





INTERNATIONAL TIN CODE REPORT: Thailand Smelting and Refining Co Ltd

| GENERAL INFORMATION | | |
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| Company details | Thailand Smelting and Refining Co Ltd. 80 Moo 8 Sakdidej Road, Tambon Vichit, Amphur Muang, Phuket 83000 Thailand |   Visual Progress Guide |
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| About our company | <p>Thailand Smelting and Refining Co Ltd (Thaisarco) was established in 1963 and it consists of one tin smelter located in Phuket, which is the scope of this Tin Code report. Thaisarco is managed and operated by its major shareholder Amalgamated Metal Corporation PLC of the UK with a minority shareholding being held by Escoy Holdings of Malaysia.</p> <p>The smelter produces high-grade tin metal. Thaisarco receives metals and secondary materials, as well as minerals. During the RMAP audit period the company reported mineral supply from the countries: the Democratic Republic of the Congo, Rwanda, Namibia, Australia, Portugal, Spain, Brazil, Burundi, Myanmar, Nigeria, Tanzania and Thailand. The company has received several sustainability recognitions from the government for their efforts in supporting social responsibility, operating in an environmentally friendly manner, and implementing an efficient energy management system.</p> <p>The smelter holds ISO 9001 and ISO 14001 certifications. It was audited for ISO 45001 in June 2023 but the certification was issued after the reporting period. Tin is registered on the London Metal Exchange (LME) under the 'Thaisarco' and 'Phuket' brands.</p> | |
| Significant changes from previous report | <p>This is the third Tin Code report from the company and it demonstrates the steps Thaisarco has taken to achieve higher ratings and highlights several areas of progress. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement.</p> <p>Since the last report, various improvements have also been made by the company, notably including:</p> | |



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| | <ol style="list-style-type: none">1. Achieving third-party verification of water consumption reduction (2.3), energy consumption reduction (2.7), hazardous and non-hazardous waste management (2.9, 2.10) standards through ISO certifications.2. Conforming with training on governance issues (1.7), training on H&S (3.5), managing the risk of forced labour (4.4), ensuring working hours according to local law (4.7), implementing a systematic approach to stakeholder management (5.1), stakeholder mapping and engagement (5.2), implementing a systematic approach to community management (6.1), implementing measures to support community health and safety (6.2), contributing to the economic development of communities (6.8), training on community management issues (6.11) and influencing positively major suppliers of good and services (8.10) through the development and implementation of several procedures and measures.3. Progressing with training on human rights issues (7.4) through the development of procedures and materials. <p>The company could regain a higher rating by providing evidence on communicating guidance on several ESG aspects in line with the Tin Code to suppliers of ASM and LSM-produced minerals to influence them positively (8.1, 8.2, 8.3, 8.4, 8.6 and 8.8).</p> <p>Among other changes, due to updates to the Tin Code, standards 1.5 and 2.6 related to supporting transparency and managing greenhouse gas emissions are now relevant to the company. This also led to adjustments for ratings for standard 2.15, related to training on relevant environmental aspects, and standard 4.2a, related to managing discrimination. Standards 2.12 and 2.13 related to biodiversity and protected areas have been assessed as not relevant to the company based on available information about the operation.</p> <p>Notes:</p> <ol style="list-style-type: none">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>2) <i>Due to an inadvertent human error the previous report dated October 2020 was published with one uncertain or provisional rating. Change to the rating since the last report due to the error has not been included in the above.</i> |
| Further information and references | <ol style="list-style-type: none">1. Thaisarco website2. Thaisarco policies3. Grievance Lodgment Form4. ISO certifications 9001:2015 and 14001:20155. Sustainability recognitions6. Supply chain policy7. Mine visit and public due diligence report8. RMAP assessment report |



