

INDEPENDENT LIMITED ASSURANCE ENGAGEMENT REPORT

1. Limited Assurance Conclusion

Based on our work described in this report, nothing has come to our attention that causes us to believe that Mining Mineral Resources (MMR) S.A.S has not reported their Step 5 Report accurately and does not comply with the Tin Code Standard 7.3 (Responsible Sourcing) Assessment Criteria for Tin Smelting Companies (Version 2, 25 March 2021) for the period from 1 January 2023 to 31 December 2023 in all material respects.

2. Date and Period of Assessment

Date of report	23 December 2024.
Addressee Company name and registered address	Mining Mineral Resources S.A.S 588, Avenue Kipushi, Commune Annexe, Ville-Lubumbashi, Democratic Republic of Congo.
Site Audited	Mining Mineral Resources S.A.S 588, Avenue Kipushi, Commune Annexe, Ville-Lubumbashi, Democratic Republic of Congo.
Level of assurance engagement	EnviroSense, the independent verifier, performed the work to a limited assurance level in accordance with ISAE 3000 (Revised).
Period covered by the assessment	1 January 2023 – December 2023.
Scope of assessment	<p>The scope of the mineral assessment was:</p> <ul style="list-style-type: none">the tin ore received at the MMR Lubumbashi warehouse and mineral processing site unloaded from delivery trucks at the warehouse*, andthe transfer of warehouse receipts to the smelter facility <p><i>*Tin ore receipts are not explicitly received for either (a) resale or (b) smelting. This required the verification of tin ore receipts at the site in Lubumbashi, as well as the initial processing and consolidation of lots allocated to the smelter.</i></p> <p>The mass balance system applies to the transfer of lots from the warehouse to the smelter and the production of tin, not the entire process.</p>
General sourcing information	MMR plans and operates a 'closed pipe' material sourcing system to reduce risk. MMR purchases and owns the mining concessions from which the tin ore receipts at Lubumbashi originate. Depending on whether the mine is LSM (Large Scale Mining) or ASM (Artisanal Scale Mining), either a mining contractor appointed by MMR will operate the

	mine for LSM, or in the case of ASM, one cooperative supplier is appointed to provides the tin ore.
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3. Author of the Assurance Report

Name and address of auditor and assurance firm authoring this report	Robin Askey EnviroSense (International) Limited Chiltern House Waterside Road Chesham HP5 1PS United Kingdom
Qualifications, experience and independence of assurance firm	EnviroSense is a UK government-registered assurance provider for specific articles of legislation verification and a UK-registered UKTR monitoring organisation. The ethical requirements governing our audit and verification services are aligned and equivalent to the IESBA Code Part A and B. We applied ISQC1 (quality control) to this assurance engagement.
Qualifications, experience and independence of auditor	<ul style="list-style-type: none"> • BSc (Hons) Applied Science. • EnviroSense UK Timber Regulation Monitoring Organisation Programme Director. • Completed over 200 ISAE 3000 assurance engagements. • Lead Auditor for International Sustainability & Carbon Certification (ISCC) • Lead Auditor for Management Systems (ISO 9001, ISO 14001) • Previous Tin Code assurance engagements. • Due diligence advisory for 3Ts since 2012 and attendance at OECD forums • The auditor and EnviroSense are independent as defined under IESBA Code sections 910,911,920,922, 924 and 990.

4. Assurance Firm Responsibilities

<ul style="list-style-type: none"> • Demonstrating that the audit firm is suitably experienced and capable of conducting assurance engagements according to the ISAE 3000 Standard. • Planning and liaising with the Company to conduct the limited assurance engagement in accordance with ISAE 3000 (Revised) and the International Standard on Quality Management (ISQM1). • Applying testing methodologies and processes to data and information the company uses in compiling the company report to validate its accuracy. • Provide an explanation to the company of audit findings, including identified misstatements or absence of information that hinders the formation of a definitive conclusion. • The provision of clear evidence and information on which, in the auditor's opinion, the assertions made in the company report are not accurate and cannot be substantiated. • Verifying corrections to misstatements with the company report where there is insufficient information to enable verification. • Applying the audit principles of traceability, completeness, consistency and accuracy to verify information and data.
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- Preparation of the audit report in accordance with ISAE 3000, including the International Standard on Quality Control (ISQC1).

5. Company Responsibilities

- Preparing data and information for auditing and verification
- Appointing an appropriately qualified and ISAE 3000 experienced audit firm
- Disclosing data and information to the audit firm on request
- Providing further information to the audit firm on request to enable a conclusion to be reached to a limited assurance engagement level as to whether the assertions of senior management and the directors contained within the company report comply with the Tin Code standard and are appropriate and accurate.
- Disclosing any changes in the data and information or misstatements identified internally by the company that could affect the conclusion of the audit firm.
- Correcting material misstatements or errors identified by the audit firm within the company report or with data and information related to the company report.

Step 4A – Plan an independent third-party audit of smelter due diligence:

MMR agreed with the auditors to plan the audit correctly according to the engagement agreement:

- i. Initial pre-engagement meeting and verification planning.
- ii. Agreement to provide information to the auditor's data room before commencing the assurance work.
- iii. Risk assessment and materiality determination by the auditors.
- iv. Information data review by the auditors.
- v. Test and sampling strategy formulation.
- vi. Audit plan submission by the auditors.
- vii. Smelter inspection and verification of processes, data generation, interviews and documentary checks by the auditor.
- viii. Assurance opinion formation.

