
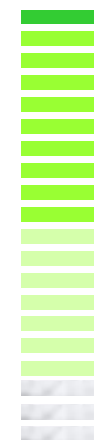


# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

GENERAL INFORMATION	
Company details	<p>White Solder Metalurgia e Mineração LTDA Highway BR 421, S/N, Zona Rural, 78932000, Ariquemes, Brazil</p> 
Date of this report	Publication 20 December 2023
Date of previous report	September 2021
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About our company	<p>White Solder Metalurgia e Mineracao LTDA (hereinafter referred to as White Solder) is a Brazilian tin smelting company in Ariquemes, Rondônia, Brazil with a capacity of up to 7,200 tonnes of tin per year production, and it is the only operation within the scope of this Tin Code report. The company produces tin from cassiterite sourced mainly from mining cooperatives in the counties of Ariquemes and Monte Negro, in the state of Rondônia, and from the group-owned mine, also located in Rondônia. Cooperatives are licensed by the government and regularly inspected by agencies such as the National Mining Agency, Ministry of Labor and Welfare, and Brazilian Institute for the Environment and Natural Resources among others.</p> <p>White Solder is part of a group founded in 1999 -TOR Participações- which also includes a logistics operation and solder plants located in Brazil and Portugal which produce various alloys and forms of solder, but these operations are out of the scope of this Tin Code report.</p> <p>White Solder holds ISO 9001 and ISO 37001 certifications, and in July 2023, the company was recommended for ISO 14001 and ISO 45001, but certification occurred after the reporting period. As per their website, the company has taken measures to show respect towards the environment. It has also informed customers about the life cycle for the final disposal of the materials and packaging of its products.</p> <p>Tin is registered on the London Metal Exchange (LME) under the 'White Solder BR' brand since 2015.</p>
Significant changes from previous report	This is the company's second Tin Code report, demonstrating the steps White Solder has taken to achieve higher ratings and highlighting several areas of progress. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement.



Visual Progress Guide



# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

	<p>Since the previous report, White Solder has made progress on several standards, including:</p> <ol style="list-style-type: none"><li>1. Achieving third-party verification on responsible sourcing (7.3) through the assurance of its Due Diligence Report against <i>the ITA-RMI Joint Criteria for Smelters (v2 Mar 2021)</i>.</li><li>2. Conforming with implementing an environmental management system (2.1), managing discharges to surface and/or groundwater (2.2) to land (2.4), to air (2.5), reducing energy consumption (2.7), minimising the production of non-hazardous and inert wastes (2.10), H&amp;S management (3.1), safe working practices (3.2), incident follow-up (3.4), H&amp;S training (3.5), labour management system (4.1), local economic development (6.8), influencing positively suppliers of ASM-produced minerals (8.1-8.7) and communicating appropriate information on tin (9.3) through the development of several procedures and implementing measures.</li><li>3. Progressing with biodiversity protection (2.12), protected areas (2.13), training on environmental aspects (2.15), training on labour aspects (4.9), stakeholder management (5.1), stakeholder mapping and engagement (4.2), training on stakeholder aspects (5.4), community management (6.1), consultation (6.3), training on community aspects (6.11), use of private security personnel (7.2), training on human right abuses (7.4) and influencing positively suppliers of goods and services (8.10) through the development of several procedures and materials.</li></ol> <p>The company could regain higher ratings by providing implementation evidence on preventing forced labour (4.4).</p> <p>Among other changes, due to internal updates to the Tin Code standard, SOP 1.5 related to transparency is now relevant, SOP 1.4 related to business integrity changed ratings, and SOP 1.2 related to management systems changed ratings due to a change in rating for SOP 1.4. Finally, SOP 8.8 on LSM suppliers has been assessed as not relevant based on available operations information.</p> <p><b>Notes:</b></p> <p>1) <i>This report has been compiled to Tin Code standards updated in May 2022, including revisions to 1.4, 1.5, 2.6, 2.8, 4.2a), 4.2b), 4.3, 4.7, 6.9, 7.1, 7.3 and 10.2 standard numbers.</i></p> <p>2) <i>This Tin Code incorporates evidence for standard 7.3 submitted in November 2023 due to delays in arranging the assurance outside of the control of the company.</i></p>
Further information and references	<ol style="list-style-type: none"><li>1. White Solder <a href="#">website</a></li><li>2. <a href="#">Whistleblowing and grievance channel</a></li><li>3. <a href="#">ISO 9001</a> Quality management and <a href="#">Quality Policy</a></li><li>4. <a href="#">ISO 37001</a> Antibribery management system and <a href="#">Antibribery Policy</a></li><li>5. <a href="#">Due Diligence Report for Responsible Sourcing 2022-2023</a></li><li>6. <a href="#">Transparency statement</a></li><li>7. <a href="#">Environmental Policy</a> and <a href="#">Life Cycle Letter</a></li><li>8. <a href="#">Certificate of Green Partner</a></li><li>9. <a href="#">Supply Chain Policy</a></li><li>10. <a href="#">Due Diligence Assurance Report</a> and <a href="#">Due Diligence Report (Step 5)</a></li></ol>



# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## Contents

PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices .....	4
PRINCIPLE 2: Seek continual improvement of environmental performance .....	6
PRINCIPLE 3: Seek continual improvement of health and safety performance .....	9
PRINCIPLE 4: Seek continual improvement in labour practices.....	10
PRINCIPLE 5: Engage with stakeholders using a participatory approach .....	12
PRINCIPLE 6: Manage negative impacts on, and contribute to development of, local communities and indigenous peoples.....	13
PRINCIPLE 7: Avoid contributing to serious human rights abuses and conflict.....	15
PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services .....	17
PRINCIPLE 9: Encourage the understanding, and safe and appropriate use of tin products .....	19
PRINCIPLE 10: Work towards reporting against the International Tin Code .....	20
Appendix A – Description of Tin Code reporting .....	21



# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices

### Overview of Principle Performance

The company has achieved the highest rating of third-party verified in two standards of this Principle. Through its ISO 37001 certification the company evidenced implementation of whistleblowing procedures and through audited financial statements by PwC, it demonstrated it is supporting the general implementation of the principles of the Extractive Industries Transparency Initiative (EITI). The company continues to conform with keeping all business registrations, licences up to date to legally carry out business activity. It is progressing by developing and publishing policies related to expectations of this Tin Code, working towards implementing appropriate management systems, preventing corruption and bribery and providing training on some but not all aspects relevant to this Principle.

STANDARD		RATING	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.	Progressing	The company has demonstrated that it is progressing through developing and publishing policies that cover some but not all the principles of the Tin Code. It has published policies on Quality, Environment, Anti-bribery and Supply Chain.
1.2	<b>Management system</b> Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Progressing	The company has demonstrated that it is progressing through developing and working towards the implementation of appropriate management systems. It is ISO 9001 and ISO 37001 certified. In July 2023 the company was recommended for ISO 14001 and ISO 45001 but had not yet received the certifications at the time of assessment.
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	The company has demonstrated that it conforms with this expectation through keeping up to date all business registrations and permits to legally carry out business activity. White Solder uses a third-party to independently track applicable laws and regulations and compliance. Also, some compliance is independently verified through ISO certifications (9001, 14001, 45001).
1.4	<b>Business integrity</b> Companies will seek to prevent anti-competitive behaviour, corruption and bribery, including facilitation payments which should be publicly disclosed if unavoidable.	Progressing	The company has demonstrated that it is progressing through developing and implementing procedures which partially address business integrity, but it has not yet demonstrated how the risk of anti-competitive practices is managed. It has an ISO 37001 certification, but its scope does not address anti-competitive practices.
1.5	<b>Transparency</b> Companies will support the implementation of the principles of the Extractive Industries Transparency Initiative (EITI) individually or through joint efforts, including through appropriate reporting <sup>(1)</sup>  <sup>(1)</sup> Reporting is required in an implementing country of EITI.	Third-party verified	The company has demonstrated that it has published a statement supporting the 12 EITI Principles and a voluntary report confirming that all relevant taxes, fees and/or royalties have been paid to governments (providing data for 2021 and 2022). This has been third-party verified through audited financial statements by PwC. As a smelter without integrated mining operations



## INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

			that is not located in an EITI implementing country, nor is a paid member of the EITI Association, the company is out of the scope of formal EITI reporting.
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 Tin Code.	Third-party verified	The company has demonstrated that it developed and implemented whistleblowing procedures enabling any interested party to report any concern safely and anonymously. This aspect has been third-party verified through its ISO 37001 certification.
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.	Progressing	The company has demonstrated it is progressing through developing procedures and implementing training covering some but not all aspects relevant to this Principle.

# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## PRINCIPLE 2: Seek continual improvement of environmental performance

### Overview of Principle Performance

The company has made several improvements during this reporting period and has improved ratings in eight standards of this Principle. It has achieved the higher rating of Conforming in eight standards of this Principle mostly through its recommendation for ISO 14001 certification in July 2023, and by developing and implementing environmental-related policies and procedures, which evidenced the implementation of an environmental management system, water quality management, land, soil and air quality management, energy consumption management, hazardous, non-hazardous and inert waste management and not using banned substances. The company is progressing with expectations related to reduction of water consumption, GHG emission data management, understand impacts on biodiversity protection, respect of protected areas and environmental training. Expectations related to tailings management and closure and reclamation are not relevant to the company's operation.

STANDARD		RATING	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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing a systematic approach to an environmental management system. In July 2023 the company was recommended for ISO 14001 but certification occurred after the time of the assessment.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures and measures to manage discharges to surface waters and groundwater.
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.	Progressing	The company has demonstrated that it is progressing through developing procedures addressing water consumption and the company is bound by licenses for abstraction, but has not yet provided evidence that measures have been implemented to reduce water consumption.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures and measures to manage discharges to land. This aspect was audited for ISO 14001 certification in July 2023 but certification occurred after the time of the assessment.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures and measures to manage discharges to air. This aspect was audited for ISO 14001 certification in July 2023 but certification occurred after the time of the assessment.
2.6	<b>Greenhouse gases</b>	Progressing	The company has demonstrated that it is progressing through developing and implementing some GHG inventory and



## INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

	Companies will seek to measure, monitor and publicly disclose direct and indirect CO2 equivalent (GHG) emissions, and work towards economic reduction targets appropriate to the nature and scale of operations and relevant protocols.		GEE study but has not yet publicly disclosed an inventory of GHG emission data and has not yet provided evidence of establishing or working towards economic reduction targets appropriate to the nature and scale of its operations.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures and measures for reducing direct and indirect energy consumption. This aspect was audited for ISO 14001 certification in July 2023 but certification occurred after the time of the assessment.
2.8	<b>Tailings management</b> Companies will dispose of or store tailings <sup>(2)</sup> in a manner that minimises the risk of impacts to the environment and human health in accordance with recognised standards when available.  <sup>(2)</sup> Including to design, build, operate, monitor and decommission for all life cycle stages.	Not Relevant	Tailings from mineral processing activities are not relevant to smelting facilities.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures for disposal of hazardous wastes in a manner that minimises negative impacts. This aspect was audited for ISO 14001 certification in July 2023 but certification occurred after the time of the assessment.
2.10	<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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures for non-hazardous and inert waste management. This aspect was audited for ISO 14001 certification in July 2023 but certification occurred after the time of the assessment.
2.11	<b>Banned substances</b> Companies will not use substances that are banned under international convention or local laws.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures and measures to check chemical substances (MSDS sheets and incompatibility matrix), and it does not use banned substances in its smelter.
2.12	<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.	Progressing	The company has demonstrated it is progressing through developing an environmental control plan and environmental monitoring report to understand potential impacts on biodiversity, and monitor according to its licence, but has not yet actively monitored flora and fauna in potentially impacted surrounding areas.
2.13	<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.	Progressing	The company has demonstrated it is progressing through maintaining an appropriate legal distance from the closest river and has developed an environmental control plan and environmental monitoring report to understand potential impacts by the company on adjacent areas but has not yet demonstrated how it manages discharge of treated wastewater/effluents that may impact adjacent areas, or how water is recycled.



## INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

2.14	<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.	Not Relevant	Closure and reclamation are not relevant to smelting facilities.
2.15	<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.	Progressing	The company has demonstrated it is progressing through providing training on some of these aspects for its ISO 14001 but has not yet demonstrated it covered all the environmental aspects relevant to the Tin Code.



# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## PRINCIPLE 3: Seek continual improvement of health and safety performance

### Overview of Principle Performance

The company has made several improvements during this reporting period, and it has now achieved the higher rating of Conforming for all the standards of this Principle. It has implemented a health and safety management system, safety procedures to ensure safe working conditions are maintained, incident investigations and follow-up procedures, and H&S training, which were audited for ISO 45001 certification in July 2023.

STANDARD		RATING	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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing a systematic approach to a H&S management system. In July 2023 the company was recommended for ISO 45001 but certification occurred after the time of the assessment.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing safety procedures and measures to ensure safe working conditions are maintained. It was audited for ISO 45001 certification in July 2023 but certification occurred after the time of the assessment.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures for reporting, investigating, and preventing incidents. It was audited for ISO 45001 certification in July 2023 but certification occurred after the time of the assessment.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures to monitor the outcomes of corrective actions. It was audited for ISO 45001 certification in July 2023 but certification occurred after the time of the assessment.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing training materials and implementing training on health and safety. It was audited for ISO 45001 certification in July 2023 but certification occurred after the time of the assessment .

# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## PRINCIPLE 4: Seek continual improvement in labour practices

### Overview of Principle Performance

The company has made improvements during this reporting period and has improved ratings in two standards of this Principle. The company has achieved a higher rating of Conforming in most standards of this Principle as it developed and implemented a systematic approach to manage labour issues, ensured fair and equal remuneration to workers, eliminated the risk of forced and child labour and engaged formally with workers on freedom of association and collective bargaining. The company is progressing with expectations related to discrimination, violence and harassment, forced labour, working hours and training activities.

STANDARD		RATING	ADDITIONAL INFORMATION
4.1	<b>Labour management systems</b> Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing a systematic approach to labour management. It has an Integration, Standards and Conduct Manual, an internal labour relations policy and other procedures which address multiple aspects of the management of labour.
4.2a)	<b>Discrimination</b> Companies will implement an equality policy (including on gender) and not make employment related 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.	Progressing	The company has demonstrated it is progressing through developing a policy and procedures which note the company does not accept any kind of discrimination and harassment and its whistleblowing channel includes specific topics for this expectation, but it has not yet provided evidence of implementation.
4.2b)	<b>Violence and harassment</b> Companies will avoid practices that may result in physical, psychological, sexual or economic harm to persons in the workplace, including gender-based violence and harassment	Progressing	The company has demonstrated it is progressing with this expectation as it developed a policy and procedures which note the company does not accept any kind of moral or sexual harassment and its whistleblowing channel includes specific topics for this expectation, but it has not yet provided evidence of implementation.
4.3	<b>Remuneration</b> Companies will ensure workers receive fair remuneration <sup>(3)</sup> for standard and overtime hours worked that meets or exceeds the local legal minimum wage plus any applicable statutory benefits and provides equal pay for work of equal value.  <sup>(3)</sup> In the absence of a minimum wage the prevailing competitive industry wage or the living wage if known.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing a formalised approach to remuneration, equal pay for equal work, and a commitment to compliance with legal requirements, including minimum wage. It has a remuneration policy that is implemented.
4.4	<b>Forced labour</b> Companies will not use or support slavery, servitude, forced or compulsory labour.	Progressing	The company has demonstrated it is progressing with this expectation through developing a policy and procedures which note the company does not accept any kind of forced labour and the public whistleblowing channel has topics specific to this expectation, but it has not yet provided evidence of implementation.
4.5	<b>Child labour – worst forms</b>	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing



## INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

	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.		procedures (such as the Integration Manual) to eliminate the risk of worst forms of child labour.
4.6	<p><b>Child labour – other forms</b></p> <p>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>	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures (such as the Integration Manual) to eliminate the risk of other forms of child labour.
4.7	<p><b>Working hours</b></p> <p>Companies will comply with local laws on working hours and provide paid annual and statutory leave, and ensure that workers undertake overtime on a voluntary basis and have at least one day of rest for every 7-day period<sup>(4)</sup> or as prescribed by local laws (whichever is higher).</p> <p><sup>(4)</sup> In circumstances such as shift work the averaging of working hours over a different period is permitted as recognised by the ILO and/or local laws.</p>	Progressing	The company has demonstrated it is progressing through developing a policy and procedures related to working hours according to Brazilian law but has not yet provided evidence to confirm overtime is voluntary.
4.8	<p><b>Freedom of association and collective bargaining</b></p> <p>Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.</p>	Conforming	The company has demonstrated that it conforms with this expectation as it engages with workers on freedom of association and collective bargaining. The company has a Collective Agreement with the union (syndicate) for the period 2022-2024.
4.9	<p><b>Training</b></p> <p>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.</p>	Progressing	The company has demonstrated it is progressing through developing training procedures and materials and providing training on many but not all aspects of this Principle.

# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

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

### Overview of Principle Performance

The company has made improvements during this reporting period and has improved ratings in three standards of this Principle. The company has achieved the higher rating of Conforming in the standard related to the implementation of a grievance mechanism, which is accessible via the company website. It is progressing in with expectations related to implementing a systematic approach to stakeholder management, identifying and engaging with stakeholders, and providing training on aspects relevant to this Principle 5.

STANDARD		RATING	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 has demonstrated it is progressing through developing several procedures for its ISO 9001 certification addressing the management of some stakeholders, but it does not appear to refer directly to external stakeholders (including communities).
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 demonstrated it is progressing through developing procedures for stakeholder mapping for its ISO 9001 certification, ISO 14001 (recommended certification) and ISO 45001 (recommended certification), but it seems there is insufficient focus on community. Certification does not explicitly require engagement or consultation with all stakeholders.
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	The company has demonstrated that it conforms with this expectation through developing and implementing a grievance mechanism, which is accessible via the company website. This aspect has been partially covered by its ISO 37001 certification but this certification does not fully address the scope of the grievance mechanism .
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.	Progressing	The company has demonstrated it is progressing through developing training procedures and materials, and provided training on some but not all aspects of this Principle.

# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## PRINCIPLE 6: Manage negative impacts on, and contribute to development of, local communities and indigenous peoples

### Overview of Principle Performance

The company has made improvements during this reporting period and has improved ratings in four standards of this Principle. The company has achieved a higher rating of Conforming in the expectation related to contributing to the economic development of local communities through donations to education or capacity building projects. It is progressing against another four standards of this Principle as it developed documentation, such as internal and external communication with stakeholders and other procedures partially related to community health and safety, that demonstrates the company is working towards implementing a systematic approach for stakeholder management, community health and safety measures, enabling the local community to express their views and providing training on these aspects. There are no indigenous peoples located around the smelter, hence, the standard related to free, prior and informed consent (FPIC) is not relevant. Another five standards were also assessed as not relevant since there are no adverse impacts on land rights, use and access to land, physical resettlement, economic displacement, access to and availability of natural resources, and cultural heritage.

STANDARD		RATING	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.	Progressing	The company has demonstrated it is progressing through developing documentation, such as the internal and external communication procedure, that demonstrates how the company manages stakeholder's aspects and supports implementation towards a methodical approach to community management, but it has a limited focus on communities (urban residents). There are no indigenous peoples located around the smelter.
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	The company has demonstrated it is progressing through developing and implementing some procedures partially related to community health and safety such as monitoring and controlling of external noise and other environmental parameters, but does not yet cover additional parameters (such as traffic and vehicle related risks and impacts) could be monitored and mitigated.
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.	Progressing	The company has demonstrated it is progressing through developing procedures for communicating with stakeholders but has not yet provided evidence of a consultation process or plan with them.
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.	Not Relevant	There are no lands belonging to indigenous people present in the city of Ariquemes, where the smelter is located.
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.	Not Relevant	There is no indication that the land purchase where the smelter is located would have the potential for impacts on land rights, land use and access to land.
6.6	<b>Physical displacement (resettlement)</b>	Not Relevant	There is no indication that the land purchase where the smelter is located would have had the potential to have

## INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

	Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons.		previously resulted in involuntary resettlement or for such an impact to be likely in the future.
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.	Not Relevant	There is no indication that the land purchase where the smelter is located would have had the potential to have previously resulted in economic displacement or for such an impact to be likely in the future.
6.8	<b>Local economic development</b> Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Conforming	The company has demonstrated that it conforms with this expectation through procedures and implemented measures for engaging and contributing to the development of local communities. The company donates to projects directly and indirectly linked to economic development, including education and working with local suppliers to improve capacity.
6.9	<b>Natural resource use and availability</b> Companies will seek to understand and minimise negative impacts on access to and availability of natural resources <sup>(5)</sup> by local communities and indigenous people.  <sup>(5)</sup> Including air, sunlight, soil, and water.	Not Relevant	There is no indication that the land purchase would have previously resulted in negative impacts on access to and availability of natural resources by local communities or that such impacts are likely in the future.
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 minimise, mitigate and/or compensate for such impacts.	Not Relevant	There is no indication that the company's activities have previously had a negative impact on physical or intangible cultural heritage or that such impacts are likely in the future.
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.	Progressing	The company has demonstrated it is progressing through developing training procedures and materials and provided training on some but not all aspects of this Principle.

# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## PRINCIPLE 7: Avoid contributing to serious human rights abuses and conflict

### Overview of Principle Performance

The company has made improvements during this reporting period and has now achieved the highest rating of Third-party verified in one standard of this Principle. The company has demonstrated that it developed and implemented policies and procedures to evaluate potential risks, and seek to avoid support to conflict, human rights and other significant abuses. It publicly reports on its efforts according to international expectations and laws, including the OECD DD Guidance 3T supplement. It has a Supply Chain Policy and Due Diligence Report publicly available on its website. This aspect has been third-party verified through assurance against the *ITA-RMI Joint Criteria for Smelters (v2 Mar 2021)* in November 2023. The independent OECD Alignment Assessment of the standards of the Criteria and the audit management process under the Tin Code shows 'fully aligned'. It is progressing with expectations related to the implementation of a systematic approach to human rights, guiding private security personnel on meeting the requirements of VPSHR, and training on this Principle.

STANDARD		RATING	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 in accordance with internationally recognised human rights frameworks and relevant domestic laws.	Progressing	The company has demonstrated it is progressing through developing procedures addressing human rights management and the UN Guiding Principles. Human rights management is effectively considered in the context of responsible sourcing, but not in the wider context.
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.	Progressing	The company has demonstrated it is progressing through developing procedures addressing human rights and checking the qualifications of suppliers (security service). Evidence has been provided of legal compliance, but no evidence relates to aligning with or meeting the requirements of VPSHR.
7.3	<b>Responsible sourcing</b> Companies <sup>(6,7)</sup> will evaluate potential risks, seek to avoid support to conflict, human rights and other significant abuses and publicly report on their efforts according to international expectations and laws, in particular the OECD Due Diligence Guidance 3T Supplement <sup>(8)</sup> .  <sup>(6)</sup> Companies with smelters will seek to be third-party assessed against recommended criteria. <sup>(7)</sup> Companies without smelters will seek to apply aspects of the recommended criteria relevant to their own circumstances <sup>(8)</sup> The criteria recommended for standard 7.3 is the ITA-RMI Assessment Criteria for Tin Smelting Companies v2 (Mar 2021) criteria 7.3. Other criteria may be utilised if deemed equivalent after equivalence checks against criteria 7.3 and 7.3 guidance by ITA experts.	Third-party verified	The company has demonstrated that it developed and implemented policies and procedures to evaluate potential risks, and seek to avoid support to conflict, human rights and other significant abuses. It publicly reports on its efforts according to international expectations and laws, including the OECD DD Guidance 3T supplement. The company produces tin from cassiterite sourced mainly from local mining cooperatives and from the group-owned mine. It has a Supply Chain Policy and Due Diligence Report publicly available on its website. This aspect has been third-party verified through assurance against the <i>ITA-RMI Joint Criteria for Smelters (v2 Mar 2021)</i> in November 2023. The independent OECD Alignment Assessment of the standards of the <i>Criteria</i> and the audit management process under the Tin Code shows 'fully aligned'.
7.4	<b>Training</b>	Progressing	The company has demonstrated it is progressing through developing training procedures and materials and



## INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

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.

provided training on some but not all aspects of this Principle.





# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services

### Overview of Principle Performance

The company has made several improvements for this reporting period and improved ratings in eight standards of this Principle. The company has now achieved a higher rating of Conforming against most of the expectations of this Principle as White Solder has communicated the ITA Artisanal and Small-Scale Mining (ASM) Handbook and its Supply Chain policy to its suppliers, who are mostly Brazilian cooperatives and the group-owned mine. By doing this, the company conformed with influencing positively suppliers of ASM-produced minerals. It is progressing with influencing suppliers of good and services to work towards principles of the Tin Code. The company does not source LSM-produced minerals or secondary materials, hence these expectations are not relevant.

