
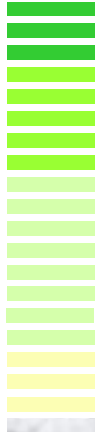


INTERNATIONAL TIN CODE REPORT: Mining Mineral Resources S.A.R.L.

GENERAL INFORMATION		
Company details	Mining Mineral Resources S.A.S. 588, Route Kipushi, Commune Annexe, Lubumbashi, DRC	  Visual Progress Guide
Date of this report	Reporting period February 2024 - February 2025	
Date of previous report	4 September 2024 (covering February 2022 - March 2023)	
Report author(s)	Independent External Assessor Programme Manager (Tin Code), 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 leading SOMIKA Group company established in 2009 to explore and develop tin, tantalum, tungsten, and gold in the Democratic Republic of the Congo (DRC). 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 tin smelter in Lubumbashi. The tin 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. MMR also has a trading unit set up to support the local community through cooperatives.</p> <p>MMR has offices in Lubumbashi (DRC) with 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. At its Lubumbashi tin smelter, MMR reports implementing material tracking and audit processes to support transparency from mine to refined metal.</p> <p>The company holds ISO 9001, 14001 and ISO 45001 certifications.</p>	
Significant changes from previous report	This is the company's second Tin Code report, and it demonstrates the steps MMR has taken to achieve higher ratings and highlights several areas of progress. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement.	



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

	<p>Since the previous report, various improvements have been made by the company, notably including:</p> <ol style="list-style-type: none"> 1. Achieving third-party verification on implementing an environmental management system (2.1), managing discharges to surface and/or groundwater (2.2), and to air (2.5), minimising the production of hazardous wastes (2.9) and non-hazardous and inert wastes (2.10), H&S management (3.1), safe working practices (3.2), incident investigation (3.3), incident follow-up (3.4) and H&S training (3.5) through its ISO certifications. The company also achieved third-party verification for its use of private or state security personnel (7.2) and responsible sourcing (7.3) through its third-party assurance of MMR's due diligence public reporting, policies and procedures that was undertaken against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021). 2. Conforming with contributing to the economic development of local communities (6.8), Suppliers of ASM produced minerals (8.1), communicating the importance of formalisation to ASM suppliers (8.2), communicating guidance on managing environmental impacts to ASM suppliers (8.3), communicating guidance on managing health and safety impacts to ASM suppliers (8.4), communicating guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour to ASM suppliers (8.5), communicating guidance on negotiating with local communities to ASM suppliers (8.6), communicating guidance to raise awareness regarding concerns over serious human rights abuses and conflict to ASM suppliers (8.7) and communicating 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 (9.3). 3. Progressing with Protected areas (2.13), communication with training on environmental management (2.15), Freedom of association and collective bargaining (4.8), training on stakeholder engagement (5.4), community and indigenous people's management (6.1), and cultural heritage protection (6.10). 4. Providing some evidence related to Greenhouse gases (2.6), Energy consumption (2.7), child labour –other forms (4.6), FPIC (6.4), physical displacement (6.6) and economic displacement (6.7), Natural resource use and availability (6.9), and requesting major suppliers meet or work towards principles of this Tin Code (8.10) informally addressing these standards. <p>Notes:</p> <p>1) This report has been compiled to Tin Code standards updated in May 2022, including revisions to 1.4, 1.5, 2.6, 2.8, 4.2a), 4.2b), 4.3, 4.7, 6.9, 7.1, 7.3 and 10.2 standard numbers.</p>
Further information and references	<ol style="list-style-type: none"> 1. MMR website 2. Corporate social responsibility 3. Policies and reports 4. Code of Conduct 5. Grievance channel 6. Latest Supply Chain Policy 7. Due Diligence (Step 5) Report 8. Assurance Report 2023