Step 4B - Implement the smelter audit with the correct scope, criteria, principles and activities:

MMR provided all necessary documentation and enabled immediate supplier interviews and verification by the auditors if required. The auditor did not need to verify information directly with the supplier, a cooperative organisation mining minerals on concessions owed by MMR's parent company, SOMIKA.

6. The Subject Matter

ITA Code Standard 7.3: Responsible sourcing. Companies 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, particularly the OECD Due Diligence Guidance 3T Supplement.

7. The Assessment Criteria

The International Tin Association (ITA) – Responsible Minerals Initiative (RMI) Assessment Criteria for Tin Smelting Companies (Version 2) and ITA-RMI Assessment Criteria Guidance 7.3.

8. Summary of Work Performed

Document Review and Preparation

- Review and desk-top document assessment of Mining Mineral Resources SAS (MMR) procedures, responsibilities and authorities before attending the site (see table below).
- Formulation of a risk, materiality and sampling plan by the auditors.
- Issuance of an audit plan to MMR on 1st December 2024.
- Pre-audit planning meeting with MMR on the 3rd of December 2024.

Site Visit

- Site visit to the Lubumbashi smelter on 4th, 5th and 6th of December 2024.
- Opening meeting on 4th December with due diligence management team and senior managers of MMR.
- Interviews and testing of processes and evidence as listed in the document list.
- Closing meeting on 6th December 2024 with senior MMR staff.

Personnel Interviewed and Providing Input

Role

MMR: Compliance and Due Diligence Manager

MMR: Operations Manager

MMR: Head of Operations

MMR: Traceability Manager

MMR: Smelter Operations Manager

Government: Division of Mines Representative onsite at MMR

Government: SAEMAPE Representative onsite at MMR

Government: CEEC Representative onsite at MMR

Government: O.C.C Representative onsite at MMR

Joint Initiative: ITSCI Manager

Government: Division of Mines Manager

Government: CEEC Manager

Documented Evidence

Provided for the desk-top audit in advance of the site visit

- 1 MMR Smelter Step 5 Report 1 January 2023 – 31 December 2023.
- 2 MMR Book of Policies
- 3 CAHRA List
- 4 MMR Due Diligence Report for the Division of Mines DRC
- 5 MMR Transaction List
- 6 MMR Supply Chain Policy
- 7 MMR Red Flag Procedure
- 8 MMR Risk Management Strategy and Plan
- 9 MMR JV List
- 10 ITSCI Incident Summary 2023

Accessed onsite

- 1 Job Descriptions
- 2 MMR Incident Summary 2023 and plans
- 3 MMR Minutes of Meetings Core Committee
- 4 MMR Risk/Due Diligence Team communication
- 5 MMR Training Records
- 6 MMR Mass Balance
- 7 MMR Tag and Mine Data Collation Reports
- 8 ITSCI Mine Baseline Reports
- 9 ITSCI Audit Report - COMIDEC

- 10 ITSCI Alert emails
- 11 ITSCI Shipment Reports
- 12 ITSCI Negotiant Logbooks
- 13 ITSC MMS Logbooks (mineral transfer to smelter)
- 14 CLS Minutes of Meetings
- 15 Mineral receipt and transactional documentation:
 - GRN (Goods Received Notes).
 - ITSCI Negotiant Logbooks.
 - Branch Packing List.
 - DRC Transfer Certificate (Branch to destination), province and transport route, tonnes and description.
 - CEEC (Centre d'Expertise de'Evaluation et de Certification) Process-verbal de traceability des produits mines – raised at the province of domestic origin.
 - Ministry of Mines - Attestation of Mineral Transfer from Mines.
 - Ministry of Mines - Attestation of Substances.
 - Ministry of Mines - Attestation of Transport of Minerals.
 - SAEMAPE document – Acknowledgement of Request (Verbal).
 - SAEMAPE – Authorisation to Transport.
 - National Congolese Police - Inspection of Substances.

Sampling

Qualitative: all processes and procedures of Steps 1-5 of MMRs due diligence system (no sampling). The audits applied specific attention to the processes governing mineral receipt at the MMR Lubumbashi warehouse and mineral processing site and the transfer of delivered minerals to the warehouse, collation of Lots for smelting and transfer to the smelter to determine the potential for undeclared or unaccounted mineal deliveries.

Qualitative: the content of MMR Step 5 due diligence report.

Quantitative sampling: This was a random sampling strategy matching the records of the minerals' deliveries to the MMR Lubumbashi warehouse and mineral processing site, to the suppliers, and to negotiant tag lists to verify quantities sent from the supplier and received at the Lubumbashi site. This information was used for the next stage: the collation of mineral deliveries into Lots to be allocated to the smelter to verify the plausibility of the tonnages allocated to the smelter and origins of the minerals.