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

Overview of Principle Performance

The company improved ratings in one standard of this Principle and has achieved a high rating of *conforming* in most of the standards. It developed and published policies addressing the Principles of the Tin Code, a legal register showing compliance evaluation of authorisations, a grievance mechanism and training on all topics of this Principle. It also has some existing documentation that refers to the risk of bribery and corruption, and it developed elements of a formal system to manage legal compliance and governance issues, progressing with those expectations. Thailand is not an EITI-implementing country and does not appear to require public reporting of taxes or payments to governments but the company could improve its rating by supporting the EITI principles through a general public statement and providing a voluntary report confirming payment of relevant taxes, fees and/or royalties.

| STANDARD | | RATING | ADDITIONAL INFORMATION |
|----------|--|-------------|--|
| 1.1 | Policies Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and published policies addressing the principles of the Tin Code. |
| 1.2 | Management system 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 with this expectation through developing elements of a formal system to manage legal compliance and governance issues. It has policies in place and tracks legal compliance, but additional procedures could expand to include in scope bribery and corruption risk management including facilitation payments. |
| 1.3 | Legal compliance 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 as it tracks legal requirements and compliance and keeps up to date all business registrations. It has developed and implemented a legal register showing monthly and annual compliance evaluation (as required by law) of authorisations, licenses required and others (including external initiatives and programmes). |
| 1.4 | Business integrity Companies will seek to prevent anti-competitive behaviour, corruption and bribery, including facilitation payments which should be publicly disclosed if unavoidable. | Progressing | The company demonstrated it is progressing with this expectation through providing some existing documentation that refer to the risk of bribery and corruption, but procedures could be further developed to control bribery, corruption and facilitation payments risks. |
| 1.5 | Transparency Companies will support the implementation of the principles of the Extractive Industries Transparency Initiative (EITI) individually or through joint efforts, including through appropriate reporting ⁽¹⁾ ⁽¹⁾ Reporting is required in an implementing country of EITI. | Inadequate | The company has not provided evidence related to this expectation. As a smelter without integrated mining operations that is not located in an EITI implementing country, nor is a paid member of the EITI Association, the company is out of scope of formal EITI reporting. However, the company could improve its rating by providing evidence of a public statement supporting the 12 EITI principles and a voluntary report confirming that all |



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| | | | relevant taxes, fees and/or royalties have been paid to the government. |
| 1.6 | Whistleblowing 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. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented a complaint submission procedure and has a grievance mechanism procedure on its website available to internal and external stakeholders. |
| 1.7 | Training 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. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures and materials for training on all topics of this Principle. |

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company improved ratings in four standards of this Principle and has achieved the highest rating of *third-party verified* in most of the standards. Through its ISO14001 certification and other government environmental recognitions, including the Green Mining Award and Green Industry certification, the company has achieved third-party verification in developing and implementing management systems, water quality management, water consumption reduction, air quality management, energy consumption management, hazardous, non-hazardous and inert waste management. The company conforms with the expectations of managing and taking steps to reduce energy consumption, and does not use banned substances in the smelter. It also has a soil monitoring plan within the site boundary and provides training on some aspects of this Principle, progressing with those standards. Expectations related to tailings management, biodiversity protection, protected areas and closure and reclamation are not relevant to the company's operation.

| STANDARD | | RATING | ADDITIONAL INFORMATION |
|----------|--|----------------------|---|
| 2.1 | Management system 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 | The company has provided evidence that it developed and implemented a systematic approach to an environmental management system. It is certified to the ISO 14001:2015 standard and has received other government environmental recognitions, including the Green Mining Award 2022 and Green Industry certification. |
| 2.2 | Water quality 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 | The company has provided evidence that it developed and implemented procedures and measures to manage discharges to surface water and groundwater. This aspect has been third-party verified through its ISO14001 certification. |
| 2.3 | Water consumption and availability Companies will seek to reduce water consumption in their operations in order to minimise negative impacts on water availability. | Third-party verified | The company has provided evidence that it developed and implemented procedures and measures to reduce water consumption. This aspect has been third-party verified through its ISO14001 and Green Industry certification. |
| 2.4 | Land and soil quality Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality. | Progressing | The company has demonstrated it is progressing with this expectation through developing and implementing a soil monitoring plan within the site boundary, but the company could extend the spatial scope and parameters of the soil survey. |
| 2.5 | Air quality Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality. | Third-party verified | The company has provided evidence that it developed and implemented procedures and measures to manage discharges to air. This aspect has been third-party verified through its ISO14001 certification. |
| 2.6 | Greenhouse gases 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. | Conforming | The company has demonstrated that it conforms with this expectation by managing energy use and taking steps to reduce energy consumption. It developed a carbon compensation programme and procedures for replacing grid electricity with renewable energy technologies. |



