



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 - December 31, 2025

1.1. Overview of Tin Smelting Operations

Established in 2009 in the Democratic Republic of Congo (DRC), Mining Mineral Resources (MMR) has been a pioneer in the exploration, trading, processing, and smelting of strategic minerals, including tin, tantalum, and tungsten. From its early activities focused on mineral trading and depot management, the Company has progressively integrated upstream and downstream operations, culminating in the operation of a state-of-the-art tin smelter. MMR has maintained uninterrupted operations over the years, building a strong reputation for operational reliability, innovation, and quality. The integration of trading, traceability, and smelting activities reflects the Company's long-term commitment to efficiency and responsible sourcing.

As a recognized leader in responsible mineral sourcing, MMR introduced one of the first upstream traceability systems in the DRC and operates in full alignment with the OECD Due Diligence Guidance. This commitment has been validated through certification under the Responsible Minerals Initiative (RMI) and continuous conformance with international standards.

MMR sources tin concentrates through a diversified production base, including mechanized, semi-mechanized, and artisanal and small-scale mining (ASM). The Company operates across seven provinces, manages fifteen trading depots, and oversees several mechanized and semi-mechanized mining sites.

The smelter operates two RMI-certified electric arc furnaces, with a combined annual capacity

of up to 3,600 metric tons of London Metal Exchange (LME) Grade A equivalent tin metal. Since 2022, MMR has consistently produced high-purity Grade A equivalent tin, reinforcing its position as a regional and international reference for ethical and efficient mineral processing. MMR's operations are supported by approximately 100 employees, complemented by experienced management personnel responsible for strategic oversight and operational control.

1.2. Scope of Minerals and Materials

The MMR smelter exclusively processes primary tin concentrates sourced directly from large-scale mining (LSM) operations and from cooperatives producing tin concentrates through artisanal and small-scale mining (ASM). This sourcing model ensures a consistent and traceable supply of high-quality tin concentrates.

MMR does not process secondary tin-bearing materials, recycled materials, slags, partially processed minerals, or other metallic by-products.

1.3. Sources of Minerals and/or Materials

During the reporting period, 100% of the minerals processed by MMR were sourced from primary tin mining operations located within the Democratic Republic of Congo. More or less 15 operational branches, all situated within permitted mining areas, supply the smelter with raw materials. MMR does not source materials from subsidiaries, third-party recycling companies, or secondary tin-bearing inputs.

Below is a summary of the MMR Smelter inputs for the period 1 January to 30 October 2025:

Country	% of total intake	Notes
Democratic Republic of Congo	100%	Dodd frank country

All incoming materials are accompanied by complete traceability documentation, including tag reports issued by the Company and the Upstream Joint Initiative (UJI). These reports confirm the mine of origin, transport routes, and tagging data for each shipment delivered to the smelter. The information is validated through the UJI traceability system, including confirmation by authorized government agents.

1.4. Responsible Sourcing Commitments

MMR confirms that its policies, systems, and practices are fully aligned with Section 7.3 of the Tin Code and the OECD five-step risk-based due diligence framework for responsible mineral supply chains. The Company demonstrates its commitment to responsible sourcing through compliance with the Tin Code, the ICGLR Regional Certification Mechanism, and the Responsible Minerals Assurance Process (RMAP). These frameworks collectively ensure

conformity with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs).

This Step 5 Report describes MMR's due diligence system, including management structures, risk identification and assessment processes, mitigation measures, and public disclosure practices. These measures support compliance with Articles 4, 5, and 7 of Regulation (EU) 2017/821. MMR sources exclusively from the DRC and holds RMAP conformant status as a tin smelter (the next is scheduled on January 2026). The Company successfully completed its first independent Tin Code assessment in 2023 and its second assessment in October 2025, covering environmental, social, governance, and responsible sourcing standards. MMR continues to work closely with the UJI programme to ensure that minerals sourced from the DRC are not associated with conflict financing or serious human rights abuses, thereby reinforcing ethical sourcing throughout the supply chain.

