



# ITSCI PROGRAMME INCIDENT AND OUTCOME REVIEW

November 2020-October 2021

## Executive Summary

This report is an overview of the ITSCI Programme’s achievements in working with stakeholders for risk mitigation in mineral supply chains from Burundi, the Democratic Republic of the Congo (DRC), Rwanda and Uganda from 1<sup>st</sup> November 2020 to 31<sup>st</sup> October 2021.

The ITSCI Programme has extensive experience supporting companies, governments and civil society in the identification and mitigation of risks associated with 3T minerals supply chains. Our standards are independently confirmed to be 100% aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance)<sup>1</sup>, and we support companies performing due diligence according to those expectations.

Our field teams complement traceability with an incident management system to identify and verify risks, as a critical aspect of due diligence. Whistleblowing is a critical component of the incident reporting framework. We communicate resultant incidents along the supply chain, recommend mitigation actions, and facilitate the discussion of mitigation among local stakeholders. In addition, we follow up and report on the progress of mitigation.

Salient indicators of ITSCI Programme implementation during the reporting period 1<sup>st</sup> November 2020 to 31<sup>st</sup> October 2021 are in Table 1.

**Table 1. Salient indicators of the ITSCI Programme**

INDICATORS	2020	2021
Monitored mine sites	2,330	2,499
Site visits per month	520*	796*
Mineral transactions	560,000	553,831
Whistle-blower calls	1,175	989
Incidents opened	1,338	1,300

\*Average per month; note the majority of ITSCI field teams are dedicated to carrying out the site visits

Of the 1,300 incidents opened during the reporting period, 97 were categorised as Level 1 seriousness with potential association with human rights abuses, the involvement of non-state armed groups, illegal taxation, or involvement in mineral business by rogue individuals of state armed groups. Of the 97 Level 1 incidents, 12 were categorised as High Risk with relevance for U.S. Securities and Exchange Commission reporting. A further four Level 2 incidents have been categorised as High Risk for this reporting period. At the time of writing all the High-Risk incidents are under mitigation and monitoring. The total number of whistle-blower calls decreased by 16% in the reporting period from 1,175 to 989 however, stakeholders’ knowledge of the system remains robust. Local partners continue to raise awareness about the whistleblowing programme over the radio, which continues to generate positive feedback among local communities.

<sup>1</sup><http://mneguidelines.oecd.org/alignment-assessment-of-industry-programmes-with-the-oecd-mineral-guidance.pdf>

Of the 97 Level 1 incidents, 12 were categorised as High Risk with relevance for U.S. Securities and Exchange Commission reporting. A further four Level 2 incidents have been categorised as High Risk for this reporting period. ITSCI has 32 indicators of outcomes from incident management (Annex 1), which for the purpose of simplification are aggregated into 7 categories. The proportion of outcomes for the 7 incident categories during the current reporting period are in Table 2.

**Table 2. Salient outcomes from incident management**

<b>AGGREGATED OUTCOMES</b>	<b>2020</b>	<b>2021</b>
Due Diligence Improvements	46%	42%
Governance and Security Improvements	13%	16%
Awareness-Raising and Mediation	14%	19%
Human Rights/Health and Safety Risk Mitigation	4%	4%
Mine/Company/Mineral Suspension or Seizure	2%	1%
Incident Unsubstantiated	6%	8%
Incident Unresolved	15%	10%

Overall, the outcomes of incident management are similar to the previous reporting period. Improvements were observed in Governance and Security and Awareness-Raising and Mediation for reasons below. Improvements in due diligence decreased slightly from that in the previous period together with the number of incidents resolved.

In general, governments in the Great Lakes region gradually lifted many of the restrictions imposed in 2020 in response to the COVID-19 pandemic. The lifting of restrictions enabled an increase in the number of monitoring visits, meetings with stakeholders, and overall follow-up on the implementation of risk and incident mitigation measures. This contributed to the resolution of 5% more incidents in 2021 compared to the previous reporting period. While the pandemic continued to impact stakeholder movements and engagement in some areas in the current reporting period, we believe this had minimal impact on incident reporting and resolution.

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## CONTENTS

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INTRODUCTION AND SCOPE	1
METHODOLOGY OF INCIDENT MANAGEMENT AND REVIEW	2
Categories	2
Levels of seriousness	2
Status	2
Outcomes	3
INCIDENT NUMBERS AND RESOLUTION STATUS	3
INCIDENT OUTCOMES	7
HIGH RISK INCIDENTS FOR SEC REPORTING	8
High Risk incidents for the reporting period	8
Update on 2019-2020 High Risk incidents	9
FURTHER INFORMATION	10

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## INTRODUCTION AND SCOPE

The ITSCI Programme assists companies to implement the recommendations of the **OECD Due Diligence Guidance** for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas through the provision of supply chain traceability, identification of risks, facilitation of risk resolution, due diligence training and various forms of independent evaluation. This support for stakeholders enables 3T supply chains to trade responsibly and avoid financing of conflict or support to human rights abuses, as well as to respond to other identified risks. ITSCI is unique among supply chain initiatives to have achieved standards confirmed by independent evaluation to be 100% aligned with the OECD Guidance, including Annex II risks, and response to such risks<sup>2</sup>.

