

resource matters



Nine Red Flags in the Emerging Lithium Sector in the DRC

December 2025



NO TO CORRUPTION

Corruption is one of the main causes of poverty. **Resource Matters** documents and exposes the bribery and embezzlement of public funds that keep the Congolese people in misery.

Introduction

In the Congolese province of Tanganyika, around the town of Manono, once famous for its tin mines, lies one of the allegedly biggest untapped hard rock lithium deposits in the world. Once commercial exploitation starts there, the Democratic Republic of Congo will potentially find itself at the forefront of another key mineral market, at the center of the global economy for its use in the production of batteries.

Companies from every corner of the world have tried to obtain permits to explore the area of Manono over the past decade, partnering up with the Congolese State-owned company Cominière. However, getting and keeping an exploration permit has proven to be fairly challenging, as well as transforming it into an exploitation license. The history of this site is characterized by sudden changes in joint venture ownership, suspicions of corruption, and long legal battles.

At present, the two joint ventures that have managed to obtain an exploitation permit are Manono Lithium SAS, owning the Northern part of the main Manono-Kitotolo deposit, and Minocom Mining SAS, which owns the license over some tailings on top of the main deposit. The Southern portion of the main Manono site is currently the object of an international arbitration between the Australian company AVZ, which lost its license in 2023, and Cominière, which should be the sole owner of the permit according to the Mining Cadaster.

Given the potential of the site, many other companies and investors are getting interested in the area of Manono, either to carry out mineral exploration or to negotiate access to it. In particular, Manono could potentially be part of the mineral

deal signed on December 5th, 2025 between the DRC and the United States.

Recent talks

When negotiations for an agreement between the United States and the DRC on transition minerals had just started, the US company Kobold [expressed interest](#)¹ in purchasing mining rights in the Manono South lithium deposit (permit 13359) from AVZ. In July 2025, Kobold also [signed a deal](#)² with the government of the DRC, which committed to support the company in acquiring and developing the Manono South site, while also getting access to some permits to search for lithium and other minerals. Kobold actually [obtained](#)³ these permits - which are separate from the Manono-Kitotolo site - the following month, while the dispute for Manono South has not been resolved yet. In order for Kobold to buy a stake in the project from AVZ, as they declared, AVZ should first be recognized as a legitimate shareholder in the arbitration proceedings.

The US-DRC minerals deal, as well as Kobold's interest in the Manono project, underline an increasing interest of the United States and other global actors in securing supplies of critical minerals, but all investments in the sector should be made

1 Kobold Metals, Kobold Metals and AVZ Agree on Framework for Kobold to Acquire AVZ's Interests in the Manono Lithium Deposit in DRC, 6 May 2025, available at <https://www.koboldmetals.com/news/kobold-metals-to-acquire-avzs-interests-in-the-manono-lithium-deposit-in-drc/?aid=04>. Accessed on 24 October 2025.

2 W. Clowes and M.J. Kavanagh (Bloomberg), Kobold Inks Congo Exploration Deal to Grow US Mineral Access, 18 July 2025, available at <https://www.bloomberg.com/news/articles/2025-07-18/kobold-inks-exploration-deal-in-congo-to-boost-us-mineral-access>. Accessed 24 October 2025.

3 W. Clowes (Bloomberg), Kobold Metals Granted Rights to Explore for Lithium in Congo, 27 August 2025, available at <https://www.bloomberg.com/news/articles/2025-08-27/kobold-metals-granted-rights-to-explore-for-lithium-in-congo>. Accessed on 24 October 2025.

in compliance with Congolese law and consider the risks of corruption that may arise. The lithium sector in particular

presents many red flags and gray areas which, even if they are not necessarily proof of corruption, may raise a number of questions and concerns for investors.

The objective is not to discourage potential investments. On the contrary, it is to ensure a transparent framework for a good running of mining activities, which would benefit all stakeholders. The commercial exploitation of Manono lithium has the potential not only to be profitable for companies, but also to benefit communities who would see their economy revived thanks to mining activities, if this is done transparently and fairly. Therefore, we invite any potential investor having set eyes on the mineral wealth of Manono to acknowledge the existing red flags, to carefully evaluate risks and to put in place appropriate mitigation

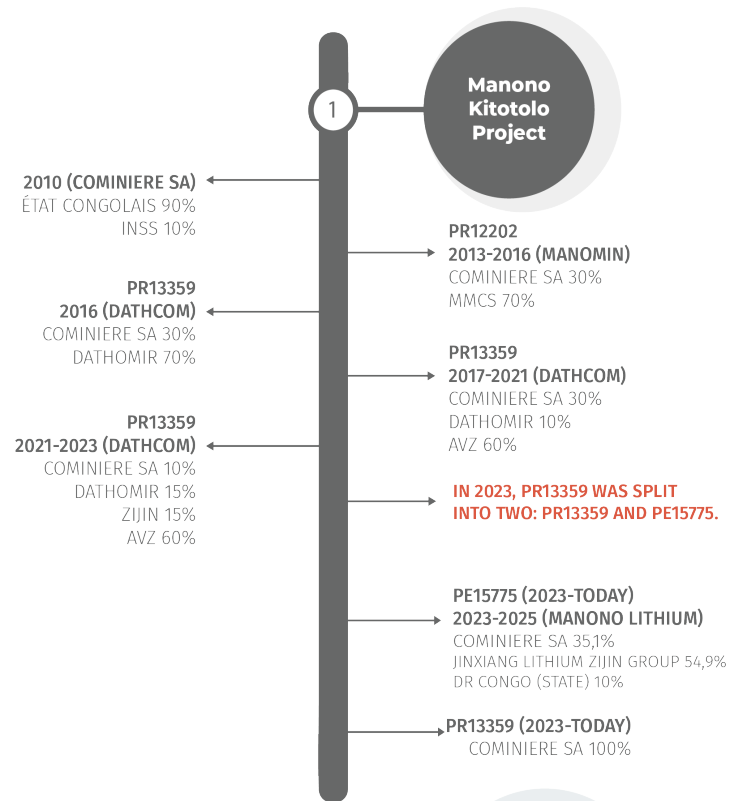
measures in order to avoid repeating damaging patterns. We also encourage the US and DRC governments to make sure that the mining projects that will be chosen in the framework of the deal contain solid transparency and anti-corruption safeguards.

Democratic Republic of the Congo: Basic administrative map

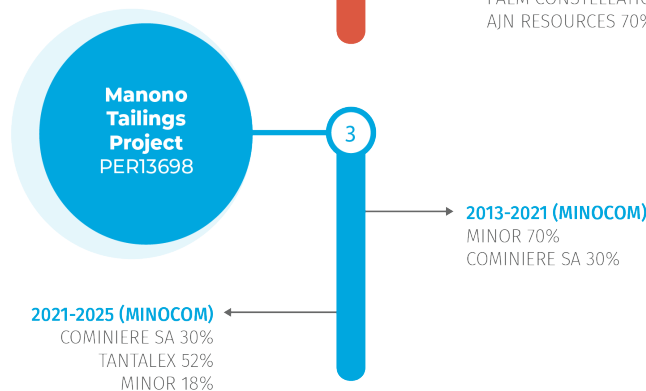
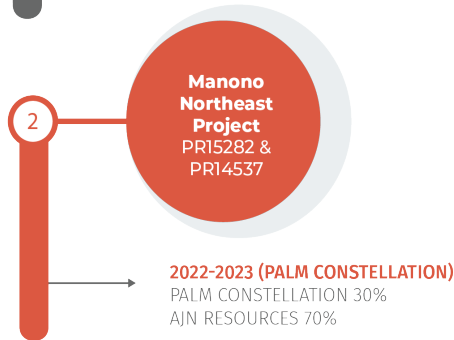


