
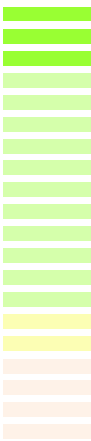




INTERNATIONAL TIN CODE REPORT: Mining Mineral Resources S.A.R.L.

GENERAL INFORMATION		
Company details	<p>Mining Mineral Resources S.A.R.L. 794, Av. Deviation, Route Likasi, Commune Annexe, Lubumbashi, DRC</p> 	 <p>Visual Progress Guide</p>
Date of this report	Publication 4 September 2024	
Date of previous report	-	
Report author(s)	Independent External Assessor Sustainability Standards Manager, International Tin Association Ltd	
Report verified by	Raj Chug, Head of Business Development	
Contact information	https://mmrdrc.com/	
About our company	<p>Mining Minerals Resources S.A.R.L. (hereinafter referred to as MMR) is a SOMIKA Group company established in 2009 to explore the potential for tin, tantalum, tungsten, and gold in the Democratic Republic of the Congo (DRC). According to its website, MMR has a presence across seven provinces in the DRC (Haut Katanga, Haut-Lomami, Tanganyika, Lualaba, Maniema, South Kivu and North Kivu), holding 50 mining concessions (+6,500 km² of mining permits) for mechanised, semi-mechanised and artisanal-small scale mining in the form of mining cooperatives, and also operates one smelter in Lubumbashi. The smelter and mechanised tin mining operations are the scope of this Tin Code report.</p> <p>MMR operates its own mechanised tin mines in Kanuka and Malemba, with underground tin mining projects in Mitwaba. The seven mechanised sites that MMR operate in the Katanga region are Kanuka, Kiyambi, Malemba, Mitwaba, Vunda, Mukuyu and Kisengo. In 2021, it produced 5,600 tonnes of tin concentrate and targeted production of 7,200 tonnes of tin concentrate for 2022. MMR also has a trading unit set up to support the local community through cooperatives.</p> <p>MMR has offices in Lubumbashi (DRC) and it is backed by over 1,000 employees. It also supports over 15,000 artisanal miners across various sites. Through Vinmart and Kisengo Foundations, MMR conducts various local CSR activities in education, entrepreneurship, healthcare, and infrastructure.</p> <p>The company holds ISO 9001, 14001 and ISO 45001 certifications.</p>	
Significant changes from previous report	Not Relevant	



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Further information and references

1. MMR [website](#)
2. [Grievance channel](#)
3. [Book of policies](#)
4. [Social responsibility](#)
5. [Due Diligence Report and Supply Chain Policy](#)
6. [Responsible Minerals Assurance Process Assessment \(RMAP\) Report](#)



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PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices

Overview of Principle Performance

The company has achieved a high rating of *conforming* in three standards of this Principle and is progressing in all other standards of this Principle. It conforms with the expectations related to publishing policies, legal compliance, and transparency through its public Book of Policies, national report to the Extractive Industries Transparency Initiative (EITI) and tracking record of licences. The company is progressing in working towards implementing appropriate management systems, preventing corruption and bribery and providing training on some but not all aspects relevant to this Principle supported by evidence from its ISO 9001 certification, published policies and training records.