An essential enabler for due diligence is the presence of field teams to continuously monitor and evaluate risks, engage local stakeholders, and report on mitigation as described in the Appendix of the OECD Guidance. ITSCI provides expert teams (~110 staff) across the Great Lakes Region who made an average of **796 visits** to mine or company sites **per month** to provide credible risk information and make recommendations to, and build capacities of, supply chain companies and other stakeholders.

ITSCI receives information on risks from multiple sources including our own field teams, government agents, company representatives, communities, local non-governmental organizations, United Nations and other reports. ITSCI also operates a **whistleblowing mechanism** in the DRC, partly funded by Apple. This includes a toll-free hotline allowing anyone to report risks or incidents and through which 989 calls were received in the last year. The mechanism additionally includes the broadcasting on two radio spots on 21 local community radios across the DRC awareness raising campaigns on responsible artisanal mining. The broadcasts take place approximately 700 times a month. All relevant potential and verified supply chain risks are captured in the ITSCI incident management system to enable the tracking of issues in terms of category and severity, and mitigation through incident status and outcome.

ITSCI's expert teams provide support and recommendations to stakeholders for actions appropriate for OECD aligned **mitigation**, and ITSCI also facilitates 51 national, provincial and mine area level **multi-stakeholder** committees to transparently discuss mitigation plans. Our teams also conduct regular **training** sessions on a wide range of issues including traceability procedures, overall due diligence principles, risk assessment and mitigation. ITSCI supplements on-the-ground activity with **analysis** of corrective actions and outcomes of incidents monitored and closed over 12 months to understand the mitigation impact of the programme.

This report provides high level coverage of incident reporting data over the twelve-month period 1<sup>st</sup> November 2020 to 31<sup>st</sup> October 2021 relating to mineral supply chains from Burundi, Democratic Republic of Congo (DRC), Rwanda and Uganda. During the reporting period, ITSCI has recorded and managed a total of **1,300 incidents across 2,499 monitored mine sites**, as well as along transport routes at the four countries within Africa. In this period, we have recorded the export of over 20,000 metric tonnes of 3T mineral concentrate through approximately 553,831 in-region transactions, as well as through the international trading chain to independently audited smelters. Many COVID-19 related restrictions were lifted by governments in the Great Lakes in the period.

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<sup>2</sup>OECD alignment assessment <https://www.oecd.org/corporate/industry-initiatives-alignment-assessment.htm>

Ongoing local lockdowns and curfews and restrictions on local travel and gatherings in some areas in response to COVID-19 surges in infections impacted incident reporting minimally in the reporting period.

## METHODOLOGY OF INCIDENT MANAGEMENT AND REVIEW

ITSCI and its field implementation partner Pact have developed the incident management process in alignment with the OECD guidance, and with added direct experience and vital lessons learned over the course of programme's growth and implementation. Both the incident categorisation and reporting system have evolved significantly and progressed since our work piloted in 2010.

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### Categories

Incidents are evaluated as relevant to one or more key issues under the **categories** of due diligence, chain of custody, corruption, armed groups and security forces and human rights and other concerns. Other concerns go beyond topics mentioned in the OECD Annex II to include health and safety or mining in protected areas, although the primary focus remains on human rights abuses and conflict financing. In total ITSCI has defined 49 sub-categories of incident to sufficiently classify the many potential risk types.

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### Levels of seriousness

In addition to categories of type, incidents are allocated a **level of seriousness**. There are 3 levels, where 3 is ranked the lowest and 1 the highest level of seriousness. Priority issues requiring immediate and High-Level attention and possible disengagement in the supply chain are classified as Level 1. For the current reporting year, we report both Level 1 and Level 2 incidents as **High Risk** when relevant for U.S. Securities and Exchange Commission (SEC) reporting. (Low level incidents relating to mistakes or lack of capacity or training are considered Level 3, with intermediate or repeated issues as a mid-category of Level 2.) It is important to note the categorisation of levels of seriousness are, amongst other aspects, based on the veracity of the allegations and evidence. Incidents may remain open for up to six months while the ITSCI team and/or involved stakeholders are verifying information with further evidence, monitoring the situation and/or implementing mitigation action. If sufficient evidence is found and/or the incident is unresolved on a persistent basis, the severity of incidents may be raised and considered as High Risk.

