



ANNUAL CORPORATE PILLAR REPORT 2021



A. COMMITMENT TO THE VOLUNTARY PRINCIPLES

1. Public Statement of commitment or endorsement of the Voluntary Principles, engagement in the Voluntary Principles Initiative, and transparency.

a. Commitment—context and why adherence to the VPs was adopted by ABM

Alphamin Bisie Mining, Société Anonyme (SA), is a subscribing participant member of the Voluntary Principles Initiative. Alphamin's management and executives recognize the importance of the promotion and protection of human rights throughout the world and in the communities around the Bisie Tin Project in Walikale Territory of North Kivu, in the Democratic Republic of the Congo, and the constructive role business, government and civil society can play in advancing these goals. Given the conflict history of the region of the DRC where Bisie is located the VP's have been embraced since 2013 as corporate values but also as a risk management strategy to mitigate the challenges related to weak governance and related insecurity from Armed Groups and the unreliability of public security.

The tin industry, along with the three other so-called conflict minerals (gold, tantalum and tungsten) sectors have actively developed initiatives to prevent conflict minerals, which include any conditions that result in the abuse of human rights, from the Great Lakes Region entering the supply chain. Alphamin's implementation of the VPI has been coordinated within the context of these of not only international initiatives, but also regional and local initiatives for the Great Lakes region and the DRC itself. Following the recommendation of the International Finance Corporation as a potential investor, ABM applied to the VPI and was accepted as a Participant in 2015.

Through these initiatives, global tin and other conflict-mineral global supply chains have recognised the issue of illegal mining and the ability of criminal, public security and armed groups to source financing from the production and trade of conflict minerals in the Great Lakes region. Within the industry, burden of proof falls primarily on supply chain operators and exporters to prove that the direct source of the cassiterite produced for smelting is free of conflict and human rights abuse linkages. Material which is not traceable to its direct source is significantly rejected or discounted in the open market since global smelters are under increasing pressure to conduct due diligence to assure certification and chain of custody.

The complexities of certifying the source of cassiterite make the product less appealing to armed groups and so reduces the risk of an attack on the mine or transporters with the intention to steal the final product. Up to 2000 artisanal miners exploited Bisie surface deposits between 2002 and 2012 and supported a community estimated at 20,000 residents. Their illicit production, which at one point represented about 4% of global tin supply, helped finance the conflict in the DRC and the Great Lakes region. As a result of improved governance, global supply chain monitoring, the granting by the GDRC of a legal industrial production permit to Alphamin, the opening of certified conflict-free supply chains nearby, and the depletion of accessible surface minerals by the artisanal miners, artisanal production has decreased dramatically since 2012. In 2021 the Bisie operation supplied about 4% of the world's conflict-free tin from the eastern DRC and the Alphamin operation demonstrates what conflict mineral legislation aimed to achieve.

b. Public company policy statement and dissemination

To advance the objectives and commitment to the VPI, Alphamin mentions its commitment to the VPI in policy documents and on its primary shareholder website, including a link to the VPI website for those interested in learning more about the initiative (<https://alphaminresources.com/sustainability/#operatingdrc>).

For all security and community related employees at the Bisie mine, orientation and ongoing training is provided to assure an understanding of the VPs but also the commitment expected of employees to behave consistently with the VPs. The ABM Security Code of Conduct was updated in 2021 and is used in orientation and training of all ABM and public security personnel.

In all formal communications with the host government of the DRC in relation to security, and in collaborative engagement with the host communities, ABM's membership and adherence to the VP's is mentioned as an element of the shared collaboration with both community and government.

c. Engagement

The priority of ABM VP engagement to abide by the Governance Rules has had to focus through 2021 on the practical application of the implementation responsibilities laid out in the VPI Roles and Responsibilities document, given the context in which ABM operates and the constraints under which it has to manage at this point in the mine life cycle.

1. Rule of law

ABM advocates continuously to record & report to the appropriate levels of government credible allegations of actions impacting security and human rights which are initiated by internal actors, public sector security or officials, Armed Groups & spoilers, especially artisanal and small scale mining (ASM) interests—some naïve, others manipulative and criminal.

