



RUTONGO MINES

Rutongo Mines Limited (RML)
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2023 ANNUAL DUE DILIGENCE REPORT

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1. Introduction

1.1 Company Information and Policy Overview

Rutongo Mines Limited (RML), a subsidiary of Trinity Metals, is a Rwandan mining company granted a 25-year large-scale mining license by the Government of Rwanda. This license allows RML to operate the Rutongo mines, covering approximately 10,000 hectares in the Rulindo District of Rwanda's Northern Province, primarily producing tin.

Each year, RML produces and publishes a Due Diligence Report on our mineral supply chain, adhering to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Step 5 of this guidance mandates that companies report meaningfully on supply chain Due Diligence to foster public confidence in their measures.

RML is committed to producing essential metals responsibly and sustainably, in compliance with all relevant national and international legal and regulatory requirements and best practices. We utilize RCS Global services, including traceability and due diligence systems, to support our efforts.

The Better Mining (BM) program, implemented by the RCS Global Group, serves as an upstream assurance mechanism. It establishes systems to ensure that minerals exported from Conflict-Affected and High-Risk Areas (CAHRA) are produced, transported, and exported in alignment with the OECD Due Diligence Guidance, the Better Mining program, and the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP).

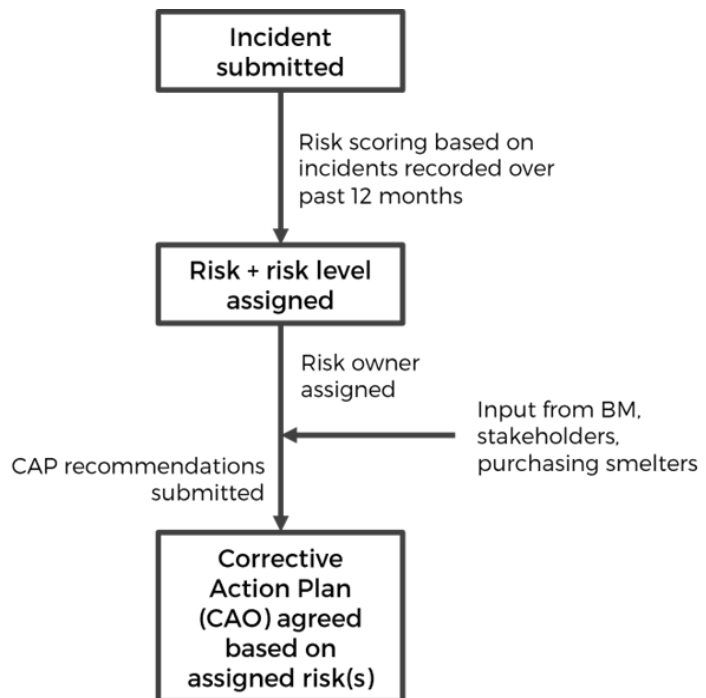
In terms of corporate governance, RML has established a Board of Directors that meets quarterly to discuss company business. The General Manager and Management Team oversee day-to-day operations, supported by the Group's corporate team.

2. Risk Identification and Mitigation Approach

2.1 Due Diligence

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 sites. 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. In parallel, the Company has identified all the risks associated with its operations and regular monitoring systems are in place.

The risk mitigation approach at Rutongo Mines seeks to address issues in a structural manner. Based on the Risk Assessment a comprehensive Corrective Action Plan (CAP) is provided to Rutongo Mines 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 risk mitigation ('corrective action').

2.2 Traceability

Based on recommendations from the OECD Guidance, Chain of Custody System Standards from the ICGLR Regional Certification Mechanism (RCM), and RMI RMAP audit requirements, Better Mining (BM) deploys a digital traceability system for materials from the 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.

This approach relies on recording traceability information at the upstream level and reconciling data in real time. It allows for the systematic identification of all participants in the supply chain. The traceability system digitally records the weight, purity, and tag number of mineral bags, as well as the names of present stakeholders and tunnel supervisors at the production level and verify the information at each supply chain step up to export.