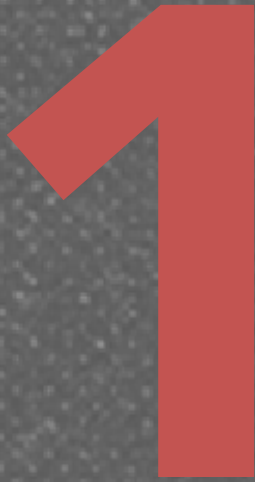
Date de production: 18 novembre 2016 Sources: Référentiel Géographique. Commun Plus d'informations: ochadrc@un.org www.drc-humanitarianresponse.info www.unocha.org/drc www.reliefweb.int

Evolution of Mining Projects in Manono



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The long-standing dispute between AVZ and Cominière over the Southern part of Manono



The main lithium site in Manono was held by a joint venture called Dathcom Mining, composed of the Australian company AVZ, another company called Dathomir, and the Congolese State-owned Cominière, later integrated by Jinxiang Lithium, a subsidiary of the Chinese group Zijin. The DRC, through its company Cominière, was taken to [international arbitration](#)⁴ in 2023 by AVZ over a disagreement about the management of the joint venture. The disagreement resulted in the unilateral dissolution of the joint venture by Cominière, and it caused AVZ to lose its license over the Manono-Kitotolo deposit. The original permit was split into two parts: the Northern section (now named Permit 15775) was awarded to a newly formed joint venture between Cominière and Jinxiang Lithium, and the Southern part went to Cominière, which to this day retains an exclusive right to the permit over this section.

Thus it would seem that AVZ currently holds no mining assets within the perimeter of permit 13359. However, AVZ has strongly contested this decision by the Congolese state before the International Chamber of Commerce tribunal, which [recently ordered](#)⁵ Cominière to pay over \$40million for non-compliance with previous judicial decisions, even though the dispute is still ongoing.

Against the backdrop of this Cominière-AVZ conflict, [a framework agreement](#)⁶ was published between AVZ and the

4 International Chamber of Commerce (ICC), AVZI, GLH and Dathcom v. Cominière (I), 18 April 2023, available at <https://jsumundi.com/fr/document/decision/fr-avz-international-pty-ltd-green-lithium-holdings-pte-ltd-and-dathcom-mining-sa-v-societe-congolaise-exploitation-miniere-cominiere-i-ordonnance-wednesday-15th-november-2023>. Accessed on 24 October 2025.

5 M.J. Kavanagh (Bloomberg), Congo State Miner Must Pay €39 Million to AVZ in Lithium Dispute, 14 March 2025, available at <https://www.bloomberg.com/news/articles/2025-03-14/congo-state-miner-must-pay-39-million-to-avz-in-lithium-dispute>. Accessed on 24 October 2025.

6 See footnote 1.

major American firm KoBold Metals, concerning AVZ's intention to sell its assets in permit 13359 to KoBold. However, AVZ should first ensure a victory in the arbitration and recover its parts, before being able to sell them. To facilitate negotiations, the arbitration was suspended for a few weeks, but then resumed. Two months after the framework agreement, the DRC government [signed a deal](#)⁷ with Kobold, committing to support the company in getting access to the Manono deposit. [AVZ claimed](#)⁸ that this deal violated the provisions of the arbitration, and the parties are still in talks to solve the issue.

This unresolved dispute, and the consequent confusion it generates, has exposed the emerging lithium sector to endless conflicts that have delayed the start of commercial production in Manono, and dashed the hopes of local communities who have been waiting for many years to see the benefits of their mineral wealth.

In the meanwhile, AVZ has also been [facing an investigation](#)⁹ by the Australian federal police due to bribery allegations, that the company denies. In addition, the Australian Securities and Investment Commission (ASIC), which is the Australian corporate regulator, [sued AVZ](#)¹⁰ for breach of disclosure obligations in relation to the legal dispute over the Manono permit.

7 See footnote 2.

8 Reuters, AVZ Minerals says Congo deal with Kobold breaches arbitration order, 21 July 2025, available at <https://www.reuters.com/world/africa/avz-minerals-says-congo-deal-with-kobold-breaches-arbitration-order-2025-07-21/#:~:text=The%20DRC%20government%20said%20on,need%20to%20start%20your%20day>. Accessed on 24 October 2025.

9 AVZ Minerals, Company Statement AFP Investigation, 10 December 2024, available at <https://avzminerals.com.au/investor-centre/2024/12/10/company-statement-afp-investigation>. Accessed on 12 November 2025.

10 ASIC, ASIC sues suspended WA mineral exploration company AVZ Minerals and directors for disclosure failures, 11 November 2025, available at <https://www.asic.gov.au/about-asic/news-centre/find-a-media-release/2025-releases/25-271mr-asic-sues-suspended-wa-mineral-exploration-company-avz-minerals-and-directors-for-disclosure-failures/>. Accessed on 12 November 2025.

2

Possible irregularities in the transfer of state shares in joint ventures



When a State-owned company intends to sell a stake in a project in the DRC, it has to follow the [2008 law on the disengagement of State companies](#).¹¹ This law sets out a number of requirements that need to be met in order for the sale to be compliant, including a market evaluation of the stake subject to the sale, and a public tender. Cominière appears to not have always followed these indications when selling its stakes in lithium projects. For example, in 2021 Cominière [transferred 15% of its shares in Dathcom to Zijin](#)¹² for US\$33,44 million. There seem to be no indications in the public domain that this transaction was the result of a public tender or a proper evaluation of the updated market value of the assets sold. The Congolese Inspection Générale des Finances (IGF) [has considered](#)¹³ this amount to be an underestimation of \$120,7 million of the actual value, estimated at \$154 million. This underevaluation of mining assets, which can be observed across sectors in the mining industry, could be the result of a lack of prior mastery of technical information about the site, or an indication of some form of malpractice, if not even a preferential treatment at the expense of transparency.

11 Loi N. 08/010 du 07 juillet 2008 fixant les règles relatives à l'organisation et à la gestion du portefeuille de l'état, available at <https://www.droit-afrique.com/upload/doc/rdc/RDC-Loi-2008-10-gestion-du-portefeuille-de-l-Etat.pdf>. Accessed on 24 October 2025.