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

Contents

PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices	4
PRINCIPLE 2: Seek continual improvement of environmental performance	6
PRINCIPLE 3: Seek continual improvement of health and safety performance	9
PRINCIPLE 4: Seek continual improvement in labour practices.....	10
PRINCIPLE 5: Engage with stakeholders using a participatory approach.....	12
PRINCIPLE 6: Manage negative impacts on, and contribute to development of, local communities and indigenous peoples.....	13
PRINCIPLE 7: Avoid contributing to serious human rights abuses and conflict.....	15
PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services	17
PRINCIPLE 9: Encourage the understanding, and safe and appropriate use of tin products	19
PRINCIPLE 10: Work towards reporting against the International Tin Code.....	20
Appendix A – Description of Tin Code reporting.....	21

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

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 implementing appropriate policies, legal compliance, and transparency through its key policies, reporting to the Extractive Industries Transparency Initiative (EITI) and tracking record of licences. The company is progressing in working towards 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 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 developing and publishing policies that apply to the smelter and the Malemba operations to support legal compliance and improve practices with respect to the expectations of the Tin Code.
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 implementing a formal system to manage legal compliance (Standard 1.3), but it has not provided evidence that business integrity (Standard 1.4) and whistleblowing (Standard 1.6) have been fully addressed.
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 as it keeps up to date all business registrations, licences and other documents necessary to legally carry out business activity and otherwise complies with relevant local laws, including health and safety and environmental requirements.
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 policies for managing the risk of bribery, corruption, facilitation payments and anti-competitive behaviour, but it has not provided evidence of how the Anti-Bribery and Anti-Corruption Policies are implemented neither the approach to managing the risk of anti-competitive behaviour. It is also not clear how issues raised by external suppliers are addressed.
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 as it has provided evidence of its support for the implementation of the principles of the Extractive Industries Transparency Initiative (EITI) and is reporting under the EITI in the DRC, which is an EITI-implementing country.



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

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.

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

PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company has made improvements during this reporting period and has improved ratings in eight standards of this Principle. It has achieved the highest rating of *third-party verified* in five standards of this Principle through its ISO 14001 certification, which evidenced the implementation of an environmental management system, water and air quality management and hazardous, non-hazardous and inert waste management. It is progressing with the expectations related to managing water consumption and availability, land and soil quality management, tailings management, not using banned substances, biodiversity protection and environmental training. The company informally addresses the expectations related to greenhouse gases (GHG) emissions, energy consumption management, respect for protected areas and closure and reclamation as limited evidence was provided.

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.	Third-party verified	The company has demonstrated that it has developed and implemented a systematic approach to an environmental management system. This aspect has been third-party verified through its ISO 14001 certification.
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.	Third-party verified	The company has demonstrated that it has developed and implemented procedures to monitor and manage wastewater generation and discharges, enabling it to control the risk of adverse impacts on water quality. This aspect has been third-party verified through its ISO 14001 certification.
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 evidence to clarify whether that certification 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 evidence to clarify whether that certification includes the management of land and soil quality, neither evidence that it monitors land and soil quality directly.
2.5	Air quality Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.	Third-party verified	The company has demonstrated that it has developed and implemented procedures and measures to manage discharges to air. This aspect has been third-party verified through its ISO 14001 certification.
2.6	Greenhouse gases	Informal	The company has a GHG Policy in place and has undertaken ambient GHG monitoring at its smelter site by