- 2023 Audit of RMAP requirements by Arche Advisor on December
- 2024 Tin code report by ITA published on September: https://tincode.org/wp-content/uploads/2024/09/20240904-2022_23-Tin-Code-Report-MMR_final.pdf
- 2024 Independent limited assurance engagement report : <https://mmrdrc.com/wp-content/uploads/2025/03/MMR-240605-TC-Assurance-Report-ITA-Revised-V4-1.pdf>
- 2025 Audit of RMAP requirements by BDO UK on January: <https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Mining%20Mineral%20Resources%20SARL%20Public%20Report.pdf>
- 2025 Tin code report by ITA reported on October: <https://tincode.org/wp-content/uploads/2025/10/2024-25-TC-report-MMR.pdf>

1.5. Joint Initiative(s) Alignment

MMR is an active member of the International Tin Association (ITA) and a full member of the International Tin Supply Chain Initiative (ITSCI). The Company has extensive experience with ITSCI systems and has been actively involved in their implementation and continuous improvement since their inception in 2010.

MMR personnel, in collaboration with relevant DRC government representatives, regularly participate in evaluations of tagging, traceability, and incident management mechanisms, including the functioning of Community-Level Stakeholder Committees (CLS) and Provincial-Level Stakeholder Committees (CPS).

MMR representatives also participate in international responsible sourcing forums, including the OECD Forum on Responsible Mineral Supply Chains (Paris, May 2025).
<https://mneguidelines.oecd.org/2025-forum-on-responsible-mineral-supply-chains.htm>.

MMR was the first company in the DRC to establish an internal tag data processing facility and has implemented a digitalized traceability system capturing mineral type, quantity, producer, cooperative, and transaction dates (new version is developing...). While benefiting from UJI systems, MMR retains full responsibility for its own due diligence decisions and risk management actions.

The Company has been subject to multiple independent audits and assessments between 2011 and 2025, including OECD and ITSCI. These assessments demonstrate continuous improvement and confirm alignment of the UJI system with OECD requirements.

MMR acknowledges that alignment with OECD standards does not imply the absence of risk and therefore maintains supplementary internal controls to address supply chain risks specific to its operations.

MMR's operations have undergone several independent evaluations,

- 2011 Audit of the company's policies and the level of implementation of the due diligence step 5 by Channel Research: <https://www.ITSCI.org/company-audits-public/>
- 2015 Audit of OECD + ITSCI requirements by Synergy Global Consulting: <https://www.ITSCI.org/company-audits-public/>
- 2019 Audit of OECD + ITSCI requirements by Synergy Global Consulting: <https://www.ITSCI.org/company-audits-public/>

2.0. Company Management System

2.1. Supply Chain Policy

MMR's Supply Chain Policy reflects its firm commitment to responsible mineral sourcing and strict adherence to the OECD Due Diligence Guidance. The policy addresses all Annex II risks, including human rights abuses, forced labor, child labor, and the direct or indirect support of armed groups or security forces.

The policy is publicly available and forms the basis for supplier engagement, risk mitigation, and disengagement where necessary. MMR prioritizes constructive engagement and risk mitigation but applies immediate disengagement in cases involving severe abuses.

Our supply chain policy is made public here: <https://mmrdrc.com/wp-content/uploads/2023/06/MMR-Supply-Chain-Policy-2.1.-1.pdf>

2.2. Management structure

MMR maintains a well-established management structure supported by experienced and qualified personnel. The Compliance Department is led by a Senior Compliance Manager with over 14 years of professional experience in mineral due diligence, traceability, and risk management.

The traceability and compliance functions are integrated across departments, with clear reporting lines and documented responsibilities. Branch managers report directly to the Compliance Department, ensuring consistent implementation of responsible sourcing requirements.

2.3. Grievance or Whistleblowing Policy

MMR operates a formal grievance and whistleblowing mechanism consistent with its Code of Business Conduct. Complaints are handled in a timely, transparent, and impartial manner, with safeguards to protect whistleblowers from retaliation.

Stakeholders are encouraged to report concerns related to misconduct or supply chain risks through internal and external channels, including ITSCI, ITA, and RMI mechanisms.

Please refer to MMR Grievance form: <https://mmrdrc.com/download-centre>

Please refer to MMR Grievance Policy: [In file](#)

MMR is also member of other external organizations and initiatives which provide relevant mechanisms including:

- ITA's Tin Code : <https://tincode.org/tin-code-reports/>
- ITSCI: <https://www.ITSCI.org/contact/>
- RMI : <https://www.responsiblemineralsinitiative.org/contact/>

2.4. Information gathering from suppliers for red Flag Review

MMR has a procedure to evaluate the plausibility of a mineral's mineral's stated origin and assess red flags in accordance with Steps 2A of the [ITA-RMI Joint Assessment Criteria for Tin Smelters V2 \(25 March 2021\)](#). It relies on the company list of CAHRA, and information gathered through other due diligence processes including on mine site extraction, transport and export point. MMR is sourcing from its own concessions.