STANDARD		RATING	ADDITIONAL INFORMATION
1.1	Policies Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code.	Conforming	The company has demonstrated that it conforms with this expectation through publishing on its website its Book of Policies which covers several expectations of the Tin Code, including anti-bribery, anti-fraud, anti-money laundering, internal communication, health, safety, environment and remediation, governance, code of ethics and 'conflict free' minerals.
1.2	Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Progressing	The company has demonstrated that it is progressing with this expectation through developing and working towards the implementation of appropriate management systems to control and monitor relevant aspects of this principle. It is ISO 9001 certified, which covers some, but not all relevant aspects under this Principle.
1.3	Legal compliance Companies will have and keep up to date all business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including with health and safety and environmental requirements.	Conforming	The company has demonstrated that it conforms with this expectation through keeping up to date all business registrations and licences to legally carry out business activity and comply with relevant local laws. It has the relevant licences or permits according to local law and maintains a record of the permits.
1.4	Business integrity Companies will seek to prevent anti-competitive behaviour, corruption and bribery, including facilitation payments which should be publicly disclosed if unavoidable.	Progressing	The company has demonstrated that it is progressing with this expectation through developing and implementing an Anti-Bribery, Anti-Fraud and Anti-Money Laundering Policy and procedures which address some business integrity expectations, but these do not appear to extend to managing the risk of anti-competitive behaviour and the approach to managing the risk of facilitation payments is unclear.
1.5	Transparency Companies will support the implementation of the principles of the Extractive Industries Transparency Initiative (EITI) individually or through joint efforts, including through appropriate reporting ⁽¹⁾ ⁽¹⁾ Reporting is required in an implementing country of EITI.	Conforming	The company has demonstrated that it conforms with this expectation through publishing a statement supporting the 12 EITI Principles in its Supply Chain Policy and is reporting under the Extractive Industries Transparency Initiative (EITI) in the DRC, which is an EITI-implementing country.



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1.6	Whistleblowing Companies will develop and implement whistleblowing procedures to enable employees and stakeholders to report concerns related to company activities, including relevant expectations of the Tin Code.	Progressing	The company has demonstrated that it is progressing with this expectation through implementing a Grievance Policy enabling any interested party to report any concern safely and anonymously on its website, but it has not provided evidence of procedures for investigating and resolving non-supply chain issues and concerns raised by stakeholders.
1.7	Training Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 1 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company has demonstrated that it is progressing with this expectation through implementing training covering some but not all aspects relevant to this Principle.

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company is progressing in most of the standards of this Principle. The company has an Environmental Policy and holds an ISO 14001 certificate applicable to the mining and processing of minerals and metals but the certificate's scope is unclear as to which sites it applies to. As a result, it is progressing with the expectations related to the implementation of an environmental management system, water quality management, reduction of water consumption, land, soil and air quality management, tailings management, hazardous, non-hazardous and inert waste management, not using banned substances and biodiversity protection. The company informally addresses the expectation related to closure and reclamation through its 2016 Environmental and Social Impact Assessment (ESIA) for one mechanised site. The company could provide evidence on the expectations related to GHG emission management, energy consumption management, respect for protected areas and environmental training to improve its rating.

STANDARD		RATING	ADDITIONAL INFORMATION
2.1	Management system Companies will work towards implementing an environmental management system that utilises the mitigation hierarchy (avoid, minimise, mitigate, compensate) to control and monitor relevant aspects of this Principle 2.	Progressing	The company has demonstrated that it is progressing with this expectation through implementing its Environmental Policy and its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers.
2.2	Water quality Companies will seek to understand and manage discharges to surface waters and groundwater in order to minimise negative impacts on water quality.	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes water management or the management of discharges to surface and groundwater.
2.3	Water consumption and availability Companies will seek to reduce water consumption in their operations in order to minimise negative impacts on water availability.	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes the management of water consumption or how the company seeks to reduce consumption.
2.4	Land and soil quality Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality.	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes the management of land and soil quality.

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2.5	<p>Air quality Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes the management of air quality.
2.6	<p>Greenhouse gases Companies will seek to measure, monitor and publicly disclose direct and indirect CO2 equivalent (GHG) emissions, and work towards economic reduction targets appropriate to the nature and scale of operations and relevant protocols.</p>	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of seeking to measure, monitor and publicly disclose direct and indirect CO2 equivalent (GHG) emissions and working towards economic reduction targets.
2.7	<p>Energy consumption Companies will seek to identify technically and financially feasible measures for reducing the direct and indirect consumption of energy per unit of production or increasing the share from renewable sources.</p>	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of measures for reducing direct and indirect consumption of energy or increasing the share from renewable sources.
2.8	<p>Tailings management Companies will dispose of or store tailings⁽²⁾ in a manner that minimises the risk of impacts to the environment and human health in accordance with recognised standards when available.</p> <p>⁽²⁾ Including to design, build, operate, monitor and decommission for all life cycle stages.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes the management of tailings.
2.9	<p>Hazardous waste management Wherever possible companies will avoid the generation of hazardous wastes; where this is not possible companies will manage and dispose of wastes in a manner that minimises negative impacts on human health and the environment.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes the management of hazardous waste.
2.10	<p>Non-hazardous and inert waste management Wherever possible companies will minimise the production of non-hazardous and inert wastes and consider reuse and recycling options before disposing of them in an appropriate manner.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes the management of non-hazardous and inert waste.
2.11	<p>Banned substances Companies will not use substances that are banned under international convention or local laws.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 14001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes the identifications and management of banned substances.
2.12	<p>Biodiversity protection Companies will seek to understand potential impacts on biodiversity and avoid activities that significantly modify or degrade critical natural habitats through an appropriate action plan.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through its 2016 ESIA for one mechanised site that refers to the identification and management of flora and fauna, and its ISO 14001 certification applicable



