



**Global
Witness**

Who buys Rwanda's smuggled coltan?

The global journey of conflict
coltan from DRC to the world's
electronics

JUNE 2026



Camille Laffont / AFP via Getty

Where have over 2,000 tonnes of smuggled conflict coltan gone?

These looted minerals come from mines in Rubaya in the Democratic Republic of the Congo, which produce 15% of the world's tantalum, a key ingredient for electronic products found in smartphones, laptops and cars around the world.

The Rubaya mines have become a main revenue source for M23's brutal warfare in DRC. Seizing vast areas of territory, the armed group backed by Rwanda's military has killed thousands and displaced hundreds of thousands of civilians, abducting and torturing with impunity.

But once the coltan is smuggled to Rwanda, little is known about who buys it or where it goes.

In a year-long investigation, Global Witness followed the DRC's conflict coltan from the mines across the border and into global supply chains. We established the complicity of Rwandan officials, as smuggling reached "unprecedented" levels.

With Rwanda's coltan exports more than doubling over the past three years, we identified the seven companies that exported 85% of the coltan.

Through interviews with coltan smugglers, we found that at least five of these seven companies buy conflict coltan from DRC, selling it on through middlemen to smelters in China and Kazakhstan.



Microsoft office. lcva2 / iStock

In the smelters, the coltan is processed into tantalum. From there, it is used to manufacture the capacitors that are essential components in electronic devices.

We found that conflict coltan may have found its way to global brands including Microsoft, Vodafone, Sony, Amazon, Nvidia, LG Display, Ericsson, Toyota and Apple – and into products we use every day.

Around 15 years ago, a system took shape in the African Great Lakes Region that was designed to put an end to minerals financing conflict. The recent war in DRC is a test case. Our investigation reveals that the due diligence and traceability systems have failed to break the link between conflict and natural resources.

Instead, the traceability system known as ITSCI that many international companies rely on to keep their supply chains conflict-free is being used to launder a large share of smuggled coltan. Coltan connected to the conflict has also likely been introduced into an alternative system called Better Mining.

The Responsible Minerals Initiative's audits have failed to detect conflict coltan in smelters' supply chains.

Key recommendations:**COMPANIES:**

Under the current circumstances we consider that responsible sourcing of coltan from Rwanda is almost impossible. Therefore, companies should

- Stop buying coltan from Rwanda until M23 has withdrawn troops from the Rubaya mines unless they have thoroughly scrutinised the coltan before export by directly checking its origin and grading.

THE INTERNATIONAL COMMUNITY SHOULD:

- Suspend export of military equipment to Rwanda.
- Make any official development assistance conditional on Rwanda stopping its support to M23.
- Sanction commanders of M23 and senior Rwandan officials responsible for abuses as well as companies profiteering from conflict resources.

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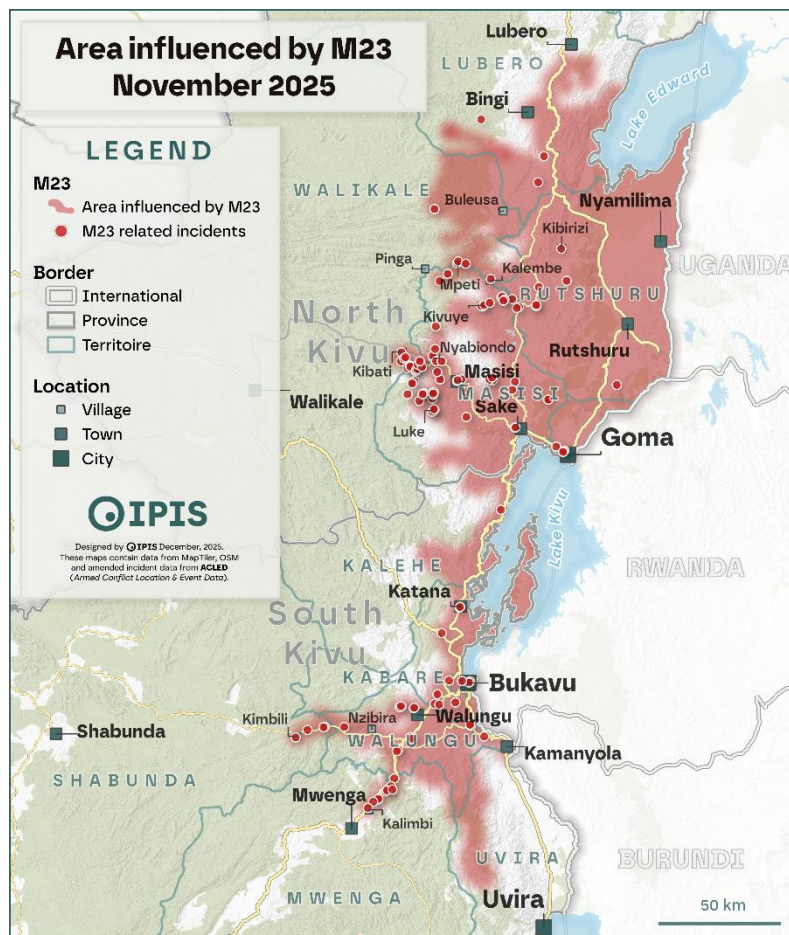
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The conflict

Eastern DRC has been the scene of a brutal war for nearly three decades. Since around 2022 the fighting has intensified, with many militias operating in parallel.¹

Of these, the M23 rebellion in North and South Kivu has drawn the most attention for its scale, humanitarian impact and geopolitical consequences.²

Backed by between 7,000 and 12,000 Rwandan troops³ and advanced weaponry, M23 has seized vast territories in its fight against the Congolese army and allied armed groups.⁴ This includes the provincial capitals Goma and Bukavu in January and February 2025 — home together to over 3 million.⁵ The offensive has left thousands dead and hundreds of thousands displaced.⁶



M23 with Rwandan support has vastly increased the area it controls in eastern DRC during the last 2 years. IPIS⁷

M23 has committed severe human rights abuses including abducting, imprisoning, torturing and executing civilians, as well as recruiting children “at alarming levels”, some of which may amount to war crimes according to UN experts.⁸

It has carried out a systematic campaign of repression in occupied areas, including extrajudicial killings, arbitrary arrests, enforced disappearances and night raids on hospitals.⁹

At the same time, the Congolese army and its allies have committed widespread looting, sexual violence and killings.¹⁰ Both sides have frequently employed heavy artillery within or near densely populated areas causing heavy civilian casualties.¹¹



Group of displaced civilians after M23's takeover of Goma in 2025. Hugh Kinsella Cunningham / Getty Images

In recent months, the M23 militia has strengthened its control over occupied areas, including by setting up a repressive parallel administration.¹² It has silenced civil society actors and replaced traditional leaders with loyalists, often torturing or killing the former leaders.¹³

The coltan mines



Coltan mines in Rubaya. Global Witness

Masisi in North Kivu province is home to some of the world's richest coltan deposits.

The mines close to Rubaya town supply around 15% of the world's tantalum demand.¹⁴ Tantalum is the metal derived from coltan that is a key component for electronics.¹⁵

Since 2023, these lucrative mines have become a war prize for various armed groups, as they have in previous phases of the wars in DRC.¹⁶ The UN reported incursions in the Rubaya mines by various Congolese armed groups throughout 2023.¹⁷

At first, M23 showed little interest in minerals as a source of finance or a strategic objective.¹⁸

Then, in late 2023, the M23 rebel group seized control of main transport routes around Rubaya.¹⁹ By April 2024, it had captured the Rubaya mines, monopolising coltan exports.²⁰

Since then, coltan has become a major – if not the main – source of funding for M23.²¹

In March 2025, M23 designated Erasto Bahati as Governor of North Kivu in its parallel administration. Bahati is the key person behind the group's illegal mining and minerals smuggling since the takeover of the Rubaya mines.²²

In his new role, Bahati has selected M23-friendly traders to smuggle minerals to Rwanda and has run a taxation system at mining and trading sites.²³ The price for the coltan and the taxes are sometimes pre-paid by buyers.²⁴

Traders pay “taxes” on coltan which includes US\$4 per kilo to M23 and US\$3 per kilo to the Rwandan government.²⁵ En route, traders need to show the receipt for the tax payment to M23 at roadblocks and at the border in order to pass.²⁶

Exporters often pay traders for the smuggled coltan via the BPR Bank Rwanda according to a trader.²⁷ BPR Bank did not respond to a request from Global Witness to comment.

By collecting taxes on coltan production and trade,²⁸ M23 has generated US\$800,000 every month since May 2024 according to a UN estimate.²⁹

TARIF	
coltan (T.A)	: 4\$
cassiterite (sno)	: 2\$
Déchet	: 2\$
Orifame	: 2\$
Kuars	: 1\$
Monazite	: 0.07\$
Bellule	: 0.05\$
NORBIUM	: 1.23\$

Taxes requested by M23 as displayed in Mubambiro. Global Witness



Children working at Rubaya mines. Global Witness

In February 2025, M23 also expanded its reach in neighbouring South Kivu province, seizing major trade routes³⁰ and looting hundreds of tonnes of 3T minerals from warehouses. 3T minerals are coltan, cassiterite and wolframite, named after the metals tantalum, tin and tungsten which are derived from them.³¹ By the end of 2025, M23 controlled around half of South Kivu's cassiterite and coltan production, and over two thirds of its wolframite output.³²

A source who works in the artisanal mines in Rubaya told Global Witness that if they defied M23 orders they would be beaten and fined.³³

Working conditions are dangerous, with at least four deadly landslides since M23's takeover³⁴ and evidence shared with Global Witness showing children working at the sites.³⁵



Digging out miners buried by a landslide (screenshot from civil society video)

Mineral smuggling to Rwanda

At least since M23 seized the Rubaya mines, most of the area's coltan has been smuggled to Rwanda. UN experts estimate that between May and October 2024 over 120 tonnes a month were trafficked to Rwanda, creating the "largest contamination of mineral supply chains" in the Great Lakes Region in a decade.³⁷

Smuggling has likely grown even further in 2025.³⁸ Within a year of M23's takeover, at least 1,400 tonnes of coltan – and probably much more – have been smuggled from DRC to Rwanda.³⁹

Many shipments now travel along a route crossing the border through Goma, which is under M23 control.⁴⁰



Motorbikes transporting coltan from Rubaya. UN Group of Experts³⁶

Complicity of Rwandan officials

Rwanda is not only supporting M23's military operations in DRC and the illegal minerals trade⁴¹ but Rwandan officials also facilitate the smuggling.