Assurance reporting

- Internal EnviroSense QA of the work conducted
- Report finalisation

9. SUMMARY OF FINDINGS

<p>IV:a to IV:f – Use of an Aligned Joint Initiative (JI) or Institutionalised Mechanism (IM)</p>	<p>MMR has fully implemented and actively participates in the Upstream Joint Initiative (UJI), leveraging it as a key component in the company's due diligence processes. Information from the UJI is consistently utilised.</p> <p>MMR comprehends the scope, purpose, and alignment of the UJI initiative. The company verifies the sources involved in the UJI program. It effectively maximises the value of the information accessed while recognising MMR's ultimate responsibility for due diligence. This does not prevent the company from conducting any due diligence measures deemed appropriate according to their standards.</p>
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<p>Step 1A - Adopt and Commit to a Supply Chain Policy</p>	<p>The company has established a comprehensive supply chain policy consistent with the requirements of the Tin Code standard. This policy explicitly incorporates Annex II risks and outlines the company's commitment to responsible sourcing. The policy is publicly available on the MMR website. Step 1A has been met.</p> <p>The auditor identified some opportunities for improvement (OFI) that the Company can consider. OFI does not require action by the Company or affect the auditor's conclusion.</p> <p>Opportunities for improvement concerning Step 1A to be considered by the Company are:</p> <ul style="list-style-type: none"> • Add a succinct description of the management processes for identifying and addressing supply chain risks. The company has a well-established due diligence management system (DDS), and the auditors believe providing a succinct description of it would be beneficial. • Explicitly specifying which steps of the OECD due diligence framework are most relevant to the company's supply chain operations (all due diligence steps; 1-5). This may add clarity for the report user.
<p>Step 1B - Structure Internal Management System to Support Supply Chain Due Diligence</p>	<p>The MMR Lubumbashi tin smelter holds certifications for ISO 9001, ISO 14001, and ISO 45000, covering quality, environmental, and health and safety management systems. MMR has notable expertise in implementing and operating management systems. The company maintains a fully documented management system that addresses all five due diligence steps required by OECD due diligence guidance (OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas) All due diligence (DD) criteria questions have been fully met, as verified by the auditor during interviews and supporting documentary evidence:</p> <ul style="list-style-type: none"> • Assignment of DD responsibilities: Responsibilities are appropriately distributed across staff, ensuring due diligence is not confined to one or a few individuals. • Senior oversight: Senior staff have the authority to oversee DD activities. • Employee expertise and knowledge transfer via extensive training: Employees responsible for DD, in particular the Compliance and Due Diligence Manager, who was formerly an ITSCI Representative in the DRC, possess notable experience. The Compliance and Due Diligence Manager has extensively trained employees, suppliers, and upstream stakeholders, including chiefs and persons involved in community engagement in the mining districts where minerals originate. The training has enhanced employees' understanding and enabled effective knowledge transfer from the Compliance and Due Diligence Manager to several key roles.

	<ul style="list-style-type: none"> • Resources for implementation: Adequate resources, including personnel, time, facilities, and systems, are allocated for effective DD implementation. • Communication of DD and risk information: The company effectively communicates critical DD and risk information through structured processes, verified by meeting minutes, WhatsApp user group messages that also include MMR and ITSCI Incident Reports and other documents (e.g. general action plans of MMR). • Accountability: Employees involved in DD are held accountable for their actions, as evidenced by interviews, job descriptions, and specific role assignments.
<p>Step 1C - Establish controls and transparency over the supply chain</p>	<p>The company has demonstrated compliance with all criteria for obtaining and maintaining comprehensive records related to mineral receipts, their origins, and the supply chain. Descriptions of the minerals received are supported by thorough documentation. This includes information on the naming of the mineral (cassiterite) and information on the origin of minerals, such as the extraction location or the mining area within the DRC. Quantities (kilograms) and extraction dates, expressed in volume or weight, are consistently recorded throughout the documentation. Transport processes and routes are well-documented. Examples of the following mineral sourcing, transportation and receipt documentation from supply include:</p> <ul style="list-style-type: none"> • Goods Received Notes (GRN) for minerals. • Branch Packing List. • DRC Transfer Certificate detailing province, transport route, tonnes, and descriptions. • CEEC (Centre d'Expertise de'Evaluation et de Certification) Process-verbal de traceability for domestic origin products. • Ministry of Mines attestations for mineral transfer, material inspection, and transport authorisation. • SAEMAPE documents acknowledging and authorising mineral transport requests. • National Congolese police inspection reports on substances. • ITSCI Negotiant logbooks. • ITSCI Shipment Reports. • ITSCI mine and negociant tags. <p>Supplier and upstream actor information is well-documented, with records of names, addresses, and known actors. MMR and CEEC identify whether UJI tags are preserved during mineral transport and receipt at MMR's Lubumbashi mineral warehouse and mineral processing site. MMR identifies where minerals are reprocessed, packed, or otherwise handled by the cooperative warehouses before transport to the MMR Lubumbashi tin smelter.</p> <p>Under the company's ISO 9001 document management and records procedures, due diligence records are retained for at least five years as required by the criteria. MMR maintains evidence of tax payments</p>