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			to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or whether it includes the management of biodiversity.
2.13	Protected areas Companies will respect legally protected areas in accordance with local laws and will seek to understand and manage potential impacts of operations on adjacent zones.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of respecting legally protected areas in accordance with local laws and understanding and managing potential impacts on adjacent zones.
2.14	Closure and reclamation Companies will allocate adequate financial resources to enable implementation of closure and rehabilitation of operations in accordance with local requirements and expectations of key stakeholders.	Informal	The company has a 2016 ESIA for one mechanised site that refers to closure, addressing informally this expectation. The company could improve its rating by providing evidence of a closure plan and budget that has been developed for all mine sites.
2.15	Training Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 2 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of working towards implementing training regarding relevant aspects of this Principle.

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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company is progressing in all of the standards of this Principle. The company has a Health and Safety policy and holds an ISO 45001 certificate applicable to the mining and processing of minerals and metals but the certificate's scope is unclear as to which sites it applies to. As a result, it is progressing with the expectations related to implementing a health and safety management system, safe working practices, incident investigations and follow-up, and H&S training.

STANDARD		RATING	ADDITIONAL INFORMATION
3.1	Health and safety management systems Companies will work towards implementing a management system to monitor and control relevant aspects of this Principle 3.	Progressing	The company has demonstrated that it is progressing with this expectation through implementing its Health and Safety Policy and its ISO 45001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or relevant documentation for the smelter.
3.2	Safe working practices Companies will maintain safe and healthy working conditions by implementing measures that minimise and seek to eliminate workplace fatalities, injuries and occupational diseases amongst employees, contractors and visitors.	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 45001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or evidence for the smelter.
3.3	Incident investigations Companies will document reportable health and safety incidents using a transparent and inclusive procedure that allows affected workers and local communities to provide input.	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 45001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or relevant documentation for the smelter.
3.4	Incident follow up Following a reportable health and safety incident, companies will define and implement corrective actions in a timely fashion and monitor the effectiveness of such actions.	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 45001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or relevant documentation for the smelter.
3.5	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 3, require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas, and provide appropriate briefings to visitors to company facilities.	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 45001 certification applicable to the mining and processing of minerals and metals, but it has not provided the ISO audit report to evidence which of MMR's mine sites the certification covers, or relevant documentation for the smelter.

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company has achieved a high rating of *conforming* in one standard and is progressing in most of the standards of this Principle. Through its Child Labour Policy and 2019 ITSCI Audit Summary Report, it conforms with the expectation related to managing the risk of the worst forms of child labour. The company is progressing with the expectations related to implementing a systematic approach to managing labour issues, managing the risk of discrimination, violence and harassment, remuneration, forced labour, working hours and training through its Employee Handbook and by implementing the RMI's Risk Readiness Assessment self-assessment tool. The company could provide evidence on the expectations related to managing the risk of other forms of child labour and engaging in freedom of association and collective bargaining with workers to improve its rating.

