
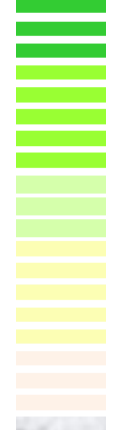


# INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT.TIMAH



GENERAL INFORMATION		
Company details	PT.TIMAH Jl. Jenderal Sudirman 51, Pangkal Pinang 33121, Bangka, Indonesia	  <b>Visual Progress Guide</b>
Date of this report	October 2018	
Date of previous report	Not Relevant	
Report author(s)	Independent External Assessor Supply Chain Standards Manager, International Tin Association Ltd	
Report verified by	Director of Operations & Production and Director - Alwin Albar	
Contact information	<a href="mailto:coc@internationaltin.org">coc@internationaltin.org</a>	
About our company	<p>PT.TIMAH is an Indonesian State-Owned Enterprise established in 1976, which carries out tin mining and smelting as well as other activities. The company is based in Pangkalpinang, Bangka Belitung Province and its operational areas relating to tin are in Bangka Belitung Province and Riau Province. PT.TIMAH has its own on and off-shore mining areas, obtains concentrate from local partners in Indonesia, and performs smelting and refining. The company is planning to expand activities to Nigeria but does not currently produce tin from areas outside Indonesia. The majority of the tin produced by the company is exported to a number of Asia Pacific countries and Europe, with approximately 5% of the total volume of production being absorbed by the Indonesian domestic markets. It is registered on the London Metal Exchange (LME) under the following brands Banka and Mentok.</p> <p>PT.TIMAH holds ISO 9001, ISO 14001 and OHSAS 18001 standards. The company has over 6000 employees in permanent, contract and outsourced roles.</p>	
Significant changes from previous report	Not Relevant	
Further information and references	<ol style="list-style-type: none"> <li>1. PT.TIMAH holds ISO 9001, ISO 14001 and OHSAS 18001 standards.</li> <li>2. Annual Report 2016 <a href="http://www.timah.com/v3/eng/report-annual-report/">http://www.timah.com/v3/eng/report-annual-report/</a></li> </ol>	

# INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT.TIMAH



PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices			
Overview of Principle Performance			
STANDARD		RANKING	ADDITIONAL INFORMATION
1.1	<b>Policies</b> Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code of Conduct.	Progressing	The company is making progress in developing and publishing policies to support legal compliance and improve practices with respect to the expectations of the Code of Conduct, but some policies have not yet been developed.
1.2	<b>Management system</b> Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Third-Party Verified	
1.3	<b>Legal compliance</b> Companies will have and keep up to date all business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including with health and safety and environmental requirements.	Conforming	
1.4	<b>Business integrity</b> Companies will seek to prevent bribery and corruption.	Conforming	
1.5	<b>Transparency</b> Companies will implement the Extractive Industries Transparency Initiative (EITI) if required by national government.	Conforming	
1.6	<b>Whistleblowing</b> Companies will develop and implement whistleblowing procedures to enable employees and stakeholders to report concerns related to company activities, including relevant expectations of the Code of Conduct.	Conforming	
1.7	<b>Training</b> Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 1 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Informal	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to legal compliance and good practices (as defined in the Code of Conduct, Principle 1) and that such training is mandatory for both employees and contractors.



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## PRINCIPLE 2: Seek continual improvement of environmental performance