In addition ABM advocates, again continuously and appropriately, at site level and neighboring communities, Walikale Territory, North Kivu Province and nationally in Kinshasa to government to apply the rule of law, in general and specifically as it applies to corrupt practices, minerals supply chain due diligence and related human rights issues.

ABM supports the government when it chooses to intervene and apply relevant legislation and policy legally, within the home country requirements of anti-corruption laws and norms. Notably this support has allowed ABM to be engaged as observers, in some cases, to make sure initiatives such as the VPs are consistently applied by public officials and security services.

2. Risk Assessment (detailed below)

3. Policies, Procedures & Guidelines (detailed below)

4. Public Sector Engagement (detailed below)

5. Plenary, Pillar, Cross-Pillar and in country engagement has been limited on a formal basis, however informal contacts with other VP member company security and risk management executives and personnel in and out of the DRC has been invaluable in sharing lessons learned, resources and approaches, particularly in engaging constructively with public security.

The relative conflict-free success of the transition of Bisie from a primary source of ASM conflict minerals to a certified exporter of clean tin and structuring its security and human rights risk strategies on the VPs is a concrete example of “work undertaken to maintain the Voluntary Principles as a leading multi-stakeholder initiative, aligned with international norms and best practice in the field of business and human rights.” The overall strategy and tactics implemented by the Government of the DRC and ABM in relation to the transition from ASM to industrial mining were the subject of a third party expert report (which was inserted in ABM's 2019 Annual Report¹), and validated by two in-depth site visit reports by Ambassador Vinalu Kakese, the National Coordinator in the DRC of the ICGLR, in 2019 and 2020.

ABM confirms its commitment to provide timely responses to reasonable requests for information from other Participants in order to facilitate greater understanding of issues related to the implementation of the Voluntary Principles and will include examples of collaboration.

¹ *The Transition from Artisanal to Industrial Mining at Bisie, Democratic Republic of the Congo*, Dan Fahey & Ballie Mutumayi, 2019
Alphamin Bisie Mining SA VP Annual Report for 2021

2. Examples of promoting awareness of the Voluntary Principles throughout the organization or government, including within the value chain.

ABM promotes the VPs internally primarily to this point with its security employees, those public security deployed to support ABM's investment at Bisie and to community development staff through orientation at on-boarding, initial and on-the-job refresher training.

In addition to the public sector security services supporting ABM there are GDRC officials at national, provincial, territorial and at the sector (decentralized territorial entities) levels of the GDRC who are continuously informed and made aware of the VPs through contact with ABM on an ongoing and specific basis as needed.

All ABM suppliers and contractors and sub-contractors commit as part of their signed contracts to respect and comply with the VPs, and the VP commitments are integrated with the commitment to respect ABM's supply chain transparency policy which includes the human rights commitments of the ICGLR's Regional Certification Mechanism and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. This supply chain horizon has resulted in all those actors in the supply chain from mine to smelter, including truck, train and ship transporters, as well as international mineral traders and intermediaries to understand the relationship of the ICGLR export certificate and its standard for assuring compliance with the VPs.

3. Examples of promoting and advancing implementation of the Voluntary Principles internationally.

Community liaison staff engage continuously with the 28 targeted communities most closely linked to the Bisie mine, including about 46,000 residents and promote the VPs and human rights, along with gathering concerns and inputs related to security issues. A broader outreach is made through the complementary support provided by a non profit organisation created by ABM which is called the Lowa Alliance (for a river that winds through most of Walikale Territory).

When there is an opportunity for dialogue with fellow Participants and external stakeholders ABM security, development and executive/management staff engage and share how the VPs have assisted ABM in its risk assessment and management by protecting human rights and promoting security for employees, neighbors and all those in the minerals supply chain.