We make continual efforts to increase the extent of our information on our supply chain for red flag review and we have complete documentation, 100 % of our minerals is come from the active mines and sufficient information are available as prove than we assess on the regular basis origin and transport routes.

2.5. Chain of Custody or Traceability System Description

We have implemented a robust chain of custody and traceability system to identify locations and supplier to the mine of origin while we source from CAHRA country. This is well document when using an upstream joint initiative mechanism like ITSCI. All mineral is come from CAHRA during the period of the audit.

MMR is developing a digitalized system utilizing unique identifiers to record the locations and operators along the supply chain, from the point of origin to the export, and documents on to the smelter. The Annex II of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas describes how to support local traceability in the countries of the region of great lakes. Once a mine is identified and approved by the ITSCI governance committee, traceability is implemented by the relevant government agents. A partner of the DR Congo government issues tags of those government agents for use at the approved sites, and the agents record the relevant data associated with each bag of mineral as tags are applied. The agents are regularly on the site and are responsible for assuring the sources of minerals tagged. Similar data recording takes place at processor and exporter locations and all data is transmitted, either internet or phone network to the tracking data Centre where it is verified and checked for errors and anomalies. Both the stakeholders support the government by training agents and following up on any potential issues of fraud or others challenges.

Once MMR receives the domestic shipment through this system, we will report to receipt to UJI.

At MMR, the Compliance Department will also conduct a thorough verification of the physical tags received to ensure their accuracy and alignment with the documented records. This process is a critical step in maintaining transparency and adherence to established regulatory and operational standards.

MMR is providing the information needed from mines, local traders and exporters for further risk assessment on our minerals from CAHRA. This includes for example the locations where minerals are mined, consolidated, processed and upgraded as mentioned in OECD Step 1C1

We aim to refer to the Extractive Industries Transparency Initiative (EITI) information available on actors in our supply chain when they publish company reports for example in DRC, the most current reported time is from 2023. <https://www.tsl-itierdc.org/donnees-itie>

A description of the externally operated systems we utilize is published in Joint Initiative website which are publicly available: <https://www.ITSCI.org/info/>

2.6. Statement on EITI Principles and Reporting

MMR is committed to supporting the 12 general principles and implementation of the Extractives Industries Transparency Initiative (EITI), recognizing the importance of transparency and accountability in natural resources sector. <http://tincode.org/wp-content/uploads/2024/11/20241122-JointTIndustryStatementEITlv1.pdf>

MMR makes a public reporting for all payments did to the DRC Government: Therefore, the EITI Standard, in its provision 2.5(c), requires that countries implementing the EITI request and that companies publicly disclose information relating to beneficial ownership. Any company holding exploitation rights, any processing entity, any mining cooperative, any approved

counter, as well as any stock exchange carrying out its activities under the provisions of the Mining Code are therefore required to declare their beneficial owners. The website of EITI-DRC has not reported the data during the designated period but the last one is on: <https://www.tsl-itierdc.org/donnees-itie>.

3.0. Risk Assessment

3.1. Red Flag

MMR identifies supply chain risks through its traceability system, on-the-ground assessments, supplier engagement, and UJI reporting. All sourcing areas during the reporting period were located in CAHRAs within the DRC.

In particular, the following issues have been identified in the website: <https://www.cahraslist.net/cahra>

3.2. Record Keeping

MMR maintains comprehensive electronic and physical records covering supplier data, receipts, risk assessments, mitigation actions, and decision-making processes. Records are securely stored and retained for a minimum of five years.

3.3. On-the-ground Assessments

Through its participation in ITSCI and UJI, MMR supports regular field assessments, stakeholder consultations, and incident investigations. Local communities, cooperatives, authorities, and civil society actors are actively involved in risk identification and resolution.

3.4. Annex II Risks and Supply Chain Management Plan

Our risk assessment approach for minerals from CAHRA involves a review of potential risks in our supply chain. We analyze the likely presence and impact of Annex II risks against our supply chain policy based on information on risks from the recent period. We have carried out risk assessment for our Dodd Franck sources country: Democratic Republic of Congo.