<b>Overview of Principle Performance</b>	<p>The company has developed and implemented a third-party verified ISO 14001 environmental management system and hence the requirements for “Water quality” and “Air quality” are third-party verified. The requirements for on-shore “Mining closure” and “Reclamation planning” are also third-party verified. Progress is being made with off-shore “Reclamation”.</p> <p>It has demonstrated qualitative awareness of the significance of its water consumption relative to water availability. It informally considers its impact on the local water needs and analyses its impact on soil.</p> <p>It has collected greenhouse emission data since 2014 and is tracking absolute emissions and emissions per tonne of product and could use this data to set energy reduction targets. It has made informal efforts to manage the storage or disposal of tailings in a planned manner, its on-shore tailings are used during reclamation activities and its inert offshore tailings are returned back to the area of extraction. It is collecting biodiversity-related data and has some formal measures in place to manage its negative impact on critical natural habitats.</p> <p>The company is making progress on formalising monitoring the use of banned substances and practises for managing non-tailings waste. It is also making progress in demonstrating avoidance of operating in protected areas and developing a range of environmental training.</p>
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STANDARD		RANKING	ADDITIONAL INFORMATION
2.1	<b>Management system</b> Companies will work towards implementing an environmental management system that utilises the mitigation hierarchy (avoid, minimise, mitigate, compensate) to control and monitor relevant aspects of this Principle 2.	Third-Party Verified	
2.2	<b>Water quality</b> Companies will seek to understand and manage discharges to surface waters and groundwater in order to minimise negative impacts on water quality.	Third-Party Verified <sup>1</sup> Conforming <sup>2</sup>	
2.3	<b>Water consumption and availability</b> Companies will seek to reduce water consumption in their operations in order to minimise negative impacts on water availability.	Informal	The company has a qualitative awareness of how significant its water consumption is relative to water availability, and informally considers wider local needs.
2.4	<b>Land and soil quality</b> Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality.	Informal	The company undertakes analysis of mineral wastes that may affect soil quality, but could improve its collection of soil baseline data against which the significance of mining-related changes can be measured.
2.5	<b>Air quality</b> Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.	Third-Party Verified	

<sup>1</sup> 2.2 Water quality - Terrestrial

<sup>2</sup> 2.2 Water quality - Offshore



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2.6	<b>Greenhouse gases</b> Companies emitting more than 25,000 tonnes of CO2-equivalent will seek to understand direct and indirect greenhouse emissions and consider economic reduction initiatives appropriate to the nature and scale of operations.	Progressing		The company has collected greenhouse emission data since 2014 and is tracking absolute emissions and emissions per tonne of product.
2.7	<b>Energy consumption</b> Companies will seek to identify technically and financially feasible measures for reducing the direct and indirect consumption of energy per unit of production or increasing the share from renewable sources.	Progressing		The company is in the process of acquiring more detailed information on energy consumption, but to improve its rating it could use this baseline to underpin energy saving targets and initiatives.
2.8	<b>Tailings management</b> Companies will store or dispose of tailings in a manner that minimises the risk of impacts to the environment and human health.	Informal <sup>3</sup>	Conforming <sup>4</sup>	<b>Terrestrial:</b> The company has made informal attempts to manage the storage or disposal of tailings in a planned manner, although tailings is used during reclamation activities.
2.9	<b>Hazardous waste management</b> Wherever possible companies will avoid the generation of hazardous wastes; where this is not possible companies will manage and dispose of wastes in a manner that minimises negative impacts on human health and the environment.	Progressing <sup>5</sup>	Progressing <sup>6</sup>	<b>Terrestrial:</b> The company is exploring ways to safely use hazardous wastes in ways that improve resource use efficiency (for example, waste oil as a fuel source in smelting activities); to improve its rating, the company could also demonstrate it is implementing measures to reduce the generation of hazardous wastes.  <b>Offshore:</b> The company could also demonstrate hazardous wastes generated offshore are transferred using safe and environmentally sound methods to suitable onshore facilities for reuse, treatment or disposal.

