



ITSCI site visit, Ibusa sub-sector, Pangji territory, Maniema Province

ITSCI Programme INCIDENT AND OUTCOME REVIEW

1st January 2024 – 31st December 2024

Executive Summary

This report is an overview of achievements of the ITSCI Programme in working with stakeholders for risk mitigation in mineral supply chains from Burundi, the Democratic Republic of the Congo (DRC), Rwanda and Uganda. The incident reporting period in this report is from 1st January 2024 to 31st December 2024.

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. In June 2023, the programme was confirmed to be **fully aligned with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD Guidance)**, and we support companies performing due diligence according to those expectations.

Our field teams support state services to establish mineral traceability and conduct regular on-the-ground monitoring to identify, verify, and report risks as a critical part of our incident management system. Whistleblowing is a critical component of the incident reporting framework. We communicate 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 the ITSCI Programme

Table A. Salient indicators of the ITSCI Programme

INDICATORS	2023	2024
Monitored mine sites	2,740	2,958
Incidents opened	1,763	1,869
Level 1 incidents	254	274
Whistleblower related incidents	55	110
High Risk Incidents*	38	40

*Relevant for U.S. Securities and Exchange Commission reporting

A total of 1,869 incidents were opened in all regions across nearly 3,000 sites with the majority occurring in Rwanda (499), South Kivu (428), Maniema (279) and North Kivu (259) provinces in the DRC. Among the incidents 285 (15% of total incidents) were categorised as Level 1 seriousness¹ with potential or confirmed 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. Most Level 1 incidents occurred in the DRC in South Kivu (93), North Kivu (90), and Maniema (59). In Rwanda there were 18 Level 1 incidents.

Incidents related to the ITSCI Chain of Custody (CoC) category make up the majority (60%) of all incidents in this reporting period, consistent with trends observed in previous years.

40 Level 1 incidents were categorised by ITSCI as High Risk² with relevance for U.S. Securities and Exchange Commission reporting.

¹ Priority issues requiring immediate and High-Level attention and possible disengagement in the supply chain are classified as Level 1

²Contact ITSCI at itsci@internationaltin.org for additional information on these high risks incidents which can be provided for a fee and can be used e.g., for Conflict Mineral Reporting obligations.

Incident Resolution

Outcomes for incident resolution can be assessed by considering the percentage of those incidents resolved from the total number verified as incidents and not found to be inconclusive and are given in Table B.

Table B. Percentage of incidents resolved

ITSCI OPERATIONAL REGION	2023	2024
DRC – Haut Katanga	74%*	90%
DRC – Haut Lomami		67%
DRC – Lualaba		88%
DRC – Tanganyika		58%
DRC – Maniema	66%	66%
DRC – South Kivu	65%	69%
DRC – Tshopo	100%	63%
DRC – North Kivu	50%	55%
Burundi	67%	100%
Rwanda	66%	73%

* Prior to 2024, incident resolution was aggregated at the Katanga regional level. As of 2024, reporting is broken down by each of the four provinces that now make up Katanga.

ITSCI was able to increase the number of monitoring visits, meetings with stakeholders, and overall follow-up on the implementation of risk and incident mitigation measures in the reporting period. Notwithstanding this, the decrease in incident resolution is due, in part, to higher levels of complexity and volatility of local contexts notably in North Kivu, South Kivu and Maniema.

Overall, an unresolved incident does not necessarily mean that no effective and successful mitigation measures were carried out. Each incident typically involves several mitigation actions implemented by different stakeholders. In many cases, some of the recommended actions are completed and lead to positive outcomes. However, when not all recommendations are implemented, the incident may still be considered as unresolved.

Incident Outcomes

ITSCI has 32 indicators of outcomes from incident management ([Annex A](#)), which for the purpose of simplification are aggregated into 7 incident categories. The proportion of outcomes for the 7 categories during the reporting period are in Table C.

Table C. Outcomes from incident management

AGGREGATED OUTCOMES	2023	2024
Due Diligence Improvements	35%	37%
Governance and Security Improvements	16%	18%
Mine/Company/Mineral Suspension or Seizure	1%	2%
Awareness-Raising and Mediation	17%	17%
Human Rights/Health and Safety Risk Mitigation	6%	4%
Incident Unsubstantiated	3%	3%
Incident Unresolved	22%	19%

Outcomes are similar to the previous year. The percentage of unresolved incidents increased by 3%.

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1 INTRODUCTION

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 (OECD Guidance) by implementing supply chain traceability in cooperation with local governments, identifying risks, facilitating stakeholder engagement, supporting risk resolution, and providing 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. In 2023 ITSCI was confirmed by an independent expert evaluator to be **Fully Aligned with the OECD Guidance**, including our approach to identifying Annex II risks, and response to such risks.

This report provides high level coverage of incident reporting data over from 1st January 2024 to 31st December 2024 relating to mineral supply chains from Burundi, Democratic Republic of the Congo (DRC), Rwanda and Uganda.