B. POLICIES, PROCEDURES AND RELATED ACTIVITIES

4. Relevant policies, procedures, and/or guidelines to implement the Voluntary Principles are listed below (Sections 4-8)

a. Company management systems –

1. *The Managing Director, the senior most executive of ABM is responsible for security and human rights and he reports to the Board of Directors of ABM, the legally registered DRC operating company for the Bisie Mine and the company that is a member of the VPI.*
2. *Security is managed and accountable to the Security Manager, who reports to the Managing Director. Site level and ABM company responsibility for human rights is also the responsibility of the Security Manager and this includes ABM’s headquarters in Goma, the capital of North Kivu, and the security and human rights responsibilities related to the outgoing transport of tin concentrate by road to Kampala, Uganda, where the responsibility passes to the buyer, who then takes responsibility for train and ship transport to smelters in Asia.*
3. *The site and community grievance system (detailed below) is managed by the Government and Community Relations manager, and he reports this information on an ongoing basis and through periodic meetings to both the Security Manager and the Managing Director, for overall accountability.*
4. *ABM’s Chief Financial Officer is the overall Compliance Officer for the VPs.*

b. Formal human rights policy mentioning VPSHR and its public availability, that is relevant to ABM security providers

The formal human rights policy (The ALPHAMIN CODE OF ETHICAL CONDUCT AND HUMAN RIGHTS POLICY STATEMENT) of ABM, which is signed by all employees, does explicitly mention the VPSHR, and ABM’s website (<https://alphaminresources.com/sustainability/#operatingdrc>) cites it as well. In addition ABM’s Responsible Supply Chain Policy (RSCP) references the VPSHR and commits all supply chain actors, including contractors and suppliers, to implement the VPSHR through signed provisions of their contracts. The RSCP is publicly available on the AFM website (<https://alphaminresources.com/sustainability/#responsibletin>). On the website as well is the annual report to the DRC Ministry of Mines and ICGLR titled “Alphamin Bisie Mining Annual Public Report for Calendar Year 2020 on the Implementation of the Requirements of the OECD Guidance for Due Diligence of Mineral Supply Chains without Linkage to Conflict” which includes an analysis of VP issues since that is required for the Ministry and ICGLR.

ABM only works with public security at the Bisie mine site (a small private security unit provides security at the Goma office) and ABM’s commitment to the VPSHR is contained in training materials provided to ABM Industrial Guards (IG--the term used in the DRC for internal un-armed mining company security), the public Mine Police under contract to ABM and the territorial police and DRC Army (known as FARDC) and relevant references in all formal communication with the GDRC and its public security services.

c. Third party verification of VPSHR compliance

ABM has engaged and has cooperated or coordinates on an ongoing basis with at least four levels of third party verification of VPSHR compliance:

1. *Human rights evaluation of departure of ASM miners*--Following the successful negotiation and peaceful departure of about 1000 ASM miners from ABM's Bisie concession in 2017 and 2018 by the GDRC's National Commission in the Struggle against Mining Fraud (CNLFM), ABM commissioned a third party evaluation of the human rights issues (Fahey & Mutumayi, 2019, cited above) including a response to concerns expressed by local and international civil society NGO's. This document was included in the 2019 VP Annual Report of ABM.
2. *The DRC's national coordinating mechanism (NCM) of the ICGLR, which is located within the DRC's Ministry of Foreign Affairs, conducted two third party assessments, one in 2019 and one in 2020, of human rights and related issues, related to the 2017-18 departure as well as incursions by a small number of persons associated with two ASM mining cooperatives who had been suspended from operating at Bisie following a 2014 attack against ABM's predecessor exploration title holder, Mining Processing Congo. The 2019 incursion was reported in ABM's 2019 Annual Report and the 2020 incursion is documented in the 2020 Annual Report. In both cases the initiative for this evaluation came from the GDRC's NCM following DRC civil society concerns, and ABM cooperated fully with the evaluations, led by Ambassador Vinalu Kakese. These two evaluations confirmed the actions of the CNLFM and of ABM as being consistent with the VP's and DRC law and, for ABM, justified its assessment of these concerns as not being credible.*
3. *The ICGLR's Regional Certification Mechanism (RCM) Third Party Audit*--In 2019 the ICGLR and its Member States revised its requirements for Third Party Audits of all exporters of "conflict minerals" (3T—tin, tantalum, tungsten and gold) to include auditing industrial mines every three years, and this requirement is expected to be implemented by the DRC Mines Ministry. In 2021 ABM engaged and paid for, as is required by the RCM, a third party audit including civil society, government and private sector experts, which was conducted in May, 2021 which examined all aspects which enable the DRC to issue the ICGLR Certificate for each lot of tin concentrate exported. As noted above ABM's Responsible Supply Chain Policy explicitly mandates VPSHR compliance by ABM and its contractors, suppliers and transporters. A public version of the audit report, which assessed ABM as compliant, was issued on 1 March, 2022 and it is posted on the ICGLR website.
4. *The GDRC public services have an established presence at the mine site due to their legal role in assuring export compliance, including for some of them specific responsibility for monitoring all aspects of the ICGLR Certification which includes assuring the absence of human rights abuse; or because ABM has requested the specialized Mine Police presence (under a contract); or because the FARDC has on its own initiative deployed army units near the ABM Area of Operations. Altogether, 10 separate governmental services (including 5 public security services) have staff at or near the mine site. As DRC governance and accountability improves, their lawful presence can be seen as an ongoing and consistent third party monitoring of security and human rights, documented through the issuance of the ICGLR Certificate for each lot of mineral exports.*

