Impact story

Subcontracted workers in DRC cobalt mine receive unpaid wages



Mine: Mutanda Mining S.A.R.L (MUMI)

Location: Kolwezi, Democratic Republic of Congo (DRC)

Sectors: Electronics and automotive (companies are not identified as remediation is still ongoing)

Image: A subcontracted worker receiving his unpaid wages

In June 2026, two groups of subcontracted workers employed by the Mutanda Mining (MUMI) industrial cobalt mine in Kolwezi, DRC, received their unpaid wages. The wage arrears were owed to the workers by their respective employers, two companies subcontracted by MUMI.

Monitoring and findings

From 2023 to 2025, Electronics Watch monitoring partners, Southern Africa Resource Watch (SARW) and Centre d'Aide Juridico Judiciaire (CAJJ), monitored the working conditions of subcontracted workers at MUMI. They conducted individual interviews and focus group discussions with 98 workers employed by eight subcontracting companies. 16 workers subcontracted by one of these companies, referred to here as "Group A", reported their unfair dismissal in 2024 and unpaid wages. The work period for which wages were owed varied by worker from one to three months. Similarly, in 2025, another group of more than 20 subcontracted workers, "Group B", employed by another subcontracting company hired by MUMI, reported unpaid wages covering a period of two to four months.

The monthly value of unpaid wages in both cases ranged from USD 150 to 500.[1] Workers said that their salaries, even when paid on time, were insufficient to meet their needs and those of their families. The monitoring findings based on workers' testimonies indicated that subcontracted workers were receiving lower wages than workers in similar positions employed directly by MUMI.

In addition to the unpaid wages, affected workers reported that the subcontracting companies did not have trade union representation, a violation of Congolese law. Focus group discussions revealed that some subcontracting companies were not meeting their legal obligation to provide workers with pay slips. Furthermore, while Congolese law requires employers to register newly hired workers with the National Social Security Fund (Caisse Nationale de Sécurité Sociale), this was not happening consistently. Unregistered workers are not entitled to social security benefits such as compensation for workplace accidents, family allowances or retirement contributions. Although the investigation related to two firms in particular, the workers emphasized that these issues are present at several companies subcontracted by MUMI.

Remediation process

CAJJ raised the issues of wage arrears and unfair dismissal directly with MUMI, which reported having handled the complaint via its grievance mechanism. CAJJ and MUMI held several meetings to discuss appropriate reparations. MUMI also met with community leaders and one of the subcontracting companies, which paid the workers from Group B in March 2026. While workers were satisfied with the payment, some of them decided to resign anyway. These individuals expressed that they could not take the risk of working for a company that does not consistently pay salaries on time.

MUMI tried unsuccessfully to reach the subcontracting company that had employed workers from Group A, which is based in Zambia.

[1] The workers interviewed were paid in US dollars, not local currency.

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The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the UNGPs state that companies who cause or contribute to adverse impacts on workers should provide remedy. Companies who are linked to the harm caused also have a responsibility to use their leverage to mitigate it. As the subcontractor could not be traced, the contractor also bears a moral responsibility for the workers' unpaid wages. On all of these grounds, responsibility for paying the workers' wages falls to MUMI.

Initially, MUMI offered to transfer the workers to another of its subcontracting companies. The workers rejected this proposal and requested payment of their unpaid wages instead. In June 2026, following discussions with CAJJ, the mine agreed. The total payments made to workers in Group A amounted to approximately USD 6,000. CAJJ was present during the payment process, accompanying workers and ensuring they were paid the amounts they were owed.

Key takeaways

Subcontracting carries specific risks

The use of subcontracting often obscures accountability for labour rights abuses, especially when subcontractors operate outside the formal labour market and do not respect the legal rights of their employees, as was the case with Group A. Subcontracted workers rarely have enough knowledge of the business relationships between the parties, access to decision makers, or the power to pursue remedy in such cases.

Remediation is often an iterative process

Although the miners were paid the wages they were owed, which they considered the most urgent matter, they have not received remedy for the other issues described above. MUMI participates in the Veramark assurance programme (formerly called Copper Mark). Electronics Watch submitted a complaint through Veramark's grievance mechanism in October 2026. The complaint detailed evidence of non-conformance with the Veramark standard. It is hoped that this mechanism will advance remedy on the issues that were not addressed by the direct engagement with MUMI.

Meaningful engagement with civil society was fundamental to securing reparations for the unpaid wages

CAJJ and MUMI held multiple meetings to discuss how to remediate the issues facing subcontracted workers. CAJJ has also been in regular contact with the complaints manager at MUMI. Civil society plays a vital role holding companies to account, especially in these informal environments.