STANDARD		RATING	ADDITIONAL INFORMATION
4.1	Labour management systems Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4.	Progressing	The company has demonstrated that it is progressing with this expectation through its Employee Handbook and implementing the RMI's Risk Readiness Assessment self-assessment tool, which covers some but not all the labour-related aspects of this Principle.
4.2a)	Discrimination Companies will implement an equality policy (including on gender) and not make employment related decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job.	Progressing	The company has demonstrated that it is progressing with this expectation through its Employee Handbook, which includes a policy statement on equal employment opportunity and on discrimination, but it has not provided evidence of procedures that are used to implement provisions noted in the handbook.
4.2b)	Violence and harassment Companies will avoid practices that may result in physical, psychological, sexual or economic harm to persons in the workplace, including gender-based violence and harassment	Progressing	The company has demonstrated that it is progressing with this expectation through its Employee Handbook, which includes a policy statement on harassment and addresses violence, but it has not provided evidence of procedures that are used to implement provisions noted in the handbook.
4.3	Remuneration Companies will ensure workers receive fair remuneration ⁽³⁾ for standard and overtime hours worked that meets or exceeds the local legal minimum wage plus any applicable statutory benefits and provides equal pay for work of equal value. ⁽³⁾ In the absence of a minimum wage the prevailing competitive industry wage or the living wage if known.	Progressing	The company has demonstrated that it is progressing with this expectation through its Employee Handbook, which addresses remuneration, overtime and some benefits, but it has not provided evidence of procedures that are used to implement provisions noted in the handbook.
4.4	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Progressing	The company has demonstrated that it is progressing with this expectation through its Child Labour Policy, which notes the company prohibits forced or compulsory labour, and results of the 2019 ITSCI Audit for some sites, which notes that no evidence was found of compulsory labour, but it has not provided evidence of developing and implementing a specific policy addressing the risk of forced labour.



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4.5	<p>Child labour – worst forms Companies will not engage in the worst forms of child labour as defined by Article 3 of ILO Convention No. 182 including that which is likely to harm the health, safety or morals of children.</p>	Conforming	The company has demonstrated that it conforms with this expectation through its Child Labour Policy, which addresses the worst forms of child labour, and results of the 2019 ITSCI Audit for some sites, which notes that no evidence was found of worst forms of child labour.
4.6	<p>Child labour – other forms Companies may employ children of minimum age 14 years, or older as defined by local laws, to undertake non-hazardous, light work that does constrain their ability to gain an education.</p>	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of managing the risk of other forms of child labour.
4.7	<p>Working hours Companies will comply with local laws on working hours and provide paid annual and statutory leave, and ensure that workers undertake overtime on a voluntary basis and have at least one day of rest for every 7-day period⁽⁴⁾ or as prescribed by local laws (whichever is higher).</p> <p>⁽⁴⁾ In circumstances such as shift work the averaging of working hours over a different period is permitted as recognised by the ILO and/or local laws.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through its Employee Handbook, which addresses working hours, overtime and vacations, but it has not provided evidence of procedures that are used to implement provisions noted in the handbook.
4.8	<p>Freedom of association and collective bargaining Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.</p>	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of engaging with workers on freedom of association and collective bargaining as permitted by local laws.
4.9	<p>Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 4 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.</p>	Progressing	The company has demonstrated that it is progressing with this expectation through its training plan, which evidences that training takes place covering some labour-related aspects, but it has not provided evidence of the exact nature of training.

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PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company is progressing in most of the standards of this Principle. Through its ISO certifications, engagement with some stakeholders and public grievance mechanism, it is progressing with the expectations related to the implementation of a stakeholder management system, stakeholder mapping and engagement, and implementation of a grievance mechanism. The company informally addresses the expectation of training on aspects relevant to this Principle as limited evidence was provided.