5. Company procedure to conduct security and human rights risk assessments, and integrate findings.

- a. **The strategic context for assessing security and human rights risk** includes the following operational assumptions which frame the long-term risk mitigation strategy of ABM, although they can be updated as needed:

1. *Risk factors analysis*, driven by economic, social, security & political risk dynamics drove the compressed baseline window for building the Bisie mine in 5-6 years.
 2. *Political economy actors requires ongoing analysis and revision*, so that those who benefit from security threats and human rights abuse are understood and strategies of work-around, confrontation (if possible and with enough partner support, e.g, from community and government), or collaboration are considered.
 3. *Within the perspective of responding to illegal ASM as competition*, ABM will identify, monitor and strengthen public, private and community champions who are willing to confront illegality & human rights abuse.
 4. *Public security in the weak governance context of the DRC has to be seen as including both potential champions and threat actors who could be influenced for the better*, and many have done so.
 5. *ABM has to create opportunities and structures that allow community and government leaders to become engaged through informal networks and formal structures* which share the risk assessment obligation among these partners.
- b. **Ongoing quarterly risk register management** is the system integrating the context (above) with inputs on continuous dynamics and changes from stakeholders and risk actors. The overall Risk Management Framework includes the following associated systems and controls under the accountability of the ABM Managing Director, who is responsible for communicating identified risk to the senior management team and, if necessary, to the Board of Directors, through a reporting framework and template which includes the following aspects:
1. *Risk category/cluster*
 2. *Description of the risk*
 3. *Discussion on the context of the risk*
 4. *Discussion on the business implications of the risk*
 5. *Review of the current controls*
 6. *Evaluation of the efficiency of the controls*
 7. *Evaluation of impact and likelihood*
 8. *Overall rating*
 9. *Risk Mitigation measures*
- c. **Alphamin Security Department, with ongoing and structured inputs from the Community Development Department holds a centralised risk register** which integrates the risk assessments of security and human rights through engagement with both security forces and local communities.
1. *Public security engagement* occurs through the Security Manager's role in informal contacts and information gathering, structured security meetings with public security and government authorities at mine site, territorial and provincial levels.
 2. *Community engagement occurs through informal contacts and structured meetings* between

liaison officers and community representative structures throughout ABM's Area of Influence, at territorial and provincial levels.

3. *ABM's Deputy Managing Director engages on risk assessment with GDRC contacts, and ABM focused meetings with politico-administrative authorities at the provincial and national levels, and if necessary, at mine site and territorial level. He engages as well with multistakeholder forums at provincial and national levels.*
4. *The risks identified are integrated into the combined risk register to see the influence that perceived risks have on the business as a whole, and also directly relating to how other risks in other departments may affect the risk assessment, positively or negatively, which includes specific analysis on human rights risks.*
5. *The Security Department in assessing risk and mitigations, uses a flow process through three different types of risk assessment platforms, namely a baseline assessment to understand the greater map of risks and stakeholders, then this will flow over into an issue-based risk assessment that finally allows critical and sensitive areas to be covered under a continuous risk assessment platform.*

6. Company procedure or mechanism to report security-related incidents with human rights implications by public/private security forces relating to the company's activities grievance & incidents