	<p>made by the company to government departments. MMR participates in the EITI process, as confirmed by the DRC Societe Technical certification on 27 September 2024. We note that the 2022 due diligence report of MMR included publishing the tax payments made, which was not in the 2023 due diligence report. An opportunity for improvement exists to include tax payments in the 2023 due diligence report. However, this is not a Tin Code standard requirement. This point is for MMR consideration only based on previous publishing tax payments</p> <p>The company has successfully met all criteria for obtaining and retaining comprehensive records related to mineral receipts, their origin, and the supply chain.</p> <p>1C:5-7 – By-products, supplying smelters, unused metal products and out-of-scope minerals or materials</p> <p>MMR did not receive by-products from supplying smelters, metal products unused for primary purposes, or out-of-scope minerals or materials during the period.</p> <p>1C:8 – Secondary material information requirements</p> <p>MMR did not receive secondary material during the period.</p> <p>1C:9-10 – Supplier records and mass balance</p> <p>MMR has information on the names and owners of the cooperatives. We identified an opportunity to improve the KYC (Know Your Counterparty) of persons within the cooperative's ownership and not rely on community groups and local committees' acceptance of cooperative owners and local committees.</p> <p>Inputs and line items to the mass balance system indicated a non-material variance of below 5%. In the auditors' opinion, no undocumented or unknown suppliers or minerals were supplied to the smelter during the audit period.</p>
<p>Step 1C:1-4 – CAHRA mineral and supplier information requirements</p>	<p>MMR leverages the UJI (ITSCI) for its chain of custody and traceability system. MMR is aware the UJI underwent a second independent OECD Alignment Assessment in 2023, confirming its alignment with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Based on this alignment, MMR utilises the UJI as the foundation for its mineral traceability system.</p>
<p>Step 1D – Structure internal management system to support supply chain due diligence</p>	<p>Verification confirmed that the company meets the criteria outlined in section 1D regarding its supply chain due diligence practices. The company demonstrates a strong commitment to maintaining long-term relationships with cooperative suppliers. This is evidenced by its cooperation in attending regular monthly meetings and active involvement in district-level community engagement and provincial</p>

	<p>meetings with the cooperative representatives. These relationships help improve leverage and enhance supplier compliance, as supported by interviews with key personnel, community meeting minutes and reviewed ITSCI Incident Reports.</p> <p>The company ensures immediate suppliers adhere to MMR supply chain policy, consistent with Annex II of the OECD Guidance. This commitment is formalised in contracts, including clauses requiring proper incident investigation. Additionally, the company communicates its expectations about mineral sourcing from conflict-affected and high-risk areas (CAHRAs) through training sessions as verified by the auditor.</p> <p>Capacity-building efforts are a key focus. The company works collaboratively with suppliers and stakeholders to develop measurable improvement plans. Evidence from the local committee (CLS) and provincial meeting (CPP) notes highlights the company's active role in formulating and monitoring these plans alongside the cooperative's Field Coordinators. Supplier performance is consistently monitored to ensure adherence to contract terms, emphasising cooperation to ensure the structure is in place to address risks and risk mitigation.</p> <p>We confirm the company's actions reflect a comprehensive approach to meeting the requirements of 1D.</p>
<p>Step 1E – Establish company-level grievance mechanism</p>	<p>MMR has implemented its grievance mechanism, which includes whistleblowing and are accessible on the company website. Letter boxes around the site enable the physical deposit of grievances. No grievances or whistleblowing actions have been raised in the audit period.</p>
<p>Step 2A – Identify scope of Annex II risk assessment (RA) through red flag review (RFR)</p>	<p>The company has a documented procedure for identifying and addressing red flags, though all the mineral supply is based in a CAHRA; the company has elected to document the process in a written procedure.</p> <p>The procedure states the information and actions required to conduct the review, the process for recording findings and obligations regarding further information. The red flag procedure includes concluding the outcome of the red flag review and that an Annex II risk assessment is necessary.</p>
<p>Step 2B – Map circumstances of the company supply chain through traceability and on-the-ground assessment team (OGAT)</p>	<p>The auditors interviewed persons with due diligence obligations and verified the process of assessing information generated by the UJI and OGAT. MMR demonstrated a thorough understanding of the supply chain context, the UJI's limitations, and how the UJI supply chain and On the Ground Assessment Team (OGAT) information can be used for traceability, conditions of mineral extraction and supply context and when Annex II risks are evident and cannot be mitigated or when additional information is required. The auditors did not identify any issues.</p>