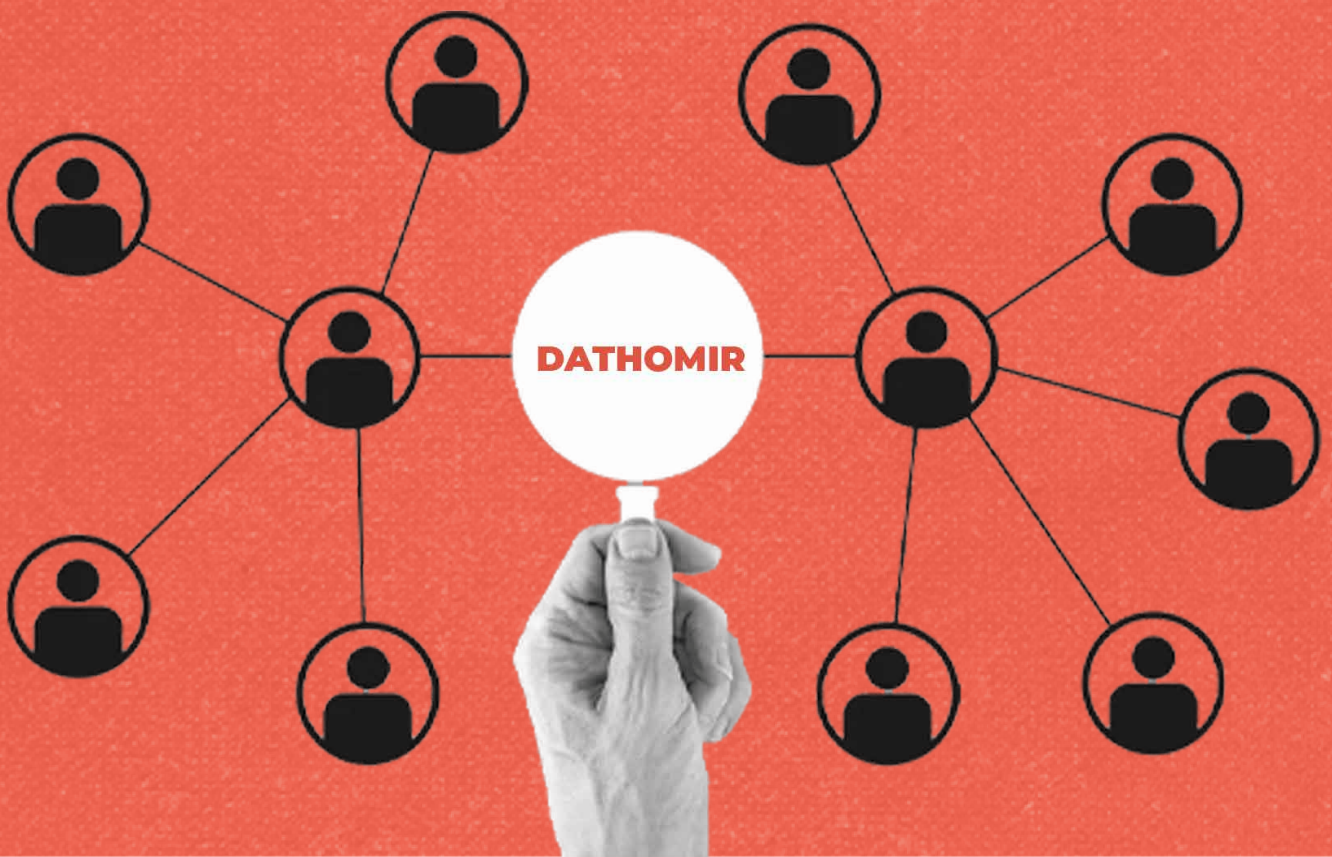
12 International Chamber of Commerce (CCI), Cominière and Jin Cheng v. AVZI and GLH, 28 April 2023, available at https://jusmundi.com/fr/document/other/en-congolaise-dexploitation-miniere-sa-cominiere-and-jin-cheng-mining-company-limited-v-avz-international-pty-ltd-and-green-lithium-holdings-pte-ltd-press-release-of-avz-minerals-limited-on-related-arbitration-proceedings-update-wednesday-27th-september-2023#other_document_34994. Accessed on 24 October 2025.

13 Inspection Générale des Finances (IGF), Rapport-synthèse de l'Inspection Générale des Finances sur la gestion des actifs miniers de la RDC par l'entreprise publique La Cominière S.A., September 2022, available at <https://congominestorage.blob.core.windows.net/congominestorage/Rapport-IGF-sur-COMINIERE-S-A-6387826ba915e%20%281%29.pdf>. Accessed on 24 October 2025.

In addition, AVZ, which was a partner of Cominière at the time of the sale, alleges that, by carrying out the sale opaquely, Cominière has prevented AVZ from exercising its pre-emption right, to which the company would have been entitled as a majority shareholder in the joint venture. As mentioned above, the dispute between Cominière and AVZ was brought to international arbitration and it is still ongoing, without any final ruling on this issue.

3

Difficulty tracing the effective ownership of certain companies



Throughout the history of Manono, many companies have tried to obtain permits to explore, and later exploit, lithium deposits, but for some it is difficult to trace who is really behind them. An example is Dathomir, which was part of the Dathcom joint venture with Cominière and the Australian company AVZ before its dissolution and the assignment of the permit to a new joint venture. At the head of Dathomir was Cong Maohuai, known as Simon Cong, a Chinese businessman involved in various projects in the DRC and [suspected of having strong links](#)¹⁴ with the Congolese political class, especially the Kabila family, [as revealed](#)¹⁵ by the Congo HoldUp investigation. He is particularly believed to be close to the President's brother, Zoé Kabila, who was governor of the Tanganyika province (where Manono is located) between 2019 and 2021. While Dathomir was operating in Manono, the area was [considered to be Zoé Kabila's fief](#).¹⁶ According to a [2019 report](#)¹⁷, a minority stake in Dathomir would be owned by Guy Loando, who has been serving as Minister in the Congolese government since 2021.

14 The Sentry, The Backchannel. State Capture and Bribery in Congo's Deal of the Century, November 2021, available at <https://thesentry.org/wp-content/uploads/2021/11/TheBackchannel-TheSentry-Nov2021.pdf>. Accessed on 24 October 2025.

15 S. Rolley (RFI), Congo Hold-Up: Congo Construction Company, le scandale du siècle, 28 November 2021, available at <https://www.rfi.fr/fr/afrique/20211128-congo-hold-up-congo-construction-company-le-scandale-du-si%C3%A8cle>. Accessed on 24 October 2025.

16 Africa Intelligence, RDC: Tête de pont du business chinois à Kinshasa, Simon Cong sort du lithium de Manono, 21 October 2020, available at <https://www.africaintelligence.fr/afrique-centrale/2020/10/21/tete-de-pont-du-business-chinois-a-kinshasa-simon-cong-sort-du-lithium-de-manono,109614188-art>. Accessed on 24 October 2025.

17 The Boatman Capital Research, AVZ Minerals: The Proceeds of Corruption?, July 2019, available at <https://theboatmancapital.com/wp-content/uploads/2021/06/Boatman-Report-on-AVZ-Minerals-July-2019.pdf>. Accessed on 24 October 2025.

Dathomir is not the only example of a company with opaque ownership that is linked to an intermediary with alleged political connections. AVZ as well was run, at the time of the first acquisitions in Manono and all the way until 2018, by Klaus Eckhof, a German geologist active in the Congolese mining sector for over 20 years, and also [considered to be close](#)¹⁸ to the Kabila circle. Moving beyond the Manono-Kitotolo project, other permits in the area present similar characteristics. It is the case of the Canadian company Tantalex, which owns a tailings exploitation permit on top of the main deposit, and whose [non-executive director](#)¹⁹ was Eckhof until June 2023. Eckhof was also involved in the activities of two other companies that have acquired and relinquished permits around Manono over the years, not always in a transparent manner. One is Alphamin, the other one is AJN Resources. [Alphamin bought some permits](#)²⁰ (referred to as “Manono Extension”) back in 2012 from a company with opaque ownership, to then relinquish them soon after. They then ended up in the hands of a company controlled by a partner of Eckhof, that [sold them to AVZ](#) in the end.²¹

18 Africa Intelligence, RDC: Le serial investisseur Klaus Eckhof de retour dans l'étain de la zone de Bisié, 21 October 2021, available at <https://www.africaintelligence.fr/afrique-centrale/2021/10/21/le-serial-investisseur-klaus-eckhof-de-retour-dans-l-etain-de-la-zone-de-bisie,109699399-art>. Accessed on 24 October 2025.

19 Tantalex Lithium Resources, Tantalex Lithium fait le point sur ses activités opérationnelles, 7 June 2023, available at <https://tantalexlithium.com/fr/tantalex-lithium-fait-le-point-sur-ses-activites-operationnelles/>. Accessed on 24 October 2025.

20 Alphamin Resources Corp., Management's Discussion and Analysis of Financial Conditions and Results of Operations for the Years Ended December 31, 2015 and 2014 (2016), available at <https://www.sedarplus.ca/csa-party/records/document.html?id=b7487ab0aed3ee40bd787a09729d42626440f3cd385c177c3a2d3b47878bf72e>. Accessed on 6 November 2025.

21 AVZ Minerals Limited, Acquisition of Manono Extension Lithium, Tin and Tantalum Project in the Democratic Republic of Congo, 19 September 2016, available at <https://announcements.asx.com.au/asxpdf/20160919/pdf/43b8qgs0ldsmbw.pdf>. Accessed on 6 November 2025.