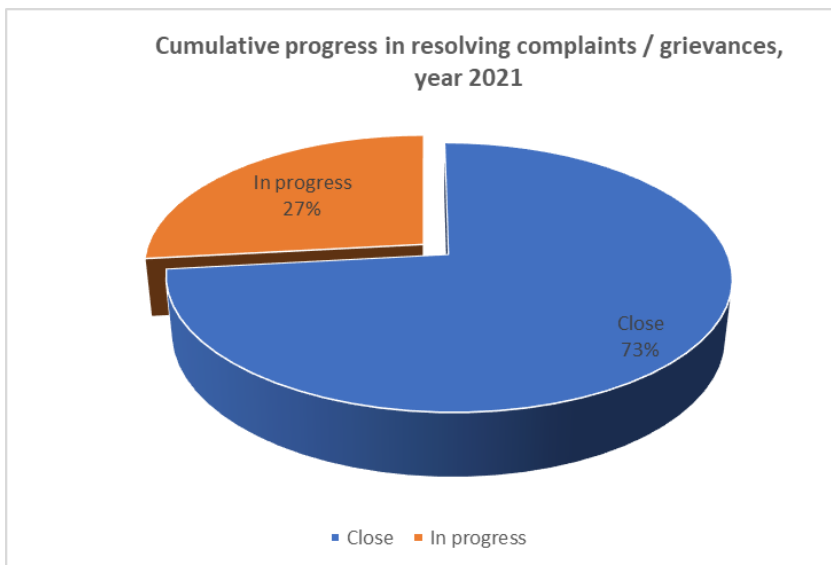
a. Grievance & Ethics Hotline Service--

1. ABM's Grievance System

ABM's Community Development Department manages a grievance system open to all employees and community members, as well as other supply chain actors, in and outside the Area of Operations. This standard system documents each complaint or grievance, categorizes the type, and tracks investigation of all grievances and their resolution, and remediation if appropriate. Human rights is a separate category and grievances in other categories are evaluated as potential human rights issues (such as discrimination, harassment, security) and investigated and remediated as needed.

In 2021 there were a total of 86 grievances reported (see below), among which there were two specific human rights grievances reported. Of the 86 grievances, 63 or 73 per cent were resolved by year end.

N°	Category (highest number to lowest)	Resolved	Unresolved	Total
1	Request	27	4	31
2	Employment policy	15	2	17
3	Late payments	8	4	12
4	Partnership policy	2	2	4
5	Request for passage on the Bisie road	2	1	3
6	Community impact of the Bisie project	2	1	3
7	Human rights	0	2	2
8	Employee misconduct	1	1	2
9	Security policy	1	1	2
10	Damage to fields by ABM / Bisie road works	1	0	1
11	Non consideration of original residents by ABM	1	0	1
12	Delay in the execution of community projects	0	2	2
13	Land dispute	0	2	2
14	Diversion	1	0	1
16	Site incursion	1	0	1
16	Compensation policy	1	0	1
17	Discrimination	0	1	1
		63	23	86



- The ABM “Ethics Hotline Service” provided by Whistle Blowers Pty Ltd plays a pivotal role in ABM’s risk management and legal compliance as its outreach is beyond the mine site and includes the general public, suppliers, contractors and transporters up and down the supply chain.

This trusted multi-channel ethics hotline (<https://alphaminresources.com/whistle-blowers-2/>) is a key component of the integrity management strategy of ABM and its majority shareholder, AFM Resource Corp. It is an essential line of communication, providing a flow of information that promotes business sustainability by helping ABM to identify and rectify problems before they become larger. When employees and other third parties can blow the whistle on unethical conduct using an independent, professional service, it ensures Alphamin remains a responsible sustainable organisation in full legal compliance.

b. External reports of issues, including legal redress

- Stakeholders may communicate grievances or credible incidents involving human rights abuse by other channels beyond the grievance system and ethics hotline and this has included, for ABM,*

various social media and NGO communications as well as the remedy of criminal or civil legal redress.

In years past two criminal complaints were submitted to the Goma “Tribunal de Grande Instance” accusing ABM of human rights and other negative actions and these were both rejected by this court. In July 2020 an additional civil suit by two of the suspended Bisie mining cooperatives was submitted to the same court, accusing ABM of human rights and other related damages associated with the public security response to the two incursions noted above and other incidents previous to Alphamin becoming operational at Bisie. The cooperatives requested \$2.5 billion in damages (see 2020 report). During 2021 ABM and its lawyers prepared a response which was necessary given the uncertainty of the DRC legal system, despite ABM’s internal assessment that it was not credible, and the previous court decisions for many of the same accusations that had been found to be lacking any legal basis.