No mineral is purchased, received, or otherwise obtained from any source other than Rutongo Mines' own mining operations. Minerals are upgraded at Rutongo Mines' premises under the supervision of its employees and a Better Mining field agent. With full traceability in place, mineral concentrates are packed, tagged, recorded, and exported directly from Rutongo Mines' premises.

2.3 Grievance Mechanism

Unethical or undesirable behavior, or any violations of Rutongo Mines' Code of Conduct, can be reported to the Company. Various policies have been adopted in this regard, including the whistleblowing policy. The Company assigns a code number to all whistleblowers, which is used for all reporting purposes. Only designated managers have access to the names and details of the relevant employees.

If it is impossible to resolve the matter without revealing the whistleblower's identity, the designated manager or officer will discuss with the whistleblower whether and how to proceed. Meanwhile, the Company will do everything possible to support and protect the employee. Detailed information about the Grievance Process for internal employees, the host community, and stakeholders can be found trinity-metals.com.

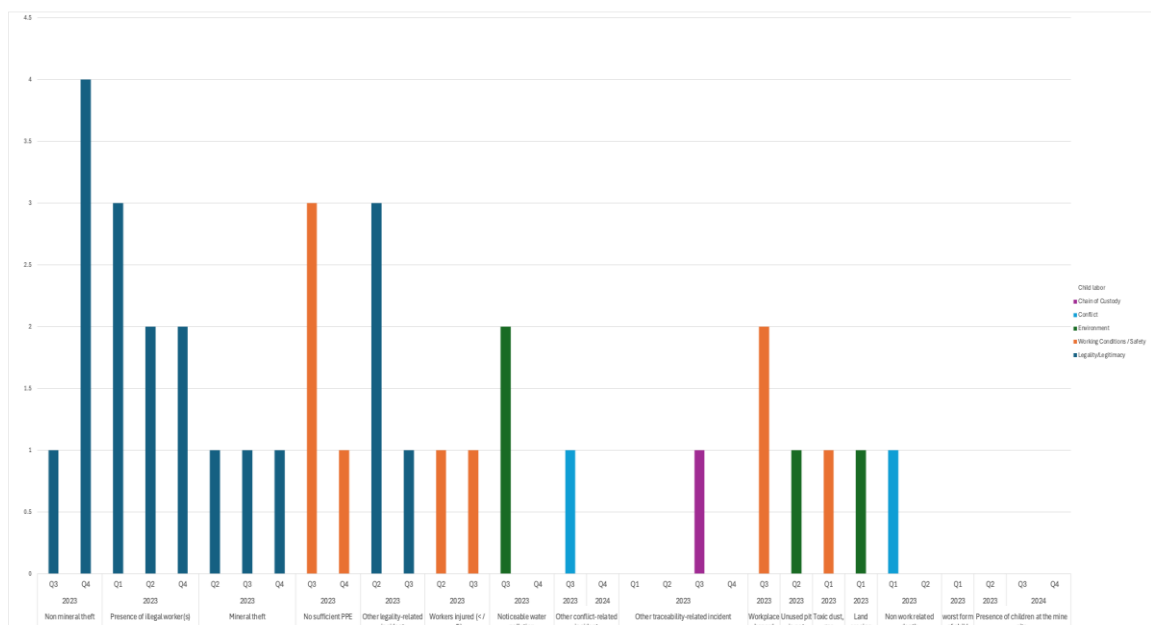
3. Annual Risk Mitigation Efforts

In 2023, significant progress was made in incident management. During the year, 33 incidents were recorded. Most of these incidents (52%) fell under the risk category of "Legality/Legitimacy," predominantly linked to illegal mining activities within the concession, which were not directly related to business operations.

The remaining incidents were categorized as follows:

- Working Conditions (27%): Associated with accidents related to mining activities.
- Environment (12%): Pertaining to wastewater management.
- Security (6%): Related to conflicts with illegal miners.
- Chain of Custody (3%): Related to weight discrepancies due to scale errors.