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| 2.7 | <p>Energy consumption 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.</p> | Third-party verified | The company has provided evidence that it developed and implemented procedures and measures for reducing direct and indirect energy consumption. This aspect has been third-party verified through its ISO14001 and Green Industry certification. |
| 2.8 | <p>Tailings management Companies will dispose of or store tailings⁽²⁾ in a manner that minimises the risk of impacts to the environment and human health in accordance with recognised standards when available.</p> <p>⁽²⁾ Including to design, build, operate, monitor and decommission for all life cycle stages.</p> | Not Relevant | Tailings from mineral processing activities are not relevant to smelting facilities. |
| 2.9 | <p>Hazardous waste management 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.</p> | Third-party verified | The company has provided evidence that it developed and implemented procedures and disposed of hazardous wastes in a manner that minimises negative impacts. This aspect has been third-party verified through its ISO14001 certification. |
| 2.10 | <p>Non-hazardous and inert waste management 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> | Third-party verified | The company has provided evidence that it developed and implemented procedures for non-hazardous and inert waste management. This aspect has been third-party verified through its ISO14001 certification. |
| 2.11 | <p>Banned substances Companies will not use substances that are banned under international convention or local laws.</p> | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures for the management of controlled substances and it does not use banned substances at its smelter. |
| 2.12 | <p>Biodiversity protection 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> | Not Relevant | This expectation is not relevant since the operational footprint has been historically cleared of existing biodiversity and there are no ongoing impacts beyond it. |
| 2.13 | <p>Protected areas 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> | Not Relevant | This expectation is not relevant since the smelter site is not located in or adjacent to a legally protected zone. |
| 2.14 | <p>Closure and reclamation 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> | Not Relevant | Closure and reclamation are not relevant to smelting facilities. |
| 2.15 | <p>Training 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 | The company has demonstrated it is progressing with this expectation through developing training procedures and materials and providing environmental training on many aspects of this Principle, but the company could expand training to address missing aspects of this Principle. |

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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company improved ratings in one standard of this Principle and has achieved a high rating of *conforming* in all the standards. It has been audited for ISO 45001, but the certification was issued after the reporting period, and therefore it conforms with the expectation of implementing a health and safety management system. The company implemented safety procedures to ensure safe working conditions are maintained, incident investigations and follow up, and H&S training and conforms with those standards.

| STANDARD | | RATING | ADDITIONAL INFORMATION |
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| 3.1 | Health and safety management systems 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 as it developed and implemented procedures for the systematic management of health and safety and was at the advanced stage of being ISO 45001 certified but the certification was issued after the reporting period. |
| 3.2 | Safe working practices 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 as it developed and implemented safety procedures and measures to ensure safe working conditions are maintained, including monitoring operational areas, and conducting safety talks. |
| 3.3 | Incident investigations 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 as it developed and implemented procedures for reporting, investigating, and preventing incidents. |
| 3.4 | Incident follow up 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 as it developed and implemented procedures to monitor the outcomes of corrective actions. |
| 3.5 | Training 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 as it developed training materials and implemented training on health and safety. |

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company improved ratings in two standards of this Principle and has achieved a high rating of *conforming* in most of the standards. Through its Staff Handbook and implementation of other labour procedures and measures, the company has ensured workers receive fair remuneration, managed the risk of forced and child labour, complied with local laws and ensured that workers undertake overtime on a voluntary basis, and supported workers on freedom of association and collective bargaining. Some procedures developed, such as the Staff Handbook and others, partially address expectations related to the implementation of a labour management system, discrimination, violence and harassment, and training, evidencing the company is progressing with these standards.