<p>Step 2C – Assess Annex II risks in the supply chain</p>	<p>MMR demonstrates a robust process for comparing information obtained on the ground (2B) with its supply chain policy and relevant legal and international standards. Based on the auditor's interviews with the Compliance Due Diligence Manager and key employees at MMR, internal communications records and risks are assessed, and the information is shared internally with appropriate staff. Risk-related issues are addressed through internal communications and review meetings, as outlined in the company's risk management protocols and the Annual Due Diligence Report which contains specific details</p> <p>MMR ensures alignment with legal agreements, licensing operations and laws, further reinforcing its compliance framework.</p>
<p>Step 3A – Report risk findings to senior management</p>	<p>Evidence from interviews, meeting minutes, email communications, and WhatsApp group messages confirms that the due diligence team includes senior management and beyond, including the CEO and Chairman, and confirmed the receipt of reported risks. Strong evidence exists of active reporting and engagement of key personnel in risk management involving the most senior persons of MMR.</p>
<p>Step 3B – Devise and adopt a risk management plan</p>	<p>The company meets all criteria under section 3B, demonstrating a comprehensive approach to risk management. The Risk Management Strategy & Plan document outlines clear strategies for handling risks, including continuing trade while mitigating risks, suspending trade while addressing issues, or disengaging from unmanageable risks. The plan includes measurable progress indicators. The company also ensures that its risk management plans align with its policies and strategies, incorporating progressive improvements within reasonable timescales.</p> <p>MMR leverages its relationships, as previously stated, with actors capable of mitigating risks, as seen in meetings with suppliers and participation in CLS (local committee) and CPP (provincial) meetings. The company also consults affected stakeholders to agree on risk strategies and improvement measures. Confidentiality is maintained when publishing the risk assessment and management plan, with relevant details in the company's 2023 due diligence report. Additionally, responses to sanctions issues are incorporated into the risk management framework, with established customer notification and reporting processes. However, this has not been triggered in the reporting period (no applicable sanctions).</p> <p>MMR has solid processes for reviewing and confirming the appropriateness of risk mitigation actions, stakeholder engagement, and UJI on-ground progress. The company ensures that risk information is shared confidentially and considers additional responses or actions as needed, adhering to ITSCI protocols, such as notifying incidents within 48 hours or discovery by MMR.</p>

Step 3C – Implement the risk management plan	MMR's documented procedure, 'Risk Management, Strategy, and Risk Management Plan,' specifies the actions required. We verified risk management plans and the company's evidence of utilising the UJI information and recommendations, communicating with suppliers and continuing to monitor specific risks. These actions demonstrated the procedure was implemented. Additionally, the company meets the criteria under Step 3D and the criteria as MMR monitors progress on an ongoing basis to evaluate changes in risks within the supply chain. Monthly updates on incidents and issues are shared with senior management, including the CEO and Chairman, ensuring continuous oversight.
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10. Company Report

The company report, titled 'MMR Smelter Step 5 Company Report' was signed by Raj Hitesh Chag, the Business Development Manager on 15th January 2024. The report is in the Annex of this document.

11. Limitations (if appropriate)

None.

10. Restrictions on Use of the Report (if appropriate)

The report is intended to demonstrate compliance with the Tin Code standard 7.3. Interested parties can use this report during their due diligence, tin sourcing and compliance efforts in accordance with Articles 4, 5 and 7 of the Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 laying down supply chain due diligence obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas.


11. Statement on the Accuracy of Information

Nothing in the MMR Company report or the assurance work indicated to the auditor and the audit firm to consider the Company report to be inaccurate. Material issues were not identified. The conclusion on page 1 applies.

12. Additional Measures (optional)

None.

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Signature	
Location	EnviroSense (International) Ltd, Chiltern House, Chesham, United Kingdom.

13. Annex: Company Report



13.0. Company Information

<i>Legal entity name /Company Name:</i>	<i>Mining Mineral Resources S.A.S.</i>
<i>Registration Number:</i>	<i>CD/TRICOM/LSH/RCCM/14-B-01615</i>
<i>Registered address:</i>	<i>588, Kipushi Road, Lubumbashi, Haut-Katanga, Democratic Republic of Congo</i>
<i>Smelter Location (s)</i>	<i>588, Kipushi Road, Lubumbashi, Haut-Katanga, Democratic Republic of Congo</i>
<i>Smelter ID</i>	<i>CID 0004065</i>
<i>Main website & Responsible sourcing pages:</i>	<i>https://mmrdrc.com, https://mmrdrc.com/download-centre/</i>
<i>Report period</i>	<i>1 January 2023- 31 December 2023</i>

13.1. Overview of Tin Smelting Operations

Established in 2009 in Democratic Republic of Congo, Mining Mineral Resources (MMR) pioneered the exploration and production of key minerals, including such as Tin, Tantalum, and Tungsten, setting the foundation for a longstanding tradition in the industry. Originally the company operated with the trading and depots. MMR has sustained continuous operations over the years, building a legacy of innovation and quality. The integration of trading into its state-of-the-art smelter exemplifies this commitment.

As a leader in responsible sourcing, the Company introduced the first upstream traceability system in the country and adheres to OECD compliance standards. This dedication to transparency and ethics is recognized through our RMI certification, reinforcing our commitment to sustainable practices across the supply chain.

MMR smelter employs a diversified approach to production, utilizing mechanized, semi-mechanized, and artisanal small-scale mining (ASM) methods to produce high-quality concentrates. MMR operates across seven provinces, managing fifteen trading depots and several mechanized and semi-mechanized mining sites.

MMR's production facilities include two electric arc furnaces certified by the Responsible Minerals Initiative, with a production capacity of up to 3,600 metric tons of LME grade a equivalent tin metal.

Since 2022, our smelting operations have produced advanced grade A equivalent tin, further solidifying the Company's role as an industry leader in ethical and efficient mineral processing. The Company's operations are supported by a skilled team of 100 employees, with additional management staff overseeing strategic and operational aspects.