A coltan smuggler told Global Witness that the Rwandan authorities are fully aware of what's happening.⁴²

Previously, much of the coltan was smuggled through lightly monitored border areas.⁴³ But since M23's takeover of Goma, much of it now crosses there in plain sight of Rwandan border officials.⁴⁴ Global Witness has even observed officials recording coltan coming from the DRC.⁴⁵



M23 rebel at “Grande barrière” border post in Goma. AFP via Getty Images

Inside Rwanda, traders usually bring the coltan to Kigali,⁴⁶ although there is evidence that some goes to Uganda.⁴⁷ Smuggled coltan is often mixed with local production.⁴⁸

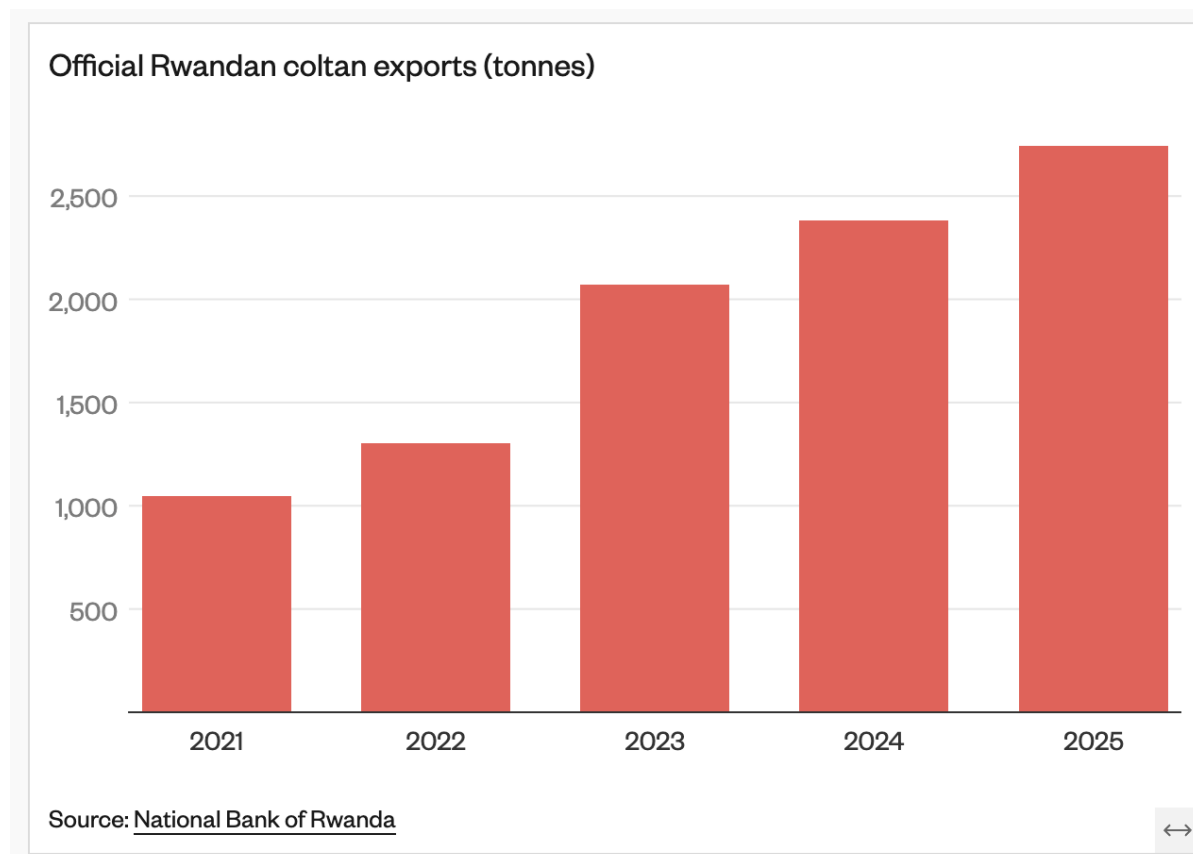
Once [they have] arrived [in Kigali], nobody is bothering [about where the minerals are from]⁴⁹

COLTAN TRADER

Global Witness found no evidence that Rwandan officials had confiscated any smuggled coltan in the last two years. The Rwanda Mines, Petroleum and Gas Board (RMB), the agency governing Rwanda's mining sector, did not reply to questions from Global Witness on the matter.

Rwandan coltan exports

Rwandan official figures show that coltan exports have increased more than 2.5 times between 2021 and 2025, reflecting the smuggling boom.⁵⁰



Other countries' imports of Rwandan coltan appear to be even higher at over 2,900 tonnes in 2024.⁵¹ Asymmetries between reported exports of minerals by a country and other countries' imports from that country point to potential smuggling.⁵²

Coltan is an important revenue stream for Rwanda, which levies a 5% tax on exports.⁵³ Since 2023, it has become the country's second largest export earner, after gold.⁵⁴

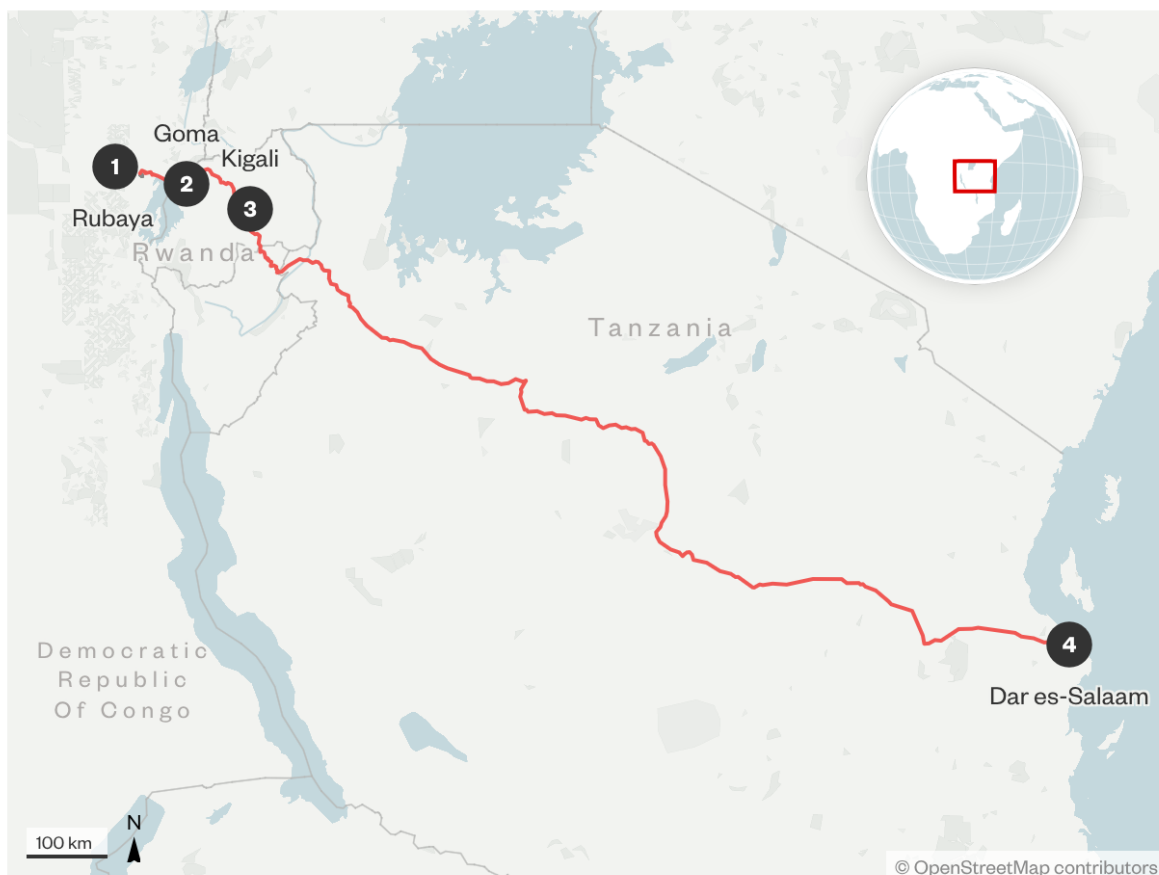
The UN, mineral experts and NGOs have continuously pointed out that Rwanda's mineral export figures do not correspond with its actual production, even before the latest surge in exports.⁵⁵ The country has been accused of exporting looted and smuggled coltan from DRC for over two decades.⁵⁶

The Rwanda Development Board (RDB) has declared annual 3T minerals production between 8,000 to 9,000 tonnes to make it appear possible that the minerals originate in the country.⁵⁷ Yet, this claim is contradicted by data from the National Institute of Statistics of Rwanda, independent geological studies and ITSCI records, according to the UN Group of Experts on DRC.⁵⁸

Rwanda's mining sector is notoriously opaque, with key data withheld that would reveal profiteering from smuggled minerals. The government doesn't publish production figures at the mine level⁵⁹ that would allow experts to check its claims.

Rwanda has repeatedly refused to apply the analytical fingerprint (AFP), a tool developed by Germany to check the origin of 3T minerals based on their geochemical composition,⁶⁰ according to a natural resources expert involved in the matter.⁶¹ This means that the tool, which cost millions of dollars to develop, has never been applied for its purpose. Rwanda questioned the reliability of the AFP, despite it being broadly accepted as a highly effective and precise instrument to verify the origin of minerals.⁶²

Rwanda also opposed an inquiry into the smuggling of minerals from DRC to Rwanda by the International Conference on the Great Lakes Region.⁶³



Coltan is usually assayed before export,⁶⁴ which means that its grade of ores or metals is assessed in a laboratory. This is often done by the company Alex Stewart International (ASI).⁶⁵ Global Witness has seen an ASI sample with a tantalum grade rated at over 41%.⁶⁶ For ASI, a company with 20 years working experience in Rwanda,⁶⁷ this should have raised red flags, as coltan from Rwanda typically has much lower grading.⁶⁸ ASI told Global Witness that it is unable to comment on these matters.⁶⁹

The RMB has not responded to Global Witness's request for comment.⁷⁰

Failed due diligence and traceability

There is a legal requirement for Rwandan minerals to be traced before being exported.⁷¹

ITSCI is the dominant due diligence and traceability system in Rwanda and until early 2025 all major coltan exporters were members.⁷³

The scheme works by assigning tags with unique numbers to bags of coltan and other 3T minerals that are supposedly free from conflict and human rights abuses. ITSCI also reports and manages incidents along supply chains.⁷⁴

Yet our investigation has found that ITSCI is instead undermined and used to launder a large share of smuggled coltan into supposedly legitimate supply chains.



ITSCI tags used in Rwanda. UNGOE⁷²

Four traders who sell smuggled coltan from Rubaya to exporters who are ITSCI members told Global Witness that that coltan is tagged by the scheme, indicating it has no conflict links.⁷⁵ One smuggler explains how this works, saying:

The [exporting] company in Kigali comes and puts the tags on the coltan from Masisi and thus it becomes Rwandan coltan⁷⁶

COLTAN SMUGGLER

In at least two cases, tags were improperly put on bags by the buyers of minerals themselves⁷⁷ and not by officials from the RMB, who are responsible for tagging minerals.⁷⁸

Another coltan smuggler explained that when he has smuggled minerals he can just call the Rwandan mining authorities and they bring as many tags as he needs.⁷⁹

One trader said that he receives tags at the Congolese border town Kibumba.⁸⁰ Tags legitimise the smuggled minerals for the onward transport to Kigali.⁸¹

Laundering 3T minerals through ITSCI is nothing new, as Global Witness revealed in a 2022 report. Ever since the scheme was set up in 2010, it has been used by major Rwandan exporters to launder large volumes of smuggled minerals from the DRC.⁸²

Analysis of trade data suggests that since 2024, coltan from Rubaya has partly been tagged by ITSCI and partly been smuggled out of Rwanda. ITSCI-tagged coltan exports increased almost precisely as much as Rwandan coltan exports between 2023 and 2024 and made up almost 100% of total Rwandan coltan exports.⁸³ Yet, coltan imports

reported by other countries from Rwanda appear to have increased even more than Rwanda's official coltan exports in 2024, suggesting that a share of the coltan may have been smuggled out of Rwanda.⁸⁴



Coltan sample shown by a trader. Global Witness

Analysis of ITSCI's data shows that the tantalite share of ITSCI-tagged 3T minerals exports increased from 21% in 2020 to 31% in 2024.⁸⁵ The surge is difficult to explain without taking the increased coltan smuggling from Rubaya to Rwanda into account.