<sup>3</sup> 2.8 Tailings management - Terrestrial

<sup>4</sup> 2.8 Tailings management - Offshore

<sup>5</sup> 2.9 Hazardous waste management - Terrestrial

<sup>6</sup> 2.9 Hazardous waste management - Offshore

# INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT.TIMAH



2.10	<p><b>Non-hazardous and inert waste management</b> Wherever possible companies will minimise the production of non-hazardous and inert wastes and consider reuse and recycling options before disposing of them in an appropriate manner.</p>	Progressing <sup>7</sup>	Inadequate <sup>8</sup>	<p><b>Terrestrial:</b> The company has some measures or plans in place to manage the generation, reuse and recycling of non-hazardous and inert wastes, including the composting of organic wastes for reuse within its operations.</p> <p><b>Offshore:</b> To improve its rating the company could demonstrate it returns non-hazardous and inert wastes from offshore activities to a terrestrial location and considers reuse and recycling options before disposing of them in an appropriate manner.</p>
2.11	<p><b>Banned substances</b> Companies will not use substances that are banned under international convention or local laws.</p>	Informal		<p>The company monitors the chemicals its uses, but to improve its rating could implement procedures to routinely compare these and other chemicals it is considering for use with current lists of chemicals banned under international conventions and local laws.</p>
2.12	<p><b>Biodiversity protection</b> Companies will seek to understand potential impacts on biodiversity and avoid activities that significantly modify or degrade critical natural habitats through an appropriate action plan.</p>	Progressing <sup>9</sup>	Inadequate <sup>10</sup>	<p><b>Terrestrial:</b> The company is collecting biodiversity-related data and has some formal measures or plans in place to manage negative impacts on critical natural habitats through closure planning and rehabilitation of disturbed sites.</p> <p><b>Offshore:</b> It is unclear whether and how the company's offshore activities affect critical natural habitats; to improve its rating the company could define the location of such habitats relative to its operations and confirm that tailings disposal in the offshore environment does not negatively impact critical natural habitats.</p>

<sup>7</sup> 2.10 Non-hazardous and inert waste management - Terrestrial

<sup>8</sup> 2.10 Non-hazardous and inert waste management - Offshore

<sup>9</sup> 2.12 Biodiversity protection - Terrestrial

<sup>10</sup> 2.12 Biodiversity protection - Offshore



## INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT.TIMAH

2.13	<p><b>Protected areas</b> Companies will respect legally protected areas in accordance with local laws, and will seek to understand and manage potential impacts of operations on adjacent zones.</p>	Progressing <sup>11</sup>	Progressing <sup>12</sup>	<p><b>Terrestrial:</b> The company is not operating within legally protected areas and has some formal measures or plans to manage negative impacts when working in areas adjacent to legally protected areas</p> <p><b>Offshore:</b> The company does not extract from protected offshore areas; to improve its rating, the company could present evidence confirming the dispersal of tailings does not negatively impact such areas.</p>
2.14	<p><b>Closure and reclamation</b> Companies will allocate adequate financial resources to enable implementation of closure and rehabilitation of operations in accordance with local requirements and expectations of key stakeholders.</p>	Third-Party Verified <sup>13</sup>	Progressing <sup>14</sup>	<p><b>Offshore:</b> The company is making progress in the effective reclamation of offshore areas, including the use of coral reef creation initiatives; to improve its rating for offshore activities, it could implement the additional measures noted for SOPs 2.8, 2.9 and 2.10.</p>
2.15	<p><b>Training</b> Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 2 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.</p>	Progressing		<p>The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to environment-related issues and management (as defined in the Code of Conduct, Principle 2) and that such training is mandatory for both employees and contractors.</p>

<sup>11</sup> 2.13 Protected areas - Terrestrial

<sup>12</sup> 2.13 Protected areas - Offshore

<sup>13</sup> 2.14 Closure and reclamation - Terrestrial

<sup>14</sup> 2.14 Closure and reclamation - Offshore



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PRINCIPLE 3: Seek continual improvement of health and safety performance		
<b>Overview of Principle Performance</b>		The company achieved the highest achievable possible ranking of “Third-party verified” for all the standards for this principle. Having OHSAS accreditation demonstrates it has in place a robust management system to maintain and continually improve health and safety practices, incident reporting, investigation and follow-up for staff, contractors and visitors to its sites.
STANDARD	RANKING	ADDITIONAL INFORMATION
3.1 <b>Health and safety management systems</b> Companies will work towards implementing a management system to monitor and control relevant aspects of this Principle 3.	Third-Party Verified	
3.2 <b>Safe working practices</b> Companies will maintain safe and healthy working conditions by implementing measures that minimise and seek to eliminate workplace fatalities, injuries and occupational diseases amongst employees, contractors and visitors.	Third-Party Verified	
3.3 <b>Incident investigations</b> Companies will document reportable health and safety incidents using a transparent and inclusive procedure that allows affected workers and local communities to provide input.	Third-Party Verified	
3.4 <b>Incident follow up</b> Following a reportable health and safety incident, companies will define and implement corrective actions in a timely fashion and monitor the effectiveness of such actions.	Third-Party Verified	
3.5 <b>Training</b> Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 3, require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas, and provide appropriate briefings to visitors to company facilities.	Third-Party Verified	