13.2. Scope of Minerals and Materials

The Smelter receives tin concentrates either directly from primary tin mining operations (LSM) or from cooperatives who deliver tin concentrates produced from artisanal and small scale mines (ASM), ensuring a consistent supply of high-quality tin concentrates for the smelter. MMR Smelter does not receive any other quantity of secondary tin bearing materials from recycling companies, neither other mineral by-product, part processed minerals like slags or other metals which are not secondary.

13.3. Sources of Minerals and/or Materials

Company-wide, 100% of our minerals are sourced directly from tin mining operations. At least 15 branches, all located within our permitted mining areas, provide the raw materials required for production. MMR smelter does not source materials from subsidiaries or from secondary tin-bearing materials provided by recycling companies.

Below is a summary of the MMR Smelter inputs for the period 1 January to 31 December 2023:

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

MMR has all necessary tag reports from the ITSCI team that summarises mine or origin and all tag info for each 'export' into the smelter. MMR works with the ITSCI programme for monitoring and validation of all sources. The information provided in the table was validated by ITSCI system which includes confirmation of mine of origin.

13.4. Responsible Sourcing Commitments

We are proud to affirm that our processes and actions align with the criteria of Section 7.3 of the Tin Code, encompassing all stages of due diligence. The MMR Smelter follows the OECD's recommended risk-based five-step framework for mineral due diligence, ensuring continuous improvement throughout our supply chain.

MMR commitment to responsible sourcing is demonstrated through adherence to the Tin Code, ICGLR Audit, and RMAP, where we actively demonstrate compliance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

This report outlines our due diligence processes, including our management system, risk identification, assessment, and mitigation efforts, as well as our disclosure practices. These measures help ensure compliance with Articles 4, 5, and 7 of Regulation (EU) 2017/821, supporting due diligence obligations for EU importers of tin, tantalum, tungsten, and their ores from conflict-affected and high-risk areas.

MMR is fully committed to sourcing materials that meet all relevant regulatory requirements at both national and international levels. MMR, as an exporter of tin metals in the region of great lakes, we source exclusively from the provinces of DR Congo and have attained certification as a conformant facility under the Responsible Minerals Assurance Process (RMAP) for tin smelters, including comprehensive due diligence steps for conflict-affected and high-risk areas (CAHRAs). Our first Tin Code independent assessment against 71 environmental, social and governance standards including standard 7.3 responsible sourcing was successfully conducted in 2023.

With raw materials primarily sourced from the Democratic Republic of Congo, particularly from provinces within DR Congo, MMR remains a leader in the exploration and production of critical minerals such as tin, tantalum, and tungsten. Setting a benchmark in responsible sourcing, the Company pioneered the introduction of an upstream traceability system and proudly holds the status of an OECD-compliant company.

MMR collaborates with the ITSCI programme to establish protocols ensuring that tin minerals can be responsibly sourced from the DR Congo aiming to avoid conflict financing contributing to armed conflict. This collaboration supports the implementation of the OECD due diligence guidance, reinforcing our dedication to ethical mineral sourcing.

13.5. Joint Initiative(s) Alignment

MMR is a member of International Tin Association (ITA), full member of ITSCI (International Tin Supply Chain Initiative) and has an in-depth knowledge of how the ITSCI upstream supply chain has evolved since its inception in 2010. MMR has deployed its personnel, along with representatives from the DRC government, to evaluate the tagging process to assess how tagging and incident mechanism works and the role of the stakeholders and local authorities in the process (Local meeting committee and Provincial meeting committee). MMR personnel have also participated in many OECD forum the implement of due diligence guidelines. MMR is joining ITA as board member in 2022, the company is actively attended the many meeting of the board member of ITA members.

MMR is the pioneer company with the tag data processing facility in the DRC, to implement its own digitalize system in the operation in the daily basis (Mineral type, quantity, producers, date, cooperative name, etc). MMR worked with ITSCI in the formation of the due diligence process in the early years and currently follows all OECD compliant process. The reason for this is that MMR has sourcing from the former Katanga region from the 2009's year.

The ITSCI program became the corner stone for the first responsible materials to come out of the DRC effective 1st April 2011. Smelters were identified as the pinch point in the OECD Due Diligence guidelines hence the Conflict Free Smelter (CFS) audits began from the date. ITSCI supported minerals, provided by the ITSCI members, nowadays, the several smelters as MMR are auditing under the RMI's RMAP.

ITSCI has 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/>
- 2023 Audit of RMAP requirements by Arche Advisor: <https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Mining%20Mineral%20Resources%20SARL%20Public%20Report.pdf>

We are pleased that these evaluations have shown continual development of the scope and systems of ITSCI, and the initiative has now been confirmed to be “fully aligned” with the OECD guidance by an assessment to the OECD methodology by a full qualified and independent assessor. MMR understands that “fully aligned” means that ITSCI standards and implementation processes are aligned with OECD recommendations. We understand alignment is critically important for credibility and any initiative.

We recognize that “fully alignment” does not mean either the initiative or the companies/our suppliers that participate in it are perfect, and we are alert to possible need to MMR to take our own additional actions.

While making full use of support and information provided by ITSCI, MMR is mindful that this does not remove our own continuing responsibilities for the due diligence and purchase decisions according to our own supply chain circumstances. We keep in mind the scope of ITSCI to make sure it remains relevant for our purposes.