| STANDARD | | RATING | ADDITIONAL INFORMATION |
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| 4.1 | Labour management systems Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4. | Progressing | The company has demonstrated it is progressing with this expectation through managing some elements of an overall labour management system. It has developed some procedures such as the Staff Handbook and others which support labour management systems but has not yet provided evidence of implementation or how it is monitored. |
| 4.2a) | Discrimination 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 with this expectation through developing procedures such as the Staff Handbook which address discrimination but has not yet provided evidence of implementation or how it is monitored. |
| 4.2b) | Violence and harassment 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 through developing procedures such as the Staff Handbook which address harassment but has not yet provided evidence of implementation or how it is monitored. |
| 4.3 | Remuneration Companies will ensure workers receive fair remuneration ⁽³⁾ 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. ⁽³⁾ 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 as it developed and implemented procedures to ensure workers receive fair remuneration for standard and overtime hours. |
| 4.4 | Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures to manage the risk of forced labour through its Staff Handbook and by directly working with applicants. |
| 4.5 | Child labour – worst forms 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. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures to eliminate the risk of child labour through its Staff Handbook and by checking the ID cards of applicants. |



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| 4.6 | <p>Child labour – other forms 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 as it developed and implemented procedures to eliminate the risk of other forms of child labour through its Staff Handbook and by checking the ID cards of applicants. |
| 4.7 | <p>Working hours 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⁽⁴⁾ or as prescribed by local laws (whichever is higher).</p> <p>⁽⁴⁾ 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> | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures related to working hours and obtaining permission from employees to work overtime. |
| 4.8 | <p>Freedom of association and collective bargaining 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 developed and implemented procedures to support workers on freedom of association and collective bargaining through union agreements and provisions outlined in the Staff Handbook. |
| 4.9 | <p>Training 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 with this expectation through developing training procedures and materials and providing environmental training on many aspects of this Principle, but the company could expand training to address missing aspects of this Principle. |

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PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company improved ratings in three standards of this Principle and has achieved a high rating of *conforming* in all standards based on the procedures developed for a methodical and systematic approach to stakeholder management. It has identified its stakeholder groups, implemented a grievance mechanism and other procedures to address stakeholder needs and expectations, and to manage communications with stakeholders. It has also provided training related to stakeholder management to employees.

| STANDARD | | RATING | ADDITIONAL INFORMATION |
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| 5.1 | Stakeholder management Companies will work towards implementing a systematic approach to stakeholder management to control and monitor relevant aspects of this Principle 5. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures for a methodical approach to managing stakeholders. Thai law mandates some stakeholder engagement and management, and the company has developed procedures to address stakeholder needs and communication. |
| 5.2 | Stakeholder mapping and engagement 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. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures for identifying stakeholder groups and reviewing their needs and expectations. |
| 5.3 | Grievance mechanism 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 as it developed and implemented a grievance mechanism and all complaints received were addressed. |
| 5.4 | Training 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. | Conforming | The company has demonstrated that it conforms with this expectation as it developed training materials and implemented training on stakeholder management. |

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

Overview of Principle Performance

The company improved ratings in four standards of this Principle and has achieved a high rating of *conforming* in several standards through its procedures for a methodical and systematic approach to community management and communications. It has engaged with the local community through committee meetings for consultation, assessed options to contribute to the development of communities nearby and developed project proposals received by the community. It has also implemented health check monitoring in the surrounding community and provided training related to community management to employees. There are no indigenous peoples' groups located around the smelter, hence, free prior and informed consent (FPIC) is not relevant. Another five standards were also 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 |
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| 6.1 | Community and indigenous people management 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. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures for a methodical approach to community management. Thai law mandates some stakeholder engagement and management, and the company has developed procedures to address community needs, expectations, and communication. There are no indigenous peoples' groups located around the smelter. |
| 6.2 | Community health and safety Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities. | Conforming | The company has demonstrated that it conforms with this expectation as it implemented measures to prevent and manage potential negative impacts on community health and safety. Trucks do not pass through communities when travelling to and from the port, and it has implemented health check monitoring in the surrounding community. |
| 6.3 | Consultation 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. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures for communicating with communities and has meetings with the CSR committee composed of representatives of the three surrounding communities. |
| 6.4 | Free, prior and informed consent (FPIC) 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 | This expectation is not relevant since there are no indigenous peoples nearby and their activities don't affect any indigenous peoples' lands, access to natural resources or cultural heritage. |
| 6.5 | Land rights, use and access 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 | This expectation is not relevant since there are no adverse impacts on land rights, land use and access to land arising from the company activities. |
| 6.6 | Physical displacement (resettlement) Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons. | Not Relevant | This expectation is not relevant since the smelter was constructed in a remote area in 1965 and it does not appear that any physical resettlement would have been required at any point. |



