



ICGLR THIRD PARTY AUDIT AT WMP EXECUTIVE SUMMARY (Published on 27 July 2016)

Martello Risk was engaged by the ICGLR Audit Committee to provide independent assurance on the supply chains of WMP Rwanda Ltd. The Report has been prepared based on the information collected from the public domain and provided by WMP and its relevant stakeholders; Martello Risk assumes no responsibility for the accuracy, completeness and authenticity of such information. Our responsibility in performing our assurance activities is to the management of the Company and the ICGLR. We do not accept or assume any responsibility for any other purpose or to any other person or organization. Any reliance any such third party may place on the Report is entirely at its own risk. Our conclusions should not be taken as a basis for interpreting the Company's overall performance, except for the aspects outlined in the scope.

Wolfram Mining and Processing Ltd. is one of Rwanda's largest wolfram and cassiterite processing companies. The company, which was registered in Rwanda in 2006, operates two concessions on a contractual basis with the Government of Rwanda. These are Gifurwe (wolfram) in the Northern Province district of Burera, and Rwinkwavu (cassiterite) in Kayonza District close to the Akagera National Park on the border with Tanzania.

In the context of the prevailing standards of mining in the region, WPM is a well run mine, and adheres strictly to the requirements of Rwandan law concerning fiscal and commercial obligations and the mining sector.

During the course of our audit we found no evidence whatsoever of any interference by either non-state armed actors or public or private security groups in the business of WMP at either its mine sites or at its head office.

We found no evidence that the company's operations at both Gifurwe and Rwinkwavu play any part in human rights violations, violations of international humanitarian law, crimes against humanity, torture, cruel, inhuman or degrading treatment, or sexual violence.

In line with Rwandan law, WMP has strict policies regarding child labour (in this case employees under the age of eighteen) and these are rigorously enforced by company managers.

While WMP does not have an explicit documented policy with regard to corruption and fraud, its management argues that this is unnecessary as the relevant regulations and statutes are clearly presented in Rwandan Law, to which the company strictly adheres.

WMP has full membership of the iTSCi tagging traceability scheme for its production of both wolfram and cassiterite. The supply chain of both minerals is tightly controlled from source, whether extraction was undertaken on either an artisanal or semi-industrial basis, to its final destination at CFSI participating smelters. The process at Gifurwe, Rwinkwavu and the Kigali depot is overseen by dedicated and fully-trained company traceability managers.

Workers are broadly satisfied with labour conditions and levels of pay.

Workers are also given health and safety as well as emergency training at least twice a year and the managements of both mine site maintain incident and accident log books which the auditors were able to inspect.

There was an observation regarding the management and storage of explosives at both the Gifurwe and Rwinkwavu mine sites. The site has corrected this issue by proving proper storage and management controls.

WMP's is committed to corporate social responsibility. Although the company does not have a formal, long-term development strategy, the management is aware of its obligations and the requirements of Rwandan legislation.

WMP undertook independent, third-party environmental audits as part of the requirements of Rwandan mining legislation in 2013. These were subsequently assessed and approved by the Rwanda Environment Management Agency (REMA) which found that both projects complied with national environmental regulations.