



TRINITY NYAKABINGO MINE LIMITED
[Formerly Eurotrade International Limited]

P.O. Box 749, Kigali, Rwanda
Kabaraza village, Bugaragara Cell, Shyorongi Sector, Rulindo District
Northern Province, Republic of Rwanda

ANNUAL DUE DILIGENCE REPORT

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1. Company Information and Policy Overview

Trinity Nyakabingo Mine Limited [Formerly Eurotrade International Limited] is a Rwandan registered mining Company, which is part of Trinity Metals Group [<https://trinity-metals.com>]. It was granted a 25-year large-scale mining licence by the Government of Rwanda, to operate the Nyakabingo Tungsten Mine. The licensed area covers a surface of approximately 1600 hectares and is in Rulindo District in the Northern province of the Republic of Rwanda.

This Annual Due Diligence Report forms part of the implementation of Nyakabingo' Due Diligence Management Systems in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (hereafter 'OECD Due Diligence Guidance'). The Due Diligence management systems and this Annual Report are designed to be in conformance with the OECD Due Diligence Guidance. According to the OECD Due Diligence Guidance, Step 5, companies should meaningfully report on supply chain due diligence to generate public confidence in the measures that companies are taking.

An objective of the Nyakabingo Due Diligence management system is to identify, assess, and mitigate human rights risks in our supply chains to reduce actual and potential negative impacts on people and planet. Furthermore, the system seeks to ensure that the company's sourcing practices are in conformance with international good practice. Our Due Diligence approach has been developed in a way that manages risks based on available information and encourages improvements over time.

Nyakabingo utilises RCS Global services, including its traceability and due diligence systems, to support our efforts. Better Mining (BM), implemented by the RCS Global Group, is an upstream assurance mechanism that puts in place a number of systems to support that exports of minerals from Conflict-Affected and High-Risk Areas (CAHRA) are produced, transported and exported by companies operating in a manner that is aligned with the requirements of the OECD Due Diligence Guidance, the Better Mining program, and the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP).

This report describes the due diligence management system, the methodology for the assessment of risks, and the steps taken to manage the risks as established at Nyakabingo.

Nyakabingo has committed to adopt and make publicly available a Supply Chain Due Diligence Policy for responsible sourcing of Minerals from conflict-affected and high-risk areas. This report follows the commitments of that policy, which are our reference for responsible sourcing practices.

2. Risk Identification and Methodology for the assessment of risks

2.1. Due Diligence

We take a transparent approach to mining operations, production, and the trade of minerals from our sites. Purchasing smelters are encouraged to review the information provided to them and follow-up on elements in line with their own due diligence procedures. The Due Diligence we apply is risk based and commensurate to the severity and likelihood of identified risks. The process includes:

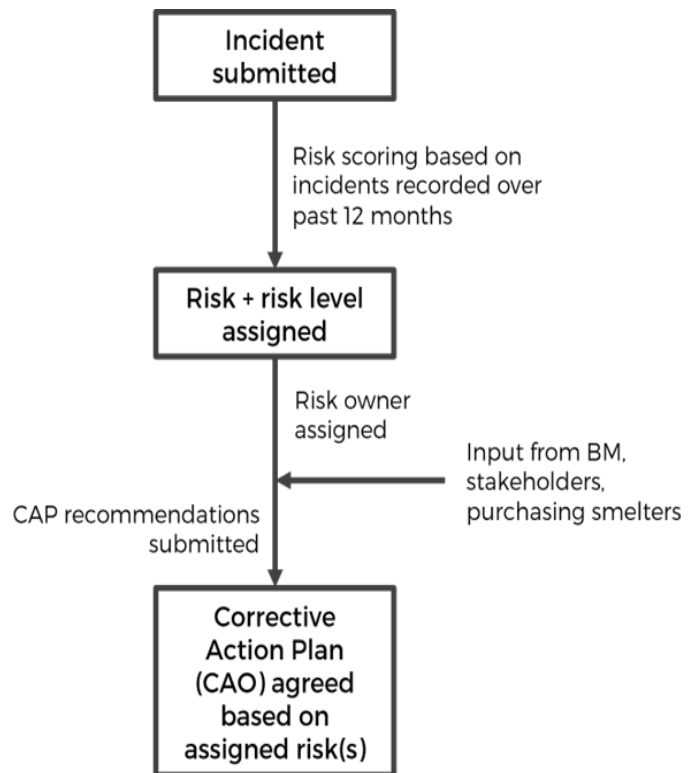
- (1) Identifying risks using evidence-based information that extends across all risks noted in the OECD Due Diligence Guidance.