Over the reporting period, new ITSCI sites continued to be integrated into the ITSCI Programme. ITSCI recorded and managed a total of 1,869 incidents across 2,958 monitored mine sites and transport routes in the Great Lakes Region. There is a 6% increase in incidents compared to the previous period and a 12% increase in Level-1 incidents of highest severity. The majority (60%) of incidents are related to the ITSCI Chain of Custody category. The cause for the increase cannot be attributed to a single factor, nor can it be considered an indicator of lower impact of the ITSCI programme on the ground.

An essential enabler for due diligence is the presence of field teams (approximately 150 staff), as recommended in the Appendix of the OECD Guidance, to continuously monitor and evaluate risks, engage local stakeholders and report on mitigation. The teams provide credible risk information, guidance, and build the capacities of supply chain companies, cooperatives, miners and other stakeholders. ITSCI's experienced teams facilitated meetings of 58 provincial and local multi-stakeholder committees to transparently discuss mitigation plans and agree on parties responsible for action. The teams conduct regular training sessions on a wide range of issues including traceability procedures, overall due diligence principles, risk assessment and mitigation.

ITSCI receives information on risks from multiple sources including the field teams, government agents, company representatives, communities, local non-governmental organisations, the United Nations, among others. ITSCI also operates a whistleblowing mechanism in the DRC. This includes a toll-free hotline allowing anyone to report risks or incidents. A total of 110 incidents related to whistleblowing were opened and/or updated in the reporting period. The mechanism additionally includes the broadcasting of awareness raising campaigns on local community radios across the DRC on responsible artisanal mining and Annex II risks in mineral supply chains.

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 outcomes.

2 INCIDENT MANAGEMENT AND REVIEW METHODOLOGY

ITSCI 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 ITSCI's work piloted in 2010. A public summary of the ITSCI incident reporting matrix used to categorise and assign levels of severity to incidents is in [Annex B](#).

2.1 Incident Categories

Incidents are evaluated as relevant to one or more key issues under ITSCI categories of due diligence, Chain of Custody (CoC), corruption and compliance, 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 53 sub-categories of incident to sufficiently classify the many potential risk types.

2.2 Levels of Incident Seriousness

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. Level 1 incidents relate to OECD Annex II risks and include serious breaches of due diligence or traceability, and more commonly relate to weaker governance or greater insecurity in particular locations. 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 that the categorisation of levels of seriousness is, 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.

2.3 Incident Resolution 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 six months the incidents 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.

2.4 Incident Outcomes

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.

3 REPORTED INCIDENTS

The 1st January to 31st December 2024 reporting period has been selected by ITSCI to enable downstream companies who report on their due diligence activities in the following calendar year to reference ITSCI data and explain how they have evaluated the potential impact and risks on their supply chains. Among other information, ITSCI downstream associate members receives incident summary tables monthly and Level 1 incident alerts on an ad-hoc basis. The following sections give the division of incident occurrence and outcomes across ITSCI operating areas.

- ▲ AT THE COUNTRY LEVEL FOR BURUNDI (BU), RWANDA (RW) AND UGANDA (UG)
- ▲ AT THE PROVINCIAL LEVEL FOR THE DRC, INCLUDING HAUT-KATANGA (HK), HAUT-LOMAMI (HL), LUALABA (LL), MANIEMA (MN), NORTH KIVU (NK), SOUTH KIVU (SK), TANGANYIKA (TG) AND TSHOPO (TS) PROVINCES

3.1 Influencing Factors

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

- ▲ PRODUCTION DYNAMICS
- ▲ NUMBERS OF MINES AND ACTIVITY LEVEL OF THOSE MINES
- ▲ NUMBERS OF OPERATORS AND THE AMOUNT OF BUSINESS THE OPERATORS COMPLETE
- ▲ LOCAL POLITICAL AND SECURITY ENVIRONMENT, INCLUDING ACTIVITIES RELATED TO NON-STATE AND STATE ARMED GROUPS AND BANDITRY
- ▲ LEVEL OF GOVERNANCE, IN PARTICULAR IN NEW ITSCI AREAS AND REMOTENESS OF SITES
- ▲ PRESENCE OF GOVERNMENT AGENTS
- ▲ TURNOVER OF GOVERNMENT AGENTS AND COMPETENCE

A higher number of incidents at a site does not necessarily correlate with an increase in adverse impacts under Annex 2 risks of the OECD Guidance. For example, new companies setting up a business in 3T trading may be less familiar with due diligence requirements, and therefore potentially increase the number of incidents. From a governance perspective, the extension of ITSCI activities to new mining areas commonly correlates with initial weaker levels of governance. A lack of knowledge of mining laws, regulations or ITSCI procedures by state services or state security forces commonly results in cases of procedural errors, illegal or unlawful interference in mining activities or trade.

3.2 Incident Numbers

Figure 1 gives the number of incidents recorded in the ITSCI operating areas and the resolution status. ITSCI recorded a total of 1,869 incidents in the reporting period.