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### Status

ITSCI investigates the causes of incidents to help determine and advise stakeholders on mitigation activities and to focus on where efforts are needed to achieve improvements. Incidents may remain open for up to six months while the ITSCI team and/or involved stakeholders are verifying information, monitoring the situation and/or implementing mitigation actions but after that time will be closed off and allocated a final **status** chosen from one of the three possibilities below:

- ▲ **RESOLVED** - THE ITSCI TEAM AND/OR INVOLVED STAKEHOLDERS HAVE AGREED AND IMPLEMENTED ACTIONS WHICH HAVE RESULTED IN SATISFACTORY MITIGATION.
- ▲ **UNRESOLVED** - THE INVOLVED STAKEHOLDERS MAY NOT HAVE AGREED, OR COMMONLY HAVE NOT EFFECTIVELY IMPLEMENTED ALL RECOMMENDED MITIGATION ACTIONS.
- ▲ **INCONCLUSIVE** - THE ITSCI TEAM DO NOT FIND SUFFICIENT EVIDENCE TO SUPPORT AN ALLEGATION OR NEED FOR MITIGATION.

In some cases, incidents are re-opened after six months if the mitigation of the incidents was not sufficient to achieve full resolution, and therefore allowing additional follow-up, monitoring, mitigation and possibly resolution.

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## Outcomes

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Following closure of each incident, the team identifies whether positive outcomes were achieved, such as arrest or sanction by authorities, or whether some or all expected outcomes were not achieved due to lack of engagement from responsible stakeholders. For metrics, stakeholders were analysed based on their ability and success in influencing, shaping and improving final outcomes of reported incidents. Outcomes were identified for four core groups:

- ▲ COMPANIES
- ▲ AUTHORITIES
- ▲ CIVIL SOCIETY
- ▲ ITSCI

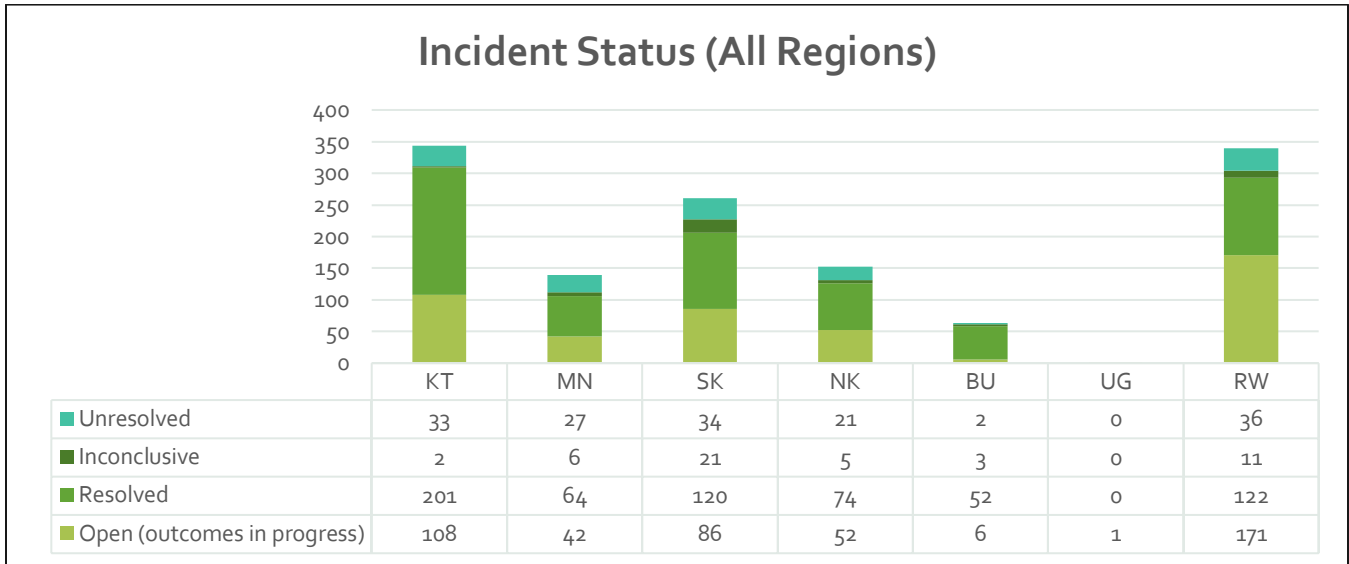
In total ITSCI has defined 32 potential outcomes to enable identification of trends. For this public summary, outcomes have been aggregated into 7 outcome groups to reduce the complexity of reporting.