- (2) Supporting the assessment of risks against our supply chain policy, national laws, and international guidance.
- (3) Responding to, managing, and reporting on identified risks in a measurable and accountable manner.
- (4) Promoting transparency along the supply chain, as part of an accurate depiction of local circumstances, to enhance engagement among supply chain members and improve access to market and investment for local operators and communities.
- (5) Promoting continuous reporting of risk-related information along our supply chain to downstream buyers.

Incidents that may occur at our site are recorded by independent monitors deployed by BM on an ongoing basis to our mine site. Monitors digitally record incidents in line with the RCS Global incident and risk categorization (aligned with the OECD Due Diligence Guidance Annex II risks). The collection and verification of incidents form the basis of the risk assessment approach. Following the logic outlined in the RCS Risk Management Procedure (RMP) the incidents recorded over the past 12 months are used to assign adequate risk levels for each monitored Risk.

The risk mitigation approach at Nyakabingo seeks to address issues in a structural manner. Based on the Risk Assessment a comprehensive Corrective Action Plan (CAP) is provided to Nyakabingo monthly by BM including the following information for each risk:

- Risk category
- Risk level
- Number of incidents associated with that risk category recorded over the past month.
- Suggested actions for risk mitigation
- Required evidence



- Recommended timeline for implementation of mitigation actions
- Responsible actor(s) for implementation
- Status (not started, in progress, completed) of mitigation actions.
- Risk owner notes (to be completed based on risk owner feedback)

In line with the core ‘continuous improvement’ principle in the OECD Due Diligence Guidance and accepted by market requirements, our company implements proactive and risk-based mitigation (‘corrective action’). Current CAP statuses are also shared along with each shipment to support our risk management and reporting obligations.

2.2. Traceability

Based on recommendations from the OECD Guidance, Chain of Custody System Standards from the ICGLR Regional Certification Mechanism (RCM), and Responsible Mineral Initiative RMAP audit requirements, BM deploys a digital traceability system for materials from mine to export. The objective of BM-implemented traceability is to provide assurance that the minerals exported originate from BM-monitored mine sites and to protect against the smuggling and laundering of minerals into BM-monitored supply chains.

The approach relies on recording traceability information at local level, and data reconciliation in real time. The approach allows for systematic identification of all participants in the supply chain. The traceability system digitally records the weight, purity, tag number of mineral bags as well as the names of present stakeholders and pit managers at the pit level and verifies the information at each supply chain step up to export.

Nyakabingo extracts minerals from their licensed concession. Minerals are being tagged and recorded daily by BM field agents. Minerals are then upgraded at the Company processing plant under the supervision of its own employees and Better Mining field agents. After a certain period, once the appropriate production quantity is reached, Nyakabingo conducts the blending and packing into drums. These processes are always conducted in the presence of a BM field agent. When the container is ready to be exported, Nyakabingo proceeds with the ICGLR certificate (International Conference of the Great Lakes Region) and the certificate of origin issued by Rwanda Revenue Authority. Minerals are exported directly from the Company premises. Note that there are no minerals purchased or received from any source other than from its own mining operations.