STANDARD		RATING	ADDITIONAL INFORMATION
5.1	Stakeholder management Companies will work towards implementing a systematic approach to stakeholder management to control and monitor relevant aspects of this Principle 5.	Progressing	The company has demonstrated that it is progressing with this expectation through its ISO 9001 certification which implies a formal approach that requires engagement with principal business-related stakeholders, but it has not provided evidence of a specific stakeholder management system that is inclusive to all stakeholders.
5.2	Stakeholder mapping and engagement Companies will seek to identify and record the characteristics and interests of stakeholders affected by, or with the potential to affect, company activities, and plan a participatory approach to engagement including disadvantaged and vulnerable groups.	Progressing	The company has demonstrated that it is progressing with this expectation based on the consideration of interested parties as a component of its ISO 14001 and ISO 45001 certifications and evidence that engagement with some stakeholders is taking place, but these certifications do not explicitly require engagement or consultation with all stakeholders.
5.3	Grievance mechanism Companies will establish an appropriate grievance mechanism to receive, and facilitate resolution of, concerns raised by individuals, workers, communities or civil society organisations regarding company activities.	Progressing	The company has demonstrated that it is progressing with this expectation through its grievance mechanism, which is publicly accessible via the company website, but it has not provided evidence of the related procedure to address grievances received.
5.4	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 5 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Informal	The company has a training plan which evidences that training takes place, but the exact nature of this relative to this Principle is unclear, addressing informally this expectation. The company could improve its rating by providing evidence of training materials for aspects covered under this Principle.

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PRINCIPLE 6: Manage negative impacts on, and contribute to development of, local communities and indigenous peoples

Overview of Principle Performance

The company is progressing in three standards of this Principle. Through its consultation record with some communities, funding of social projects and its plan for social-related investments and development, it is progressing with expectations related to community health and safety management, consultation and contributing to the economic development of local communities. The company informally addresses the expectations of implementing a systematic approach to the management of community, seeking to anticipate and avoid or minimise land rights, use and access, and training on aspects relevant to this Principle as limited evidence was provided. The company could provide evidence on the expectations related to free, prior and informed consent (FPIC), physical resettlement, economic displacement, access to and availability of natural resources, and cultural heritage to improve its rating.

STANDARD		RATING	ADDITIONAL INFORMATION
6.1	Community and indigenous people management Companies will consider implementing a systematic approach to the management of community and indigenous peoples' issues to control and monitor relevant aspects of this Principle 6.	Informal	The company has risk assessment procedures that address risks related to communities in a limited fashion, addressing informally this expectation. The company could improve its rating by providing evidence of procedures for the systematic and formal management of community and indigenous peoples-related issues in all communities in which it operates.
6.2	Community health and safety Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities.	Progressing	The company has demonstrated that it is progressing with this expectation through recording consultations with some local communities and funding development projects that will improve community health and safety, but it has not provided evidence of addressing the potential impacts of its own operations on community health and safety.
6.3	Consultation Companies will plan a process of consultation that enables local communities and indigenous peoples to express their views on risks, impacts and mitigation measures, and allows the company to consider and respond to them.	Progressing	The company has demonstrated that it is progressing with this expectation through recording consultations in one territory (Malemba), but it has not provided evidence of consultations in other territories where tin is produced.
6.4	Free, prior and informed consent (FPIC) Companies will seek the FPIC of indigenous peoples where their lands, access to natural resources or cultural heritage may be impacted by company activities.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of seeking the FPIC of indigenous peoples where the lands, access to natural resources or cultural heritage of indigenous peoples may be impacted by MMR's mining or smelting activities.
6.5	Land rights, use and access Companies will seek to anticipate and avoid or minimise adverse impacts on land rights, land use and access to land and compensate for any significant residual impacts.	Informal	The company has implemented a development project related to improving the cultivation of food crops that could represent a means of compensating for adverse impacts on land rights, use and access, addressing this expectation informally. The company could improve its rating by providing evidence of seeking to anticipate and