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PRINCIPLE 4: Seek continual improvement in labour practices			
Overview of Principle Performance			
STANDARD		RANKING	
		ADDITIONAL INFORMATION	
<p><b>Overview of Principle Performance</b></p> <p>The company conforms with the requirement to develop and implement a formal system to manage labour issues by having an 'Employee Handbook'. The Handbook sets out the company's commitment to remuneration, working hours, and freedom of association and these commitments are clearly implemented. The Handbook also states that the company does not condone risks that it would not normally foresee, such as forced and child labour in its operations, and discrimination, but could further formalise how these aspects of the Handbook are delivered. Training is provided informally and could be more formalised for staff and contractors.</p>			
4.1	<p><b>Labour management systems</b> Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4.</p>	Conforming	
4.2	<p><b>Discrimination</b> Companies will not make employment decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job.</p>	Informal	The company states that it complies with local laws the prohibit discrimination, but to improve its rating needs to demonstrate how anti-discrimination is practically implemented in the workplace through policies and procedures and positive outcomes effectively monitored.
4.3	<p><b>Remuneration</b> Companies will ensure workers receive fair remuneration for standard and overtime hours worked that meets or exceeds the local legal minimum plus any applicable statutory benefits and provide equal pay for work of equal value.</p>	Conforming	
4.4	<p><b>Forced labour</b> Companies will not use or support slavery, servitude, forced or compulsory labour.</p>	Informal	The company states that it does not use, support or condone forced labour and considers this issue unlikely to occur in the context of its operations. It can, however, improve its rating by developing and implementing policies and procedures to ensure its own employees, contractor staff and workers hired through third-parties do not meet any of the criteria that characterise forced or compulsory labour.
4.5	<p><b>Child labour – worst forms</b> Companies will not engage in the worst forms of child labour as defined by Article 3 of ILO Convention No. 182 including that which is likely to harm the health, safety or morals of children.</p>	Informal	While the company states that it does not employ persons under the age of 18 (in compliance with local laws) and considers this issue unlikely to occur in the context of its operations, it can improve its rating by developing and implementing procedures to routinely determine the age of job applicants, ensuring only adults are employed.
4.6	<p><b>Child labour – other forms</b> Companies may employ children of minimum age 14 years, or older as defined by local laws, to undertake non-hazardous, light work that does constrain their ability to gain an education.</p>	Informal	While the company states that it does not employ persons under the age of 18 (in compliance with local laws) and considers this issue unlikely to occur in the context of its operations, it can improve its rating by developing and implementing procedures to routinely determine the age of job applicants, ensuring only adults are employed.





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4.7	<b>Working hours</b> Companies will comply with local laws and ensure that workers undertake overtime on a voluntary basis and have at least one day of rest for every 7-day period or as prescribed by local laws (whichever is higher).	Conforming	
4.8	<b>Freedom of association and collective bargaining</b> Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.	Conforming	
4.9	<b>Training</b> Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 4 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Informal	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to labour-related practices (as defined in the International Tin Code of Conduct, Principle 4) and that such training is mandatory for both employees and contractors.

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## PRINCIPLE 5: Engage with stakeholders using a participatory approach

### Overview of Principle Performance

The company conforms with the expectation to establish an appropriate grievance mechanism to receive feedback from stakeholders. Stakeholder mapping is underway as part of some of the third-party verified management systems the company has in place and progress is being made on these processes which could be more formalised in written procedures or documentation. The company is also progressing in engaging more actively with all stakeholders and could improve its training practices in this regard.