## INCIDENT NUMBERS AND RESOLUTION STATUS

The 1<sup>st</sup> November 2020 to 31<sup>st</sup> October 2021 reporting period has been selected by ITSCI to enable downstream companies who report on their due diligence activities in the first quarter of any calendar year to reference ITSCI data and explain how they have evaluated the potential impact on their own supply chains. Direct comparison with other ITSCI publications which refer to calendar years should not be made.

Figure 1 shows the division of incident occurrence and status across ITSCI operating areas listed as follows.

- ▲ AT THE COUNTRY LEVEL FOR BURUNDI (BU), RWANDA (RW) AND UGANDA (UG)
- ▲ AT THE SUB-NATIONAL LEVEL FOR DRC, INCLUDING 'KATANGA' (KT), MANIEMA (MN), NORTH KIVU (NK) AND SOUTH KIVU (SK)
- ▲ NOTING THAT AGGREGATED DATA IS REPORTED FOR 'KATANGA' WHICH ENCOMPASSES THE PROVINCES OF HAUT-LOMAMI, HAUT-KATANGA, TANGANYIKA AND LUALABA TO ALLOW FOR COMPARISON AGAINST OTHER ITSCI PUBLICATIONS



**Figure 1. Incident numbers and status for the reporting period**

A total of 1,300 incidents were recorded by ITSCI in the 12-month period from 1<sup>st</sup> November 2020 to 31<sup>st</sup> October 2021, which is similar compared to incidents recorded in the previous reporting period (1,338). The total number of recorded incidents is influenced by a range of factors, addressed below. Katanga (344) and Rwanda (340) had the most recorded incidents during the reporting period and Burundi and Uganda the least mainly due to comparatively lower levels of activity in these countries. At the time of reporting 466 incidents remained open and their outcomes are in progress.

In any reporting period the total number of recorded incidents is influenced by a range of factors, including but not limited to the following.

- ▲ TOTAL LEVEL OF PRODUCTION
- ▲ NUMBERS OF MINES, AS WELL AS THE ACTIVITY LEVEL OF THOSE MINES
- ▲ NUMBERS OF OPERATORS, AS WELL AS THE AMOUNT OF BUSINESS THE OPERATORS COMPLETE

For example, new companies may set up in business to engage in 3T trading, and may be less familiar with due diligence requirements, therefore potentially increasing the number of incidents. However, those same new companies may be less able to compete in what is a new market for them and deal in only low weights of mineral, therefore potentially decreasing the number of incidents.

Success in resolution of incidents can be assessed by considering the percentage of those incidents resolved from the total number verified as incidents and not found to be inconclusive. In this reporting period the overall resolution rate was 81% with variations between the regions given in Table 3. Incidents may result in actions taken by stakeholders and thus positive outcomes but may be categorised as unresolved if not all expected outcomes based on ITSCI, and OECD Guideline expectations were achieved.



**Table 3. Percentage of resolved incidents for the reporting period**

ITSCI INCIDENT RESOLUTION	KT	MN	SK	NK	BU	UG	RW
Resolved	201	64	120	74	52	0	122
Unresolved	33	27	34	21	2	0	36
Total	234	91	154	95	54	0	158
<b>Resolved Incidents (%)</b> <b>1 Nov. 20 to 31 Oct. 21</b>	<b>86%</b>	<b>70%</b>	<b>78%</b>	<b>78%</b>	<b>96%</b>	<b>0%</b>	<b>77%</b>