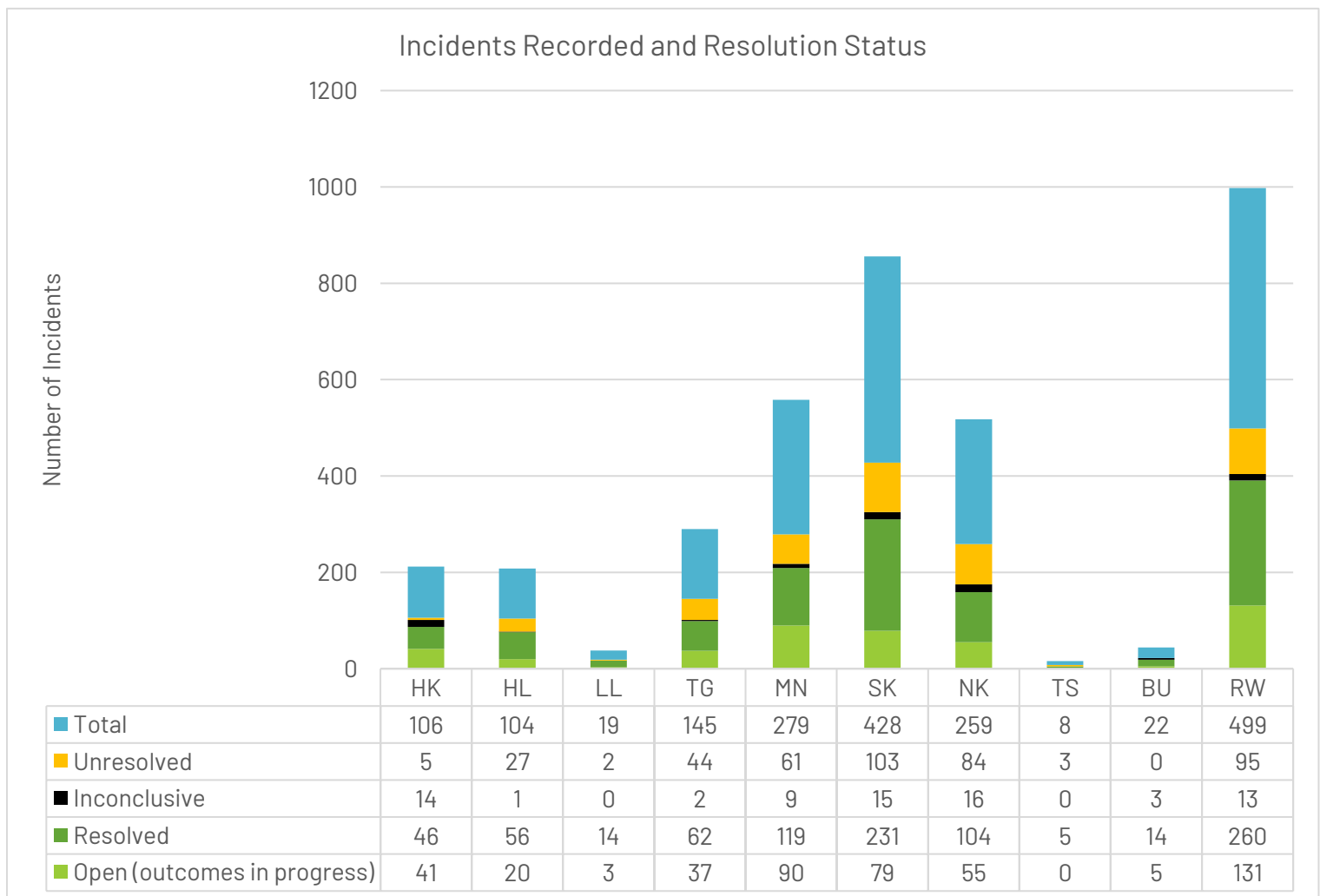


Figure 1. Division of incident occurrence and resolution status across ITSCI operating areas

There are 103 more incidents reported in 2024 compared to 2023, representing a 6% increase during the current reporting period.

The highest number of incidents was recorded in Rwanda (499) and South Kivu (428), like the previous reporting period while the fewest occurred in Burundi (22) and Tshopo province (8) in the DRC reflecting its relatively low level of activity compared to other areas. Compared to the previous reporting period, increases were observed across all provinces of the DRC, notably in Maniema (16%), South Kivu (11%), and North Kivu (6%).

At the end of the reporting period 131 incidents remained open with outcomes in progress with the majority open in Rwanda (131) followed by Maniema (90), South Kivu (79) and North Kivu (55). Refer to Section 3.5 for further discussion on incident resolution status.

A total of 110 incidents related to whistleblowing were opened and/or updated in the reporting period. Local partners raise awareness about the mechanism over radio stations, which continues to generate positive feedback among local communities.

3.3 Incident Categories

Under the ITSCI incident reporting and management system incidents are evaluated as relevant to one of five major incident categories (Figure 2).