STANDARD		RANKING	ADDITIONAL INFORMATION
5.1	<b>Stakeholder management</b> Companies will work towards implementing a systematic approach to stakeholder management to control and monitor relevant aspects of this Principle 5.	Progressing	The company manages some aspects related to stakeholder issues, but to improve its rating the company could implement a formal stakeholder management system to further enhance its control and monitoring activities.
5.2	<b>Stakeholder mapping and engagement</b> Companies will seek to identify and record the characteristics and interests of stakeholders affected by, or with the potential to affect, company activities, and plan a participatory approach to engagement including disadvantaged and vulnerable groups.	Progressing	The company has undertaken some stakeholder mapping and is engaging with some stakeholders; to improve its rating it could implement measures to ensure all stakeholders are engaged, including disadvantaged and vulnerable groups.
5.3	<b>Grievance mechanism</b> Companies will establish an appropriate grievance mechanism to receive, and facilitate resolution of, concerns raised by individuals, workers, communities or civil society organisations regarding company activities.	Conforming	
5.4	<b>Training</b> Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 5 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Inadequate	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to covering stakeholder engagement and management issues (as defined in the International Tin Code of Conduct, Principle 5) and that such training is mandatory for both employees and contractors.

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PRINCIPLE 6: Manage negative impacts on, and contribute to development of, local communities and indigenous peoples			
Overview of Principle Performance			
STANDARD		RANKING	
		ADDITIONAL INFORMATION	
6.1	<b>Community and indigenous people management</b> Companies will consider implementing a systematic approach to the management of community and indigenous peoples issues to control and monitor relevant aspects of this Principle 6.	Informal	
6.2	<b>Community health and safety</b> Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities.	Progressing <sup>15</sup>	Conforming <sup>16</sup>
6.3	<b>Consultation</b> Companies will plan a process of consultation that enables local communities and indigenous peoples to express their views on risks, impacts and mitigation measures, and allows the company to consider and respond to them.	Informal	
6.4	<b>Free, prior and informed consent (FPIC)</b> Companies will seek the FPIC of indigenous peoples where their lands, access to natural resources or cultural heritage may be impacted by company activities.	Inadequate	

<sup>15</sup> 6.4 Free, prior and informed consent (FPIC) - Terrestrial

<sup>16</sup> 6.4 Free, prior and informed consent (FPIC) - Offshore



## INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT.TIMAH

6.5	<b>Land rights, use and access</b> Companies will seek to anticipate and avoid or minimise adverse impacts on land rights, land use and access to land and compensate for any significant residual impacts.	Inadequate	It is not clear whether or how the company has implemented procedures and plans for assessing and addressing adverse impacts on land rights, land use and access to land or how it compensates for any residual impacts; to improve its rating the company could describe such procedures and plans if they exist already, or develop and implement them if not.
6.6	<b>Physical displacement (resettlement)</b> Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons.	Inadequate	The company has not yet provided evidence confirming it has avoided the resettlement of people; to improve its performance, the company could provide city planning maps showing that there are no settlements / people present in the area of past, current and planned mining or related activities.
6.7	<b>Economic displacement (livelihoods)</b> Companies will financially compensate economically displaced people as required by local laws and plan a livelihoods restoration programme to ensure that there is no net negative impact on their livelihoods.	Inadequate	The company has not yet provided evidence that it implements procedures and plans to compensate economically displaced people and has a livelihoods restoration programme to ensure there is no net negative impact; to improve its rating, the company could provide such evidence.
6.8	<b>Local economic development</b> Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Conforming	
6.9	<b>Natural resource use and availability</b> Companies will seek to minimise negative impacts on access to and availability of natural resources by local communities and indigenous people.	Inadequate	The company has not yet provided evidence it is collecting natural resource use and availability data and has implemented measures or plans to reduce impacts on local communities and indigenous people; to improve its rating, the company could provide such evidence.
6.10	<b>Cultural heritage protection</b> Companies will anticipate and wherever possible avoid adverse impacts on cultural heritage; when avoidance is not possible, companies will minimize, mitigate and/or compensate for such impacts.	Inadequate	The company has not yet provided evidence to confirm it has undertaken surveys to demonstrate the absence of cultural heritage in past, current and planned mining areas; to improve its rating the company could provide such evidence, including surveys that demonstrate that the company's operations and activities have not had / are not having negative impacts on cultural heritage.
6.11	<b>Training</b> Companies will provide appropriate and periodic training for employees regarding aspects of this Principle 6 relevant to interactions with local communities and indigenous people that may occur during the course of their work. Companies will require onsite contractors to undertake the same training when relevant to their specific role.	Inadequate	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to local community and indigenous peoples issues (as defined in the International Tin Code of Conduct, Principle 6) and that such training is mandatory for both employees and contractors.