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			avoid or minimise adverse impacts on land rights, land use and access to land.
6.6	Physical displacement (resettlement) Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence that physical displacement has not occurred and the standard is not applicable.
6.7	Economic displacement (livelihoods) Companies will financially compensate economically displaced people as required by local laws and plan a livelihoods restoration programme to ensure that there is no net negative impact on their livelihoods.	Inadequate	The company has not provided relevant evidence related to this expectation. The company could improve its rating by providing evidence by clarifying which social development projects are compensating economically displaced people and evidence related to the nature and extent of economic displacement arising from MMR's operations, if any.
6.8	Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Progressing	The company has demonstrated that it is progressing with this expectation through its plan for social-related investments and development, but it has not provided evidence of expenditure on projects that have been completed or that are underway.
6.9	Natural resource use and availability Companies will seek to understand and minimise negative impacts on access to and availability of natural resources ⁽⁵⁾ by local communities and indigenous people. ⁽⁵⁾ Including air, sunlight, soil, and water.	Inadequate	The company has not provided relevant evidence related to this expectation. The company could improve its rating by clarifying evidence on which of the social development projects address negative impacts on access to and availability of natural resources and providing evidence related to seeking to understand and minimise negative impacts on access to and availability of natural resources.
6.10	Cultural heritage protection Companies will anticipate and wherever possible avoid adverse impacts on cultural heritage; when avoidance is not possible, companies will minimise, mitigate and/or compensate for such impacts.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by clarifying evidence on which of the social development projects address negative impacts on cultural heritage and providing evidence related to anticipating adverse impacts on cultural heritage.
6.11	Training Companies will provide appropriate and periodic training for employees regarding aspects of this Principle 6 relevant to interactions with local communities and indigenous people that may occur during the course of their work. Companies will require onsite contractors to undertake the same training when relevant to their specific role.	Informal	The company has a training plan which evidence that training takes place, but the exact nature of this relative to this Principle is unclear, addressing informally this expectation. The company could improve its rating by providing evidence of training materials for aspects covered under this Principle.

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PRINCIPLE 7: Avoid contributing to serious human rights abuses and conflict

Overview of Principle Performance

The company has achieved a high rating of *conforming* in two standards and is progressing in the other two of the standards of this Principle. Through its Human Rights Policy, RMAP audit results and RMI's Risk Readiness Assessment self-assessment tool, it conforms with the expectations related to the implementation of a systematic approach to human rights management and use of private security personnel in accordance with the expectations of the Voluntary Principles on Security and Human Rights (VPSHR). It is progressing with expectations related to training on this Principle through training records on responsible sourcing. The company has demonstrated that it is progressing in responsible sourcing according to international expectations, including the OECD Due Diligence Guidance 3T supplement. MMR has a public Supply Chain Policy and Due Diligence Report available on its website and is on the RMAP conformant list with an audit dated June 2023 which used the audit protocol of '2017'. During the RMAP audit period, the company reported mineral supply from the DRC. Minerals sourced from the DRC as a Dodd-Frank country are sourced with support of the ITSCI due diligence programme, which has been independently confirmed as fully OECD-aligned. However, the RMAP 2017 standard and assessment processes have not yet been confirmed as fully OECD-aligned publicly. The company could provide information on auditor qualifications.

STANDARD		RATING	ADDITIONAL INFORMATION
7.1	<p>Human rights management Companies will work towards implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7 in accordance with internationally recognised human rights frameworks and relevant domestic laws.</p>	Conforming	The company has demonstrated that it conforms with this expectation through its Human Rights Policy, the results of the RMAP audit and the application of RMI's Risk Readiness Assessment self-assessment tool.
7.2	<p>Use of private or state security personnel Companies using direct or contracted workers to provide security will be guided by the Voluntary Principles on Security and Human Rights and by applicable local law.</p>	Conforming	The company has demonstrated that it conforms with this expectation through results in the RMAP audit, which confirms that MMR holds security and human rights forums (Voluntary Principles on Security and Human Rights - VPSHR) with mining operators and representatives of the provincial security services.
7.3	<p>Responsible sourcing Companies^(6,7) will evaluate potential risks, seek to avoid support to conflict, human rights and other significant abuses and publicly report on their efforts according to international expectations and laws, in particular the OECD Due Diligence Guidance 3T Supplement⁽⁸⁾.</p> <p>⁽⁶⁾ Companies with smelters will seek to be third-party assessed against recommended criteria. ⁽⁷⁾ Companies without smelters will seek to apply aspects of the recommended criteria relevant to their own circumstances ⁽⁸⁾ The criteria recommended for standard 7.3 is the ITA-RMI Assessment Criteria for Tin Smelting Companies v2 (Mar 2021) criteria 7.3. Other criteria may be utilised if deemed equivalent after equivalence checks against criteria 7.3 and 7.3 guidance by ITA experts.</p>	Progressing	The company has demonstrated that it is progressing in responsible sourcing according to international expectations, including the OECD Due Diligence Guidance 3T supplement. MMR has a public Supply Chain Policy and Due Diligence Report available on its website and is on the RMAP conformant list with an audit dated June 2023 which used the audit protocol of '2017'. During the RMAP audit period, the company reported mineral supply from the DRC. Minerals sourced from the DRC as a Dodd-Frank country are sourced with support of the ITSCI due diligence programme, which has been independently confirmed as fully OECD-aligned. However, the RMAP 2017 standard and assessment processes have not yet been confirmed as fully OECD-aligned publicly. The company could provide information on auditor qualifications.