MMR is extracting and smelting significant tonnages of minerals supported by ITSCI, we understand the lack of infrastructure in the DRC and need for a manual process but hope that ITSCI can improve data systems to speed up traceability reporting. As a full member, MMR receives regular information regarding its supply chain. Further information on how ITSCI operates, as well as the type of an example information is available publicly on the ITSCI website.

2.0. Company Management System

2.1. Supply Chain Policy

Our supply chain policy reflects our unwavering commitment to responsible mineral sourcing practices. MMR rigorously implements the OECD Due Diligence Guidance for Responsible Supply Chains, setting standards that align with the OECD Annex II risks aiming to prevent any contribution—direct or indirect—to human rights abuses, forced labor, and violence against children and women.

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

MMR prioritizes engagement as part of its responsible sourcing strategy, choosing to continue trade while actively pursuing risk mitigation whenever feasible. However, we recognize that severe abuses necessitate immediate disengagement to uphold ethical standards.

MMR approach includes a detailed procedure to identify and assess red flags, applying a robust risk assessment framework to identify, evaluate, and address potential risks within our supply chain. This involves systematically gathering relevant information and conducting ongoing assessments to manage risks effectively.

MMR adopt practical timeframes for mitigation and disengagement, aligned with those recommended in OECD Annex II, to encourage timely responses from suppliers and subcontractors regarding identified risks.

MMR signed the joint industry statement on EITI supports the 12 principles of the Extractive Industries Transparency Initiative (EITI) and demonstrates this commitment through transparent reporting where relevant. We are currently working on a formal public statement to reinforce this support. <http://tincode.org/wp-content/uploads/2024/11/20241122-JointTIndustryStatementEITv1.pdf>

In the event of identified risks, MMR maintain close communication with suppliers involved in extracting and processing raw materials, taking necessary actions to address any issues that may arise within our supply chain.

While ITSCI provides comprehensive reporting and insights into ground-level situations, including incidents that trigger risk management, final decisions are made by MMR. This reinforces our role as an upstream company fully committed to the principles of the OECD Due Diligence Guidance.

2.2. Management structure

MMR has a robust management structure in place. The core committee has been together for over a decade now supported by well trained staff. The Compliance department is headed by the person, who has competence, knowledge and experience to be responsible for the implementation of the due diligence management system as he has been involved in DDMS for around 13 years. He has been working for different organizations in the area of due diligence of minerals. He has a degree in Geotechnics and Hydrogeology from university de Lubumbashi and a Responsible Business Academy certification in Applied Arts and International Affairs. Prior to being appointed as Compliance Manager in 2017, He has worked as a terrain coordinator and geologist.

The traceability team is including all the H.O.D. of different departments and opens the meeting on the regular basis. The branch manager has a direct reporting line to the CEO which underscores company's commitment towards responsible sourcing.

Responsibilities and accountabilities of key personnel in the sourcing team are well documented in their Job Descriptions. The trading Manager who heads the branch managements has overall responsibility on determining strategy to respond to identified risks, planning and follow up. As mentioned, the Compliance Manager has been exposed to on ground assessment carried out by ITSCI, participate to OECD forum, several webinars conducted by RMI and ITA, and he also headed the RMAP process.

MMR communicates with the suppliers on almost routine basis given the nature of its business. Request for the information of data from suppliers are either via email, meeting or phone call and this includes information about risk and what is expected of them. The same medium is used when communicating the same to staff or senior management and important decisions are confirmed in writing.

2.3. Grievance or Whistleblowing Policy

MMR is committed to conducting business in accordance with the law and the highest ethical standards. In line with our Code of Business of Conduct, the implementation of Grievance Policy further supports the following principles:

MMR ensures that grievances and complaints will be addressed in a timely, transparent, accessible and equitable manner. MMR ensure fair and objective investigation of grievances and complaints identified, based on facts or reliable evidence.

MMR will make every effort to ensure that the whistle-blower and all interested parties are protected against any reprisal, discrimination or other adverse employment consequences – excluding compliance with the law and disciplinary rules.

All interested parties are encouraged to voice to MMR any concerns regarding misconduct, wrongdoing or any identified risk within our supply chain at the earliest opportunity with a view to them being fully investigated by the appropriate authority.

Please refer to MMR Grievance Policy for full details at https://mmrdrc.com/wp-content/uploads/2023/04/BOOK-OF-POLICIES_V.1.3_31.12.2022.pdf

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 has implemented a digitalized system "Tag Point" utilizes 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 ITSCI.

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.

ITSCI program provide MMR with 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 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 2021. <https://eiti.org/documents/democratic-republic-congo-2020-2021-eiti-report>

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.

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://eiti.org/documents/democratic-republic-congo-2020-2021-eiti-report> (Page no 105, 110 & 120)

3.0. Risk Assessment

3.1. Red Flag

MMR identifies much of the information needed on suppliers and origin of mineral through its detailed chain of custody and traceability system in CAHRA. It confirms minerals in its supply chain originated/were transported through following provinces (haut-katanga, haut lomami etc.). These are all CAHRAs etc.

MMR makes some efforts to collect ownership and other relevant information on significant upstream actors in CAHRA that it knows through the traceability system.