STANDARD		RATING	ADDITIONAL INFORMATION
8.1	<b>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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to guide its suppliers of ASM-produced minerals towards the objectives of the Tin Code and encouraged improvements, if necessary. White Solder has communicated the ITA ASM Handbook to its suppliers (Brazilian cooperatives).
8.2	<b>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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate the importance of formalisation to its suppliers of ASM-produced minerals. White Solder has communicated the ITA ASM Handbook to its suppliers (Brazilian cooperatives), engaged with cooperatives to encourage licensed operation and monitored the status of cooperatives to identify issues that need to be resolved to enable trading to continue.
8.3	<b>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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance on managing environmental impacts to its suppliers of ASM-produced minerals. White Solder has communicated the ITA ASM Handbook to its suppliers (Brazilian cooperatives).
8.4	<b>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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance on managing H&S impacts to its suppliers of ASM-produced minerals. White Solder has communicated the ITA ASM Handbook to its suppliers (Brazilian cooperatives).
8.5	<b>Principle 4 ASM minerals (labour)</b>	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and

## INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

	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.		implementing measures to communicate guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour to its suppliers of ASM-produced minerals. White Solder has communicated the ITA ASM Handbook to its suppliers (Brazilian cooperatives) and none of the suppliers appear on the government registry for employers associated with slave-like employment practices.
8.6	<b>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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance negotiating with local communities to its suppliers of ASM-produced minerals. White Solder has communicated the ITA ASM Handbook to its suppliers (Brazilian cooperatives).
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing materials and implementing measures to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict to its suppliers of ASM-produced minerals. White Solder has communicated the ITA ASM Handbook and supply chain policy to its suppliers (Brazilian cooperatives). None of the suppliers appear on the government registry for employers associated with slave-like employment practices.
8.8	<b>Suppliers of LSM produced minerals</b> Companies will request major suppliers meet or work towards principles of this Tin Code.	Not Relevant	This expectation is not relevant as the company does not source LSM produced minerals.
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 Tin Code.	Not Relevant	This expectation is not relevant as the company does not source secondary materials.
8.10	<b>Suppliers of goods and services</b> Companies will request major suppliers meet or work towards principles of this Tin Code.	Progressing	The company has demonstrated it is progressing through developing and implementing procedures such as the Supplier Approval process, which covers some but not all the expectations of the Tin Code.



# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

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

### Overview of Principle Performance

Through its membership of International Tin Association, the company conforms with the expectation to regularly support the understanding of the potential effects of tin on humans and the environment and has also encouraged the safe, appropriate, and efficient use of tin. The company communicates information on tin, and the tin industry, to users in the value chain and wider stakeholders with no noted breaches under data protection laws.

STANDARD		RATING	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	Through its membership of International Tin Association, the company conforms with the expectation to regularly support activities to review, lead and advance understanding of the properties and potential effects of tin as found necessary.
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	Through its membership of International Tin Association, the company conforms with the expectation to regularly support research and innovation and leading collaboration that promotes the safe, appropriate, and efficient use of tin.
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	The company has demonstrated that it conforms with this expectation as information related to the use of tin, products is provided on the public website, market platforms and through presentations, with no noted breaches under data protection laws.



# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

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

### Overview of Principle Performance

The management and staff of White Solder 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 report on the Tin Code, conforming with all reporting expectations.

STANDARD		RATING	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	The company representatives were knowledgeable about the expectations of the Tin Code and the need to review and update policies. They actively participated in reviewing and updating policies and procedures when required.
10.2	<b>Communicating reporting information</b> Companies will support and agree to the annual publication of a report of activities against the Principles and Standards of the Code	Conforming	The management of White Solder agreed to the publication of this report on activities against the Principles and Standards of the Tin Code.
10.3	<b>Management Review</b> Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	The management of White Solder approved the content of this report.



# INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineração LTDA

## Appendix A – Description of Tin 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 Rating 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 report 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 ratings 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 ratings.

**Additional information:** This provides information on the evidence that was made available by the company to demonstrate its activities and show progress.