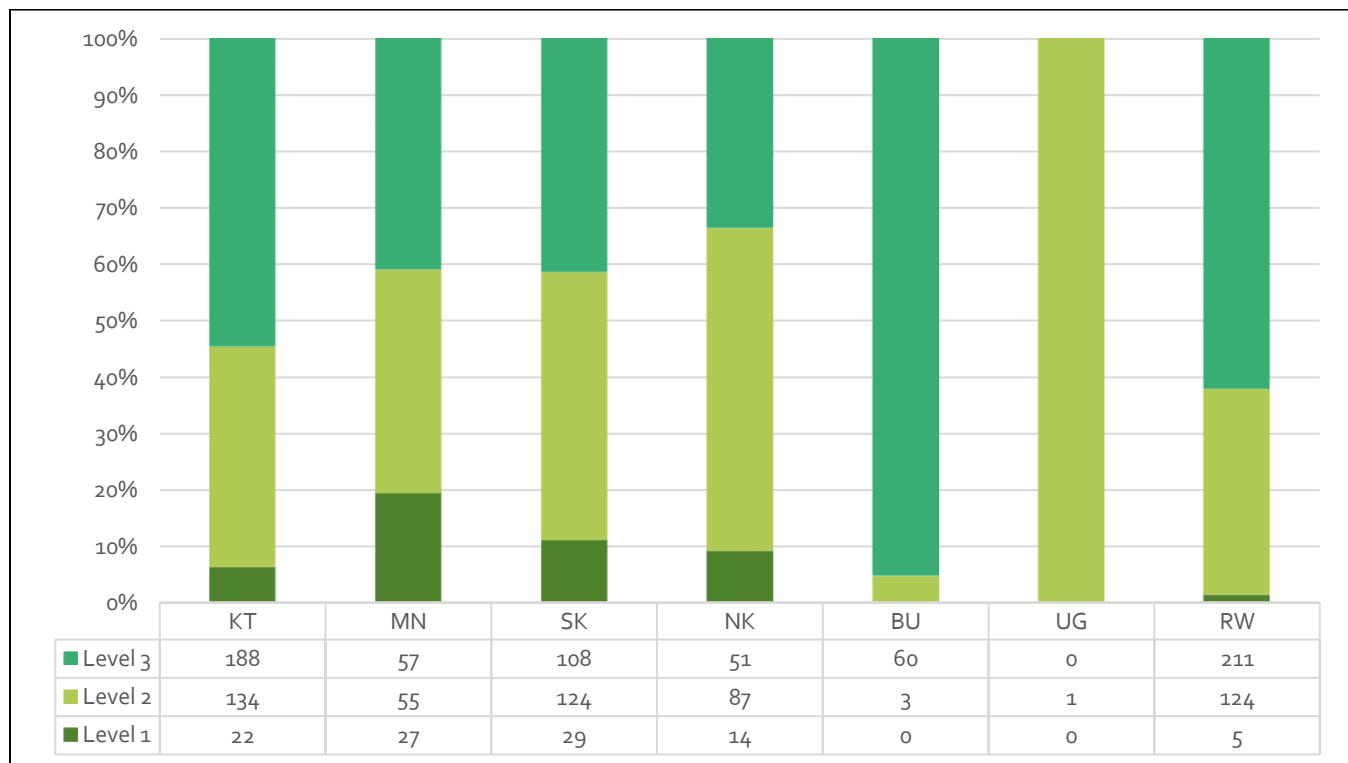
The average percentage of incidents resolved is marginally higher (81%) in the current reporting period (excluding Uganda where there was minimal activity), compared to the previous period (79%). In Maniema (DRC) the majority of the comparatively low level of incident resolution (70%) related to weight discrepancies at the processor level. Analysis for weight discrepancies has since been adjusted for more effective follow up. In addition, the CPP (Provincial Steering Committee) did not convene in 2020 and only convened in very few instances in 2021 due to political instability in Kindu which reduced local stakeholder follow up. In Burundi and Katanga, a high percentage (96% and 86% respectively) of incidents were resolved which generally indicates good follow up and engagement by ITSCI, authorities and companies in these regions. In Burundi incidents are typically resolved with rapid refresher training and correction of mis-recorded data, which comprises most incidents.

In general, governments in the Great Lakes region gradually lifted many of the restrictions imposed in 2020 in response to the COVID-19 pandemic. This resulted in increased ITSCI site visits and follow up on and monitoring of incidents through stakeholder meetings and engagement. In addition, ITSCI widened its focus on incidents of all levels of severity but still prioritised high-risk incidents to maintain OECD standards. Resultantly 5% more incidents were resolved in 2021 compared to the previous reporting period. The pandemic continued to impact stakeholder movements and engagement in the current reporting period. Not all restrictions were lifted and there was a brief lockdown in Rwanda, localized curfews in the DRC, and ongoing restrictions on local travel and some gatherings in response to surges in COVID-19 infections. These had minimal impact on incident reporting in the reporting period.

The relative proportion of Level 1, 2, and 3 incidents per ITSCI area is given in Table 4 and illustrated in Figure 2. While Level 1 incidents include serious breaches of due diligence or traceability, they more commonly relate to weaker governance or greater insecurity in particular locations.

**Table 4. Relative proportion of Level 1, 2, and 3 incidents per ITSCI area**

LEVEL	KT	MN	SK	NK	BU	UG	RW	TOTAL DRC	TOTAL
Level 1	22	27	29	14	0	0	5	92	97
Level 2	134	55	124	87	3	1	124	400	528
Level 3	188	57	108	51	60	0	211	404	675
<b>Total</b>	<b>344</b>	<b>139</b>	<b>261</b>	<b>152</b>	<b>63</b>	<b>1</b>	<b>340</b>	<b>896</b>	<b>1,300</b>



**Figure 2. Seriousness of incident per area for the reporting period**

Level 1 incidents are those of highest severity relating to OECD Annex II risks. In the reporting period these incidents in the DRC were typically due to rogue FARDC involvement in the mineral trade, (which is prohibited by DRC law except for in matters of national security), clashes of non-state armed groups with FARDC, mineral fraud and theft, sporadic acts of harassment, detentions of miners and violence. In Katanga some Level 1 incidents occurred when actors prevented ITSCI from overseeing traceability requirements. Almost all incidents in Burundi are related to Level 3 data management issues and have been consistently for many years. In all the regions (excluding Uganda and Burundi), the majority of incidents are Level 2 and Level 3 incidents of lower severity.