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

MMR has its traceability department which is recording all supply risk for evaluation through the weekly meeting. The several risk assessments are generated during a cumulative period. Anomalies and plausibility of supplies are assessed through a traceability team including different managers of the operations' departments to request the clarification from the extracting locations head. The production figures found in the ITA website, as well as other ITA member data from ITSCI on exports:

- <https://www.internationaltin.org>
- <https://www.ITSCI.org>

3.2. Record Keeping

We believe in meticulous record-keeping which is essential to maintaining transparency, traceability and trust worthy in our mineral sourcing operations. We have kept the risk register electronic/physical records of receipts and suppliers in a centralized and secure database. Reviews, assessments, and decisions pertaining to our due diligence processes are also digitally recorded. Any red flag should be referred to as Annex II risk if it is something to be mitigated.

Our record-keeping is preliminary electronic, as it can be securely kept. Records related to receipts and suppliers are retained for a minimum of 5 years

3.3. On-the-ground Assessments

As a member of ITA, we do subscribe to responsible sourcing from early days. ITSCI became the first upstream mechanism system in central Africa hence MMR was the first to use ITSCI given its expertise and knowledge to carry out on-the-ground assessments to gather essential information from CHARA (conflict-Affected-High-Risk-Areas) supply areas in the Ex-Katanga province.

As a member of ITSCI program, MMR implements the theoretical recommendations of the OECD Due Diligence Guidance. MMR provides advices to cooperatives, companies authorities daily regarding policies, procedures, assessments, risk management and reporting, and organize training, meetings, including the local committee and the provincial committee

MMR includes several branches where we have the storage depot of the concentrates, each branch has a field team: technicians, geologist and lawyer. They show the limit of the concession, check the expected production levels, security and other conditions, and report to the core management.

Once a plausible risk has been identified, the stakeholders that are implicated are contacted for their input and reaction. Following receipt of additional information and clarification over a period, the ITSCI reporting team summarizes events according to all available information, suggest that MMR staff and suppliers engage in the process and play their part in these actions for different parties to resolve risks, and follow up to report on whether those action have been successfully completed. Of course, all companies are ultimately responsible for decisions on risks and whether they continue to purchase minerals affected, but in most cases the actions suggested by ITSCI are considered appropriate.

In the same way as we involve community whistleblowers in risk reporting, we also involve local communities in risk resolution. ITSCI establishes and facilitates meetings of the stakeholders both close to meeting areas, as well as at

country or province level. The aim of these meetings is to allow discussion of issues that arise, suggest and participate in resolution of risks. These stakeholder meetings typically involve mining authorities, police, army and other agencies, civil society and companies.

The on-the-ground team plays a vital role in providing information that is useful for our risk assessment and management. As an ITSCI member MMR has direct contact with the ITSCI field teams if MMR should need to clarify some points.

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:

the humans' rights abuses and risk of the Chain of Custody (Coc)

- A violent attack by local villagers targeted a company's offices, housing, and workers, leading to injuries, property damage, and significant mineral theft. Police arrived hours later to calm the situation. Unlabeled minerals, including materials, were stolen, making tracking impossible. The financial loss is reported as extensive, though no specific figures are provided.

High risks of Direct or Indirect support to public or private security forces who accidentally use the arm

- A police officer accidentally fired three shots, injuring himself in the leg at a security checkpoint of an export company in the miner camp located in Tanganyika province. His cries and the gunfire created panic among the local community.

Other abuse made by an exporter

- A private transporter tried to move minerals along a privately funded road without permission from the road's owner, leading to a police intervention after a complaint. Months earlier, the complainant had proposed a shared road project to the other exporter, who declined, preferring to transport minerals by lake. After another attempt to negotiate on September 23, police barred the transporter from using the road without permission. When further road maintenance was needed on November 10, the initial exporter again suggested collaboration, which was again declined.

The Humans right abuses

- Four unidentified individuals violently attacked two motorcycle drivers in a bush area near a mine, killing one and injuring the other before stealing the motorcycles and fleeing. The incident stirred anger in the city, leading to protests, property damage, and police intervention to restore order. Mining activities were halted for 24 hours as a result.

the humans' rights abuses and risk of the Chain of Custody (Coc)

- Recent disturbances at the mining site reveal critical issues impacting artisanal miners and their cooperatives. A fire, set by miners at the control barrier, destroyed a storage facility and its contents, driven by a severe cash shortage faced by the cooperative overseeing operations. Cooperatives have increasingly resorted to self-financing while awaiting funding from exporting companies for mineral purchases. This situation is exacerbated during the New Year period when many cooperative leaders and members return to urban areas for celebrations, leading to further cash shortages at mining sites. Miners, who rely on daily production for their income, reacted to these challenges by expressing their frustrations through the destruction of the storage facility and associated equipment.

ITSCI Incident report in 2023;

Incidents report direct involving the company: **8**

Incidents report indirect involving the company: **10**

Incident report of level 1: **1**

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 ITSCI programme 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 (VPSHR) held with mining operators and representatives from provincial security services.
- Monthly reports published by the ITSCI, as well as meetings of Local Monitoring Committees and Provincial Monitoring 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 ITSCI 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 ITSCI and all auditors that visit the MMR site.

RAJ HITESH CHAG

Business Development Manager

Mining Mineral Resources S.A.S.

January 15, 2024