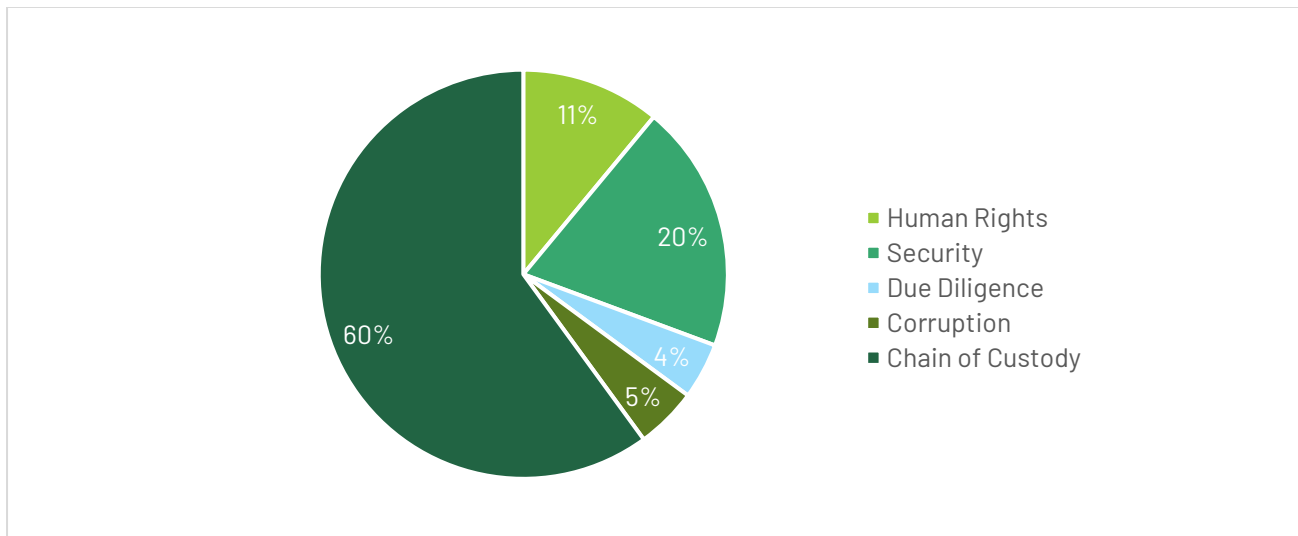


Figure 2. Incidents in ITSCI incident categories

The distribution of incidents across percentage categories remained consistent with the previous reporting period. There was a minor (+2%) increase in security related incidents and decrease in human rights (-3%) in the reporting period.

Incidents related to the ITSCI Chain of Custody (CoC) category make up the majority (60%) of all incidents in this reporting period, consistent with trends observed in previous years.

3.4 Incident Severity

Incidents of Level 1, 2, and 3 severity are given in Table 1 and Figure 3.

Table 1. Level 1, 2, and 3 incidents in ITSCI operating areas

LEVEL	HK	HL	LL	TG	MN	SK	NK	TS	BU	RW	TOTAL DRC	TOTAL
Level 1	5	5	-	14	59	93	90	1	-	18	267	285
Level 2	31	36	11	92	127	178	101	5	10	220	581	811
Level 3	70	63	8	39	93	157	68	2	12	261	500	773
Total	106	104	19	145	279	428	259	8	22	499	1,348	1,869