ITSCI's incident reporting also indicates that its members may source smuggled material.⁸⁶ In 2025 ITSCI reported 70 incidents related to plausibility concerns and misuse of tags.⁸⁷

All exporters for which Global Witness has found evidence of buying conflict coltan have been ITSCI members (see [chapter 9](#)), although three have been suspended since by ITSCI. In early 2026, ITSCI told Global Witness that three additional exporters were under review and at risk of expulsion and suspension.⁸⁸

In total ITSCI has suspended or expelled six coltan exporters (although two were reinstated later, one three months later, the other only a few days later),⁸⁹ one mining company⁹⁰ and one tantalum smelter since 2024.⁹¹

SLR Consulting's Better Mining increased its foothold as an alternative traceability system in Rwanda in 2025. At least two companies Better Mining works with, and a further one that is going through its onboarding process,⁹² are former ITSCI members that have been suspended by ITSCI.⁹³ Two of them, Space Mining and Philbert Trading Minerals (see [chapter 9](#)), have sourced conflict coltan during the time they worked with Better Mining, according to traders we spoke to. We also suspect Sunrise Metal Company, which is going through Better Mining's onboarding process, to have bought conflict minerals.

Unlike ITSCI, Better Mining doesn't publish the names of its members nor any risks it has identified in supply chains.

Better Mining has tried to establish itself as an alternative traceability and due diligence system to ITSCI for over a decade, and Global Witness has reported about how ITSCI has used unfair means to keep its near monopoly position.⁹⁴ An alternative traceability provider could play a positive role, if it helped to push the bar higher. Yet, if Better Mining takes on board companies that source conflict material and have been suspended from ITSCI, it has the opposite effect.

Furthermore, some companies have started using their own traceability schemes,⁹⁵ that likely provide even less independent oversight than the established schemes.

ITSCI replied to Global Witness's request for comment that its system is active and functioning, referring to its incident reporting, suspensions, letters it wrote to ITSCI members alerting them to high risks and requesting explanations about due diligence measures, collecting additional data at mines for plausibility checks, and directly addressing exporters when it had concerns, as well as organising trainings.⁹⁶

Regarding the increased tantalite share in ITSCI exported minerals, ITSCI told Global Witness that such aggregated data offers limited insight and that, instead, ITSCI conducts more effective plausibility assessments at the level of a mine or of single transaction of minerals. Global Witness has requested granular data on mine production and supplier transactions from ITSCI, but ITSCI has not shared it, citing confidentiality.⁹⁷

ITSCI told Global Witness that it finds the UN's estimate of 120 tonnes of smuggled coltan per month between May 2024 and the end of that year questionable, saying there had only been a 300 tonnes increase of ITSCI-tagged tantalum concentrate in 2024 compared to 2023.⁹⁸ Yet, this argument does not take into consideration that smuggling levels were already high before the M23 take-over of the Rubaya mines.⁹⁹

Furthermore, ITSCI also told Global Witness that it is no longer the dominant traceability system, seemingly referring to 2025 particularly¹⁰⁰ and has previously denied having a monopoly status.¹⁰¹ ITSCI has previously denied that its scheme was used to launder massive volumes of minerals in the past and that it has used unfair means against Better Mining.¹⁰²

Better Mining denied having tagged conflict-affected coltan. Better Mining wrote that its due diligence and traceability approach is based on an onboarding processes, a supply chain evaluation, field-based monitoring, controlled tag issuance, traceability documentation, and ongoing risk identification within a defined operational framework as well as audits by a third party. It denied that Global Witness has provided evidence that conflict-affected material entered the Better Mining traceability system and requested more granular data. Better Mining also wrote to Global Witness that no decision whether to take Sunrise Metal Company on board has yet been taken and the company has not yet received any tags from Better Mining.¹⁰³

Who sells and buys coltan from Rwanda?

From January 2023 to September 2025, the period covered in this research, just seven Rwandan companies exported almost 85% of coltan from Rwanda, according to customs data seen by Global Witness.¹⁰⁴

Exporter	Coltan exported (tonnes)	Percent of total volume	Cumulative percent
East Group Minerals	1,333	29.70%	29.7%
Sunrise Metal Company	810	18.10%	47.8%
African Panther Resources	439	9.80%	57.6%
Tawotin	411	9.20%	66.8%
Kanzamin	362	8.10%	74.9%
Boss Mining Solution	306	6.80%	81.7%
Philbert Trading Minerals	155	3.50%	85.2%

Export volumes are based on customs data which may be incomplete and therefore true volumes may be higher

Source: Global Witness analysis of customs data

The same seven companies dominated Rwandan coltan exports in 2023 and 2024, but in 2025 some shifts became apparent, with African Panther Resources, Sunrise Metal Company and Philbert Trading Minerals halting exports.¹⁰⁵ Several other companies that had not exported any coltan in recent years also started exporting smaller quantities of coltan.¹⁰⁶

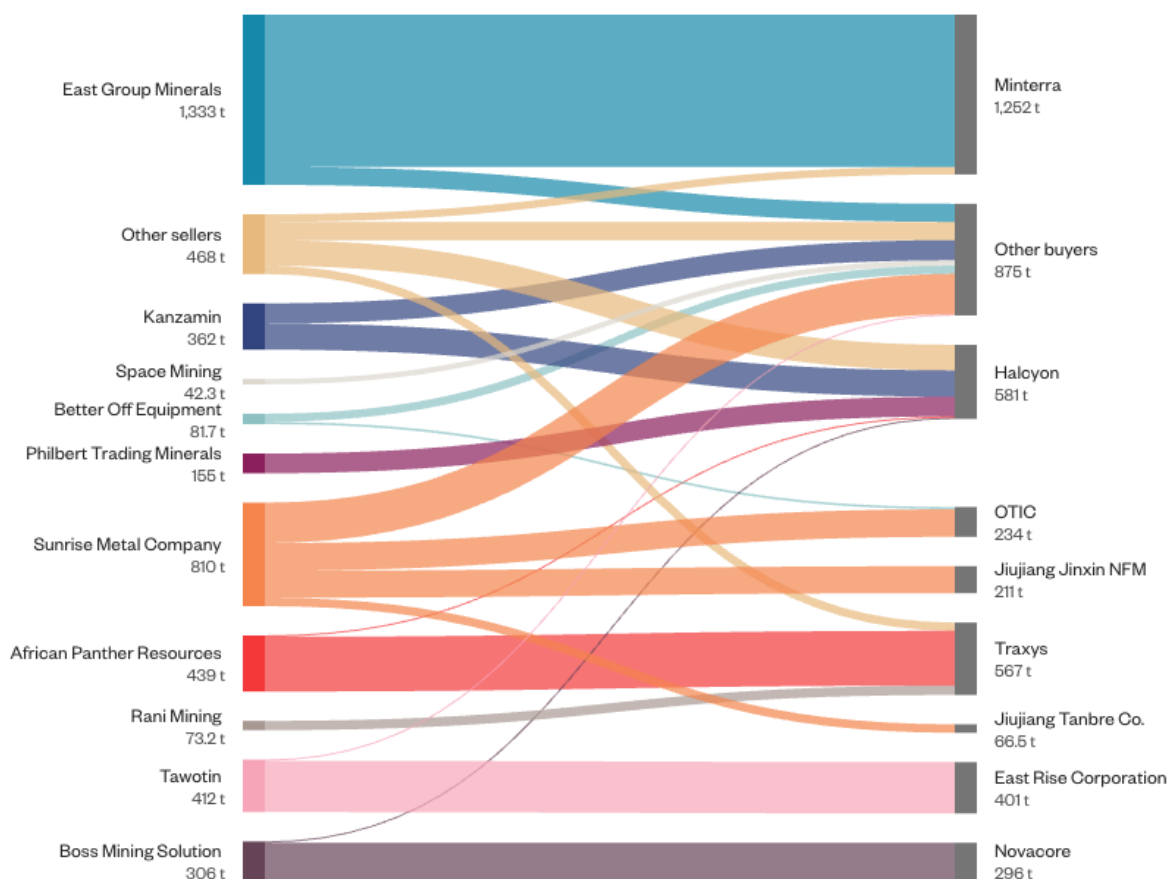
Buyer	Coltan purchased (tonnes)	Percent of total volume	Cumulative percent
Minterra	1,252	27.9%	27.9%
Halcyon	581	13.0%	40.9%
Traxys	567	12.6%	53.5%
East Rise Corporation	401	9.0%	62.5%
Novacore	296	6.6%	69.1%
Ningxia Orient Tantalum Industry Co.	234	5.2%	74.3%
Jiujiang Jinxin Non Ferrous Metals	211	4.7%	79.0%

Export volumes are based on customs data which may be incomplete and therefore true volumes may be higher

Source: Global Witness analysis of customs data

From Rwanda, coltan is brought to the ports of Dar es Salam in Tanzania or Mombasa in Kenya from where it is shipped.¹⁰⁷ Since the start of 2023 until September 2025, seven companies have been the direct buyers of almost 80% of the coltan exported from Rwanda.¹⁰⁸

Tonnes of coltan traded from Rwanda between January 2023 - September 2025



Nodes represent exporters and buyers of coltan registered as originating from Rwanda. Link width represents relative weight of traded coltan.
 Source: Global Witness analysis of customs and trade data. Note that trade volumes are based on customs data which may be incomplete and therefore true volumes may be higher.

Which companies are buying conflict coltan?

Global Witness has found direct evidence that at least five of the seven largest Rwandan coltan exporters have bought conflict coltan from DRC's Rubaya mines:

African Panther Resources, Sunrise Metal Company, Boss Mining Solution, Kanzamin and Philbert Trading Minerals.

We found that smaller exporters **Space Mining** and **Rani Mining** also bought conflict coltan from Rubaya.

There are indications that other companies may also have sold conflict coltan to international markets. ITSCI has reported incidents indicating fraudulent practices about several exporters. Furthermore, a few companies have in the past been involved in smuggling minerals.

Below, we set out evidence of the connections between these Rwandan coltan exporters and the Rubaya mines in the DRC. We also examine the role of the trading companies that sell the coltan to smelters, where it is processed into tantalum.