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

	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.		the University of Lubumbashi, although GHG emissions have not been quantified, informally addressing this expectation. The company could improve its rating by quantifying its GHG emissions, developing reduction targets and implementing measures to achieve these targets.
2.7	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.	Informal	The company has provided energy consumption figures for its smelter, informally addressing this expectation. The company could improve its rating by developing a comprehensive energy baseline and establishing energy reduction targets. Also, by developing and implementing procedures and measures for reducing direct and indirect energy consumption, as well as plans to increase the share of energy provided by renewable sources.
2.8	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. ⁽²⁾ Including to design, build, operate, monitor and decommission for all life cycle stages.	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, but it has not provided evidence of regular third-party, independent reviews and surveillance of its tailings storage facilities in compliance with recognised tailings storage facility standards and the location, design, capacity and operational lifespan of each facility in use.
2.9	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.	Third-party verified	The company has demonstrated that it has developed and implemented procedures for disposing of hazardous wastes in a manner that minimises negative impacts. This aspect has been third-party verified through its ISO 14001 certification.
2.10	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.	Third party verified	The company has demonstrated that it has developed and implemented procedures for non-hazardous and inert waste management. This aspect has been third-party verified through its ISO 14001 certification.
2.11	Banned substances Companies will not use substances that are banned under international convention or local laws.	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 evidence to clarify whether it includes the identification and management of banned substances.
2.12	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.	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 evidence to clarify 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.	Progressing	The company has demonstrated that it is progressing with this expectation through its Protected Areas Policy, and there is no indication that large-scale mining or smelter-related activities impact protected areas or adjacent zones, but it has not provided evidence of a procedure for

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

			checking and updating mining / processing locations and their position relative to protected area locations.
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 and a Closure Policy in place, informally addressing this expectation. The company could improve its rating by providing evidence of a Closure Plan and allocation of adequate financial resources to enable implementation of closure and rehabilitation of operations for all mechanised sites in accordance with local requirements and expectations of key stakeholders.
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.	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.

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

PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company has made improvements during this reporting period and has achieved the highest rating of *third-party verified* in all the standards of this Principle. Through its ISO 45001 certification, the company evidenced implementation of a health and safety management system, safety procedures to ensure safe working conditions are maintained, incident investigations and follow-up procedures, 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.	Third-party verified	The company has demonstrated that it has developed and implemented a systematic approach to a Health and Safety (H&S) management system. This aspect has been third-party verified through its ISO 45001 certification.
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.	Third-party verified	The company has demonstrated that it has developed and implemented safety procedures and measures to ensure safe working conditions are maintained. This aspect has been third-party verified through its ISO 45001 certification.
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.	Third-party verified	The company has demonstrated that it has developed and implemented procedures for reporting, investigating, and preventing incidents. This aspect has been third-party verified through its ISO 45001 certification.
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.	Third-party verified	The company has demonstrated that it has developed and implemented procedures to monitor the outcomes of corrective actions. This aspect has been third-party verified through its ISO 45001 certification.
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.	Third-party verified	The company has demonstrated that it has developed training materials and implemented training on Health and Safety (H&S). This aspect has been third-party verified through its ISO 45001 certification.

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

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, engaging in freedom of association and collective bargaining with workers and training through its Employee Handbook, policies and by implementing the RMI's Risk Readiness Assessment self-assessment tool. The company informally addresses the expectation related to managing the risk of other forms of child labour as limited evidence was provided.

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 Code of Conduct, but it has not provided evidence outlining its labour management system.
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 clarification of its remuneration details and provide procedures to implement the provisions noted in the Employee Handbook or as a standalone comprehensive Remuneration Policy.
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.

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

4.5	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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing 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	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.	Progressing	The company has demonstrated that it is progressing with this expectation through compliance with the laws of the DRC and has developed a Child Labour Policy to combat the worst forms of child labour (not all forms of child labour) and a Supply Chain Policy which prohibits child labour and invests in education and child welfare. The company could improve its rating by providing evidence of the development and implementation of a formal policy on the employment of children.
4.7	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). ⁽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.	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	Freedom of association and collective bargaining Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.	Progressing	The company has demonstrated that it is progressing with this expectation through providing evidence of its legal compliance with the laws of the DRC, its Freedom of Association and Collective Bargaining Policy and its engagement with workers on Freedom of association and collective bargaining, but it has not provided details of union representation.
4.9	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.	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.

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

PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company is progressing in all 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, implementation of a grievance mechanism, and training on aspects relevant to this Principle.