Referred to Annex II Risks (in annex), the major incidents are listed below:

Security /Human Right/operational

MMR-IR-17052025

Location: Lunga, Nyunzu, Tanganyika, DRC

Date incident occurred: 30/04/2025

Summary

Fatal shooting by FARDC: On 30 April 2025, a serious security incident occurred at the Lunga Mining Site involving a member of the Forces Armées de la République Démocratique du Congo (FARDC).

A civilian resident of Lunga village, sustained a gunshot wound allegedly inflicted by FARDC soldier of Unit 061, under the kisengo's command.

The victim initially received medical treatment at Kisengo Mining before opting for traditional medicine. He passed away on 14 May 2025.

The incident was immediately escalated, and the alleged perpetrator was arrested. No evidence indicates involvement of local Exporter personnel.

Mitigation Measures Implemented

- ✓ Immediate operational suspension

- ✓ Coordination with security and judicial authorities

- ✓ Monitoring of FARDC deployment and conduct

- ✓ Internal escalation and documentation

- ✓ Conditional resumption of activities based on stability assessment

Conclusion – Audit & Compliance Perspective

The Lunga incident represents a high-severity security and human rights risk driven by external armed actor conduct.

MMR has demonstrated:

- ✓ Immediate escalation
- ✓ Responsible operational suspension
- ✓ Full cooperation with authorities
- ✓ Alignment with UJI, RMI and RMAP standards

Security & Armed Actor Misconduct

MMR-IR-10072025

Location : Semeki, Ngoya, Haut-Lomami, DRC

Date incident occurred : 09/07/2025

Summary

Rogue soldier incident:

On 09 July 2025 at approximately 18:00 hrs, a rogue soldier from the Forces Armées de la République Démocratique du Congo (FARDC), accompanied by a motorcyclist, entered the Semeki mining site, located about 300 meters from a military base.

The soldier attempted to forcibly arrest six diggers exiting the site. When the individuals fled, he fired several warning shots into the air. No civilian injuries occurred during this phase.

Subsequently, the soldier detained a cooperative-affiliated buyer and forcibly confiscated approximately 20 kg of cassiterite. While discharging his firearm again, he sustained a self-inflicted gunshot injury to the foot.

The incident occurred in an area under government control and UJI monitoring, raising serious concerns regarding civilian safety and supply-chain integrity.

Mitigation Measures Implemented / Recommended

- ✓ Immediate escalation to military command
- ✓ Reinforcement of military protocol awareness
- ✓ Coordination with UJI field teams
- ✓ Recovery process for confiscated cassiterite
- ✓ Continued monitoring of the area

Conclusion – Audit & Compliance Perspective

This incident highlights the risks associated with unauthorized armed actions in proximity to UJI-monitored mining sites. While no civilians were injured, the confiscation of minerals and firearm discharge represent material compliance and security concerns.

MMR demonstrated:

- ✓ Rapid escalation
- ✓ Cooperation with state authorities
- ✓ Protection of civilians
- ✓ Commitment to supply-chain integrity

Safety & Human Rights Risk

MMR-IR-23102025

Location: Ringo, Kisengo, Nyunzu, Tanganyika, DRC

Date incident occurred: 22/10/2025

Summary

Fatal landslide:

On 22 October 2025, a fatal incident occurred at the inactive Ringo mining site, located approximately 5 km from the Kisengo base. The site had been officially closed and declared inactive; however, two to three artisanal miners illegally entered the area at night to extract minerals.

During unauthorized excavation activities, a landslide occurred, burying one artisanal. The

accompanying individuals fled the site and later informed local residents.

The victim's body was recovered on 23 October 2025 and buried with the assistance of the cooperative and local community. An internal investigation was immediately initiated to assess circumstances including soil instability and unauthorized access.

Mitigation Measures Implemented / Recommended

- ✓ Reinforced patrols around inactive sites
- ✓ Awareness campaigns on dangers of illegal mining
- ✓ Installation of warning signage and physical barriers
- ✓ Geotechnical safety review of inactive sites
- ✓ Strengthened coordination with technical authorities

Conclusion – Audit & Compliance Perspective

This tragic incident highlights the serious safety risks associated with unauthorized artisanal mining in inactive areas, particularly where geotechnical instability exists.

Transport & Logistics Safety Risk

MMR-IR-31102025

Location: Ndola, Zambia

Date incident occurred: 31/10/2025

Summary

Load slip accident:

On 31 October 2025, while transiting on the Kapiri–Ndola Road in Masaiti, Zambia, a truck transporting Tin Ingots from an exporter facility (Lubumbashi) to Europe was forced to brake suddenly after another vehicle abruptly entered its lane.