AJN Resources, on the other hand, signed two term sheets in 2023 (with [Palm Constellation](#)²² and [Future Mining](#)²³, respectively) to obtain a majority stake in two exploration permits surrounding Manono-Kitotolo. The ownership of AJN's partner companies in these ventures, especially for Future Mining, raises questions about transparency and the possible involvement of PEPs (Politically Exposed Persons). One of the ventures, the one with Future Mining, however, does not appear anymore on the Mining Cadaster website, and it has not appeared in AJN Resources' presentation to investors or financial statements since the end of 2023, something that generates uncertainty on its current status.

While these elements are not necessarily evidence of wrongdoing, they might raise some concerns and demand for further investigation into the role that these companies and individuals played in Manono over the years.

22 Junior Mining Network, AJN Resources Announces Signing of Binding Term Sheet for Option to Acquire up to 70% Indirect Interest in Highly Prospective Lithium Exploration Permit Located on Manono Trend in Eastern DRC, 2 June 2023, available at <https://www.juniorminingnetwork.com/junior-miner-news/press-releases/2608-cse/ajn/142576-ajn-resources-inc-announces-signing-of-a-binding-term-sheet-for-an-option-to-acquire-up-to-a-70-indirect-interest-in-a-highly-prospective-lithium-exploration-permit-located-on-the-manono-trend-in-eastern-drc.html>. Accessed on 24 October 2025.

23 Newsfile, AJN Resources Inc. Announces Signing of a Binding Term Sheet for an Option to Acquire up to a 70% Indirect Interest in a Second Highly Prospective Lithium Exploration Permit Located on the Manono Trend in Eastern DRC, 30 August 2023, available at <https://www.newsfilecorp.com/release/178944/AJN-Resources-Inc.-Announces-Signing-of-a-Binding-Term-Sheet-for-an-Option-to-Acquire-up-to-a-70-Indirect-Interest-in-a-Second-Highly-Prospective-Lithium-Exploration-Permit-Located-on-the-Manono-Trend-in-Eastern-DRC>. Accessed on 24 October 2025.

4

Questionable role of certain companies in mining project development and the transfer of mining rights

2016

Dathomir buys
70% of Dathcom.

Sale of 60%
to AVZ

2017



This is especially true for Dathomir, whose ownership is not the only mystery around this company. Its role in the dealings related to mining in Manono is also unclear. In 2016, it acquired 70% of shares in Dathcom, immediately [reselling 60% to AVZ](#).²⁴ It is therefore unclear what role Dathomir played other than acting as an intermediary. The same could be said of MINOR, a company with suspected links with Cong, that bought mining rights on Manono's tailings, only to [resell them](#)²⁵ to the Canadian company Tantalex seemingly without investing anything. Tantalex [paid \\$3 million](#)²⁶ to MINOR in 2018, and then more [between 2021 and 2022](#)²⁷ to gain full control over the permit. MINOR made a total of around \$7 million as a result of these transactions, but it is not known whether it invested anything in the project, or at which price it got the shares in the first place from Cominière.

Both examples raise a number of questions: what was the role of these companies in the two projects? What mining experience did Dathomir have? Given the formal link of Mr Cong to Dathomir, what kind of due diligence did AVZ carry out before acquiring shares in Dathcom from them? And what about Tantalex when it bought MINOR's stake and mining rights?

24 The Boatman Capital Research, AVZ: Experiencing a Chinese burn?, 20 May 2022, available at https://theboatmancapital.com/wp-content/uploads/2022/05/AVZ-Minerals-20-May-2022_.pdf. Accessed on 24 October 2025.

25 Tantalex Lithium Resources, Tantalex Exercises Option to Acquire Majority Stake in the Manono Lithium Tailings Project and Announces Issuance of Shares, 17 June 2022, available at <https://tantalexlithium.com/tantalex-exercises-option-to-acquire-majority-stake-in-the-manono-lithium-tailings-project-and-announces-issuance-of-shares/>. Accessed on 24 October 2025.

26 Tantalex Resources, Tantalex Resources Corporation Management's Discussion and Analysis for the Three Months Ended May 31, 2021, 21 July 2021, available at <https://www.sedarplus.ca/csa-party/records/document.html?id=ed36f200917d4767a1844c846f72a72cad14e5fdc1f814665662989c75c1ece4>. Accessed on 24 October 2025.

27 Tantalex Lithium Resources, Tantalex Lithium Resources (Formerly Tantalex Resources Corporation) Management's Discussion and Analysis for the Years Ended February 28, 2022 and 2021, 27 June 2022, available at <https://tantalexlithium.com/wp-content/uploads/2022/06/TTX-MDA-FEB-2022.pdf>. Accessed on 24 October 2025.

5


Questionable respect of procedures in the attribution of mining permits

LISTE DES PRESENCES A LA CONSULTATION DU PUBLIQUE POUR L'ELABORATION DE L'ETUDE D'IMPACT ENVIRONNEMENTAL ET SOCIAL DU PROJET MINIER MANONO LITHIUM
PROVINCE DE TANGANYIKA

Date de la Consultation: *Vendredi, le 03 MAI 2024*
Lieu de la Consultation: *Gouade-salle / Cathédrale St BARTE SE MANONO*

N°	NOMS	FONCTION/ORGANISATION	NUMERO
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ETUDE D'IMPACT ENVIRONNEMENTAL ET SOCIAL (EIES)/PLAN DE GESTION ENVIRONNEMENTALE ET SOCIALE (PGES) POUR LA TRANSFORMATION DU PERMIS DE RECHERCHES (PR) 15775 EN PERMIS D'EXPLOITATION (PE)



REPUBLICQUE DEMOCR CONGO
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Requ le *16/05/2024*
Par *XRAIN*
N° d'enregistrement *3482*
Paraphé *[Signature]*

Avril 2024

A key question concerns the process for granting and revoking mining permits at Manono. Over the years, several companies have successively attempted to obtain an exploration permit, then an exploitation permit, with varying degrees of success. AVZ almost succeeded in obtaining an exploitation permit, which was actually granted in 2022, but [revoked](#)²⁸ shortly thereafter, under questionable circumstances. Following this incident, [the joint venture was dissolved](#)²⁹: AVZ was excluded from the project, and the permit was split in two: a northern portion, now owned by Manono Lithium SAS (Cominière + Jinxiang Lithium (Zijin)), and the southern portion, which has once again become the exclusive property of Cominière.

While AVZ Minerals spent almost a full year trying to obtain its exploitation permit, Manono Lithium SAS obtained it in just four months, a record time that could call into question the respect of the procedure for converting PR 15575 into a PE. Adding to this is the absence or public inaccessibility of certain documents required by law.

[The 2018 Mining Code](#)³⁰ requires an environmental and social impact assessment and management plan before converting an exploration permit into an exploitation permit. The summary of this assessment must be published within fifteen

28 AVZ Minerals Limited, Issue of Two New Ministerial Decrees Manono Lithium and Tin Project, 6 February 2023, available at <https://announcements.asx.com.au/asxpdf/20230206/pdf/45lb934rh2k8tn.pdf> Accessed on 24 October 2025.

29 International Chamber of Commerce (ICC), AVZI, GLH and Dathcom V. Cominiere, 2023, available at <https://jusmundi.com/fr/document/decision/fr-avz-international-pty-ltd-green-lithium-holdings-pte-ltd-and-dathcom-mining-sa-v-societe-congolaise-dexploitation-miniére-cominiere-i-ordonnance-wednesday-15th-november-2023>

30 Loi n.18/001 du 09 mars 2018 modifiant et complétant la Loi n. 007/2002 du 11 juillet 2002 portant Code Minier, available at <https://www.leganet.cd/Legislation/JO/2018/JOS.28.03.2018.pdf>. Accessed on 25 October 2025.