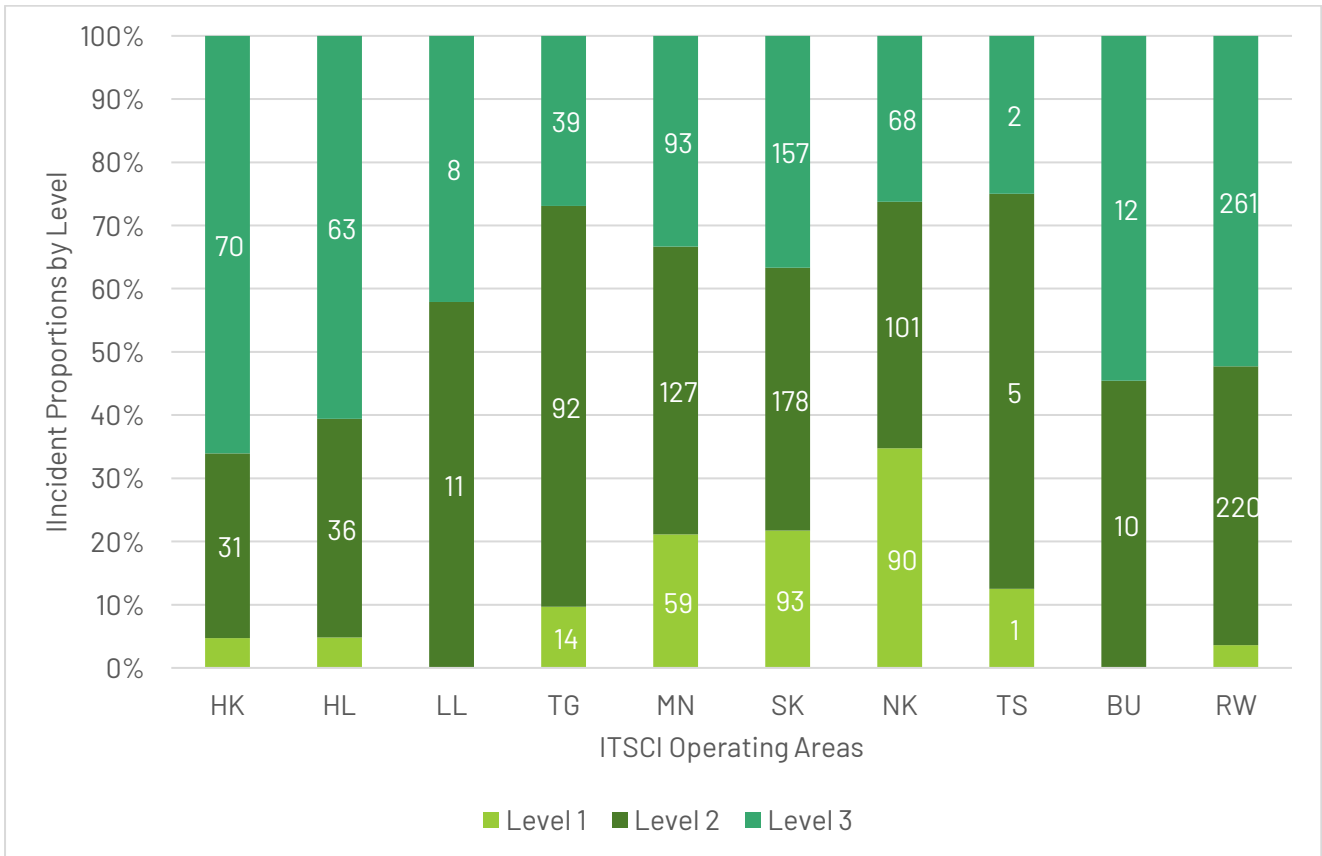


Figure 3. Seriousness of incident per ITSCI operating area

Level 1 incidents make up 15% of incidents which is similar to the previous reporting year (14%).

As in the previous reporting period, most Level 1 incidents (94%) occurred in the DRC, primarily in the provinces of South Kivu (33%), North Kivu (32%), and Maniema (21%), where mining activity is more concentrated. Level 1 incidents doubled in Rwanda from 9 to 18 in the current reporting period.

The increase in Level 1 incidents is primarily linked to the expanding deterioration of the security situation in these DRC provinces throughout 2024. As in the previous year, contributing factors include heightened involvement of rogue elements within state services and armed forces (e.g., FARDC, PMH, and PNC) in mining-related activities, as well as increased operations by non-state armed groups, notably Wazalendo and M23/AFC, criminal gangs and bandits engaged in sporadic acts of harassment, violence, and the theft of minerals or property. In Rwanda, there was an increase in allegations of cross-border smuggling, reportedly linked to the security situation in the DRC since the advance of M23/AFC in key mining areas in Eastern DRC. Additionally, an overall rise in plausibility weight discrepancies was noted in both the DRC and Rwanda (see Section 3.5 for further details). ITSCI has enhanced monitoring of these risks with improved tools and procedures and urges stronger due diligence from companies sourcing in or from the GLR.

Despite the security situation in the reporting period, mining activities and tagging by state mining services continued in many areas of the DRC, including in Haut-Katanga, Haut-Lomami, Lualaba, Maniema, North Kivu, South Kivu, Tanganyika and Tshopo Province. Activities also continued in Burundi and Rwanda.

Level 2 and Level 3 incidents, which are of lower severity, continued to account for most incidents (85%), consistent with trends observed in previous years.

3.5 Incident Resolution Status

The percentage of resolved incidents for the reporting period is given in Table 2. Outcomes for 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.

Table 2. Percentage of resolved incidents for the reporting period

ITSCI INCIDENT RESOLUTION	HK	HL	LL	TG	MN	SK	NK	BU	TS	RW	TOTAL DRC	TOTAL
Resolved	46	56	14	62	119	231	104	5	14	260	637	911
Unresolved	5	27	2	44	61	103	84	3	0	95	329	424
Total	51	83	16	106	180	334	188	8	14	355	966	1,335
Resolved Incidents (%)	90%	67%	88%	58%	66%	69%	55%	63%	100%	73%	66%	68%

Further explanation follows for each region.

3.5.1 Haut-Katanga

In Haut-Katanga, 90% of reported incidents were resolved during the period. The unresolved cases are primarily related to CoC issues and involve a diverse range of concerns, including weight discrepancies and mismanagement of tags by exporters. Additional unresolved incidents include failure by exporters to submit annual due diligence reports, the loss of logbooks, and errors in completing them. Follow-up with the relevant companies and authorities is ongoing to resolve these outstanding issues.

3.5.2 Haut-Lomami

Unresolved incidents only make up 12% of incidents in this province. They relate to human rights associated with issues of child labour and fatalities at mine sites and which require further investigation by ITSCI and authorities. Typical CoC issues mineral changes and requiring further training by ITSCI.

3.5.3 Maniema

In Maniema 66% of incidents are resolved. Incidents are generally attributed to unsanctioned or illegal rogue state services and security force interference in mining activities and lack of mitigation by their hierarchy and state prosecutors. An uptick in banditry, looting, and the involvement of children in mining was reported in the province in 2024.