As a result of the sudden braking, part of the load—secured on a tarpaulin—shifted and fell from the trailer onto the roadside. The transporter immediately secured the area and reloaded the materials.

A full verification confirmed that all 29 pallets and 8 loose tin ingots were recovered intact, with no loss, damage, injuries, or environmental impact.

Mitigation & Preventive Measures

- ✓ Reinforced cargo securing (chains, straps, anti-slip mats)

- ✓ Avoid placing heavy cargo directly on tarpaulins
- ✓ Driver refresher training on braking and safe distances
- ✓ Pre-departure inspection of all securing equipment

Conclusion – Audit & Compliance Perspective

This vehicle incident represents a minor logistics safety event with no loss, injury, or supply-chain breach.

MMR and its transporter demonstrated:

- ✓ Prompt response
- ✓ Full recovery and traceability
- ✓ Transparent reporting
- ✓ Preventive improvement measures

Security & Human Rights Risk

MMR-IR-03112025

Location: Buzito, Mitwaba, Haut-Katanga, DRC

Date incident occurred: 02/11/2025

Summary

Guard killed during theft : On 02 November 2025 at approximately 13:00 hrs, a fatal security incident occurred within the mining perimeter of the Buzito site, Mitwaba.

Three unauthorized individuals were detected attempting to illegally remove cassiterite from the site. During a routine security patrol, a cooperative security guard intercepted the suspects. The individuals reacted violently, assaulting the guard from behind and strangling him in an attempt to flee.

Despite raising an SOS alert, the guard succumbed to his injuries. A second guard responded immediately, apprehending two suspects, while one suspect escaped with a bag of cassiterite.

Mitigation Measures Implemented / Recommended

- ✓ Reinforced security patrols (day & night)
- ✓ Enhanced coordination with local authorities
- ✓ Additional safety and emergency response training
- ✓ Internal investigation into procedural gaps

Conclusion – Audit & Compliance Perspective

This fatal incident highlights the significant security risks associated with artisanal mining environments, particularly relating to unauthorized intrusions and mineral theft.

MMR has demonstrated:

- ✓ Prompt incident response
 - ✓ Cooperation with authorities
 - ✓ Support to affected parties
 - ✓ Commitment to continuous improvement
-

Security / Theft

MMR-IR-01122025

Location: Mikengele, Lubudi, Lualaba, DRC

Date incident occurred: 29/11/2025

Summary

Cassiterite theft : Theft of 100kg cassiterite following forced access during heavy rainfall. On 29 November 2025, following daily mineral purchasing activities at the Mikengele trading area, heavy rainfall prevented the immediate transfer of minerals to the secured storage container. During the night, an unidentified individual exploited these conditions to force entry into the temporary trading site.

The incident was detected at 06:32 on 30 November 2025 during the opening of operations. Subsequent verification confirmed the theft of 100 kg of cassiterite from an initial stock of 210 kg. No injuries were reported. Immediate internal reporting and compliance notification were undertaken.

Mitigation Measures Implemented

- ✓ Relocation to a secured permanent depot
- ✓ Installation of a metallic security door
- ✓ Review of night-time storage procedures
- ✓ Staff sensitization on emergency handling during adverse weather

Conclusion – Management & Audit Perspective

The Mikengele incident confirms the importance of adaptive security controls in artisanal and trading-site operations, particularly during adverse weather conditions.

MMR demonstrated:

- ✓ Prompt incident detection
- ✓ Transparent reporting

- ✓ Effective corrective action
 - ✓ Continuous improvement of controls
-

Human rights abuses

MMR-IR-24122025

Location : Busanga, Lubudi, Lualaba, DRC

Date incident occurred : 23/12/2025

Summary

Mass Violence Incident

Between 23 December 2025 and 31 December 2025, a series of serious security incidents occurred at the Busanga mining site, involving organized groups of artisanal miners who demanded that the cooperative review the current mineral purchase price.

These incidents resulted in serious human rights violations, including physical assaults on personnel, destruction of mining infrastructure, and a significant disruption of lawful mining operations. The events posed a material risk to the safety of employees and contractors, as well as to the continuity of operations and compliance obligations.