2.3 Grievance mechanism

Unethical or undesirable behaviour or any violations of the Company Code of Ethics can be reported to the Company. Various policies were adopted in that regard including the whistleblowing policy. The Company will assign a code number to all whistle-blowers. This code number will be used for all reporting purposes, and only designated managers will have access to the names and details of the relevant employees. If it is impossible to resolve the matter without revealing the whistle-blower’s identity, the designated Manager/ Officer will discuss whether and how to proceed with the whistle-blower. Meanwhile, the Company will do everything possible to support and protect the employee.

A Grievance Process for internal employees, the host community and stakeholders can be found in detail at trinity-metals.com.

3. Annual Risk Mitigation Efforts

In 2022, Better Mining operated at Nyakabingo Mine on a near permanent basis. During the year, Nyakabingo engaged with Government stakeholders including the Local authorities, Security organs and the Rwanda Investigation Bureau (RIB) regarding mineral theft and internal theft. Furthermore, Nyakabingo participated in community meetings on environmental and community related issues.

In 2022, **10** incidents were recorded which is less than half the number recorded in the previous year. 80% of recorded incidents were related to the risk of “Legality/ Legitimacy” and pertaining to cases of mineral theft and illegal mining. The other 20% concerned health and safety issues, primarily accidents related to mining activities. Of those incidents, 50% received a “low” incident score, while the remaining incidents received “Moderate ” 40% or “High” 10% incident scores. No “Very High” or “Critical Breach” incidents were recorded.

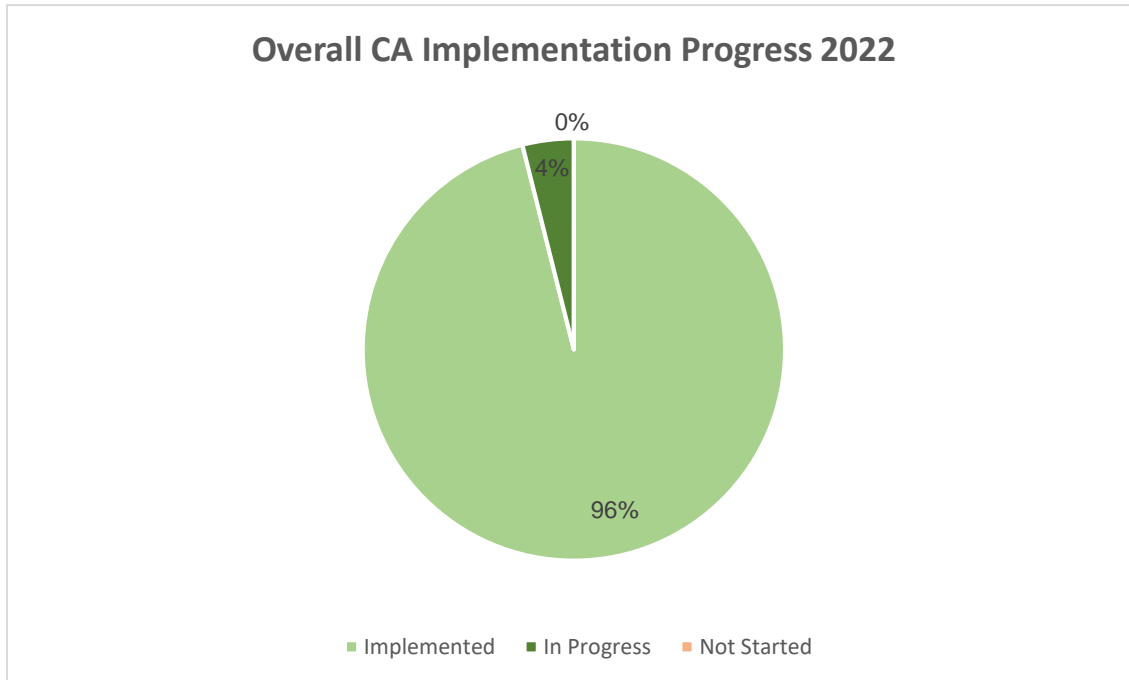
The below table shows the average score recorded for each risk during the year 2022.