3.5.4 South Kivu

In South Kivu, 69% of reported incidents were resolved. However, 2024 saw a notable escalation in security challenges.

There was a significant rise in activity by non-state armed groups, who erected barriers along mineral transport routes and entered mining sites. Fighting among factions of non-state armed groups Wazalendo, Mai-Mai, and Raia Mutomboki, combined with a rise in banditry and clashes with state armed forces (FARDC), contributed to growing instability and heightened risks across the province.

A number of reported incidents in South Kivu during the period were also linked to cross-provincial mineral fraud, stemming from the deteriorating security situation in North Kivu.

The continued lack of engagement by state services and security forces in implementing effective mitigation measures, exacerbated by the worsening security environment, further contributed to unresolved incidents and undermined effective incident resolution.

Toward the end of the year, the situation deteriorated further as M23/AFC activity spilled over from North Kivu into South Kivu, particularly affecting Kalehe Territory, where ITSCI operates.

3.5.5 North Kivu

ITSCI operates in Masisi, Lubero, and Walikale territories in North Kivu. As in the previous reporting period, the number of resolved incidents remained stable (55%) in the province, reflecting persistent operational and security challenges.

Masisi Territory

The security situation deteriorated further throughout 2024, particularly in Masisi, due to the continued presence of the non-state armed group M23/AFC, alongside activity by other local non-state armed groups, including those commonly referred to as 'Wazalendo', and the Alliance of Patriots for a Free and Sovereign Congo (APCLS).

For most of 2024, tagging at all ITSCI-monitored sites in Masisi territory has been suspended, as large parts of the territory have come under M23/AFC control.³

Walikale and Lubero Territories

In Walikale, ITSCI activities continued as normal during the reporting period. However, in Lubero Territory, incursions by ADF-Nalu and M23 were reported, leading to the suspension of ITSCI tagging at several monitored sites in the territory.

Operational Impacts on Incident Resolution

The suspension of operations in Masisi significantly impacted the facilitation of local multi-stakeholder committee meetings, which are crucial for risk mitigation, stakeholder dialogue, and follow-up actions. Additionally, the ongoing state of siege, in place in North Kivu Province since April 2021, continues to hinder effective incident resolution in the province.

Non ITSCI Member - Société Minière de Bisunzu (SMB)

Increased risks were also associated with the lack of state control over suspended and cancelled mining concession PE 4731, owned by SMB, in Masisi.

Additional Information

Further details on ITSCI's work and the security context in North Kivu are available here:

- [Escalating security situation in North and South Kivu, DRC - ITSCI Update - ITSCI](#)
- [ITSCI update on the security situation in North Kivu Province - ITSCI](#)
- [ITSCI update on our work in North Kivu, DRC - ITSCI](#)

3.5.6 Tshopo

Most incidents fall under the CoC and security categories - security incidents are associated with clashes between Wazalendo and ADF non-state armed groups to prevent incursions into Tshopo from North Kivu and FARDC illicit activities along transport routes and at gold mines in the vicinity of ITSCI mines. ITSCI continues to monitor many of these incidents and to follow-up on their resolution with local and provincial stakeholders.

3.5.7 Burundi

In Burundi, 63% of incidents reported during this period were resolved. The unresolved incidents primarily relate to CoC and due diligence type issues. These include failure to submit annual reports by

³ See ITSCI updates: [Suspension of activities in December 2023](#), followed by a [resumption in April 2024](#) and again by a [suspension since May 2024](#).

exporters and unaccounted-for tags at the exporter level. All incidents fall under Level 2 and Level 3 classifications.

3.5.8 Rwanda

In Rwanda, there was an increase in the number of recorded incidents during the reporting period, along with an improved resolution rate of 73%, compared to 66% in the previous year. A significant portion of incidents relate to health and safety, including injuries and fatalities linked to informal mining activities. Joint visits with RMB are being planned to assess the safety measures implemented by cooperatives and to follow up on the compensation process.

Chain of Custody (CoC) incidents remain common and include informal mining, plausibility concerns, and traceability or procedural errors. These cases require continued monitoring and investigation by ITSCI.

Many of the health and safety-related incidents led to the non-renewal or cancellation of mining licenses by RMB during the period, which has, in turn, contributed to a rise in informal mining and an increased risk of internal mineral fraud. These developments are partly connected to earlier changes in Rwandan legislation.

3.6 REPORTED OUTCOMES

3.6.1 Categories

ITSCI has defined 32 outcomes which measure the impacts achieved through the management of incidents and indicate the type of stakeholder engaged in the mitigation process. An overview of incident outcomes and aggregated outcome groupings is in Annex B. To simplify, the 32 outcomes are combined into 7 aggregated groupings in Table 4.

3.6.2 Influencing Factors

Outcomes of successful resolution are determined once any incident has been closed. Under ITSCI procedures this requires: 1) all details of the identified risk are known; 2) mitigation actions appropriate to OECD Annex II have been recommended and discussed; 3) the mitigation actions have been implemented; and 4) improvement confirmed by ITSCI.