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PRINCIPLE 7: Avoid contributing to serious human rights abuses and conflict			
Overview of Principle Performance			
STANDARD		RANKING	ADDITIONAL INFORMATION
7.1	<b>Human rights management</b> Companies will work towards implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7.	Inadequate	The company has not yet provided evidence to confirm it has developed and implemented a systematic approach to human rights management; to improve its rating the company could provide such evidence if it exists or take steps to develop and implement a systematic approach to human rights management if not.
7.2	<b>Use of private or state security personnel</b> Companies using direct or contracted workers to provide security will be guided by the Voluntary Principles on Security and Human Rights and by applicable local law.	Informal	The company complies with local laws and informally follows the Voluntary Principles on Security and Human Rights; to improve its rating it could implement a systematic approach to implementing the Voluntary Principles for its direct and contracted security workers.
7.3	<b>Responsible sourcing</b> Companies will evaluate potential risks when sourcing minerals and seek to avoid purchases that may support conflict or human rights abuses according to international expectations and laws.	Informal	Aside from its own production, the company obtains some minerals from its close partners within Indonesia which, through informal assessment, the company does not consider are linked to conflict or human rights abuses. The company is RMAP compliant but that audit has not evaluated the company's assessment of supply risks that would trigger the need for OECD due diligence.
7.4	<b>Training</b> Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 7 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Inadequate	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to human rights and conflict-related issues (as defined in the International Tin Code of Conduct, Principle 7) and that such training is mandatory for both employees and contractors.

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PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services		
Overview of Principle Performance		
STANDARD	RANKING	ADDITIONAL INFORMATION
<p><b>8.1 Suppliers of ASM produced minerals, general</b> Companies will request suppliers declare that they will work towards understanding their supply chain and communicating through suppliers the objectives of International Tin's Code, information and guidance to encourage improvements.</p>	Conforming	
<p><b>8.2 Principle 1 ASM minerals (compliance and policies)</b> Suppliers will be requested to communicate the importance of formalisation and potential opportunities to engage in practical projects encouraging formalisation of ASM as appropriate (based on feedback) to the production area.</p>	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on formalisation; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.
<p><b>8.3 Principle 2 ASM minerals (environment)</b> Suppliers will be requested to communicate guidance on managing environmental impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.</p>	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on the management of environmental impacts; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.
<p><b>8.4 Principle 3 ASM minerals (health and safety)</b> Suppliers will be requested to communicate guidance on managing health and safety impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.</p>	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on the management of health and safety impacts; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.
<p><b>8.5 Principle 4 ASM minerals (labour)</b> Suppliers will be requested to communicate guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.</p>	Inadequate	The company has not yet provided evidence to confirm it has made informal attempts to engage suppliers of ASM produced minerals and distribute relevant guidance on managing labour issues.
<p><b>8.6 Principle 6 ASM minerals (communities)</b> Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.</p>	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on negotiating with local communities and indigenous peoples; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.



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8.7	<b>Principle 7 ASM minerals (human rights and conflict)</b> Suppliers will be requested to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict, as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Informal	The company has made informal attempts to engage suppliers and distribute relevant information on serious human rights abuses and conflict-related issues; but to improve its rating it could strengthen its formal engagement and follow-up to monitor the outcomes of these engagements.
8.8	<b>Suppliers of LSM produced minerals</b> Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Inadequate	The company has not yet provided evidence to clarify whether it has major suppliers of LSM produced minerals, and if so whether requests have been made to suppliers to meet or work towards principles of this Code of Conduct.
8.9	<b>Suppliers of secondary materials</b> Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Code of Conduct.	Not Relevant	Conformance with the requirement is considered to be not relevant as the company does not source secondary materials from external parties.
8.10	<b>Suppliers of goods and services</b> Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Inadequate	The company has not yet provided evidence to confirm it has requested major suppliers of goods and services meet or work towards principles of this Code of Conduct.