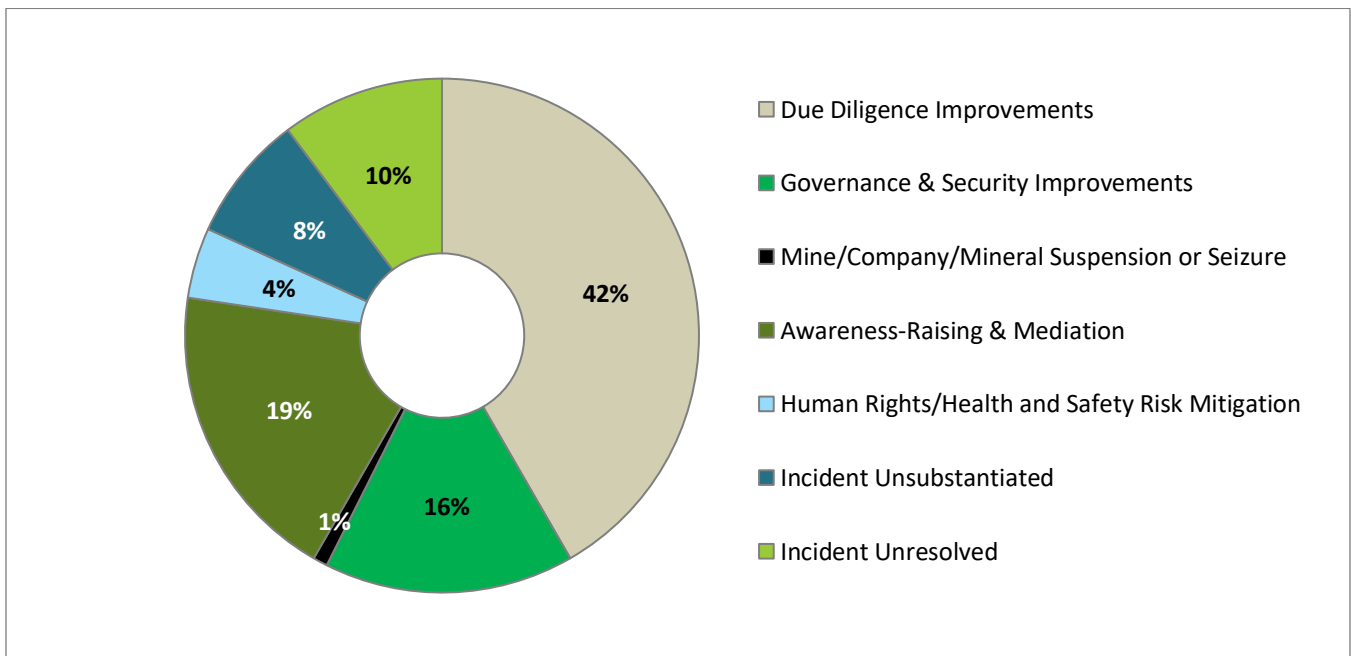
## INCIDENT OUTCOMES

ITSCI has defined and uses 32 outcomes which measure the impacts achieved through the management of incidents and indicate the type of stakeholder engaged in the mitigation process. Outcomes of successful resolution are determined once any incident has been closed. Under ITSCI procedures this requires that all details of the identified risk are known, mitigation actions appropriate to OECD Annex II have been recommended and discussed, the mitigation actions have been implemented, and improvement confirmed.

For the purposes of providing a simplified overview of the positive impacts achieved through the ITSCI programme, the 32 outcomes have been combined into 7 aggregated groupings as follows.

- ▲ DUE DILIGENCE IMPROVEMENTS
- ▲ GOVERNANCE & SECURITY IMPROVEMENTS
- ▲ MINE/COMPANY/MINERAL SUSPENSION OR SEIZURE
- ▲ AWARENESS-RAISING & MEDIATION
- ▲ HUMAN RIGHTS/HEALTH AND SAFETY RISK MITIGATION
- ▲ INCIDENT UNSUBSTANTIATED
- ▲ INCIDENT UNRESOLVED

Figure 3 illustrates the type of outcomes which have been achieved by the work and cooperation of all stakeholders, and the programme itself, in this reporting period. Note that there may be more than one outcome per incident.