2. *Resolving the cooperatives’ 2020 civil lawsuit was delayed through 2020 and 2021 for a number of reasons, including the Goma volcano eruption and the imposition of a “state of siege” (“etat de siege” in French, which is loosely a form of martial law) in North Kivu Province. At the date of submission of this 2021 report (September, 2022) ABM can report its lawyers’ summary of the resolution of this case,*

“The Tribunal de Grande Instance of Goma, in the Democratic Republic of Congo, rendered its decision on 12 April 2022 declaring Alphamin Bisie Mining SA innocent. This decision is essentially based on the fact that no evidence of civil liability of the company has been demonstrated and that all actions were initiated by the National Commission for the Fight against Mining Fraud.

After having duly notified the decision to all parties and after the legal time limit for appeal had elapsed, ABM obtained a Certificate of Non Appeal dated 3 June 2022. This procedure was concluded in strict compliance with human rights. Indeed, Congolese judicial law enshrines the double degree of jurisdiction indicating that each citizen has the right to two degrees of judgement. In this particular case, the Cooperatives expressly waived their right to appeal.”

ABM accepts its VPSHR engagements may go beyond host country legal requirements and judgements, and notwithstanding that the Goma court found ABM innocent, the company is confident that its own internal investigations and those of the third party expert and the GDRC’s National Coordinator of the ICGLR (cited above) validate that in these incidents DRC public security on its own and as part of the CNLFM acted legally and consistently with the VPs throughout the period of 2017 through 2021.

7. Company procedure to consider the Voluntary Principles in entering into relations with private security providers

ABM does not use private security at Bisie or on its transport routes from Bisie to the Uganda border. The small team contracted at the Goma office to a private security company does require a review and this is planned for 2022.

8. Company procedure or mechanism to investigate and remediate security related incidents with human rights implications by public/private security forces relating to the company’s activities

Consistent with the grievance system which includes investigation, resolution and remediation steps and documentation any security incident with human rights implications is investigated through a written report which is submitted to the ABM Managing Director for review and approval and, if appropriate, the Alphamin Bisie Mining Compliance Officer, who is the Chief Financial Officer.

Any concerns from external stakeholders can be responded to by the MD with access to this internal reporting, and as noted above, has been supplemented by third party reports, either commissioned by ABM, or initiated by the National Coordinating Mechanism of the ICGLR.

During 2021, as part of the preparation for the civil case described above, ABM again reviewed exhaustively its own actions, reporting and the evaluations it made of public security throughout the period.

C. COUNTRY IMPLEMENTATION

9. Overview of country operations selected for reporting.

For the purposes of this report, the Alphamin operations in the Walikale territory of North Kivu, Democratic Republic of the Congo, are represented and reviewed since ABM only operates one mining project.

10. Engagements with stakeholders on country implementation

In 2021 ABM focused primarily on local/mine site, territorial, provincial and Eastern DRC engagements as detailed above due to operational constraints and the prioritisation of these engagements due to the turn-over of the key Managing Director and Security Manager roles.

11. Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreement with private security providers, as well as arrangement with public security forces

VPI implementation is conducted through awareness, orientation and training in the VPs by all senior executives and managers, who hold monthly meetings at which VPI issues are identified and addressed.

The core direct employees involved in applying the VPs are ABM's internal and un-armed security guards, known in the DRC as Industrial Guards, who at the end of 2021 numbered 130 (almost all these are residents of the local communities) and who participate in initial on-boarding, formal training and daily and "as-needed" orientations side by side with the dedicated Mine Police detachment (PMH).

a. Arrangements with public security forces

Alphamin's ABM operation (Alphamin Bisie Mining) has a formalised engagement with the DRC's National Police in the form of the dedicated Mines Police structure (*PMH – Police des Mines et Hydrocarbures*) and a written contract which is allowed under DRC law. Engagement with this partner is structured and regulated through meetings at both provincial, territorial and National level and through ongoing daily and needed coordination at the level of the mine site.