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7.4	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 7 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company has demonstrated it is progressing with this expectation through its training records on responsible minerals sourcing, but it has not provided evidence of training specific to general human rights issues and management.
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PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services

Overview of Principle Performance

The company is progressing in three standards of this Principle. Through the development of agreements with some cooperatives that include guidance on some of the expectations of the Tin Code, it is progressing with expectations related to seeking to positively influencing suppliers of ASM-produced minerals on health and safety, labour and human rights and conflict management. The company informally addresses the expectation of communicating guidance on managing environmental impacts to suppliers of ASM-produced minerals as limited evidence was provided. The company could provide evidence on the expectations related to requesting suppliers of ASM-produced minerals to work towards understanding their supply chain, communicating guidance on formalisation and negotiating with local communities; and influencing positively suppliers of goods and services. The company does not source LSM-produced minerals or secondary materials, hence these expectations are not relevant.

STANDARD		RATING	ADDITIONAL INFORMATION
8.1	Suppliers of ASM produced minerals, general Companies will request suppliers declare that they will work towards understanding their supply chain and communicating through suppliers the objectives of International Tin's Code, information and guidance to encourage improvements.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of requesting suppliers declare that they will work towards understanding their supply chain and communicating through the supply chain the objectives of the Tin Code.
8.2	Principle 1 ASM minerals (compliance and policies) Suppliers will be requested to communicate the importance of formalisation and potential opportunities to engage in practical projects encouraging formalisation of ASM as appropriate (based on feedback) to the production area.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of communicating the importance of formalisation and potential opportunities to engage in practical projects encouraging formalisation of ASM as appropriate.
8.3	Principle 2 ASM minerals (environment) Suppliers will be requested to communicate guidance on managing environmental impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Informal	The company has provided evidence of limited training on environmental management, addressing informally this expectation. The company could improve its rating by providing evidence of formally communicating guidance on managing environmental impacts to most of its suppliers of ASM as appropriate.
8.4	Principle 3 ASM minerals (health and safety) Suppliers will be requested to communicate guidance on managing health and safety impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Progressing	The company has demonstrated that it is progressing with this expectation through developing agreements addressed to cooperatives which address health and safety management guidance. This was evidenced for one supplier but has not been evidenced for most of its suppliers of ASM-produced minerals.
8.5	Principle 4 ASM minerals (labour) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Progressing	The company has demonstrated that it is progressing with this expectation through developing agreements addressed to cooperatives which address human rights guidance, including child and forced labour. This was



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			evidenced for two suppliers but has not been evidenced for most of its suppliers of ASM-produced minerals.
8.6	Principle 6 ASM minerals (communities) Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of communicating guidance on negotiating with local communities and indigenous peoples regarding access to land.
8.7	Principle 7 ASM minerals (human rights and conflict) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict, as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Progressing	The company has demonstrated that it is progressing with this expectation through developing agreements addressed to cooperatives which address human rights guidance and conformance with OECD due diligence expectations for sourcing from Conflict-Affected and High-Risk Areas (CAHRA). This was evidenced for two suppliers but has not been evidenced for most of its suppliers of ASM-produced minerals.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.	Not Relevant	This expectation is not relevant as the company does not source LSM produced minerals.
8.9	Suppliers of secondary materials Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Tin Code.	Not Relevant	This expectation is not relevant as the company does not source secondary materials.
8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of requesting major suppliers of goods and services working towards the principles of the Tin Code.