**Figure 3. Aggregated incident outcomes achieved in the reporting period**

Companies take actions to enhance **due diligence**, such as making additional mine site visits, improving working practices, drafting risks assessment reports, participating in stakeholder meetings, and implementing other mitigation measures. These actions can also be supported through focused monitoring and training by ITSCI field staff. Analysis of the data in the current reporting period revealed that due diligence improvements decreased marginally from that in the previous calendar year. The measure of Governance and Security Improvements and Awareness-Raising and Mediation increased marginally compared to the previous reporting period.

Many risks arise from the operating environment and the need for capacity building at government level. It is therefore interesting to highlight that 16% of the outcomes are related to improvement in **governance and security** performance compared to 13% of outcomes in the previous reporting period. Examples include arrests, court martial, reposting of mining or security service staff or similar legal actions against perpetrators, as well as improved performance through training or new commitments to principles of due diligence.

In addition to direct actions related to specific incidents, it is positive to also note **awareness raising and mediation** progressed in the current reporting period and enabled the ITSCI team, stakeholders, and multi-stakeholders to continue sharing information that improved processes and procedures. In the DRC, ITSCI currently facilitates local consultation and mitigation at 7 provincial and 44 local committees, which are chaired by state services and authorities with civil society participation. ITSCI continued to encourage the establishment of active national steering committees in Burundi and Rwanda. In Rwanda, 13 District Mining Task Forces have been established so far in which ITSCI participates. These form the bedrock of continued improvement and better management of risks in the longer term and these actions accounted for 19% of the total outcomes compared to 14% in the previous reporting year.

One key role of ITSCI field teams is to assist companies in performing their due diligence and to support state services and authorities to enhance their management of mining activities and improve overall governance of the mining sector. To achieve these objectives, ITSCI teams conduct regular training sessions, one-to-one coaching sessions, capacity-building activities or group workshops for state agents, miners, negociants (middlemen), mining cooperatives, and exporters. Topics include a wide range of issues including tagging and traceability procedures, overall due diligence principles and risk assessment and mitigation. In the current reporting period, ITSCI field teams conducted **716 training sessions** with a total of **12,309 beneficiaries**. The extensive training activities performed by ITSCI over this time helped to achieve and maintain the high proportion of due diligence improvement (42%) as incident outcomes.

## HIGH RISK INCIDENTS FOR SEC REPORTING

### High Risk incidents for the reporting period

Of the total 1,300 incidents recorded in the reporting period, 16 were identified as High Risk in relation to **US SEC reporting**. The process of identifying incidents potentially relevant to US SEC reporting took place via rigorous assessment and analysis by ITSCI working in close collaboration with our field implementation partner to check facts on the ground. Of these incidents four were Level 2 and 12 are Level 1 which are associated with the potential involvement of individuals who are, or may be, members of an armed group identified as a perpetrator of serious human rights abuses in annual Country Reports on Human Rights Practices under sections 116(d) and 502B(b) of

the Foreign Assistance Act of 1961 (22U.S.C. 2151n(d) and 2304(b)) relating to the DRC or an adjoining country. This may relate to non-state armed groups or rogue individuals in state armed groups such as the police or national army whether the individual themselves was armed at the time of the incident.

The numbers of High-Risk incidents derived from Level 1 incidents per area are shown in Table 5.

**Table 5. High Risk incidents identified in the reporting period**

ITSCI OPERATING AREAS	LEVEL 1 TOTAL	LEVEL 1 HIGH RISK	% AS LEVEL 1
KT	22	1	5%
MN	27	4	15%
SK	29	6	21%
NK	14	1	7%
BU	0	0	0%
UG	0	0	0%
RW	5	0	0%
<b>Total</b>	<b>97</b>	<b>12</b>	<b>12%</b>

Overall, across all ITSCI areas, 12% of Level 1 incidents were considered High Risk. Of the four Level 2 incidents which were considered High Risk; 3 were in North Kivu and 1 in South Kivu. At the end of the reporting period 7 of the High-Risk incidents were still open and under mitigation and ITSCI will continue to monitor the incidents in accordance with ITSCI procedures. Five of the remaining incidents were closed as resolved and four as unresolved.

### Update on 2019-2020 High Risk incidents

In the 2020 reporting period, 9 of the 1,338 incidents were identified as High Risk with potential links to rogue elements of the police in the DRC and/or the DRC national army in connection with a variety of alleged illicit activities such as fraud, bribery, illegal payments, or taxation. Five of the 9 incidents were closed at the end of the 2020 reporting period. The remaining four were closed during 2021 after follow-up in accordance with ITSCI criteria. Of the four incidents closed in 2021, one relating to a non-state armed group was closed after additional security patrols were carried out and no similar incidents occurred relating to mining. Another incident was determined not to involve armed groups and subsequently closed. Concerning the third closed incident, the aspect relating to PNC (national police) in collecting tax ceased. However, the incident was closed as unresolved, and a new incident opened in 2021, as taxation collected by other state agents continues, without the involvement of PNC. The remaining incident was closed as inconclusive as no further information was found relating to the affected minerals. Since the incident, the implicated PMH (mine police) officers have not been reported in any new incidents.