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 14001 and ISO 9001 certifications 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.	Progressing	The company has demonstrated that it is progressing with this expectation through developing training procedures and materials and providing training on some but not all the aspects relevant to this Principle.

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

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

Overview of Principle Performance

The company has achieved a high rating of *conforming* in one standard and is progressing in three standards of this Principle. Through developing and implementing local development and sponsorship initiatives, it conforms with the expectation related to contributing to the economic development of local communities. It is progressing with expectations related to implementing a systematic approach to the management of community, community health and safety management and consultation, and through its policy on indigenous peoples management. The company informally addresses the expectations related to free, prior and informed consent (FPIC), seeking to anticipate and avoid or minimise land rights, use and access, physical resettlement, economic displacement, access to and availability of natural resources, cultural heritage and training on aspects relevant to this Principle as limited evidence was provided.

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.	Progressing	The company has demonstrated that it is progressing with this expectation through developing a Policy on Indigenous People's Management, but it has not provided evidence of how this policy is implemented.
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 funding / developing projects that will improve community health and safety and by implementing reasonable environmental management measures with the goal of eliminating some negative health and safety impacts of local communities, but it has not provided evidence to demonstrate it is 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) mainly related to community infrastructure and development projects supported by the company, but it has not provided evidence of consultations in other territories where it undertakes mining and whether consultation extends beyond community infrastructure and development projects.
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.	Informal	The company has a FPIC policy in place, informally addressing this expectation. The company could improve its rating by providing evidence that it has sought FPIC at its operational sites (within the scope of this report).
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.	Progressing	The company has demonstrated that it is progressing with this expectation through compliance with the laws of the DRC and developing a procedure for compensation related to farmland. The company could improve its rating by providing evidence of a systematic approach to land rights,

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

			land use and access, or a procedure for identifying and minimising potential impacts.
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.	Informal	The company complies with the laws of the DRC, informally addressing this expectation. The company could improve its rating by providing evidence of a formal policy that seeks to avoid involuntary resettlement.
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.	Progressing	The company has demonstrated that it is progressing with this expectation through compliance with the laws of the DRC and developing a procedure for compensation related to farmland. The company could improve its rating by providing evidence on how it compensates displaced people (if any).
6.8	Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Conforming	The company has demonstrated that it is conforming with this expectation through developing and implementing local development and sponsorship initiatives.
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.	Progressing	The company has demonstrated that it is progressing with this expectation through developing a formal policy on natural resource use and availability, as well as undertaking development projects for local communities that are targeted at improving sustainability of natural resource use. The company could improve its rating by providing evidence of implementation of the policy.
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.	Progressing	The company has demonstrated that it is progressing with this expectation through developing a ESIA baseline assessment of cultural heritage and a published Cultural Heritage Protection Policy. The company could improve its rating by providing evidence of its Cultural Heritage Protection Policy being implemented.
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 provided evidence of general training to some employees, but the exact nature of the training has not been specified, informally addressing this expectation. The company could improve its rating by providing evidence of training materials used that relate to expectations of this Principle.

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

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

Overview of Principle Performance

The company has achieved the highest rating of third-party verified in one standard of this Principle. The company has demonstrated that it developed and implemented policies and procedures to evaluate potential risks, and seek to avoid support to conflict, human rights and other significant abuses. It publicly reports on its efforts according to international expectations and laws, including the OECD DD Guidance 3T supplement. The company has a Supply Chain Policy and Due Diligence Report publicly available on its website. This aspect has been third-party verified through assurance against the ITA-RMI Joint Criteria for Smelters (v2 Mar 2021). The independent OECD Alignment Assessment of the standards of the Criteria and the audit management process under the Tin Code shows 'fully aligned'. The company has achieved a high rating of *conforming* in two standards and is progressing in one of the standards of this Principle. Through its Human Rights Policy, audit results against the 7.3 Criteria 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.