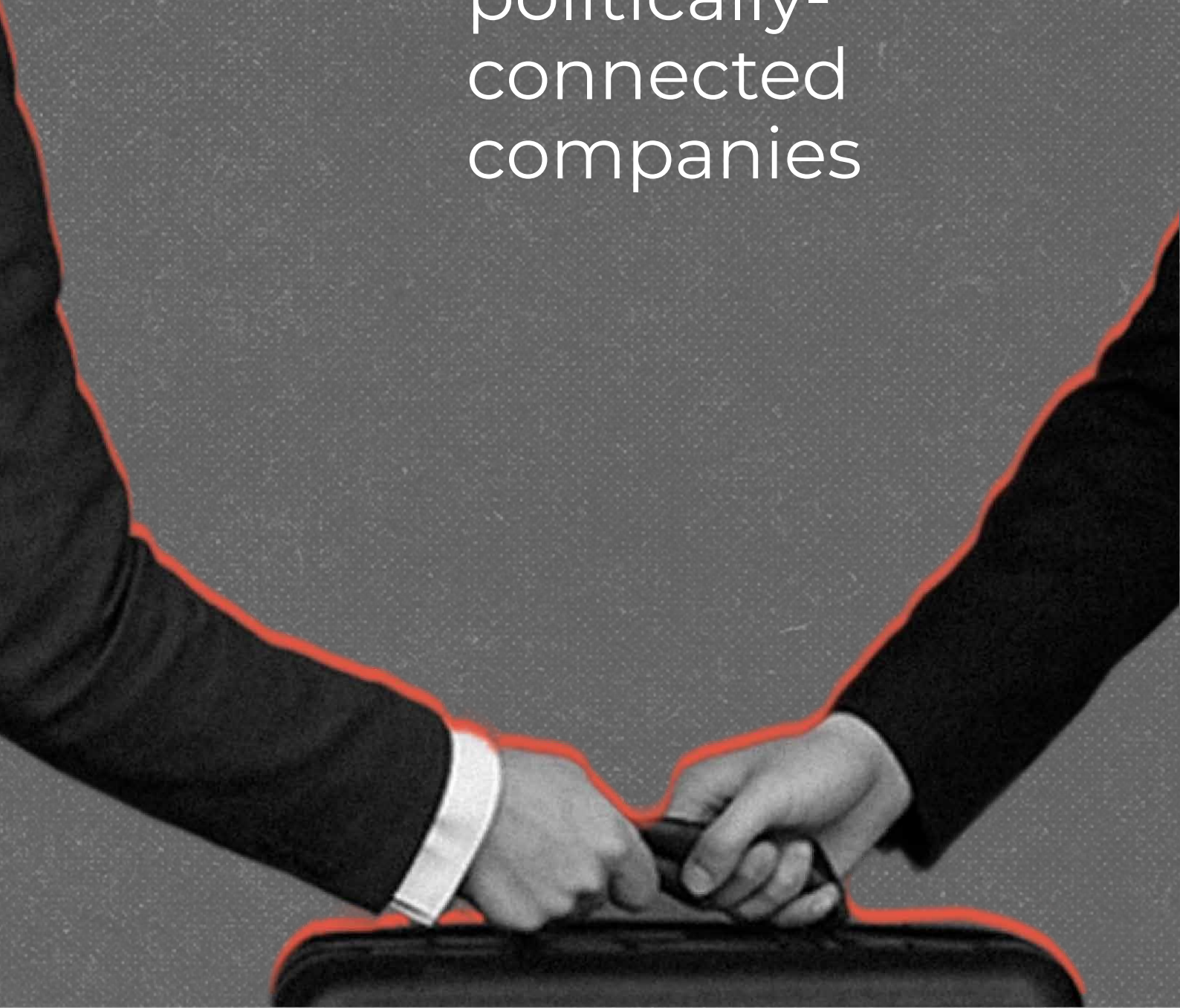
days of its receipt by the competent authority. Manono Lithium SAS's assessment does not appear to be in the public domain.

Resource Matters was able to obtain a list of attendances for the public consultation conducted as part of the preparation of the environmental and social impact assessment for the Manono Lithium mining project by Manono Lithium SAS, as well as proof of the existence of the environmental and social impact assessment filed by Manono Lithium SAS with the Mining Registry. However, none of these documents nor their summaries have been made public, contrary to the requirements of the 2018 Mining Code. Furthermore, analysis of these documents reveals a major inconsistency: the public consultation for the preparation of the ESIA was organized a year after the ESIA was filed with the Mining Registry, whereas the 2018 Mining Code stipulates that it must take place during the study's completion. This temporal irregularity reinforces suspicions that Manono Lithium did not follow the correct procedures for conducting an ESIA aimed at obtaining the conversion of its exploration permit into an exploitation permit.

Even for MINOCOM, which has obtained a permit to exploit the tailings, it is not clear whether it has submitted a feasibility study or a social and environmental impact study for its exploitation activities.

6

The role of
Cominière and
its apparent
ease at doing
business with
politically-
connected
companies



Cominière has played a fundamental role in the battle of private companies to obtain permits in Manono. As in the copper/cobalt sector, it is generally the state company that holds the mining permits. Private companies intending to engage in a mining project must enter into a joint venture with the public company – Cominière in the case of Manono – to gain access to exploration and then mining rights. In Manono, Cominière has created and dissolved joint ventures with a number of companies: MMCS first, replaced by Dathomir and AVZ, and then by Zijin. The procedure and reasons for each dissolution remain opaque and have led to [claims](#)³¹(see also [here](#)³²) by former partners who suddenly lost their permits after the sudden dissolution of joint ventures they were part of.

Moreover, as mentioned above, Dathomir was suspected of being controlled by individuals with alleged ties to the political elite. Given also the lack of proven expertise in the mining sector, the question remains on what kind of due diligence, if any, has Cominière carried out in relation to the risks of conducting business with a politically-connected company.

31 International Chamber of Commerce (ICC), MMCS v. Cominière, 2019, available at <https://jsumundi.com/en/document/decision/en-mmcs-strategic-1-v-congolaise-dexploitation-miniére-sa-constitution-of-the-tribunal>. Accessed on 24 October 2025.

32 See footnote 4.

7

Opacity in the
publication of
contracts of
joint venture
between
Cominière
and private
companies



Joint-venture –
Manono lithium SAS

Contrary to existing legal provisions regarding transparency in the mining sector in the DRC, the majority of joint venture contracts between the state portfolio company (Cominière) and its private partners have not been made public to date, nor are the corresponding financial transactions known. The most notable example is the contract creating the Manono Lithium SAS joint venture, which was signed in 2023 and has never been made publicly available. This goes against the provisions of the [DRC Mining Code](#),³³ according to which mining contracts must be published in the official Journal and on the website of the Ministry of Mines within 60 days from their date of signature. The contracts establishing MINOCOM for the exploitation of the tailings have also never been published, including the adjustments made following the integration of Tantalex.

33 Loi n.18/001 du 09 mars 2018 modifiant et complétant la Loi n. 007/2002 du 11 juillet 2002 portant Code Minier, available at <https://www.leganet.cd/Legislation/JO/2018/JOS.28.03.2018.pdf>. Accessed on 25 October 2025.

8

Dubious payments to a politically connected NGO



In 2024, the Chinese company Zijin, partner of the state company Cominière in the Manono Lithium SAS joint venture holding mining permit 15775, [made a \\$70 million transfer](#)³⁴ to an NGO named Le Bouclier, which is supposed to provide humanitarian aid in the eastern part of the DRC. The president of this NGO is Jean David E'ngazi, a member of Cominière's Board of Directors and Adviser to the Republic. This payment has raised serious suspicions of corruption considering Mr. E'ngazi's political role and his involvement with the state company in joint venture with Zijin. This donation is particularly noteworthy because it is more than double the amount that Zijin paid to Cominière for its stake in Manono Lithium SAS. Currently, the actual use of the \$70 million remains unknown.