Companies, ITSCI and government authorities take actions in line with their due diligence responsibilities, 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 are supported through focused monitoring and training by ITSCI field staff.

3.6.3 Incident Outcomes

Table 3 and Figure 4 give outcomes achieved by the work and cooperation of the programme and its stakeholders in the reporting period. There may be more than one outcome per incident.

Table 3. Outcomes achieved in the reporting period compared to the previous period

AGGREGATED OUTCOMES	2023	2024
Due Diligence Improvements	35%	37%
Governance and Security Improvements	16%	18%
Mine/Company/Mineral Suspension or Seizure	1%	2%
Awareness-Raising and Mediation	17%	17%
Human Rights/Health and Safety Risk Mitigation	6%	4%
Incident Unsubstantiated	3%	3%
Incident Unresolved	22%	19%

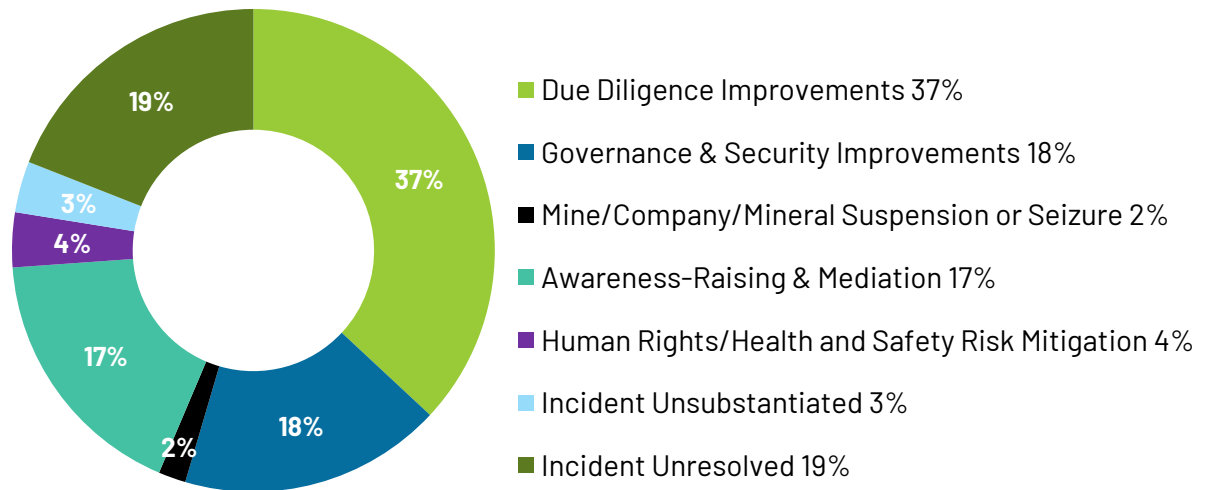


Figure 4. Types of incident outcomes

For the reporting period the percentage of outcomes leading to improvement in due diligence and governance and security, and mitigating human rights/health and safety, differ marginally from the previous year.

The percentage of unresolved incidents decreased by 3% and outcomes leading to improvements in due diligence, governance and security performance and mineral suspension or seizure improved marginally. Outcomes in the remaining categories are similar to the previous year.

Regular multi-stakeholder consultations in local and provincial meetings are commonly facilitated and attended by ITSCI field teams to drive incident resolution. In the DRC, ITSCI currently facilitates consultation and mitigation at 58 multistakeholder provincial and local committees which are chaired by provincial and local authorities with state services and civil society participation. ITSCI continued to encourage the establishment of active national steering committees in Burundi and Rwanda. In Rwanda, ITSCI continued to encourage the establishment of District Mining Task Forces (DMTFs), and support training of their members while participating in DMTF meetings or joint visits. By the end of this reporting period, 13 DMTFs were established. These task forces form the bedrock of continued improvement and improved identification and management of risks in the longer term and these actions accounted for 17% of the total outcomes compared to 22% in the previous reporting year. DMTFs enable the sharing of information, discussion of risks, and agreement of mitigation of incidents. This contributed to greater accountability of local stakeholders and improved due diligence practices.

One key role of ITSCI field teams is to assist companies in performing their due diligence and to support state services and authorities with strengthening their management of mining activities and improving 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, security forces, miners, negociants (local traders), 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.

4 HIGH RISK INCIDENTS FOR U.S. SECURITIES AND EXCHANGE COMMISSION REPORTING

4.1 High Risk Incidents for the Reporting Period

Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act) requires publicly traded companies to disclose their use of conflict minerals sourced from the DRC or adjoining countries as part of efforts to reduce the financing of armed groups involved in serious human rights abuses.

The process of identifying incidents 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. The number of High-Risk incidents relevant to US SEC reporting are in Table 4.