Our investigation found that traders often have the same directors or owners as the exporters they buy from, particularly if they have exclusive trading relationships.¹⁰⁹ This raises the question of what value a trading company adds if it belongs to the same entity as the exporter. The likely reason for sending minerals to a trader instead of the smelter that will process them is to obscure the supply chain – a view that is supported by industry sources Global Witness has spoken to.¹¹⁰

Due diligence requirements

The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas is the internationally recognised standard for responsible sourcing, which has been developed in the context of the wars in DRC. The Guidance sets out a five-step process that companies are supposed to follow when sourcing minerals from conflict and high-risk areas. Companies need to immediately disengage from suppliers that have a reasonable risk of being connected to conflict and/or serious human rights abuses.¹¹¹

OECD's 5-STEP FRAMEWORK



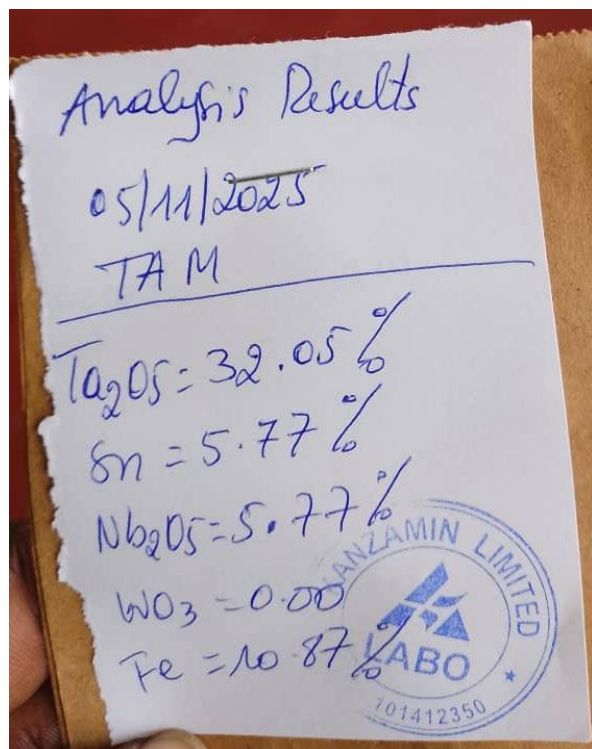
Rwandan coltan exporters

KANZAMIN

Kanzamin Limited has been in the minerals trading business for well over a decade, operating under the name Trading Services Logistics Limited until 2023.¹¹²

Run by Donat Ndagijimana and chaired by Dany Nzaramba, both Rwandan nationals,¹¹³ the company and its owner bought smuggled 3T minerals from DRC in 2012 according to the UN.¹¹⁴ According to a former Rwandan Defense Force officer, as

far back as the 2000s Dany Nzaramba was selling smuggled minerals as part of the Congo Desk,¹¹⁵ a military unit led by James Kabarebe that was used to plunder DRC's natural resources.¹¹⁶



The results of a coltan sample analysed in Kanzamin's Rubaya lab. Global Witness

Four traders confirmed to Global Witness that they have sold coltan from the mines in Rubaya to Kanzamin. Three of them did so during the M23 occupation and the other immediately before the occupation, at a time when other armed groups were making incursions into the mines.¹¹⁷

An employee of Kanzamin also confirmed that the company buys coltan from Rubaya.¹¹⁸ Kanzamin has even set up a small laboratory in Rubaya where the tantalum concentration of ores can be measured (see photo), they said.¹¹⁹

Kanzamin halted coltan exports from Rwanda at the end of 2024,¹²⁰ after a series of ITSCI incidents indicating fraudulent practices. This included one at the highest level,¹²¹ which under ITSCI guidance requires immediate attention and requires buyers to potentially disengage.¹²²

Implausible amounts of minerals had been found in a depot of one of Kanzamin's suppliers.¹²³ There were also longstanding instances of higher-than-expected levels of coltan in lots where coltan was mixed with cassiterite from five of Kanzamin's suppliers.¹²⁴

Despite these incidents, ITSCI has not suspended Kanzamin.¹²⁵ The company resumed exports from Rwanda in July 2025¹²⁶ and continued to buy conflict coltan according to traders who spoke to Global Witness.¹²⁷

Kanzamin sold conflict coltan to **Halcyon Inc.** in the United Arab Emirates (UAE) in 2025.¹²⁸ It also sold coltan to another company until the end of 2024, Hong Kong-based **Specialty Metals Resources**, but Global Witness has no evidence that this coltan was linked to conflict.

Halcyon also bought coltan from other Rwandan exporters (see sections below). Halcyon's principal is Rajan Sureshchandra Karia¹²⁹ but the company is closely connected to the Kotecha family, which has previously been accused of buying conflict minerals from the DRC (see box below).



Kanzamin premises in Kigali. Global Witness

Halcyon confirmed to Global Witness that it has bought coltan from Kanzamin but denied that the coltan came from Rubaya. It referred to KYC reviews, supply-chain documentation, its announced and unannounced site visits in DRC and Rwanda in 2025 and risk mitigation measures, which included disengagement from Kanzamin until receiving evidence that its due diligence mechanisms have been strengthened.¹³⁰ Halcyon wrote that Global Witness hasn't provided transaction-level evidence demonstrating that material purchased by Halcyon originated from Rubaya.¹³¹ Kanzamin has not replied to Global Witness's request to comment.¹³²

The Kotecha family's minerals business in the African Great Lakes Region

The Kotecha family has been in the minerals trading business in the Great Lakes region for three generations.¹³³ For decades, companies owned by the family have been accused of buying conflict minerals from DRC.

Back in 2002, a UN report alleged that the family was part of both a Burundian and Indo-Pakistani network of criminal actors.¹³⁴ Another UN report accused Ramnik O. Kotecha of using his role as a US honorary consul in Bukavu in eastern DRC to facilitate "the purchase of illegal minerals".¹³⁵ Then, in 2008, UN experts reported that a company called Afrimex run by Ramnik's son Ketankumar Kotecha¹³⁶ bought conflict cassiterite from the DRC¹³⁷ and continued to do so in 2009 despite telling the UN that it had stopped.¹³⁸

Global Witness at the time filed a complaint with the UK National Contact Point for Responsible Business Conduct, which found that Afrimex's payments contributed to the conflict in DRC, violating OECD due diligence standards for multinational enterprises.¹³⁹ A second company run at the time by Ketankumar Kotecha called SOCOMI was accused of processing conflict coltan in 2009.¹⁴⁰ Following negative reporting, the company was renamed in 2009 to Société Générale de Commerce Sarl (SOGECOM)¹⁴¹ and in 2013 the rebranded company became an ITSCI member.¹⁴² SOGECOM told Global Witness that Ketankumar Kotecha is one shareholder, though he is not operationally involved in the company's daily business.

In 2022 Global Witness reported that SOGECOM sourced from an area where conflict-linked minerals were being laundered into ITSCI supply chains in South Kivu,¹⁴³ and that it bought trafficked minerals tied to violence in the Rubaya area.¹⁴⁴ By 2023, when armed group incursions into Rubaya intensified,¹⁴⁵ SOGECOM was the second-largest coltan buyer from North Kivu,¹⁴⁶ where an overwhelming share of the coltan comes from the Rubaya mines.¹⁴⁷

SOGECOM exported most of its coltan to Halcyon,¹⁴⁸ one of the largest buyers of coltan from DRC until the end of 2023¹⁴⁹ - when tagging in Rubaya stopped – as well as one of the largest buyers of coltan from Rwanda.¹⁵⁰

Halcyon is closely linked to the Kotecha family. Dharam Kotecha, Ketankumar's son, was Halcyon's director until at least 2024.¹⁵¹

Dharam Kotecha has been actively engaged in the OECD due diligence process.¹⁵² He also sits on the supply chain team of the Tantalum-Niobium International Study Center (T.I.C.),¹⁵³ a tantalum industry association that jointly oversees ITSCI.¹⁵⁴

In March 2025, in this role, he warned that T.I.C. would investigate members trying to “game the system” by hiding the origin of smuggled coltan entering Rwanda.¹⁵⁵ Halcyon, where he holds a key role, has continued to buy conflict-linked materials, as this investigation alleges.

SOGECOM strongly denied that the Kotecha family has profited from conflict minerals for three decades. It wrote that no evidence has been presented supporting the allegations against Ramnik O. Kotecha or against SOCOMI and that there are no disciplinary or legal rulings against SOGECOM or against any Kotecha family member for buying conflict minerals from the DRC or any related offence. It told Global Witness that Ketankumar Kotecha has been a stakeholder of SOGECOM and its predecessor SOCOMI but has not been operationally involved.¹⁵⁶

SOGECOM denied having sourced conflict minerals from the Rubaya mines, referring to its active monitoring of the area, site visits and “geo finger printing”, a technique involving chemical and mineralogical signatures of minerals. SOGECOM denied having bought coltan coming from the two main concessions in Rubaya after late 2021 but confirmed having sold coltan to Halcyon in 2023.¹⁵⁷

Halcyon denied having purchased any material from Rubaya in 2023, referring to geo-fingerprinting for coltan bought from North Kivu.¹⁵⁸

BOSS MINING SOLUTION

Boss Mining Solution is run by Eddy Habimana, a Rwandan businessman.¹⁵⁹

Habimana is a relative of James Kabarebe,¹⁶⁰ Rwanda's minister for regional cooperation,¹⁶¹ who has been leading the Rwandan army's North Kivu operations supporting M23.¹⁶²

Kabarebe also played a key role in organising both Rwandan military support for M23 in its 2012 insurrection in eastern DRC¹⁶³ and, according to Global Witness sources, overseeing the flow of plundered minerals to Rwanda in the early 2010s.¹⁶⁴

The US sanctioned Kabarebe in February 2025 on the basis of his support to M23 as well as accusing him of generating much of M23's income by "coordinating the export of extracted minerals from mining sites in the DRC for eventual export from Rwanda".¹⁶⁵

A UN Group of Experts on DRC reported in July 2025 that Boss Mining Solution was buying coltan from Rubaya,¹⁶⁶ and Global Witness a few months later spoke to a trader who confirmed that he had been selling coltan from Rubaya to Boss Mining Solution.¹⁶⁷

In 2012, the UN accused Habimana of smuggling minerals from Goma over the border to Rwanda with parts of the profits being channelled to M23.¹⁶⁸



Premises at Boss Mining Solution's registered address. Global Witness

ITSCI has published incident reports suggesting Boss Mining Solution may have bought smuggled minerals,¹⁶⁹ but has not suspended the company.¹⁷⁰

Along with Habimana, Boss Mining Solution is co-owned by Yuri Tolmatchev and Alexander Konovalchik, who both have dual Russian-British citizenship.¹⁷¹ The latter owns Metarex,¹⁷² a Cyprus registered company which in turn owns **Novacore**, a UAE-based company that almost exclusively buys

Boss Mining Solution's coltan.¹⁷³ Tolmatchev is also the managing director of Novacore.¹⁷⁴

Novacore has bought most of Boss Mining Solution's coltan and has therefore sourced conflict coltan. One coltan shipment went to **Halcyon** in March 2025, according to trade data seen by Global Witness.¹⁷⁵

Novacore replied to Global Witness's request for comment to say that after a visit in Kigali "to familiarise ... with the activities of Boss Mining Solution" it "found no anomalies" in Boss Mining Solution's export volumes and that "shipments originated in Rwanda and comply with ITSCI program requirements."¹⁷⁶

Halcyon denies it has had any contractual or commercial relationship with Boss Mining Solution.¹⁷⁷

Boss Mining Solution has not replied to Global Witness's request to comment.¹⁷⁸

AFRICAN PANTHER RESOURCES

African Panther Resources is co-owned by Henry Dudgeon, a British citizen, and Rwandan Joseph Karamira.¹⁷⁹