In addition, [the IGF report](#)³⁵ indicates that a part of the \$33 million that Zijin paid to Cominière for its stake was used to pay a consultancy firm called Focus Plaidoirie, allegedly linked to Lisette Kabanga, who was a close advisor of President Tshisekedi at the time, and President of the board of Cominière, which makes her a politically exposed person. This firm received \$1.7 million as part of this deal, according to the IGF. Payments to a politically exposed person as a result of a mining deal could constitute a serious corruption red flag, according to [civil society organizations](#).³⁶

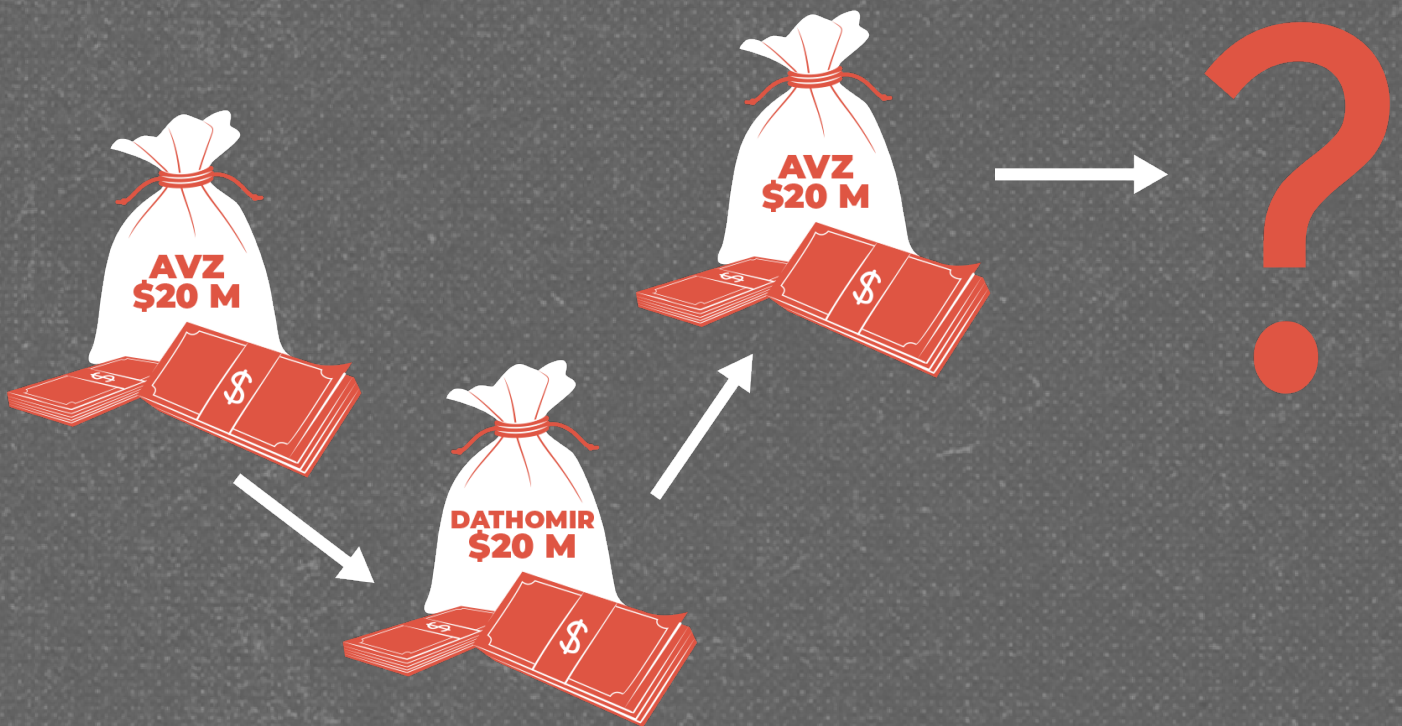
34 Africa Intelligence, RDC: Lithium: l'intrigant virement de 70 millions de dollars de Zijin Mining à une ONG, 19 April 2024, available at <https://www.africaintelligence.fr/afrique-centrale/2024/04/19/lithium--l-intrigant-virement-de-70-millions-de-dollars-de-zijin-mining-a-une-ong.110217536-art>. Accessed on 24 October 2025.

35 See footnote 13.

36 Global Witness, The lithium rush in Africa risks fuelling corruption and failing citizens, 14 November 2023, available at <https://globalwitness.org/en/campaigns/transition-minerals/a-rush-for-lithium-in-africa-risks-fuelling-corruption-and-failing-citizens/>. Accessed on 24 October 2025.

9

Missing money? (The \$20 million missing from AVZ's deposit account)



AVZ had expressed the wish to acquire the remaining 15% shares of Dathomir Mining, one of its partners in the Dathcom joint venture. AVZ allegedly transferred \$20 million into Dathomir's account to definitively acquire the remaining stake.

However, Dathomir seemingly did not consent to the sale, or withdrew from it, and returned the \$20 million it had received to AVZ's bank account—an action that AVZ did not appreciate to the point of [taking legal action](#).³⁷ The money was put in a newly created escrow account [managed by AVZ's lawyer](#)³⁸ to hold the \$20 million until the dispute was definitively resolved.

However, a few months later, the \$20 million, which was supposed to remain untouched in the account until resolution of the dispute, [disappeared](#)³⁹. The arbitration court has recently pronounced itself [in favor of AVZ](#)⁴⁰ at least for part of the 15% share acquisition, but to this date it remains unclear where the money went and why it was used.

37 International Chamber of Commerce (CCI), AVZ v. Dathomir (I), 1 December 2022, available at <https://jusmundi.com/fr/document/other/en-avz-minerals-limited-and-avz-international-pty-ltd-v-dathomir-mining-sarl-i-press-release-of-avz-minerals-limited-on-arbitration-proceedings-update-and-interim-financial-report-clarification-wednesday-22nd-march-2023>. Accessed on 24 October 2025.

38 C. Kakule (Okapi News), Me Christian Lukusa, bouc émissaire d'AVZ: Où sont passés les 20 millions de dollars? (Tribune), 28 November 2024, available at <https://okapinews.net/nation/rdc-me-christian-lukusa-bouc-emissaire-davz-ou-sont-passes-les-20-millions-de-dollars-tribune/>. Accessed on 24 October 2025.

39 AVZ Minerals Limited, In-country Legal Update, 31 July 2024, available at <https://static1.squarespace.com/static/5934d2ae6b8f5beeb5ba23f3/t/66a9a066755ebf4107cc6f8b/1722392679661/20240731+Announcement+-+In-Country+Legal+Update.pdf>. Accessed on 24 October 2025.

40 See footnote 37.

Conclusion

Lithium exploitation in Manono represents an invaluable opportunity not only for companies, which will profit from such a rich deposit of a highly demanded material worldwide. It can be an important turning point for the people living in Manono as well, who have been waiting for the past decade for the beginning of commercial activities. Finally, it will be a chance for the DRC to position itself as a global player in the commercialization of this mineral, opening the door to further investments in the country and to benefits for its economy.

However, turning a blind eye to the emerging patterns of opacity and potential corruption risks leading to a repetition of those same patterns that have pillaged the DRC in the cobalt/copper industry: disregard of laws and procedures to favor politically connected companies; the consequent absence of fair competition; shell companies diverting money and making it untraceable; middlemen with links to the political elite ensuring the enrichment of individuals but not of communities... The playbook is not new, and it has already brought great damage to the country. The lithium sector is an opportunity for the DRC, and for companies interested in investing in it, to start anew and to break the curse that has prevented the people from benefiting from their natural resources until now. But this can only be achieved by respecting the laws, engaging with communities and with the civil society, and putting in place strong transparency and anti-corruption safeguards in any agreement or contract.