## FURTHER INFORMATION

We welcome the participation and engagement of companies that wish to be informed regularly of individual incidents. Companies that join as ITSCI members receive a monthly report on each incident, actions recommended and underway, and whether the incident has been resolved. In addition, ITSCI members receive alerts on Level 1 incidents as soon as sufficient information is available to describe the risk so that companies can determine their own due diligence strategy in response to that risk.

Further to this report, ITSCI can also support downstream companies in their individual compliance reporting requirements with additional detail and analysis based on individual agreements, including a reasonable financial contribution towards the costs of reporting on our comprehensive incident management.

Information on all incidents is also made public with a delay of three months after all incidents in any six-month period have been closed. Incident information is available on the Info pages of the ITSCI website: <https://www.itsci.org/incident-summaries-public/>

For requests, suggestions or enquiries please contact the ITSCI Programme via +44 (0)1727 875 544 or [itsci@internationaltin.org](mailto:itsci@internationaltin.org)

Our special thanks go to the ITSCI reporting teams for their commitment and continued hard work.

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**ANNEX I. Overview of incident outcomes and aggregated outcome groupings**

Overview Level	Detailed Level	Description
Due Diligence Improvements	Improved company due diligence	Company gathers more information from suppliers, through mine visits or other sources and follows up
	Improved company procedures	Company improves working practise or formalises documentation and systems
	Improved data	ITSCI and the company, in cooperation with relevant state services, resolve questions on data or supply chain of custody information
	Plausibility control	ITSCI manages risks from implausible mineral type or production level at mines or weight changes
	Risk alert to companies	ITSCI provides alerts on higher risk mines, suppliers or locations to participants
	Improved ITSCI procedures	ITSCI enhances method of working or documentation including adapting processes to local requirements
	Continued monitoring	ITSCI continues focused monitoring beyond incident period of issues considered high risk or likely to reoccur
Governance & Security Improvements	Improved private security	Company formalises contracts with private security provider, vets or trains the security firm on human rights
	Completed legal process inc. arrests	Authorities take corrective action which may include arrest, fine or other enforcement measures through the legal process
	Change in legislation or procedure	Authorities or customary leaders introduce national or local law or revised procedures to protect traceability and reduce risk
	Change in customary behaviour	Tribal or other traditional leaders adopt new behaviour to support supports due diligence
	Improved state security	Authorities provide added security, train or improve protection around mineral areas
	Action from command	Authorities take corrective action which may include a hearing and enforcement measures against rogue individuals in official position
	Improved government performance	Authorities replace poor performing or missing agents, increase number of agents, or participate in training
	Protection of national park	Authorities prevent minerals originating from national parks entering the supply chain
	Increased local accountability and monitoring	Stakeholders take action to protect responsible supply chains including through whistleblowing
	Reduced corruption	Stakeholders identify, report or prevent corruption
	Membership or mineral trade suspension	ITSCI suspends companies or mines from participation or freezes mineral movement

Overview Level	Detailed Level	Description
Mine/Company/Mineral Suspension or Seizure	Mineral quarantined	ITSCI requests participants to set aside mineral from trading during incident investigation
	Suspension of operators	Authorities suspend mining licenses or operators
	Minerals seized	Authorities seize questionable minerals
Awareness-Raising & Mediation	Awareness raising	Stakeholders participate in informal training or receive general advice on processes or activity
	Formal training	Stakeholders participate in formally organised training or coaching sessions with specified ITSCI objectives
	Stakeholder dialogue	Stakeholders participate in negotiation between commercial parties or others to resolve disputes
Human Rights/Health and Safety Risk Mitigation	Improved safety	Stakeholders close mines or act to prevent repeated accidents through measures such as training
	Company contribution	Company pays compensation to injured miners or community
	Reduced child labour	Stakeholders train, raise awareness or take measures to reduce child labour
	Reduced forced labour	Stakeholders take action to prevent forced labour
Incident Unsubstantiated	Unresolved inconclusive	Unresolved due to lack of sufficient information or any evidence to enable a conclusion to be reached
Incident Unresolved	Unresolved lack engagement	Unresolved due to lack of requested information or action from company or authorities
	Unresolved incomplete legal process	Unresolved due to failure to complete legal process following arrests or similar
	Unresolved lack international agreement	Unresolved due to no agreed solution, including for disposal of seized minerals