In an April 2025 report, Global Witness revealed that African Panther Resources was buying coltan from Rubaya, based on two statements from traders.¹⁸⁰ Global Witness has spoken with three further traders who all confirm selling coltan from Rubaya to African Panther Resources.¹⁸¹

After various ITSCI incidents indicated the potential sourcing of smuggled minerals,¹⁸² ITSCI suspended African Panther Resources in March 2025 for due diligence failures,¹⁸³ but it lifted the suspension just three months later.¹⁸⁴

Trade data seen by Global Witness indicates that African Panther Resources stopped exporting coltan from Rwanda after its suspension from ITSCI until the end of 2025.¹⁸⁵ However, a trader told us they had sold coltan from Rubaya to African Panther Resources even after the suspension.¹⁸⁶ A further trader said that the company mixes coltan from Rubaya with coltan from Rwanda.¹⁸⁷

African Panther Resources also sent a coltan shipment to Halcyon by the end of 2024 according to trade data.¹⁸⁸ Halcyon denies having received any coltan from African Panther Resources.¹⁸⁹

Traxys is a multibillion-dollar raw materials trader headquartered in Luxembourg, with subsidiaries all over the world.¹⁹⁰ The company traces its roots back to the creation in 1919 of Sogem, the trading arm of Belgian mineral trading giant Umicore.¹⁹¹ In 2023 it was acquired by a consortium of investors including Optiver.¹⁹²

Traxys is a supplier to Project Vault,¹⁹³ a \$12 billion US initiative designed to secure supplies of critical minerals that can insulate manufacturers from supply shocks.¹⁹⁴

Traxys has stakes in Global Advanced Metals,¹⁹⁵ a major vertically integrated tantalum player owning tantalum mines in Australia, with a smelter in Japan and capacitor manufacturing facilities in the US.¹⁹⁶

Traxys almost exclusively bought African Panther Resources' coltan from 2023 to March 2025.¹⁹⁷

Traxys has a track record of buying conflict minerals from



Traxys hosting a lounge at the Resourcing Tomorrow conference in London. Global Witness

eastern DRC and continues to source from the region despite mounting evidence of the illicit trade.

Back in 2008, Traxys bought minerals from four exporters in DRC that the UN connected to the armed Democratic Forces for the Liberation of Rwanda.¹⁹⁸ Traxys continued buying from the same exporters after the publication of the report, as reported by the UN the following year.¹⁹⁹

Together with two of the major smelters of 3T minerals from the Great Lakes region, Traxys was a key company involved in the creation of ITSCI in 2009.²⁰⁰ Like Traxys, the two smelters have been cited in UN reports as buying conflict minerals from DRC.²⁰¹

More recently, in 2025, Global Witness found that Traxys was buying conflict minerals from Nzibira in South Kivu,²⁰² a hotspot of conflict minerals laundering since at least 2014 as documented by the UN, Global Witness and other civil society groups.²⁰³

TRAXYS' NEW SUPPLIERS

African Panther Resources stopped shipping to Traxys on 21 March 2025,²⁰⁴ five days after it was suspended from ITSCI.²⁰⁵ But Traxys quickly found two new companies to replace African Panther Resources' coltan supply.

According to trade data seen by Global Witness, Traxys started buying coltan from Rani Mining on 8 April²⁰⁶ and from Hillside Mining Company on 3 May.²⁰⁷

When a Global Witness researcher posed as a trader from Rubaya offering to sell coltan, a senior representative from Rani Mining immediately said the company was interested in buying it and offered support for crossing the border.²⁰⁸

This quick change of suppliers raises concerns that Traxys has not carried out sufficient due diligence on the companies, while a look into their backgrounds reveals various other red flags.

Both companies are new to the trade: Rani had not previously exported coltan from Rwanda and Hillside made its first shipment less than two months before it started selling to Traxys.²⁰⁹

Rani Mining was registered in 2020 to Odette Uzayisenga as both director and chairwoman.²¹⁰ Uzayisenga was the first advisor to Rwanda's official mining association.²¹¹ ITSCI has raised concerns about the company's sources of supply.²¹²

ITSCI questioned one of Rani Mining's suppliers' production figures, noting three incidents of higher-than-expected levels of coltan in 2023,²¹³ and found that similar problems continued into 2024.²¹⁴

Hillside Mining company was registered in 2022.²¹⁵ From nowhere, it was able to export 108 tonnes of coltan between March and September 2025,²¹⁶ making it the third largest coltan exporter from Rwanda during that period.²¹⁷

The company is owned by two Rwandan nationals,²¹⁸ chairperson Jean Claude Mbarushimana who lives in Switzerland and US-based managing director Evode Muvunyi.²¹⁹



A trader showed Global Witness this sample of coltan that he smuggled from Rubaya to Rwanda. Global Witness

Muvunyi is a mining manager at Jasper [Mining Supplies], a mining company, according to his LinkedIn profile.²²⁰ The company has been called out by ITSCI for numerous incidents since 2021, including disparity between reported production and activity in four of its mines, and untagged minerals in a deposit where it refused to give ITSCI access. ITSCI has escalated two of these incidents to level 1, the highest level.²²¹

Traxys confirms having bought coltan from African Panther Resources, Rani Mining and Hillside Mining but strongly denies that the coltan was from DRC and connected to conflict. Traxys wrote to Global Witness that the mineralogy of the bought coltan was different from that in DRC, that the minerals it bought were traced back to specific mine sites in Rwanda and that a Traxys representative

regularly monitored the operations at the premises of African Panther Resources (see more detailed comments [here](#)).

Traxys also wrote that it signed contracts with Hillside and Rani before the temporary suspension of African Panther Resources, that both companies have been active in the local market for some time and that Traxys has not ignored red flags but instead enhanced its due diligence by sourcing from specific mines instead of aggregators in Rwanda. Traxys wrote that it is swift to disengage from problematic suppliers and said it had ceased sourcing tantalum from Rwanda in May 2025.

Global Witness asked ITSCI why African Panther Resources' suspension had been lifted but has not received a response.²²²

African Panther Resources has previously denied having sourced conflict coltan from Rwanda, referring to its due diligence procedures,²²³ but did not reply to Global Witness's request to comment on allegations that it continues to buy conflict coltan.²²⁴ Rani Mining and Hillside Mining have not replied to Global Witness's request to comment.²²⁵

SUNRISE METAL COMPANY

Sunrise Metal Company was created in 2014 and is owned by two Chinese nationals, who according to ITSCI had no previous experience in the minerals business.²²⁶ Sunrise

Metal Company is one of very few coltan exporters selling minerals directly to smelters between 2023 and its suspension in April 2025.²²⁷ Sunrise Metal Company exported coltan to the Chinese smelters **Jiujiang Jinxin Nonferrous Metals Co., Jiujiang Tanbre Co. and Ningxia Orient Tantalum Industry**.²²⁸

Global Witness contacted Sunrise Metal Company posing as a trader from Rubaya offering to sell coltan, which Sunrise Metal Company offered to buy and also offered support for the border crossing.²²⁹ Sunrise Metal Company's advice on crossing the border suggests that the company has experience in buying smuggled material.

In 2024, ITSCI reported various incidents that may indicate the sourcing of smuggled minerals by Sunrise Metal Company.²³⁰ The company remains an ITSCI member but was suspended in April due to "insufficient evidence of implementation of due diligence".²³¹

Sunrise Metal Company was going through the onboarding process for the Better Mining traceability scheme in early 2026 but has not received any tags yet according to Better Mining.²³²

Sunrise Metal Company stopped exporting coltan after its suspension by ITSCI.²³³

However, a new company called **Better Off Equipment & Solutions** started exporting coltan at exactly the same time, to three of Sunrise Metal Company's former customers.²³⁴ The two companies also mention the same address in their corporate documents.²³⁵

This suggests that Better Off Equipment & Solutions took over Sunrise Metal Company's coltan business after the ITSCI suspension. Better Off Equipment & Solutions started working with Better Mining in April 2025.²³⁶

Sunrise Metal Company and Better Off Equipment & Solutions did not reply to Global Witness's request to comment.²³⁷

PHILBERT TRADING MINERALS

Two coltan smugglers told Global Witness that they regularly sell coltan from Rubaya to **Philbert Trading Minerals**,²³⁸ which is owned by Rwandan national Sibomana Viateur.²³⁹

Viateur has been accused by ITSCI of selling minerals stolen from other mining concessions.²⁴⁰ He also owns a mining company that has been red-flagged for due diligence concerns by ITSCI.²⁴¹ Several ITSCI incidents from recent years indicate that this mining company may have bought smuggled minerals.²⁴²

Philbert Trading Minerals was suspended by ITSCI in November 2025.²⁴³ It started working with Better Mining in the same month.²⁴⁴

Global Witness's evidence of Philbert Trading Minerals buying conflict coltan is from mid and late 2025, likely covering the period it worked with ITSCI as well as the period it worked with Better Mining. Prior to this, until February 2025, the company sold

coltan to **Halcyon**²⁴⁵ and then stopped exporting coltan, according to trade data seen by Global Witness.

Halcyon told Global Witness that it permanently disengaged from Philbert Trading Minerals in 2025.²⁴⁶ Philbert Trading Minerals has not replied to Global Witness's request to comment.²⁴⁷

SPACE MINING

Space Mining is a new player in the coltan business in Rwanda. The company was registered in 2022²⁴⁸ and is owned by two Chinese nationals.²⁴⁹

Space Mining became an ITSCI member in 2024, despite ITSCI's assessment that estimated supply for three of its four suppliers significantly exceeded recorded production.²⁵⁰ ITSCI suspended the company in October 2025.²⁵¹ Better Mining told Global Witness that it started working with Space Mining in March 2025.²⁵²

Two traders told Global Witness that they sold coltan from Rubaya to Space Mining in 2025, referring to a period when Space Mining has started working with Better Mining but before its suspension by ITSCI.²⁵³ One trader said that Space Mining has good relationships with M23 and that M23 is helping the company to access coltan.²⁵⁴

Space Mining has not replied to Global Witness's request to comment.²⁵⁵

EAST GROUP MINERALS

East Group Minerals is owned by Gvidas Galubickas, a Lithuanian national, and is managed by Martynas Medelis, another Lithuanian.²⁵⁶ Until 2019 the company operated under the name of Blancomet AA Metals.²⁵⁷

East Group Minerals has sold coltan almost exclusively to UAE-based **Minterra FCZ**,²⁵⁸ which before 2020 operated under the name Tardigrade Trading FZE.²⁵⁹ The two companies are connected through key individuals who have either been managers or directors at both companies or are connected to third companies.²⁶⁰



East Group Minerals premises in Kigali. Global Witness

East Group Minerals' coltan exports reached over 700 tonnes in 2024, well over a fourth of Rwanda's total coltan exports that themselves increased dramatically over the previous three years.²⁶¹

ITSCI logged various incidents in the first half of 2024 that may indicate sourcing of smuggled minerals by East Group Minerals.²⁶²

Minterra wrote to Global Witness that it found no indications of sourcing or trading of smuggled or conflict minerals by East Group Minerals, referring to its ITSCI membership and monitoring. It also mentioned that all ITSCI incidents were resolved. Minterra wrote that “increases in exported quantities should be viewed in the context of starting from relatively low base” export volumes. Minterra did not disclose specific mines and the quantities it sourced from each of them, as requested by Global Witness.²⁶³ East Group Minerals has not replied to Global Witness’s request to comment.²⁶⁴

TAWOTIN

Tawotin has been a major exporter of coltan from Rwanda for over a decade.²⁶⁵ Its ultimate beneficial owner is Swiss businessman Chris Huber.²⁶⁶

In 2022, Global Witness reported that three Rwanda-based companies connected to Huber all appeared to be exporting smuggled coltan originating from DRC.²⁶⁷ But Huber’s involvement in conflict minerals dates back much further.