On November 14, 2025, we offered a right of reply to Alphamin, AVZ, Mr Cong, Cominière, Dathomir, Mr Eckhof, MINOR, Tantalex and Zijin. Resource Matters did not receive responses within the proposed one-week timeframe.

Sources

- 1 Africa intelligence, Le serial investisseur Klaus Eckhof de retour dans l'étain de la zone de Bisié (2021) <https://www.africaintelligence.fr/afrique-centrale/2021/10/21/le-serial-investisseur-klaus-eckhof-de-retour-dans-l-etain-de-la-zone-de-bisie,109699399-art>
- 2 Africa intelligence, Lithium : l'intrigant virement de 70 millions de dollars de Zijin Mining à une ONG (2024) <https://www.africaintelligence.fr/afrique-centrale/2024/04/19/lithium--l-intrigant-virement-de-70-millions-de-dollars-de-zijin-mining-a-une-ong,110217536-art>
- 3 Africa Intelligence, RDC: Tête de pont du business chinois à Kinshasa, Simon Cong sort du lithium de Manono (2020) <https://www.africaintelligence.fr/afrique-centrale/2020/10/21/tete-de-pont-du-business-chinois-a-kinshasa-simon-cong-sort-du-lithium-de-manono,109614188-art>
- 4 Alphamin Resources Corp., Management's Discussion and Analysis of Financial Conditions and Results of Operations for the Years Ended December 31, 2015 and 2014 (2016) <https://www.sedarplus.ca/csa-party/records/document>.
- 5 ASIC, ASIC sues suspended WA mineral exploration company AVZ Minerals and directors for disclosure failures, (2025), <https://www.asic.gov.au/about-asic/news-centre/find-a-media-release/2025-releases/25-271mr-asic-sues-suspended-wa-mineral-exploration-company-avz-minerals-and-directors-for-disclosure-failures/>.
- 6 AVZ Minerals Limited, Acquisition of Manono Extension Lithium, Tin and Tantalum Project in the Democratic Republic of Congo, 19 September 2016, available at <https://announcements.asx.com.au/asxpdf/20160919/pdf/43b8qgs0ldsmbw.pdf>.
- 7 AVZ Minerals Limited, AVZ wins ICC proceedings – AVZ legally acquired Dathomir's shares (2025) <https://jusmundi.com/en/document/other/en-avz-minerals-limited-and-avz-international-pty-ltd-v-dathomir-mining-sarl-i-press-release-of-avz-minerals-limited-on-outcome-of-arbitration-wednesday-2nd-july-2025>
- 8 AVZ Minerals Limited, Company Statement AFP Investigation, (2024), <https://avzminerals.com.au/investor-centre/2024/12/10/company-statement-afp-investigation>.

- 9 AVZ Minerals Limited, In-country Legal Update (2024) <https://share.google/bmka7YFnbvdq2HtET>
- 10 AVZ Minerals Limited, Issue of two new Ministerial Decrees Manono Lithium and Tin project (2023) <https://announcements.asx.com.au/asxpdf/20230206/pdf/45lb934rh2k8tn.pdf>
- 11 Clowes, W. (Bloomberg), KoBold Metals granted rights to explore for lithium in congo (2025) <https://www.bloomberg.com/news/articles/2025-08-27/kobold-metals-granted-rights-to-explore-for-lithium-in-congo>
- 12 Clowes, W. and Kavanagh, M.J. (Bloomberg), Kobold inks Congo exploration deal to grow us mineral access (2025) <https://www.bloomberg.com/news/articles/2025-07-18/kobold-inks-exploration-deal-in-congo-to-boost-us-mineral-access>
- 13 Cominière and Jin Cheng v. AVZI and GLH Congolaise d'Exploitation Minière SA (Cominière) and Jin Cheng Mining Company Limited v. AVZ International Pty Ltd and Green Lithium Holdings Pte Ltd, ICC Case No. 27769/SP/ETT/SVE(2023) https://jusmundi.com/fr/document/other/en-congolaise-dexploitation-mini%C3%A9re-sa-comini%C3%A8re-and-jin-cheng-mining-company-limited-v-avz-international-pty-ltd-and-green-lithium-holdings-pte-ltd-press-release-of-avz-minerals-limited-on-related-arbitration-proceedings-update-wednesday-27th-september-2023#other_document_34994
- 14 Global Witness, A rush for lithium in Africa risks fuelling corruption and failing citizens (2023) <https://globalwitness.org/en/campaigns/transition-minerals/a-rush-for-lithium-in-africa-risks-fuelling-corruption-and-failing-citizens/>
- 15 Inspection Générale des Finances, Rapport-synthèse de l'inspection générale des finances sur la gestion des actifs miniers de la rdc par l'entreprise publique la cominiere S.A (2022). [https://congominestorage.blob.core.windows.net/congominestorage/Rapport-IGF-sur-COMINIERE-S-A-6387826ba915e%20\(1\).pdf](https://congominestorage.blob.core.windows.net/congominestorage/Rapport-IGF-sur-COMINIERE-S-A-6387826ba915e%20(1).pdf)
- 16 International Chamber of Commerce (CCI), AVZ v. Dathomir (I), 1 December 2022, <https://jusmundi.com/fr/document/other/en-avz-minerals-limited-and-avz-international-pty-ltd-v-dathomir-mining-sarl-i-press-release-of-avz-minerals-limited-on-arbitration-proceedings-update-and-interim-financial-report-clarification-wednesday-22nd-march-2023>.
- 17 International Chamber of Commerce (CCI), Cominière and Jin Cheng v. AVZI and GLH, 28 April 2023, <https://jusmundi.com/fr/document/other/en-congolaise-dexploitation-mini%C3%A9re-sa-comini%C3%A8re-and-jin-cheng-mining-company-limited-v-avz-international-pty-ltd-and-green-lithium->

[holdings-pte-ltd-press-release-of-avz-minerals-limited-on-related-arbitration-proceedings-update-wednesday-27th-september-2023#other-document_34994](#)

- 18** International Chamber of Commerce (ICC), MMCS v. Cominière, 2019, <https://jsumundi.com/en/document/decision/en-mmcs-strategic-1-v-congolaise-dexploitation-miniere-sa-constitution-of-the-tribuna>
- 19** Junior Mining Network, AJN Resources Announces Signing of Binding Term Sheet for Option to Acquire up to 70% Indirect Interest in Highly Prospective Lithium Exploration Permit Located on Manono Trend in Eastern DRC (2023) <https://www.juniorminingnetwork.com/junior-miner-news/press-releases/2608-cse/ajn/142576-ajn-resources-inc-announces-signing-of-a-binding-term-sheet-for-an-option-to-acquire-up-to-a-70-indirect-interest-in-a-highly-prospective-lithium-exploration-permit-located-on-the-manono-trend-in-eastern-drc.html>
- 20** Kakule, C. (Okapinews), Me Christian Lukusa, bouc émissaire d'AVZ : Où sont passés les 20 millions de dollars ? (Tribune)!(2024) <https://okapinews.net/nation/rdc-me-christian-lukusa-bouc-emissaire-davz-ou-sont-passes-les-20-millions-de-dollars-tribune/>
- 21** Kavanagh, M.J. (Bloomberg),Congo State Miner Must Pay €39 Million to AVZ in Lithium Dispute (2025) <https://www.bloomberg.com/news/articles/2025-03-14/congo-state-miner-must-pay-39-million-to-avz-in-lithium-dispute>
- 22** KoBold Metals, KoBold Metals and AVZ Agree on Framework for KoBold to Acquire AVZ's Interests in the Manono Lithium Deposit in DRC (2025) <https://www.koboldmetals.com/news/kobold-metals-to-acquire-avzs-interests-in-the-manono-lithium-deposit-in-drc/>
- 23** Loi n° 007/2002 du 11 juillet 2002 portant code minier telle que modifiée et complétée par la loi n° 18/001 du 09 mars 2018 <https://www.icnl.org/wp-content/uploads/miningcode.pdf>
- 24** Loi n° 08/010 du 07 juillet 2008 fixant les règles relatives à l'organisation et à la gestion du portefeuille de l'état(2008). <http://www.droit-afrique.com/upload/doc/rdc/RDC-Loi-2008-10-gestion-du-portefeuille-de-l-Etat.pdf>
- 25** Newsfilecorp, AJN Resources Inc. Announces Signing of a Binding Term Sheet for an Option to Acquire up to a 70% Indirect Interest in a Second Highly Prospective Lithium Exploration Permit Located on the Manono Trend in Eastern DRC (2023) <https://www.newsfilecorp.com/release/178944/AJN-Resources-Inc.-Announces-Signing-of-a-Binding-Term-Sheet-for->