The chart below illustrates the number of incidents recorded in 2023 per risk category.



Incidents are systematically reviewed by local and international Better Mining staff. Incidents above a certain score trigger alerts to the mining operator, exporter, and other relevant supply chain stakeholders. Each incident is assigned an overall score between 1 and 25, calculated by multiplying the impact score by the resolution score. These scores correspond to a five-scale scoring system: Very Low, Low, Moderate, High, and Very High.

The score "Least Risk" also exists in the system and is treated as the default state, assigned if no incident data has ever been registered in relation to a specific risk.

During the year 2023, 63% of the recorded incidents fall in the incident score categories “Low”, 33% falls into “Moderate”, while 4% scored “Very high”. No “Critical Breach” incidents were recorded for 2023.

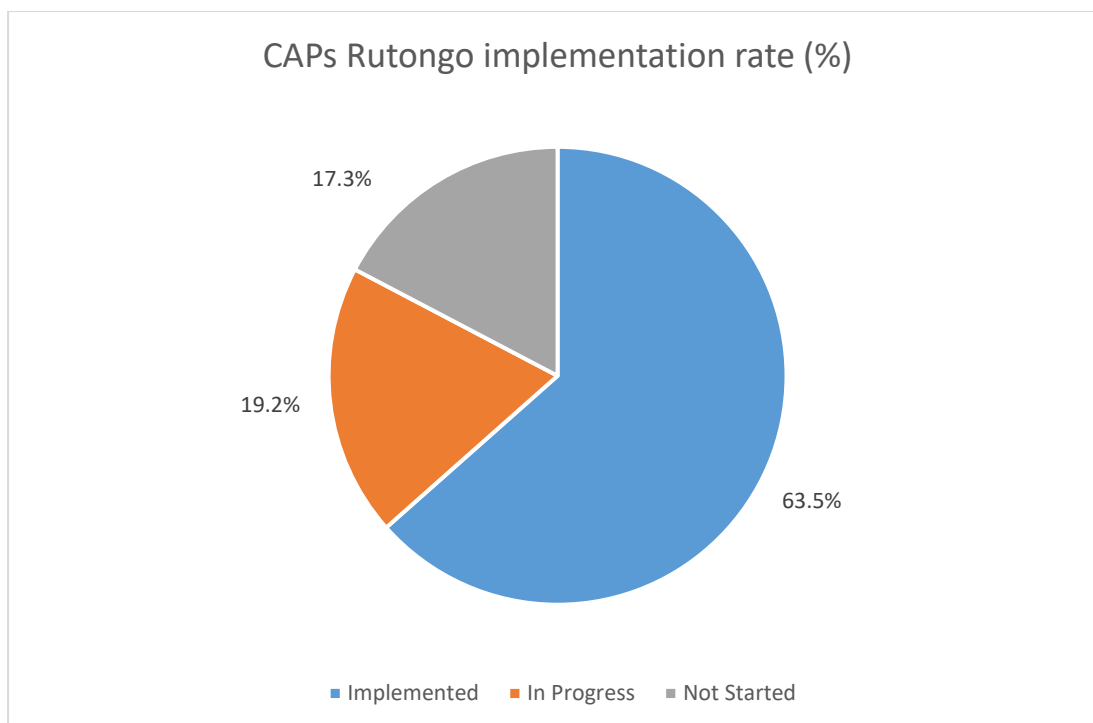
The below table shows the average score recorded for each risk during the year 2023