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PRINCIPLE 9: Encourage the understanding, and safe and appropriate use of tin products

Overview of Principle Performance

Through its membership of International Tin Association, the company conforms with the expectation to regularly support the understanding of the potential effects of tin on humans and the environment and has also encouraged the safe, appropriate, and efficient use of tin. The company is progressing in communicating information on tin, and the tin industry via its website and ITA membership with no noted breaches under data protection laws.

STANDARD		RATING	ADDITIONAL INFORMATION
9.1	Understanding potential impacts of tin Companies will seek to advance the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data.	Conforming	Through its membership of International Tin Association, the company conforms with the expectation to regularly support activities to review, lead and advance understanding of the properties and potential effects of tin as found necessary.
9.2	Encouraging safe and appropriate use Companies will support research, innovation and collaboration that promotes safe and efficient production, use and recycling of tin, including to ensure regulatory compliance and efficient use of energy and natural resources	Conforming	Through its membership of International Tin Association, the company conforms with the expectation to regularly support research and innovation and leading collaboration that promotes the safe, appropriate, and efficient use of tin.
9.3	Communicating appropriate information Companies will communicate accurate information on impacts and use of its products, to workers, users in the value chain and wider stakeholders, accounting for the need for appropriate confidentiality.	Progressing	The company has demonstrated that it is progressing with this expectation as information related to the use of tin products is provided on the public website, with no noted breaches under data protection laws, but has not yet evidenced providing more information to wider stakeholders.



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PRINCIPLE 10: Work towards reporting against the International Tin Code

Overview of Principle Performance

The management and staff of MMR have taken ownership of reporting on the Tin Code and there is a clear commitment to providing evidence on conformance and making continued progress with the standards of the Tin Code. They proactively worked with the Independent External Assessor and the International Tin Association to develop this report on the Tin Code, conforming with all reporting expectations.

STANDARD		RATING	ADDITIONAL INFORMATION
10.1	Policy Review Companies will review published policies at least annually to reflect any changes to company expectations in relation to standard 1.1	Conforming	The company representatives were knowledgeable about the expectations of the Tin Code and the need to review and update policies. They actively participated in reviewing and updating policies and procedures when required.
10.2	Communicating reporting information Companies will support and agree to the annual publication of a report of activities against the Principles and Standards of the Code	Conforming	The management of MMR agreed to the publication of this report on activities against the Principles and Standards of the Tin Code.
10.3	Management Review Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	The management of MMR approved the content of this report.



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Appendix A – Description of Tin Code reporting

Evidence review process: The assessment of conformance with the Principles and Standards relies on detailed evaluation of documentary evidence and discussion with the company to ensure a full understanding of progress. ITA encourages members to provide maximum available information and collates this into an evidence dossier for submission to the Independent Assessor. During a period of feedback and consultation the company may submit further evidence to clarify or add to the information originally provided in order to improve accuracy. The Independent Assessor then determines the final Rating and agrees the text included in this report.

The Independent Assessor: ITA engages an expert to make the assessment of evidence separately and independently from the views of the ITA or its members. The Independent Assessor for this report is a consulting firm with more than 25 years' experience working on environmental and social issues and impacts in the natural resource sector. It specialises in analysis, prevention and management of environmental and social issues in the oil and gas, mining and aggregates industries worldwide and is familiar with large scale and artisanal mining, and acts as auditor and/or advisor to other commodity standards initiatives such as Bettercoal.

Reporting guide: The 'visual progress guide' on the title page is a general representation of the proportion of ratings overall.

Not Relevant	The Standard is not appropriate or does not apply to the company.
Third-party verified	Company activity has been verified by a third party recognised qualified body, for example during audit or inspection.
Conforming	Company activity is formally documented and implemented with evidence of conformance with the Standard.
Progressing	Company activity is documented but may benefit from formalisation in a procedure or expansion to the Standard.
Informal	Company activity is underway but may benefit from being documented more formally to the Standard.
Inadequate	There is insufficient evidence available to achieve other ratings.

Additional information: This provides information on the evidence that was made available by the company to demonstrate its activities and show progress.