[an-Option-to-Acquire-up-to-a-70-Indirect-Interest-in-a-Second-Highly-Prospective-Lithium-Exploration-Permit-Located-on-the-Manono-Trend-in-Eastern-DRC](#)

- 26 Reuters, AVZ Minerals says Congo deal with KoBold breaches arbitration order (2025) <https://www.reuters.com/world/africa/avz-minerals-says-congo-deal-with-kobold-breaches-arbitration-order-2025-07-21/#:~:text=The%20DRC%20government%20said%20on,need%20to%20start%20your%20day>.
- 27 Rolley, S. (Rfi), Congo Hold-Up: Congo Construction Company, le scandale du siècle (2021) <https://www.rfi.fr/fr/afrique/20211128-congo-hold-up-congo-construction-company-le-scandale-du-si%C3%A8cle>
- 28 Tantalex Lithium, Tantalex exercises option to acquire majority stake in the manono lithium tailings project and announces issuance of shares (2022) <https://tantalexlithium.com/tantalex-exercises-option-to-acquire-majority-stake-in-the-manono-lithium-tailings-project-and-announces-issuance-of-shares/>
- 29 Tantalex Lithium, Tantalex lithium fait le point sur ses activites operationnelles (2023) <https://tantalexlithium.com/fr/tantalex-lithium-fait-le-point-sur-ses-activites-operationnelles/>
- 30 Tantalex Lithium Resources Corp., Tantalex lithium resources corporation (formerly tantalex resources corporation) management's discussion and analysis for the years ended February 28, 2022 and 2021 (2022) <https://tantalexlithium.com/wp-content/uploads/2022/06/TTX-MDA-FEB-2022.pdf>
- 31 Tantalex Lithium Resources Corp., Tantalex resources corporation management's discussion and analysis for the three months ended May 31, 2021 (2021) <https://www.sedarplus.ca/csa-party/records/document.html?id=ed36f200917d4767a1844c846f72a72cad14e5fdc1f814665662989c75c1ece4>
- 32 The Boatman Capital Research, AVZ Minerals: Experiencing A Chinese Burn? (2022) https://theboatmancapital.com/wp-content/uploads/2022/05/AVZ-Minerals-20-May-2022_.pdf
- 33 The Boatman Capital Research, AVZ Minerals: The Proceeds of Corruption? (2019) <https://theboatmancapital.com/wp-content/uploads/2021/06/Boatman-Report-on-AVZ-Minerals-July-2019.pdf>
- 34 The Sentry, The Backchannel State Capture and Bribery in Congo's Deal of the Century (2021) <https://thesentry.org/wp-content/uploads/2021/11/TheBackchannel-TheSentry-Nov2021.pdf>

Annex

Main companies operating in Manono (past and present)

1. AJN Resources

A company affiliated with businessman Klaus Eckhof. In 2023, it acquired two permits that make up the “Manono Northeast” project: permit 15282, purchased from Palm Constellation, a Congolese company with alleged ties to another Eckhof company; and permit 14537, purchased from Future Mining. The latter is no longer visible on the Mining Registry website.

2. AVZ

An Australian mining company that acquired a 60% stake in Dathcom Mining from Dathomir in 2016, making it a majority shareholder in the joint venture, with all statutory privileges. However, tensions between AVZ and Cominière ultimately forced AVZ out of all its mining rights in the joint venture until its dissolution, prompting AVZ to refer the matter to two international arbitration courts, and paving the way for the splitting of permit 13359 in two.

3. Cominière

La Congolaise de l'Exploitation Minière (or Cominière) is a Congolese State-owned company founded on April 12, 2010.

It is 90% owned by the Ministry of Portfolio of the DRC, and 10% by the National Institute of Social Security. It owns several mining permits in North Katanga, including in the Manono area.

4. Dathcom Mining SA

A joint venture initially created by Cominière (30%) and its partner Dathomir Mining (70%) to explore for and exploit lithium on permit 13359 covering the Manono-Kitotolo deposit. Later, in two separate moments, the joint venture was integrated by two other companies: AVZ Minerals at the end of 2016, and Jinxiang Lithium (a subsidiary of Zijin) in 2021. In 2023, following disagreements between AVZ, which was the majority shareholder, and the public company Cominière, Dathcom Mining was unilaterally dissolved by Cominière.

5. Dathomir Mining

A Congolese company managed by the Chinese businessman Simon Cong, who is believed to have strong connections to Kabila's network. This company is suspected of being owned by entities linked to members of the political elite. In 2016, while there were still unresolved differences between Cominière and MMCS Strategic, Dathomir Mining signed a contract to create a new joint venture with Cominière called "Dathcom Mining" covered by permit 13359 (formerly 12202), in which it held 70% of the shares, while Cominière held 30%.

6. Jinxiang Lithium Limited (filiale de Zijin Mining)

A Chinese company that had integrated Dathcom Mining in 2021 by purchasing a 15% stake from Cominière, a purchase strongly contested by AVZ. Shortly after Zijin's integration into the joint venture, Dathcom Mining was dissolved by Cominière. Meanwhile, Zijin created a new joint venture with Cominière, Manono Lithium

SAS, covered by the new permit 15775 (the northeastern portion of the old permit 13359).

7. Manono Lithium SAS

The joint venture created between the public company Cominière (39%) and Jinxiang Lithium (61%, a subsidiary of Zijin), holder of the section of the Manono-Kitotolo deposit covered by permit 15775 (the northeastern part of the former permit 13359). Manono Lithium SAS obtained an exploitation permit in 2024.

8. Minocom

The joint venture created between the public company Cominière (30%) and the company Minor (70%) holds the mining rights to permit 13698. To date, its shareholding structure would be as follows: Tantalex 52%, Cominière 30% and Minor 18%.

9. Minor SARL

Mines d'Or Resources (MINOR) SARLU was originally managed by Min Guo Wei, a business partner of Simon Cong. In 2017, it formed a joint venture with Cominière to explore waste in Manono. The JV was called MINOCOM SAS, and MINOR held 70%, and Cominière 30%. The President of MINOCOM was Simon Cong. MINOCOM still exists today, but with a different shareholding structure (see Tantalex and Minocom).

10. MMCS Strategic

A company registered in Mauritius that was in a joint venture with Cominière for the exploration of the Manono-Kitotolo site from 2013 to 2016. MMCS had disagreements with Cominière over its alleged inability to properly carry out exploratory work, which allegedly led

the Ministry of Mines to revoke its permit in 2016. MMCS contested the decision and referred the matter to international arbitration, which is still ongoing.

11. Tantalex

Tantalex is a Canadian company. It has been gradually acquiring Minor's stake in the Manono lithium tailings project. Upon publication of the lithium tailings reserve estimate study (which has not taken place yet), Tantalex's stake is expected to increase to 52%. Between 2022 and 2023, Eckhof served as a non-executive director on Tantalex's board of directors. At the end of 2023, Tantalex entered into a marketing agreement with the Swiss giant Glencore.



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