Table 4. Number of High Risk incidents per region

ITSCI OPERATING AREAS		LEVEL 1 TOTAL	LEVEL 1 HIGH RISK*	% AS LEVEL 1
D R C	Haut-Katanga	5	0	0%
	Haut-Lomami	5	0	0%
	Lualaba	0	0	n/a
	Maniema	59	5	9%
	North Kivu	90	10	11%
	South Kivu	93	24	26%
	Tanganyika	14	1	7%
	Tshopo	1	0	0%
Burundi		0	0	n/a
Rwanda		18	0	0%
Total		285	40	14%

*Relevant to US SEC reporting

Of the total 1,869 incidents recorded in the reporting period, 40 Level-1 incidents – 14% of Level-1 incidents – were identified as High Risk in relation to Section 1502 with the majority in South Kivu Province. All the incidents are Level 1 and associated with the potential involvement of individuals who are, or may be, members of an armed group identified 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, and who may be financially benefiting from mineral exploitation or trade as per Section 1502 of the Dodd-Frank Act. 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.

At the end of the reporting period 21 High-Risk incidents were resolved and 12 were unresolved. The remaining seven incidents were still open and under mitigation. ITSCI will continue to monitor the incidents⁴ in accordance with ITSCI procedures.

⁴Contact ITSCI at itsci@internationaltin.org for additional information on these high risks incidents which can be provided for a fee and can be used e.g., for Conflict Mineral Reporting obligations.

4.2 Update On High Risk incidents in the Previous Reporting Period

In the previous reporting period, 38 of the 1,763 incidents were identified as High Risk. All the incidents are closed. Of the 12 incidents closed in 2024, six related to state and non-state armed groups barriers were closed as resolved following suspension of activity and intervention by state security and local authorities. The remaining incidents were closed as unresolved due to lack of engagement by state services, state security and lack of engagement from exporters. In relation to three of these incidents, a new due diligence incident was opened in 2024 to follow up with exporters.

5 FURTHER INFORMATION

ITSCI welcomes 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 with; 1) an incident summary table for each province or country; 2) recommendations on actions taken and/or to be taken; 3) responsible stakeholders to implement these actions; and 4) 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 based on individual agreements, including a reasonable financial contribution towards the costs of reporting on our comprehensive incident management. Such support can for instance consist in providing additional detail and analysis of high risks incidents, including incident status, information on mitigation actions and outcomes, and their possible relevance for SEC reporting.

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

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

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ANNEX A. 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	
Mine/Company/Mineral Suspension or Seizure	Membership or mineral trade suspension	ITSCI suspends companies or mines from participation or freezes mineral movement
	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

OVERVIEW LEVEL	DETAILED LEVEL	DESCRIPTION
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

ANNEX B. Public, high-level summary of the ITSCI Incident Matrix

Note: unless otherwise specified, the ITSCI incident matrix may apply to any stakeholder group, including state services, security forces, on-the-ground mining operators and companies (such as cooperatives, negociants, exporters), ITSCI field teams, and ITSCI Members, among others. The matrix covers all OECD Annex II risks as well as additional risks that go beyond Annex II. Level 3 incidents represent the lowest level of severity, while level 1 incidents are the most serious.

Any incident reported by ITSCI may represent a confirmed and documented issue or a potential risk that has not yet materialised. Summarised information on recorded ITSCI incidents – including their category, level, location, responsible parties, recommended actions and status – is provided in the ITSCI incident summary tables and shared on a monthly basis with ITSCI Full Members. ITSCI Full Members are expected to review these tables on a monthly basis as part of their risk assessment and due diligence management responsibilities.

Level	Due diligence	Chain of custody	Corruption and compliance	Armed groups and security forces	Human rights and other concerns
1	Repeated or persistent failure to implement due diligence; refusal to provide information or provision of false information; misuse of ITSCI membership	Inexplicable or deliberate plausibility, traceability or procedural issues; misrepresentation of mineral origin; refusal to apply procedures; false or misleading supply chain documents	Bribes influencing stated mineral origin and misrepresentation; conflict financing by unarmed services; lack of compliance with sanctions	Illegal controls, taxation or behaviour by non-state armed groups or bandits; illegal behaviour of state security impacting minerals	Serious human rights abuses; coercion, threats or attacks on personnel; unresolved worst forms of child labour
2	Failure to implement due diligence policies, assessments or plans; lack of response to risks or recommendations; repeated lack of due diligence inc. failure to provide updates, meet financial and other obligations or hold stakeholder meetings	Repeated plausibility, traceability or unresolved procedural issues by state services or participants inc. repetitive errors	General bribery related to mineral business; continued avoidance or non-payment of official government tax or fees; lack of compliance with local laws	Non state armed groups, bandits or state security near minerals, inc. theft; state security acting beyond their mandate or with contested mandate	Worst forms of child labour; accidental death; mining in protected areas; intimidation of personnel
3	Lack of policies, reports or documents; failure to assess or plan to manage risk inc. plausibility; failure to provide updates or meet financial and other obligations; lack of due diligence. inc stakeholder meetings	Indications of plausibility, traceability or procedural errors or damages related to traceability by state services or participants; lack of commitment to implementation inc. lack of govt agents	Offers of bribes related to mineral business; non-contractual or receipted payments; lack of tax or fee payment; disagreement or dispute over taxes or fees	State security disrupting mineral activities; poorly contracted security with no reference to VPSHR; state security personnel mining	Child labour; community or other disputes; accidental injuries