

Dear Business & Human Rights Resource Centre,

Thank you for your correspondence and attention. We greatly appreciate and commend your impartial and objective approach in considering and publishing the company's statements and clarifications on this matter.

First and foremost, we express deep concern regarding the health issues mentioned in the Mongabay report involving artisanal miners and extend our sympathy for their situation. However, we would like to clarify that, as of the publication of Mongabay's report, COMMUS has not received any complaints concerning such health issues allegedly caused by mining activities, whether through government or community channels, or via its community office, community representatives, phone lines, or email. Nor did Mongabay seek inquiries or file complaints with us. This does not match Mongabay's assertion that Zijin Mining Group and COMMUS were contacted.

After a thorough review of the report, we believe that Mongabay may have confused the distinctions and relationships between Artisanal and Small-scale Mining (ASM) and Large-scale Mining (LSM). For reference, the International Council on Mining and Metals (ICMM) provides the following challenges regarding ASM: "*The ASM sector often lacks basic worker health and safety provisions and workplace dangers include a lack of training, poor ventilation, lack of safety equipment, improper use of chemicals, and outdated equipment. Women and children are frequently involved.*" (<https://www.icmm.com/en-gb/our-work/social-performance/indigenous-peoples-and-human-rights/collaborate-artisanal-mining>) As an LSM operation, COMMUS adheres to strict standards and protocols concerning safety, health, and environmental protection. Based on these clarifications, we would like to make the following statements:

1. The individuals interviewed in the report are local female miner engaged in ASM. Statements made by Suzanne Ngwewe and Kulemba Samba also confirm that these women lack the necessary personal protective equipment, and that unregulated, unprotected artisanal mining poses serious negative impacts on their safety, health, and the natural environment. According to data from institutions like the World Bank, approximately 10 million people in the Democratic Republic of Congo (DRC) directly or indirectly depend on the ASM sector, and ASM accounts for about 20% of the mining production in the DRC. To address these issues, the DRC has established SAEMAPE (Service for Assistance and Management of Artisanal and Small-scale Mining) to oversee and regulate ASM activities, with professional ASM groups and organizations also established locally. The societal challenges faced by the ASM sector require joint attention and support from all stakeholders worldwide. As stated in the report, these artisanal miners have entered the COMMUS waste dump area illegally. Out of consideration for their livelihoods, COMMUS does not enforce evictions but has attempted to guide them away in an orderly manner. However, it should be noted that these miners mainly collect hard rocks from the dump site for use as building materials, rather than extracting ore.
2. As a responsible LSM, COMMUS places a high priority on the management of environmental protection, occupational health and safety, and strives to minimize any impact on surrounding communities, residents, and employees (including contractors). For instance, COMMUS

provides occupational health and safety training for employees, equips them with comprehensive protective equipment, and undertakes extensive greening and landscaping efforts in the factory area and waste dump slopes. Additionally, COMMUS has constructed retaining walls and dust suppression systems along the ore transport route and around the plant boundaries. In collaboration with relevant government regulatory bodies, COMMUS also regularly conducts water and air quality monitoring to ensure compliance with environmental standards. Under such rigorous management, COMMUS has maintained favorable occupational health and safety performance levels and has been actively engaging with stakeholders to improve its performance.

3. To enhance COMMUS's grievance mechanism and ensure that health and safety concerns from local residents are not overlooked, our field team visited other hospitals in the community where the report's referenced hospital is located. However, the results contradicted the claims made in the Mongabay report. After reviewing the past three years' medical data from EMERGENCE, BORA, and PRODIGE DE L'ETERNEL hospitals in the same community, we found no evidence of the purported disease surge. Moreover, COMMUS visited Polyclinique Manassé, which provides medical care to our employees and their families, and also found no evidence of such issues.
4. Over the years, in line with our commitment to "Mining for a Better Society," COMMUS has been actively listening to community opinions and needs to help improve the quality of life for residents. However, it is undeniable that with the rapid expansion of Kolwezi city, there has been a constant influx of migrants, which has brought new social challenges to communities like the one where the Trinité Medical Center is located. COMMUS remains committed to fulfilling its social responsibilities by community investments and welfare in areas such as water supply, education, and healthcare to alleviate these new social issues and help improve residents' quality of life.

In conclusion, we would like to reiterate that, as a responsible mining company, COMMUS will continue to strictly comply with relevant laws, regulations, and industry standards in the DRC, and carry out robust and responsible management of environmental protection, occupational health and safety. We are also committed to subjecting ourselves to oversight from various government authorities, social institutions, and local communities.

Thank you again for your email and attention.

Yours sincerely,

GAO Juntao

Assistant to ESG Officer

Zijin Mining Group Co., Ltd.