The company operations at the end of 2021 had a dedicated detachment of 45 trained PMH officers, posted throughout the areas of operations. A written contract (MOU) which is consistent with DRC law is used to frame this working arrangement. Two FARDC soldiers are deployed at the explosives magazine storage area for its protection, following the law in the DRC on the storage of explosives which has to be assured by the army.

Engagement with other security forces (military and intelligence services) takes place on two levels; most frequently is informal engagement on the ground at operational level when patrolling or visiting military, or intelligence services visiting the security department to inform them of their presence and purpose in the area. This form of engagement allows the security department to have a basic understanding and knowledge of who is in the area, how many and where they will be in the area (Potential Risk). This links back to the understanding of possible issues that may arise within the local communities relating to these security services being there.

At the same time, ABM Security personnel visit the headquarters and key officers of all involved security and intelligence services in Walikale Territory and North Kivu Province to maintain contacts and relationships and share information.

A more formalised engagement is seen at the provincial and territorial level, when the company is invited to attend open meetings called by the provincial or territorial authorities. These meetings are over a diverse field of matters, but do focus on community and security, given the complexities of both in the area that Alphamin operates.

b. ABM Security Code, including Rules of engagement & Use of Force

Through 2021 the ABM Security Code was updated and finalised in April, 2022 which includes the elements of background to the VPSHR but most importantly the elements of the Rules of Engagement and Use of Force for ABM Industrial Guards and all police and military units deployed to provide security on or near the Bisie Mine. The nine page document is in French and is available to any VP Participant who wishes to reference it and adapts the models in Annex H of the VP Implementation Guidance Tools to the DRC context where the Participant company must work closely with public security and assure, in many cases, that they understand and will apply in practical terms the rules of engagement, use of force, and firearms procedure since only public security can use firearms. The topics covered include:

- 1. Basic Human Rights For Security Officers*
- 2. Expected Conduct For Any Security Officer Deployed To an ABM Site*
 - a. General conduct*
 - b. Use of force*
 - c. Use of lethal force*
 - d. Arrest of persons*
 - e. Detention*
 - f. Prohibition of torture or other cruel, inhuman or degrading treatment or punishment*
 - g. Sexual or gender-based violence*
 - h. Trafficking in human beings*
 - i. Prohibition of slavery and forced labour*
 - j. Prohibition of all forms of child labour*
 - k. Discrimination*
 - l. Respect for privacy and property*
 - m. Freedom of expression and peaceful assembly*
 - n. Freedom of association*
 - o. Identification of personnel*
- 3. INCORPORATION OF THE CODE INTO SECURITY MANAGEMENT*
 - a. Incorporation of the Code into the Company's internal regulations*
 - b. Selection and vetting of subcontractors*
 - c. Company policies and staff contracts*
 - d. Staff training*
 - e. Weapons management*
 - f. Incident reporting*
 - g. Safe and healthy working environment*
 - h. Harassment*
- 4. INVESTIGATION OF ALLEGED HUMAN RIGHTS VIOLATIONS*
- 5. THE WHISTLEBLOWER RULE*

c. Vetting security providers

Informal vetting of senior officers assigned to site occurs based on knowledge of key executives and management, and key informants. For Industrial Guards (IGs) there is a security service review that occurs but for all officers, IGs and other police and military assigned, ABM uses a “vetting after the fact” approach of zero-tolerance for any individuals with abusive behaviour who are rotated out (company guards & public sector).

d. Equipment transfer policy and practice, including transport by air from Goma to/from Bisie

Vehicles and fuel are not provided unless there is a formal and written requisition approved by senior and mandated officers consistent with national legislation. Transport by air from and to Goma on leased ABM aircraft for public security also requires written authorization and, in some cases, requests have been denied because of the officers’ known abusive historic human rights record.