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT.TIMAH

## PRINCIPLE 9: Encourage the understanding, and safe and appropriate use of tin products

### Overview of Principle Performance

Through its membership of International Tin Association, and the REACH consortium, the company conforms with the expectation to support the development of improved understanding of the properties and potential effects of tin on humans and the environment. It also supports research and innovation to promote the safe, appropriate and efficient use of tin. The company was able to provide evidence of occasionally communicating accurate public information on tin to the tin industry and its users with no noted breaches under data protection law.

STANDARD		RANKING	ADDITIONAL INFORMATION
9.1	<b>Understanding potential impacts of tin</b> Companies will seek to advance the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data.	Conforming	
9.2	<b>Encouraging safe and appropriate use</b> Companies will support research, innovation and collaboration that promotes safe and efficient production, use and recycling of tin, including to ensure regulatory compliance and efficient use of energy and natural resources	Conforming	
9.3	<b>Communicating appropriate information</b> Companies will communicate accurate information on impacts and use of its products, to workers, users in the value chain and wider stakeholders, accounting for the need for appropriate confidentiality.	Conforming	





# INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT.TIMAH

## PRINCIPLE 10: Work towards reporting against the International Tin Code of Conduct

### Overview of Principle Performance

The management and staff of PT.Timah have taken ownership of reporting on the Code and there is a clear commitment to providing evidence on conformance and making continued progress with the standards of the Code. They proactively worked with the Independent External Assessor and the International Tin Association to develop this first company report on the Code.

STANDARD		RANKING	ADDITIONAL INFORMATION
10.1	<b>Policy Review</b> Companies will review published policies at least annually to reflect any changes to company expectations in relation to standard 1.1	Conforming	
10.2	<b>Communicating reporting information</b> Companies will agree to the publication of a report of activities against the Principles and Standards of the Code.	Conforming	
10.3	<b>Management Review</b> Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: PT.TIMAH

## Appendix A – Description of Code reporting

**Evidence review process:** The assessment of conformance with the Principles and Standards relies on detailed evaluation of documentary evidence and discussion with the company to ensure a full understanding of progress. ITA encourages members to provide maximum available information, and collates this into an evidence dossier for submission to the Independent Assessor. During a period of feedback and consultation the company may submit further evidence to clarify or add to the information originally provided in order to improve accuracy. The Independent Assessor then determines the final ranking and agrees the text included in this report.

**The Independent Assessor:** ITA engages an expert to make the assessment of evidence separately and independently from the views of the ITA or its members. The independent assessor for this pilot reporting is a consulting firm with more than 25 years’ experience working on environmental and social issues and impacts in the natural resource sector. It specialises in analysis, prevention and management of environmental and social issues in the oil and gas, mining and aggregates industries worldwide and is familiar with large scale and artisanal mining, and acts as auditor and/or advisor to other commodity standards initiatives such as Bettercoal.

**Reporting guide:** The ‘visual progress guide’ on the title page is a general representation of the proportion of rankings overall.

Not Relevant	The Standard is not appropriate or does not apply to the company.
Third-party verified	Company activity has been verified by a third party recognised qualified body, for example during audit or inspection.
Conforming	Company activity is formally documented and implemented with evidence of conformance with the Standard.
Progressing	Company activity is documented but may benefit from formalisation in a procedure or expansion to the Standard.
Informal	Company activity is underway but may benefit from being documented more formally to the Standard.
Inadequate	There is insufficient evidence available to achieve other rankings.

**Additional Information:** In the reporting format, details of ‘Additional Information’ is not included for ‘Conforming’ and ‘Third-party Verified’ standards, but is provided in the case of other rankings as a useful guide to show progress.