Risk category	Risk	Risk Score
Human Rights	Child Labour	Least Risk
	Worst Forms of Child Labour	Least Risk
	Discrimination	Least Risk
	Forced Labour	Least Risk
	Gender	Least Risk
	Torture, cruel, inhuman treatment	Least Risk
	General Security	Least Risk
Security	International Humanitarian Law	Least Risk
	Non-State Armed Group	Least Risk
	Public or Private Security Forces	Least Risk
Working Conditions / Safety	Occupational Health and Safety	Low Risk
	Worker Rights	Least Risk
Environment	Emissions / Waste	Least Risk
	Water	Least Risk
	Mine Closure and Reclamation	Least Risk
	Protected Flora / Fauna	Least Risk
	Resource / Land Management	Least Risk
Legality / Legitimacy	Corruption / Bribery	Least Risk
	Legal / Transparent Tax Paying (EITI)	Least Risk
	Money Laundering	Least Risk
	Operational Legality	Moderate Risk
	Transparency / Reporting	Moderate Risk
Community	Business Conflict	Least Risk
	Community Engagement / Development	Least Risk
	Indigenous / FPIC / Heritage	Least Risk
Chain of Custody	Traceability	Least Risk

To mitigate the identified risks, Nyakabingo worked on implementing 26 mitigation actions following the guidance of the BM-issued Corrective Action Plans. Over the past year, 96% actions were successfully

implemented. For 4% of the mitigation actions, the implementation is still ongoing, and 0% actions are yet due to be started.

The below chart shows the rates of implementation for each risk that has been identified during 2022.



In 2022, various actions were taken in relation to Occupational Health & Safety, Operational Legality, Transparency and Reporting, Environment, Human Right and Community Engagement.

Occupational Health and Safety

Nyakabingo safety team has conducted a Health and Safety training for workers who handle semi-mechanized equipment and some artisanal tools. The team also conducts daily safety inspections and meets twice a week with safety coordinators and tunnel captains.

Operational Legality

Nyakabingo establishes and maintains good relationships with all stakeholders including central and local government, RCS global and Non-Governmental Organisations. Illegal miners and smugglers constituted the main challenge at the operational level. However, Nyakabingo has managed to Cooperate with the State Authority to identify and confront some illegal miners and illegal buyers. Nyakabingo continues to engage with Local government and security organs to ensure that the people who are mining without authorization are held accountable for their actions. To address these challenges, the company collaborates consistently with the people from the local community.

Transparency and Reporting

Nyakabingo conducts annual Due Diligence reports which is one of the OECD guidance requirements. The Annual Due Diligence Report for the year 2021 was published on the RCS Global Group website on February 28, 2022 and copies of the said report were made available at the Nyakabingo offices. This year report will be published at both Trinity Metals and RCS Global websites and a copy will be made available at Nyakabingo offices.

Human rights

Before recruiting workers Nyakabingo conducts background checks that include checking the national Identification cards and the age of the candidates among other things and considers the six components under Human Rights as defined in the OECD Guidance Annex II. These are: Child labour or Worst Forms of Child Labour, discrimination, forced labour, sexual violence, and torture, cruel, and inhuman treatment. In addition, Nyakabingo respects and applies the Labour Law and regulations in force in Rwanda for its human resources management.

Environment

In 2022, Nyakabingo started a project involving the construction of three water Dams for Mine wastewater collection, treatment, and recycling, to avoid the water flowing from the mine to the community farms and the pollution of natural waterways.

Community Engagement/ Development

Nyakabingo participates in different community activities like Umuganda where the community leaders and members discuss various issues and address different gaps that require action. Nyakabingo mostly provides financial support to the District and community activities. In 2022 Nyakabingo provided construction materials such as cement, sand, aggregate stones, iron sheets to vulnerable people. They also paid house rent for them and constructed better houses for them. With this contribution, the community appreciates Nyakabingo and are now more committed to supporting the growth and the development of the Nyakabingo mining company.