Immediate Actions Taken (RMAP – Step 3 Risk Mitigation)

1. Immediate evacuation of exposed personnel
2. Intervention by law enforcement authorities
3. Reinforcement of site security
4. Arrest of individuals involved

Conclusion – Compliance & Audit Perspective

These incidents highlight major security and human rights challenges at the Busanga mining site, requiring coordinated actions among the mining operator, state authorities, and local communities.

MMR reaffirms its commitment to:

1. Respect human rights
2. Prevent conflict and violence
3. Promote responsible mining practices

UJI Incident report from January to December 2025;

Incidents report direct involving the company: **25**

Incidents report indirect involving the company: **6**

Incident report of level 1: **15**

4.0. Risk Management

4.1. Risk Management Plan and Steps

The supply chain of MINING MINERAL RESOURCES is a secure circuit. In addition to minerals sourced from mechanized mining, the suppliers are mining cooperatives that work on mining sites approved and integrated into the UJI program where risks are monitored MMR doing:

- Screening potential suppliers and validating them when necessary.
- Verifying the source of origin through surprise visits and periodic inspections of the mining sites managed by the suppliers (cooperatives).
- Cross-verifying the quantities provided at various levels using official government documents (purchase vouchers, loading reports, transport authorization) as well as ITSCI documents (Log-books) and internal MINING MINERAL RESOURCES documents (Packing-lists, Tag reports), etc.
- Gathering information related to the source mine, transport route, trading center, and export. This information is then communicated to immediate downstream buyers or to any institutionalized mechanism set up for this purpose.
- Escorting mineral products from collection and preprocessing bases to the processing, packaging, and export bases.

The 5 steps of the OECD Guidance for Risk-Based Due Diligence require MINING MINERAL RESOURCES SAS to establish an internal team responsible for overseeing due diligence controls in the supply chain. By allocating the necessary budgetary resources, the mining company has appointed a senior executive to lead the Compliance Department, designated as the Senior Compliance Manager.

The department is implementing an internal system dedicated to transparency, information collection, and the archiving of due diligence procedures in the supply chain, along with their findings and the decisions made accordingly.

It is crucial to pay particular attention to supply chains identified as sensitive. It is imperative to strive to gradually gather and maintain updated information on the responsible and/or traceable supply chain:

- The identity of all relevant suppliers and service providers involved in the handling of materials in the supply chain, from the source mine to the smelter. This includes the ownership structure (including beneficial owners) and organization of the exporter, as well as the names of company executives and directors. It is also essential to identify business links and connections of its executives in business circles, administration, political environments, or the military, particularly in conflict or high-risk areas.
- The total amount of taxes, fees, and royalties paid to the government related to the extraction, trade, transport, processing of minerals into metal, and the export of minerals.
- The total payments made to public or private security forces.

4.2. Mitigation actions

In order to facilitate the collection and analysis of information related to the supply chain, the Compliance Department has developed an incident reporting protocol that enables effective monitoring of the supply chain. Targeted information is collected and transmitted through the

communication chain defined by this protocol, from extraction to smelter.

Information is also obtained and shared through:

- Established links with NGOs and civil society.
- Discussions regarding site and supply route security conducted during safety and human rights forums with mining operators and representatives from provincial security services.
- Monthly reports published by the UJI, as well as meetings of Community-level stakeholder committees and Provincial-level stakeholder committees held in the four provinces: Haut-Katanga, Lualaba, Haut-Lomami, and Tanganyika.

Risk assessment is conducted for each incident recorded by MINING MINERAL RESOURCES or reported by the UJI team, primarily in relation to human rights, security, and potential direct or indirect support for non-state armed groups. To manage these risks, the Compliance Department of MINING MINERAL RESOURCES (MMRCD) has established a comprehensive risk management plan addressing security, human rights, funding of armed groups, and traceability. This plan outlines the general measures to be taken in the event that such risks are identified, the timelines for implementing these measures, and the timelines for mitigating these risks, where applicable.

5.0. Due Diligence Report

5.1. Annual Reporting Commitment

MMR report serves as a valuable resource, providing detailed information on all types of minerals and materials to our customers and downstream companies. We are committed to transparency in our sourcing activities.

5.2. Disclosure of Mine of Origin information

Information regarding our concession is typically confidential. Disclosed in full to UJI and all auditors that visit the MMR site

Raj Chug

hug
Business Development
Mining Mineral Resources SAS
January 05th, 2026