Risk category	Risk	Recorded	Risk Score
Human Rights	Child Labour	No	Least Risk
	Worst Forms of Child Labour	No	Least Risk
	Discrimination	No	Least Risk
	Forced Labour	No	Least Risk
	Sexual violence	No	Least Risk
	Torture, cruel, inhuman treatment	No	Least Risk
Conflict	General Security	Yes	Very high
	International Humanitarian Law	No	Least Risk
	Non-State Armed Group	No	Least Risk
	Public or Private Security Forces	Yes	Low risk
Working Conditions / Safety	Occupational Health and Safety	Yes	Moderate Risk
	Worker Rights	No	Least Risk
	Work related injury	Yes	Low risk
Environment	Emissions / Waste	Yes	Moderate Risk
	Water	Yes	Low risk
	Mine Closure and Reclamation	yes	Low risk
	Protected Flora / Fauna	No	Least Risk
	Resource / Land Management	Yes	Moderate Risk
Legality / Legitimacy	Company governance	No	Least Risk
	Corruption / Bribery	No	Least Risk
	Legal / Transparent Tax Paying (EITI)	No	Least Risk
	Money Laundering	No	Least Risk
	Operational Legality	Yes	Moderate Risk
	Transparency / Reporting	No	Least Risk
Community	Business Conflict	No	Least Risk
	Community Engagement / Development	No	Least Risk
	Indigenous / FPIC / Heritage	No	Least Risk
Chain of Custody	Traceability	Yes	Low risk

The “high risk” score in the table above refers the confrontation between a group of illegal miners and company security guards where one night an illegal miner fell into the reservoir and sadly passed away during an attack that was organised by illegal miners to steal production among other things.

To mitigate the identified risks Rutongo Mines worked on the implementation of mitigation actions in line with the BM-issued Corrective Action Plans. 91% of the actions were successfully implemented. For 9% 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 of corrective actions for each risk that has been identified during 2023.



In 2023, Rutongo Mines Limited (RML) undertook several actions related to Occupational Health & Safety, Transparency and Reporting, Operational Legality, Human Rights, Environment, and Community Engagement/Development.

Occupational Health and Safety

Rutongo Mines has a dedicated safety team responsible for overseeing risk assessments at work sites, both inside and outside tunnels, before any activity commences. In 2023, RML securely closed various pits across the concession that were created by illegal miners.

Transparency and Reporting

Rutongo Mines is obligated to report annually on the status of Due Diligence and publishes these reports on the RCS Global Group website as well as on Trinity Metal Group's various platforms.

Operational Legality

Rutongo Mines maintains good relationships with all stakeholders, including central and local government, RCS Global, and other non-governmental organizations. Illegal miners and smugglers pose significant operational challenges. RML is continuously planning to expand mining activities in Nyamyumba and Gasambya and to encourage illegal miners to operate legally.

Child Labour

Rutongo Mines enforces a strict recruitment policy, hiring only employees aged 18 and above. No child is allowed in its mining operations. However, RML does not have total control over illegal mining operators and their buyers, which can lead to the involvement of children in illegal mining activities. RML collaborates with the government of Rwanda and other stakeholders to prevent the presence of children on mine sites within the Rutongo Mines concession.

Environment

The construction of a tailing treatment plant at the Nyamyumba site has been completed. This plant upgrades ore production from Tunnel BV32 and Tunnel BV31, addressing the issue of artisanal ground sluicing that pollutes land and destroys biodiversity.

Rutongo Mines has established a central pit for rubbish collection, reducing littering along the concession. The company has also planted trees to reduce soil erosion, created trenches for the same purpose, and provided trees to community members involved in Umuganda (community work). Additionally, grass has been planted around the dam to prevent erosion, and tree nurseries have been prepared for future rehabilitation of the concession and its surroundings.

Water sampling has been conducted to measure and regulate the release of unwanted toxins, ensuring the water used by the surrounding community is safe. This also helps determine the number of dams required at the site.

Community Engagement/ Development

In 2023, Rutongo Mines has focussed on creating more employment opportunities. Rutongo Mines has helped the host community by funding two Early Childhood Development Centres whose aim is to ensure children are well catered during the day when their parents are at work. Rutongo Mines also has helped women to engage in various projects such as mushroom cultivation to provide complete nutrition to their children.

Funding of different football competitions in secondary schools around the concession and provided medical insurance for the vulnerable families around the concession to enable them have access to proper health. Helped in building houses for vulnerable families who are Genocide survivors who were living in houses that were due for renovation.

Digging of boreholes that will be used by the surrounding community around that shall be filled with water to help them in their daily livelihood.