He was first identified in 2002 as playing a major role in financing the war in DRC.²⁶⁸ He has been under criminal investigation in Switzerland since 2018 for suspected pillage, a war crime under Swiss law.²⁶⁹



Drums with Congolese flag, Trend Minerals Corporation website²⁷²

Tawotin sells to Hong Kong-based **East Rise Corporation**,²⁷⁰ which is run by Huber’s business partner John Crawley. The two men are connected through several coltan trading companies including Star Dragon Corporation, which is also based in Hong Kong.²⁷¹

In 2022, Global Witness reported that Crawley’s company **Coopérative des Artisans Miniers du Congo (CDMC)**²⁷³ had sourced minerals likely connected to conflict directly from South Kivu,²⁷⁴ and coltan that was trafficked and laundered into

ITSCI supply chains in North Kivu. It appears that some of the minerals were connected to violence.²⁷⁵

CDMC continued buying minerals from the same concession,²⁷⁶ even after the UN reported that it was a source of trafficked minerals.²⁷⁷ In 2023, when armed groups made increasingly frequent incursions into the Rubaya mines,²⁷⁸ CDMC was the largest buyer of coltan from North Kivu.²⁷⁹ CDMC first sold the minerals to Star Dragon Corporation and from the end of 2022 on to East Rise Corporation.²⁸⁰

In August 2025, the US Treasury sanctioned CDMC, East Rise Corporation and Star Dragon Corporation for trading conflict minerals.²⁸¹ East Rise Corporation has two subsidiaries, Hong-Kong-based TMC Minerals and Metals Holding Company Limited and Malaysia-based Trend Minerals Corporation SDN.²⁸² Trade data suggests that Trend Minerals Corporation may have been used to ship an important share of coltan

from East Rise Corporation to China.²⁸³ As subsidiaries of US sanctioned entities, sanctions would apply to them too under US rules.²⁸⁴

After the US sanctions were imposed, Tawotin sent coltan to a different trading company to East Rise Corporation.²⁸⁵

Tawotin denied having sourced conflict material from DRC in recent years²⁸⁶ and previously denied having done so in the 2010s.²⁸⁷ It told Global Witness that its coltan exports increased in 2024 because in 2023 it was not active during half of the year.²⁸⁸ Tawotin also wrote that it follows sanctions regimes and therefore had to find another buyer after East Rise Corporation was sanctioned by the US. Tawotin²⁸⁹ and Huber²⁹⁰ both deny being connected to each other and Huber denies that he is or has ever been a beneficial owner or member of Tawotin.²⁹¹

CDMC denies having traded conflict minerals from the Rubaya mines, referring to “verification and control measures” and temporary suspension after alerts.²⁹² CDMC²⁹³ and Crawley²⁹⁴ both deny being connected to each other. East Rise Corporation has not replied to Global Witness’s request to comment.²⁹⁵



Cargo ships in Dar Es Salaam port. wilpunt / iStock

The smelters processing the coltan

The buyers of coltan directly from Rwanda that we profiled in the previous section are mainly based in the UAE, China, Hong Kong and Luxembourg.²⁹⁶

But all these locations, with the exception of China, are transit hubs, where traders sell coltan on to smelters and refiners elsewhere.²⁹⁷

These processors extract the metal tantalum from coltan by removing impurities with high heat and acid, and refiners purify the tantalum.²⁹⁸ Smelters and refiners turn coltan into products like tantalum powder, wire or ingots,²⁹⁹ which are used for manufacturing heat-resistant capacitors, surgical implants and alloys used in jet engines.³⁰⁰

Global Witness has identified eight smelters that processed the bulk of the coltan exported from Rwanda from 2023 to September 2025. Six are in China, one is in Kazakhstan and another one is in Thailand.

China is the top destination for processing coltan from Rwanda, both in terms of volume and the number of smelters. Every major Rwandan exporter sends at least part of its coltan there.³⁰¹

Rwanda became China's second-largest coltan supplier after Nigeria in 2023.³⁰² China imported 1,571 tonnes of coltan from Rwanda in 2023, which jumped to 2,286 tonnes in 2024.³⁰³

Six Chinese smelters processed coltan from Rwanda between 2023 and 2025 according to trade data:

- **Ningxia Orient Tantalum Industry Co. (OTIC)** is a state-owned³⁰⁴ public company that trades on the Shenzhen stock exchange. OTIC is a subsidiary of the state-owned CNMC (Ningxia) Oriental Group Co.³⁰⁵ and has itself a subsidiary in Rwanda.³⁰⁶
- **Jiujiang Jinxin Nonferrous Metals Co.**, based in Jiujiang was created in 2003 and received government investment in 2024.³⁰⁷
- **Jiujiang Tanbre Co.** is also based in Jiujiang and is owned by two Chinese state-owned companies.³⁰⁸
- **Jiujiang Zhongao Tantalum & Niobium Co.**, a third tantalum smelter based in Jiangxi province was established in 2011.³⁰⁹
- **Ximei Resources (Guangdong)** in Guangzhou, formerly known as Guangdong Zhiyuan New Material Co. is listed on the Hong Kong stock exchange.³¹⁰
- **Hengyang King Xing Lifeng New Materials Co.** was set up in Hunan province in 1993.³¹¹

Smelters in China, Kazakhstan and Thailand



Customs data suggests that **Ulba Metallurgical Plant (Ulba)** in Kazakhstan also received coltan exported from Rwanda between 2023 and 2025.³¹²

Ulba was founded in 1949³¹³ and is owned by the National Atomic Company Kazatomprom which is the national operator of Kazakhstan's nuclear industry.³¹⁴ Aside from tantalum and other metals, Ulba produces uranium-based fuel bricks for nuclear power stations.³¹⁵

Taniobis, a tantalum smelter based in Thailand, also imported coltan from Rwanda until the end of 2023.³¹⁶ Taniobis told Global Witness it stopped sourcing coltan from DRC or Rwanda at the end of 2023.³¹⁷

Taniobis, formerly H.C. Starck Tantalum and Niobium, was founded in Germany in 1920³¹⁸ and has been owned by Japan's JX Mining and Metals since 2018.³¹⁹ While Taniobis headquarters remain in Germany, its smelting operations appear to be mainly in Thailand.³²⁰

Smelters play an important role in supply chain due diligence. They are considered the pinch point in the supply chain as their number is limited and traceability is lost in the smelting process.³²¹

This is the reason why the OECD Due Diligence Guidance recommends that 3T smelters and refiners should collect detailed information about the upstream supply chain and use their leverage to mitigate risks. Given their importance, all 3T smelters and refiners are expected to regularly undertake audits of their due diligence on minerals from conflict-affected and high-risk areas.³²²

All the smelters named above are T.I.C.³²³ and ITSCI members.³²⁴

The smelters processing coltan from Rwanda

Our investigation found links between the traders who buy coltan from Rwanda, and the smelters that process it, with the port of Dar es Salaam functioning as a key trading hub.

Customs data shows that **Traxys** sent various coltan shipments possibly bought in Rwanda through Dar es Salaam to Jiujiang Tanbre Co in August and September 2024³²⁵ and one shipment to Ningxia Orient Tantalum Industry Co. in April 2024.³²⁶ In 2023, Traxys shipped coltan likely from Rwanda but shipped through Tanzania to these two smelters as well as to Ximei Resources (Guangdong) Limited,³²⁷ Jiujiang Jinxin³²⁸ and Jiujiang Zhongao.³²⁹

An important share of **Boss Mining Solution's** coltan was shipped to China by Novacore.³³⁰ In 2023 and 2024, Novacore sent coltan from Dar es Salaam to Jiujiang Jinxin Nonferrous Metals.³³¹

Halcyon sent a share of its coltan from Dar es Salaam to Taniobis in 2023,³³² and Halcyon sent Rwandan coltan to China.³³³ Kanzamin shipped coltan to Ningxia Orient Tantalum Industry in 2018.³³⁴

Specialty Metals Resources sent at least one shipment of its coltan from Dar es Salaam to Ximei Resources (Quangdong) in 2024.³³⁵

Space Mining shipped coltan from Rwanda to three traders in China³³⁶ but it is not clear which smelter processed the coltan.

Sunrise Metal Company sold large quantities of coltan to Jiujiang Jinxin Nonferrous Metals Co., Jiujiang Tanbre Co. and Ningxia Orient Tantalum Industry and sent at least one shipment to Hengyang King Xing Lifeng New Materials Co.³³⁷

East Group Minerals through Minterra sent most of its coltan to China in 2023, 2024 and 2025. East Group Minerals also sent coltan to Jiujiang Zhongao Tantalum & Niobium Co. in 2024 and 2025.³³⁸ Minterra sent coltan from Rwanda to Ulba Metallurgical Plant in 2023.³³⁹ Minterra also sent coltan shipments from Dar es Salaam to Ningxia Orient Tantalum Industry in 2023.³⁴⁰

In 2023 and 2024, **East Rise Corporation** sent various coltan shipments, some from DRC and others with ambiguous origin to Ulba,³⁴¹ with which Huber and Crawley have

a longstanding relationship.³⁴² In 2024 and in 2025 East Rise Corporation shipped coltan from Rwanda and DRC to its Malaysian subsidiary Trend Minerals Corporation. Previously, in 2023, Trend Minerals Corporation shipped coltan from Malaysia to China.³⁴³



Smelting, Nordroden / iStock

How smelter audits whitewash supply chains

Our investigation has found that the leading audit for smelters and refiners is failing to identify conflict links in coltan supply chains.

The Responsible Minerals Assurance Process (RMAP) run by the Responsible Minerals Initiative (RMI)³⁴⁴ is a key part of the due diligence system for sourcing minerals from conflict-affected and high-risk areas. It audits smelters' and refiners' due diligence systems and processes.³⁴⁵

In 2024 and 2025, all eight smelters sourcing Rwandan coltan were assessed under RMAP. Each audit apart from the one on Hengyang King Xing Lifeng New Materials Co. covered at least part of the period when the M23 armed group occupied the Rubaya mines from the end of April 2024.³⁴⁶

By the time of the assessment, the high risks of sourcing coltan from Rwanda were already well known.³⁴⁷ The UN reported in 2023 about incursions by armed groups into

the Rubaya mines and minerals being smuggled to Rwanda,³⁴⁸ while ITSCI halted tagging in Rubaya from December 2023.³⁴⁹

All eight smelters were found compliant.³⁵⁰ Yet, Global Witness and the UN have uncovered evidence linking some of them to conflict coltan. At least four smelters have likely processed coltan from Rubaya that is connected to the war in DRC, evidence suggests:

- **Jiujiang Tanbre Co.** has sourced conflict coltan from **African Panther Resources** shipped by Traxys³⁵¹ and likely also from **Sunrise Metal Company**.³⁵²
- **Ningxia Orient Tantalum Industry Co.** has sourced conflict coltan from **Sunrise Metal Company**.³⁵³
- **Jiujiang Jinxin Nonferrous Metals Co.** may have sourced conflict coltan from **Boss Mining Solution** through Novacore³⁵⁴ and from **Sunrise Metal Company**.³⁵⁵
- **Ulba** has processed coltan from **East Rise Corporation** which according to the US sourced conflict coltan in DRC.³⁵⁶

Jiujiang Tanbre Co.,³⁵⁷ Jiujiang Jinxin Nonferrous Metals Co.³⁵⁸ and Ulba³⁵⁹ were all assessed conformant to the RMAP standard despite sourcing coltan likely linked to the conflict in DRC during the assessment period according to our evidence.³⁶⁰

If processors source from high-risk sources, RMAP requires them to assess the plausibility of the production from mines to verify the origin of minerals. Auditors review such assessments along with trading links between the mining company and processors.³⁶¹

Yet, processors and auditors usually don't know which other processors source from the same mines and in what quantities.³⁶² As Rwandan mining companies often supply many companies, RMI's audits are not able to carry out effective plausibility assessments that would compare all sold minerals from a mine with the mine's estimated production.