12. Examples of supporting outreach, education, and/or training of (i) relevant personnel, (ii) private security, (iii) public security, and/or (iv) civil society (e.g. local NGOs, community groups)

Described above

13. Company procedure to review progress on implementing the Voluntary Principles at local facilities

a. Grievance System & Analysis is reviewed monthly

b. Risk register is updated quarterly

c. Key issues for monitoring:

1. *In May, 2021 the GDRC declared an “Etat de Siege” (literally, state of siege, a form of martial law) for the provinces of North Kivu and Ituri.* This temporary shift of provincial government leadership in the province where Bisie is located and in a province through which ABM’s exports are transported to Uganda, was intended to focus public security more clearly in combatting insecurity and the presence of Armed Groups in these two provinces. This senior leadership change has had no impact on the overall positive relationship between the GDRC and ABM, and in particular with public security services. No changes in operations have been experienced and the civil servants with whom ABM manages its operations and exports have not been replaced and no material changes have been implemented.
2. *Incursion of illegal ASM mining on concession*—is monitored and, so far, since the 2018 departure has not occurred. Lowa Alliance monitors legal ASM including former ASM miners from Bisie at a nearby legal ASM site, but one that is off the ABM concession and where some of the 2018 departing ASM miners migrated to.
3. *Continue to raise awareness within all security services of the potential abuse or misperception related to “voluntary community work”* that is encouraged by politico-administrative authorities with the guidance for security services to avoid any involvement in such practices, at mining sites or anywhere in Walikale Territory.

D. LESSONS AND ISSUES

14. Lessons and issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organization.

The following plans and opportunities have been identified for the year 2022 based on lessons learned from 2021:

- a. **Community outreach** to seek annual and ongoing input, from a broader network of contacts and thought leaders and at a more in-depth level of perceived community concerns related directly and indirectly to the Bisie Tin Project. This analysis will also look at underlying root causes of the ongoing conflict in eastern DRC and the immediate Walikale Territory, as well as positive indicators of stability in ABM's Area of Operations
- b. **Better systematic integration** of this data into project and ABM level VPI risk assessments, including appropriate monitoring and lobbying on all issues, but particularly those where ABM lacks direct responsibility for mitigating such risks.
- c. **Basic orientation and training for all staff, contractors and stakeholders on what the VPI entails**, why Alphamin has adopted the VPI and what each partner and employee's roles are, which goes beyond the current focus on security and community personnel.
- d. **Continuous training of the police detachment and security guard detachments** in their role as providers of security to the company and the greater community around them.
- e. **Continuous training with and of the ComDev liaison officers, Lowa Alliance, Local Development Committee (LDC) leaders and members** who are the front line of ABM's work in the community.
- f. **Clarify Equipment transfer policy** in clear policy document rolled out to all ABM managers and supervisors, including equipment, fuel, in-kind food supplies and the modalities of review of all requested transport to and from Goma.
- g. **Improve integration of grievance system** to assure that all internal departments understand the system and how to submit a grievance, refine the categorization of grievance categories to assist more easily in human rights specific and related categories, and improve the cross-department analysis of resolutions and remediations so that the MD can more easily identify human rights and security trends that need attention.
- h. **Orient and train, review implementation procedures of the VPs for the contracted Goma security contractor.**
- i. **Engage with the national VP Work Group** in relation to the application of the DRC to join the VPI as the second African nation.

E. Abbreviations

ABM	Alphamin Bisie Mining SA
AFM	Alphamin Resource Corp (majority shareholder of ABM)
ASM	Artisanal and small-scale mining
ASMRP	Artisanal and small-scale miner’s repositioning plan
CNLFM	Comité national de lutte contre la fraude minière
DRC	Democratic Republic of the Congo
GDRC	Government of the Democratic Republic of the Congo
FARDC	Armed Forces of the Democratic Republic of the Congo
ICGLR	International Conference of the Great Lakes Region
IG	Industrial Guard—unarmed company guard/employees of ABM
IRC	International Red Cross
LDC	Local Development Committee
MONUSCO	Mission de l’Organisation des Nations unies pour la stabilisation en République démocratique du Congo (Fr) United Nations Organization Stabilization Mission in the Democratic Republic of the Congo (Eng)
NCM	National Coordinating Mechanism of the ICGLR in DRC, housed in Foreign Affairs Ministry
NGO	Non governmental organisation
PMH	Police des Mines et Hydrocarbures
RSCP	Responsible Supply Chain Policy
UK	United Kingdom
US	United States of America
VP	Voluntary Principles
VPI	Voluntary Principles Initiative