STANDARD		RATING	ADDITIONAL INFORMATION
7.1	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.	Conforming	The company has demonstrated that it conforms with this expectation through its Human Rights Policy, the results of the third-party verified 7.3 responsible sourcing through assurance against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021) with an audit report dated 23 December 2024, and the completion of RMI's Risk Readiness Assessment self-assessment tool.
7.2	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.	Third-party verified	The company has demonstrated that it has implemented measures for security personnel to be guided by the Voluntary Principles on Security and Human Rights (VPSHR), which confirms that MMR holds security and human rights forums with mining operators and representatives of the provincial security services. This aspect has been third-party verified through assurance against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021) with an audit report dated 23 December 2024.
7.3	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⁾ . ⁽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	Third-party verified	The company has demonstrated that it developed and implemented policies and procedures to evaluate potential risks, and seek to avoid support to conflict, human rights and other significant abuses. It publicly reports on its efforts according to international expectations and laws, including the OECD DD Guidance 3T supplement. During the due diligence reporting period (1 January 2023 to 31 December 2023), the Mining Mineral Resources S.A.S. (MMR) smelter site reported sourcing minerals only from the Democratic Republic of the Congo

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

	<p>⁽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>		<p>(DRC) which the company considers is a Conflict Affected and High-Risk Area (CAHRA) and which is also a Dodd-Frank covered country. Minerals are sourced with support of the ITSCI programme which has been independently confirmed as fully OECD-aligned. The company has a public Supply Chain Policy and Due Diligence Report available on its website. The company's due diligence management systems have been third-party verified through assurance against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021) with an audit report dated 23 December 2024. No material issues were noted in the assurance report. Some opportunities for improvement were identified, which relate only to existing formal processes and do not significantly impact the company's ability to avoid supply chain abuses. The independent Alignment Assessment against OECD Guidance of the standards of the Criteria and the audit management process under the Tin Code shows 'fully aligned'.</p>
7.4	<p>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.</p>	Progressing	<p>The company has demonstrated that it is progressing with this expectation through developing training procedures and materials and providing training on some but not all the aspects relevant to this Principle.</p>

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

PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services

Overview of Principle Performance

The company has achieved a high rating of *conforming* against most of the standards of this Principle. MMR has communicated the ITA Artisanal and Small-Scale Mining (ASM) Handbook to its ASM suppliers. By doing this, the company conforms with the expectations to influence suppliers of ASM-produced minerals positively. The company informally addresses the expectation of influencing positively suppliers of goods and services to suppliers as limited evidence was provided. 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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to guide its suppliers of ASM-produced minerals towards the objectives of the Tin Code and encouraged improvements, if necessary. MMR has communicated the ITA ASM Handbook to its suppliers.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate the importance of formalisation to its suppliers of ASM-produced minerals. MMR has communicated the ITA ASM Handbook to its suppliers.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance on managing environmental impacts to its suppliers of ASM produced minerals. MMR has communicated the ITA ASM Handbook to its suppliers.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance on managing health and safety impacts to its suppliers of ASM-produced minerals. MMR has communicated the ITA ASM Handbook to its suppliers.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour to its suppliers of ASM-produced minerals. MMR has communicated the ITA ASM Handbook to its suppliers.



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

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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance on negotiating with local communities to its suppliers of ASM produced minerals. MMR has communicated the ITA ASM Handbook to its suppliers.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict to its suppliers of ASM-produced minerals. MMR has communicated the ITA ASM Handbook and supply chain policy to its suppliers.
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 from external parties.
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.	Informal	The company has terms and conditions for partnerships with suppliers, informally addressing 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.

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

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 expectations to support the understanding of the potential effects of tin on humans and the environment and encourages the safe, appropriate and efficient use of tin. The company communicates information on tin, and the tin industry, to users in the value chain and wider stakeholders 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 requirement to advance the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data.
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 requirement to 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.
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.	Conforming	The company has demonstrated that it conforms with this expectation by disclosing information relating to its own site and operations, with no noted breaches under data protection laws.



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

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 standards 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.

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

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.