For its assessments RMI can't rely on the analytical fingerprint either (see [chapter 5](#)), as it is not applied, nor can it rely on traceability as at least the main system has been widely used to launder minerals (see [chapter 6](#)). Therefore, RMI's audits can't verify if minerals are smuggled and its audits can't ensure that smelters are conflict-free.

Yet, despite the apparent weaknesses, companies often treat RMAP certification as evidence of a conflict-free supply chain.³⁶³ Companies along minerals supply chains can use sustainability standards such as ITSCI, Better Mining or RMI to support their due diligence but bear ultimate responsibility for their sourcing.³⁶⁴

In 2025 the EU has recognised RMAP under its conflict minerals regulation. This means that mineral importers into the EU can claim that they meet their due diligence obligations if they rely on the scheme.³⁶⁵

The RMAP reports indicate that Jiujiang Jinxin Nonferrous Metals Co. and Ximei Resources (Guangdong) do not source from high-risk areas³⁶⁶ despite our evidence that they bought coltan from Rwanda during the assessment period.³⁶⁷

OTIC,³⁶⁸ Jiujiang Tanbre Co.³⁶⁹ and Jiujiang Jinxin Nonferrous Metals Co.³⁷⁰ denied having sourced material connected to conflict, referring to their due diligence which they told Global Witness is in line with the OECD Due Diligence Guidance.

Ulba confirmed to Global Witness that it has bought coltan from East Rise Corporation but denies that the coltan is connected to conflict, referring to its risk monitoring through RMAP and its policy to suspend suppliers if they are linked to conflict. It also wrote that it stopped buying “from the region” in May 2024 including from East Rise Corporation.³⁷¹

RMI replied to Global Witness’s request to comment that the claim that RMAP audits can’t ensure smelters are conflict-free is unfounded. RMI wrote that Global Witness’s trade data has deficiencies such as ignoring “the often-significant interval between mining and international trade.” RMI mentioned “at least one case” of “extended (12+ months) warehousing of a shipment prior to receipt by the smelter.” “As such, shipment dates from 2025 and 2024 may still be in the process of an active assessment or may not be reviewed until 2026.”

RMI also wrote that “many of the data points referenced in the Global Witness research to support allegations of potential conflict financing pre-date the escalation of the conflict in eastern DRC.”³⁷² RMI didn’t answer Global Witness’s question about which shipment was received after an extended warehouse period, citing confidentiality.³⁷³ RMI also referred to the lag between mining and shipping as a reason why auditors may have assessed processors as sourcing from low-risk areas only.

Furthermore, RMI said it had made significant efforts to clarify the scope and limitations of RMAP assessments to its members and other stakeholders.

T.I.C. wrote that its members’ “compliance with its legal obligations remains their sole individual responsibility” and that a manual for enhanced due diligence guides its members in complying with their obligations.³⁷⁴

Capacitors for electronics: From smelters to global manufacturers

Tantalum is mainly used in capacitors,³⁷⁵ which are widely used in electronics applications, including smartphones, laptops and car electronics.³⁷⁶ Tantalum is also used for aerospace and defence industries, medical implants and metallurgical additives.³⁷⁷

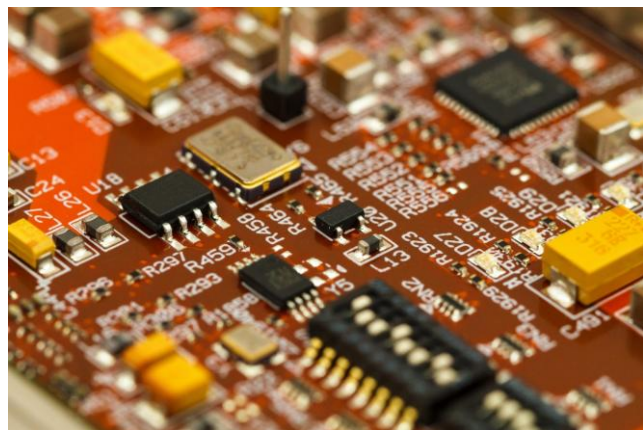
The tantalum capacitor market is highly concentrated, dominated by around five major players: Kemet, Kyocera AVX, Vishay, Panasonic and Hongda Electronics Corp.³⁷⁸

The US, followed by El Salvador, Israel and the Philippines, have been the largest importers of tantalum from China, where most of Rwanda's coltan is processed.³⁷⁹

Various capacitor manufacturers operate in the US, including Vishay³⁸⁰, Kyocera AVX,³⁸¹ Global Advanced Metals³⁸² and Kemet.³⁸³ Most of the tantalum sold into the US was shipped from China's Ningxia province (which implies that the tantalum likely came from OTIC) and to a lesser degree from Guangdong province (which means that the tantalum was likely processed by Ximei Resources (Guangdong) Limited).³⁸⁴ In 2024, smaller quantities came from Jiangxi province.³⁸⁵

Kyocera AVX is likely the main receiver of China's tantalum exports to El Salvador,³⁸⁶ where the company has a production site that it claims is the largest in the world.³⁸⁷ These exports all originate from Guangdong province,³⁸⁸ where tantalum smelter Ximei Resources (Guangdong) Limited is based.

Global Witness has also found evidence of shipments from OTIC to Samsung's subsidiaries in the Philippines,³⁸⁹ where Samsung has a capacitor manufacturing plant,³⁹⁰ as well as Panasonic's subsidiary in the Philippines.³⁹¹ This tantalum was likely affected by conflict.



Tantalum capacitors on a circuit board. pkphotography / iStock

The tantalum shipments to Israel where Vishay has an important production site³⁹² came from Ningxia province in recent years,³⁹³ suggesting that shipments came from OTIC.

Thailand exports tantalum to various countries where important capacitor manufacturers are located, including China, Czechia (Kyocera AVX), El Salvador (Kyocera AVX), Israel (Vishay), Japan (Kyocera, Panasonic) and the US.³⁹⁴

From Kazakhstan where the Ulba smelter is located, tantalum has been mainly exported to Russia, Japan and the US in recent years according to UN trade data.³⁹⁵

Samsung told Global Witness that, after reviewing, it had no concerns in its transactions with OTIC, referring to OTIC's RMI audit.³⁹⁶ Panasonic has not replied to a request for comment by Global Witness.³⁹⁷

Downstream companies

Companies using tantalum are mainly in the electronics, tech, car and aviation industries. Many international brands all over the world use products containing tantalum from smelters which according to our research have sourced coltan linked to the conflict in DRC.

Amazon, Microsoft, Vodafone, Toyota, Sony, Nvidia, Honda, LG Display and Ericsson all report having products from smelters in their supply chains that according to our research have sourced conflict coltan from Rubaya.³⁹⁸ Conflict coltan ends up in goods that consumers use every day such as mobile phones, laptops and cars.

Apple reports Ulba as a processor in its supply chain in 2023. In that year Ulba sourced coltan from East Rise Corporation likely connected to the conflict.



Vodafone shop. TkKurikawa / iStock



Honda car dealership in California. Wirestock / iStock

Toyota told Global Witness that it does not tolerate human rights abuses and aims to procure conflict-free minerals, referring to due diligence checks on suppliers and promptly addressing identified abuses.³⁹⁹ Sony wrote that it is committed to building a responsible supply chain and that it expects all suppliers to comply with its supply chain code of conduct and policy which it enforces with corrective actions.⁴⁰⁰ Ericsson

wrote that it collaborates with the RMI, that the smelters Global Witness refers to are RMI-conformant and that it will review the specific cases.⁴⁰¹

Apple wrote to Global Witness that as the conflict in the region escalated, it notified its suppliers that their smelters and refiners must suspend 3T and gold purchases from the DRC and Rwanda, as it was concerned that industry certification mechanisms could no longer perform the required due diligence and that it has increased its support to organisations that help communities.⁴⁰² Apple did not reply to Global Witness's question about how it can avoid sourcing coltan from DRC and Rwanda given the importance of DRC as a coltan-producing country and the fact that smelters and refiners usually mix minerals from different origins.

Nvidia, Amazon, Microsoft, Vodafone and LG Display have not replied to Global Witness's requests for comment.⁴⁰³

Recommendations

RWANDAN GOVERNMENT:

- Withdraw all troops from the territory of DRC.
- Stop all support to M23 in violation of the UN arms embargo and sanctions regime.
- Intercept smuggled minerals and repatriate them to the country of origin.
- Support the use of the analytical fingerprint.
- Make mine-level production data public.

GOVERNMENT OF THE DRC:

- Strengthen control over national armed forces and ensure that violations committed by the army and affiliated armed combatants are investigated and violations are prosecuted.
- Stop support for non-state armed groups.

INTERNATIONAL COMMUNITY:

- Suspend export of military equipment to Rwanda.
- Make any official development assistance conditional on Rwanda stopping its support to M23.
- Sanction of commanders of M23 and senior Rwandan officials responsible for abuses as well as companies profiteering from conflict resources.

EU (ADDITIONALLY TO THE RECOMMENDATIONS ABOVE):

- Enforce the EU conflict minerals regulation and the Corporate Sustainability Due Diligence Directive (CSDDD) so EU companies effectively stop buying, processing or trading conflict minerals.

- The EU should broaden the scope of the CSDDD to include all downstream activities of business partners, as well as EU companies with 1,000 or more employees and €450 million or more in global net turnover, and non-EU companies with €450 million or more in EU turnover.
- Rescind the strategic partnership with Rwanda on strategic raw materials.

US (ADDITIONALLY TO RECOMMENDATIONS ABOVE):

- Strengthen and enforce section 1502 of the Dodd-Frank Act.
- Avoid agreements that tie resource extraction to security guarantees.

ITSCI:

- Thoroughly scrutinise Rwandan members regarding smuggled minerals from DRC.
- Set up a multistakeholder governance structure that avoids conflicts of interest between ITSCI's members and its due diligence function.
- Publish detailed mine-level production data for minerals tagged by ITSCI.

BETTER MINING:

- Thoroughly scrutinise Rwandan members regarding smuggled minerals from DRC.
- Publish names of member companies and incidents related to their supply chains.
- Publish detailed mine-level production data for minerals tagged by Better Mining.

