including ITSCI reporting teams and local civil society groups, to recommend appropriate mitigation strategies.

4.0. Risk Management

MMR maintains a secure and transparent supply chain, ensuring full compliance with ethical sourcing standards. Our risk management strategy focuses on proactive measures to mitigate potential risks and ensure operational integrity. This includes comprehensive due diligence, continuous monitoring, and cross-verification mechanisms.

4.1 Supply Chain Security and Oversight

MMR's supply chain is structured as a secure circuit, ensuring minerals originate from approved mechanized mining operations and recognized mining cooperatives. Our compliance framework includes:

- **Screening and validating suppliers** to ensure they meet ethical and regulatory requirements.
- **Conducting surprise inspections** and periodic site visits to verify supply sources and operations.
- **Cross-referencing production data** with official government records, purchase vouchers, and transport authorizations to prevent discrepancies.
- **Tracking mineral movements** from mining sites to export facilities through a proprietary traceability system.
- **Maintaining transparency** by sharing relevant supply chain data with institutionalized mechanisms and downstream buyers.

To support risk-based due diligence, MMR has appointed a Senior Compliance Manager to oversee internal controls and compliance efforts. The Compliance Department ensures due diligence transparency through a structured system for data collection, archival, and reporting.

Our team places a strong emphasis on high-risk supply chains, ensuring continuous updates and thorough documentation of:

- Supplier identities, including beneficial ownership structures.
- Payments related to extraction, trade, and mineral processing.
- Transactions involving public or private security forces within the supply chain.

4.2 Mitigation Actions

To further strengthen risk monitoring and management, MMR has implemented an incident reporting protocol. This system enables structured data collection and ensures effective communication throughout the supply chain. Key mitigation strategies include:

- Engagement with NGOs and civil society organizations to enhance risk awareness and compliance initiatives.
- Collaboration with local security services and industry stakeholders to assess and improve safety measures.
- Continuous review of regulatory reports and industry developments to align with evolving best practices.

MMR actively addresses security, human rights, and environmental risks associated with mineral extraction and transportation. Our Compliance Department has developed a comprehensive risk management plan that outlines corrective actions, escalation processes, and operational improvements for identified risks. Through these efforts, we maintain the highest standards of accountability, ensuring that our supply chain remains ethical, transparent, and secure.

5.0. Due Diligence Report

MMR operates in one of the most closely monitored and complex mining environments in the world. As a result, we have developed one of the most rigorous due diligence frameworks in the industry to ensure our sourcing, processing, and export operations meet the highest international standards. We recognize that the scrutiny placed on mineral supply chains, particularly in the Democratic Republic of Congo, requires unparalleled diligence, transparency, and preparedness. Our due diligence reporting reflects our commitment to compliance, risk mitigation, and industry leadership.

5.1 Annual Reporting Commitment

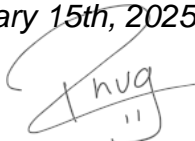
MMR is dedicated to providing full transparency in its sourcing activities by publishing an annual due diligence report that outlines all minerals and materials processed within our operations. This report serves as a critical resource for customers, downstream partners, and regulatory bodies, offering a comprehensive view of our responsible sourcing practices, risk management measures, and adherence to global compliance standards. By ensuring robust and consistent reporting, we reinforce our position as a leader in ethical mineral production and supply chain governance.

5.2 Disclosure of Mine of Origin Information

Traceability is at the core of MMR's supply chain management. While we maintain the confidentiality of certain proprietary concession details, we fully disclose relevant mine origin information to auditors, international regulatory bodies, and recognized third-party assessment programs. This ensures that all stakeholders have confidence in the integrity of our sourcing practices, while protecting sensitive business data. Our adherence to international due diligence frameworks guarantees that our operations remain transparent, secure, and accountable.

MMR continues to refine and strengthen its reporting mechanisms to align with evolving global best practices, reinforcing our leadership in responsible mineral sourcing and due diligence excellence.

Raj Chug
Business Development
Mining Mineral Resources SAS
January 15th, 2025

A handwritten signature in black ink, appearing to read "Raj Chug" with a stylized flourish underneath.