RMI:

- Thoroughly scrutinise tantalum smelters sourcing minerals from the African Great Lakes Region.
- Strengthen the RMAP audits by including data that allows plausibility assessments of mines and fingerprinting.
- Clearly communicate that RMAP audits are not able to confirm the origin of minerals.

RWANDAN EXPORTERS:

- Stop buying conflict-affected minerals.
- Carry out proper due diligence on supply chains including close monitoring of Rwandan mines from which minerals allegedly come.
- Follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

TRADERS AND PROCESSORS:

- Stop buying coltan from Rwanda until M23 has withdrawn troops from the Rubaya mines unless they have scrutinised the coltan before export by directly checking its origin and grading.
- Follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

DOWNSTREAM COMPANIES, CAPACITOR MANUFACTURERS:

- Directly communicate with processors and check their due diligence as well as consult with affected groups.
- Demand high-quality reports from suppliers, engage with and follow up on the risks identified and report on these in their own annual due diligence reports.
- Stop sourcing tantalum or products including tantalum from Rwanda until M23 has withdrawn from the Rubaya mines unless they have thoroughly scrutinised the coltan before export by directly checking its origin and grading.
- Follow the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

Methodology

Global Witness's investigation is based on extensive field and desk research over one year, reviewing trade data and interviews with over 70 actors from governments, the private sector, civil society and academia, cross-referencing our findings with UN and NGO investigations and other sources.

To identify exporters and buyers of coltan, Global Witness analysed and cross-checked customs and trade data from multiple sources including also data compiled by C4ADS and SOMO (The Counter).

We isolated coltan exports from Rwanda using relevant Harmonised System codes and product descriptions, identifying records where the cargo origin was recorded as Rwanda.

We standardised company names to account for alternate spellings and apparent misspellings across datasets, and deduplicated records where the same shipment appeared to have been recorded more than once, including at Rwanda's border and again at export ports when cargo was loaded onto ships.

Endnotes

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- ⁴² Global Witness interview R1I2.
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 2024: 2,384 tonnes (<https://www.bnr.rw/Estatistics>)
 ITSCI export data:
 2023: 2,021 tonnes (<https://www.itsci.org/mineral-tonnage-data/>)
 2024: 2,354 tonnes (<https://www.itsci.org/2025/11/12/itsci-statement-shifts-in-tantalum-mineral-flows-from-the-great-lakes-region/>) and 2,339 tonnes respectively (<https://www.itsci.org/mineral-tonnage-data/>, p.6.)
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¹⁰³ Better Mining, Opportunity to comment response, 12/1/26, 18/5/26.

¹⁰⁴ Trade data seen by Global Witness.

¹⁰⁵ Ibid.

¹⁰⁶ Ibid.

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¹¹⁹ Global Witness interview R2I12.

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- ²³⁶ Better Mining, Opportunity to comment response, 5/5/26.
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²⁶⁰ Gediminas Satkus, a former managing director of Minterra previously worked for Blancomet according to his RockedReach profile (https://rocketreach.co/gediminas-satkus-email_58519607) and has shares of Beta Metals Ke Limited (corporate document), a company owned by M Holding, which is the previous parent company of East Group Minerals (corporate documents).

Andrius Jankunas, listed as a director and the owner of Minterra is a shareholder and/or director at the companies Recohub and Lambda Metals where Darius Krasauskas is also an owner and/or director (corporate documents). Darius Krasauskas in turn was the owner of Blancomet until 2021 (through M Holdings). In its response to Global Witness's request to comment, Ignas Pilvinis who is listed as director and general manager for Minterra, wrote that Andrius Jankunas has never been a director of Minterra.

Antanas Krasauskas who bears the same family name as Darius K. was the CEO of Minterra from May 2023 to June 2024 according to a RockedReach profile. Antanas Krasauskas denies any family connection with Darius Krasauskas.

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²⁷⁵ Global Witness (2022): The ITSCI laundromat, p.61, <https://globalwitness.org/en/campaigns/transition-minerals/the-itsci-laundromat/>.

²⁷⁶ Export data, North Kivu, 2023.

²⁷⁷ UN Group of Experts on DRC (2023), Midterm report, para 67, <https://docs.un.org/en/s/2023/990>

²⁷⁸ UN Group of Experts on DRC (2023), Final report, para 91, <https://docs.un.org/en/s/2023/431>; UN Group of Experts on DRC (2023), Midterm report, para 67, <https://docs.un.org/en/s/2023/990>.

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²⁸⁰ Trade data seen by Global Witness.

²⁸¹ <https://home.treasury.gov/news/press-releases/sb0221>

²⁸² Corporate document, East Rise Corporation.

²⁸³ Trade data compiled by C4ADS.

²⁸⁴ <https://home.treasury.gov/news/press-releases/sb0221>

²⁸⁵ Trade data seen by Global Witness.

²⁸⁶ Tawotin, Opportunity to comment response, 22/12/25.

²⁸⁷ Tawotin, Opportunity to comment response, 09/12/21.

²⁸⁸ Tawotin, Opportunity to comment response, 22/12/25.

²⁸⁹ Ibid.

²⁹⁰ Chris Huber, Opportunity to comment response, 22/12/25.

²⁹¹ Ibid.

²⁹² CDMC, Opportunity to comment response, 22/12/2025.

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²⁹⁴ John Crawley, Opportunity to comment response, 15/12/21.

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³⁰⁴ <https://govt.chinadaily.com.cn/s/201904/22/WS5cbd8dd7498e079e6801eb70/china-nonferrous-metal-mining-group-co-ltd-cnmc.html>

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³⁵⁴ Trade data seen by Global Witness; trade data compiled by C4ADS.

³⁵⁵ Ibid.

³⁵⁶ US Treasury statement: <https://home.treasury.gov/news/press-releases/sb0221>; trade data compiled by C4ADS.

³⁵⁷ <https://www.responsiblemineralsinitiative.org/tantalum-smelters-list/conformant-tantalum-smelters/>

³⁵⁸ Ibid

³⁵⁹ Ibid

³⁶⁰ Trade data seen by Global Witness.

³⁶¹

https://www.responsiblemineralsinitiative.org/media/docs/standards/Responsible%20Minerals%20Assurance%20Process_Standard_SnTa_EN.pdf

³⁶² Global Witness interview AI7.

³⁶³ Ulba, Opportunity to comment response, 31/12/25. "To this day, UMP JSC retains its presence in the list of RMAP conformant tantalum smelters, which indicates the proper functioning of ULBA's due diligence management system."

Samsung, Opportunity to comment response, 22/12/2025. "We have thoroughly reviewed the raised issue, and the review result confirms that there are no potential concerns in our transactions with [names of two smelters]. We conduct business

with mineral refining powder companies that comply with RMI regulations. Our partners undergo an annual RMI audit, and the certified refinery information is updated in our system according to the audit results.”

- ³⁶⁴ OECD (2016): OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, p. 41, https://www.oecd.org/en/publications/2016/04/oecd-due-diligence-guidance-for-responsible-supply-chains-of-minerals-from-conflict-affected-and-high-risk-areas_glg65996.html
- ³⁶⁵ https://policy.trade.ec.europa.eu/news/first-supply-chain-due-diligence-scheme-recognised-under-conflict-minerals-regulation-facilitate-2025-10-17_en
- ³⁶⁶ RMI conformant tantalum smelter list: <https://www.responsiblemineralsinitiative.org/tantalum-smelters-list/conformant-tantalum-smelters/>:
<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Jiujiang%20Jinxin%20Public%20Report.pdf>
<https://www.responsiblemineralsinitiative.org/media/docs/Public%20Reports/Ximei%20Resources%20Public%20Report.pdf>
- ³⁶⁷ Trade data seen by Global Witness.
- ³⁶⁸ OTIC, Opportunity to comment response, 22/12/25.
- ³⁶⁹ Jiujiang Tanbre Co., Opportunity to comment response, 22/12/25.
- ³⁷⁰ Jiujiang Jinxin Nonferrous Metals Co., Opportunity to comment response, 17/12/25.
- ³⁷¹ Ulba, Opportunity to comment response, 31/12/25.
- ³⁷² RMI, Opportunity to comment response, 12/1/26; 4/2/26.
- ³⁷³ Global Witness, Opportunity to comment letter, 29/01/26.
- ³⁷⁴ RMI, Opportunity to comment response, 12/1/26.
- ³⁷⁵ <https://www.samaterials.com/3-important-things-about-tantalum-capacitor.html>
- ³⁷⁶ <https://www.samaterials.com/blog/how-tantalum-capacitors-are-used-in-electronics.html>
- ³⁷⁷ https://www.samaterials.com/content/what-are-the-uses-of-tantalum.html#:~:text=Medical%20Technology:%20Tantalum%27s%20biocompatibility%20makes,alloys%20used%20for%20turbine%20blades,https://www.sfa-oxford.com/knowledge-and-insights/critical-minerals-in-low-carbon-and-future-technologies/critical-minerals-in-defence-and-national-security/#:~:text=They%20are%20used%20in:%20*%20AN/MPQ%2D65%20Radar,ground%2Dbased%20radars%20for%20surveillance%20and%20counter%2Dfire%20detection.
- ³⁷⁸ <https://reports.valuates.com/market-reports/QYRE-Auto-26I4167/global-tantalum-capacitors;>
<https://www.hongdacapacitors.com/4200.html>
- ³⁷⁹ Trade data seen by Global Witness.
- ³⁸⁰ [https://www.vishay.com/en/capacitors/;](https://www.vishay.com/en/capacitors/)
<https://www.sec.gov/ix?doc=/Archives/edgar/data/103730/000010373025000017/form10k.htm>
- ³⁸¹ [https://www.kyocera-avx.com/about/;](https://www.kyocera-avx.com/about/) <https://www.kyocera-avx.com/resources/high-reliability-solid-tantalum-capacitors/>
- ³⁸² <https://globaladvancedmetals.com/global-operations/>
- ³⁸³ <https://www.kemet.com/en/us.html>
- ³⁸⁴ Trade data seen by Global Witness.
- ³⁸⁵ Ibid.
- ³⁸⁶ Ibid.
- ³⁸⁷ [https://www.thecentralamericangroup.com/kyocera-in-el-salvador/;](https://www.thecentralamericangroup.com/kyocera-in-el-salvador/) <https://infoterra.us/2024/08/21/la-produccion-de-condensadores-en-el-salvador-un-potencial-en-desarrollo/>
- ³⁸⁸ Trade data seen by Global Witness.
- ³⁸⁹ Trade data compiled by C4ADS.
- ³⁹⁰ <https://samsungsem.com/global-network/philippines/overview.do>
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<https://app.g2xchange.com/companies/VFH5VJ2BMUE9>
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- ³⁹⁴ UN Comtrade database.
- ³⁹⁵ Ibid.

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³⁹⁷ Global Witness, Opportunity to comment letter, 16/12/25.

³⁹⁸ Data retrieved from U.S. Securities and Exchange Commission website, <https://www.sec.gov/edgar>.

³⁹⁹ Toyota, Opportunity to comment response, 22/12/25.

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⁴⁰¹ Ericsson, Opportunity to comment response, 22/12/25.

⁴⁰² Apple, Opportunity to comment response, 13/1/26.

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