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| 6.7 | <p>Economic displacement (livelihoods) 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.</p> | Not Relevant | This expectation is not relevant since the smelter was constructed in a remote area in 1965 and it does not appear that any economic displacement would have been required at any point. |
| 6.8 | <p>Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.</p> | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented procedures for engaging and contributing to the development of communities nearby and has developed project proposals received by the community. |
| 6.9 | <p>Natural resource use and availability Companies will seek to understand and minimise negative impacts on access to and availability of natural resources⁽⁵⁾ by local communities and indigenous people.</p> <p>⁽⁵⁾ Including air, sunlight, soil, and water.</p> | Not Relevant | This expectation is not relevant since there are no negative impacts on access to and availability of natural resources by local communities and indigenous people. |
| 6.10 | <p>Cultural heritage protection 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.</p> | Not Relevant | This expectation is not relevant since there are no adverse impacts on cultural heritage. |
| 6.11 | <p>Training 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.</p> | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented training on managing negative impacts and contributing to the development of communities. |

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

Overview of Principle Performance

The company improved ratings in one standard of this Principle and is progressing with all the standards of this Principle related to human rights management and responsible sourcing. The company has demonstrated it is progressing in responsible sourcing according to international expectations, including the OECD Due Diligence Guidance 3T supplement. Thaisarco receives metals and secondary materials, as well as minerals. During the RMAP audit period the company reported mineral supply from the countries: the Democratic Republic of the Congo, Rwanda, Namibia, Australia, Portugal, Spain, Brazil, Burundi, Myanmar, Nigeria, Tanzania and Thailand. Minerals sourced from Dodd-Frank countries are partly sourced with support of the ITSCI programme which has been independently confirmed as fully OECD-aligned. Thaisarco has a public Supply Chain Policy and Due Diligence Report available on its website and is on the RMAP conformant list with an audit dated February 2023 which used the audit protocol of '2017'. However, the RMAP 2017 standard and assessment processes have not yet been confirmed as fully OECD-aligned publicly. The company could add content to their public due diligence report to be more quantitative and informative, including aligning the public report with the transactions listed for the period. The company could also provide information on auditor qualifications. The company 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 | <p>Human rights management 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.</p> | Progressing | The company has demonstrated it is progressing with this expectation through developing some procedures such as the Staff Handbook which addresses human rights issues and has implemented some measures to avoid complicity in direct and indirect human rights violations but has not evidenced how it implemented and monitored systematic approaches to human rights management. |
| 7.2 | <p>Use of private or state security personnel 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.</p> | Progressing | The company has demonstrated it is progressing with this expectation through developing some procedures and measures relevant to use of private or public security personnel. It applies due diligence to security companies and its website indicates that security service providers will conform with the VPSHR but has not evidenced how it implemented and monitored this. |
| 7.3 | <p>Responsible sourcing Companies^(6,7) 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⁽⁸⁾.</p> <p>⁽⁶⁾ Companies with smelters will seek to be third-party assessed against recommended criteria. ⁽⁷⁾ Companies without smelters will seek to apply aspects of the recommended criteria relevant to their own circumstances ⁽⁸⁾ 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.</p> | Progressing | The company has demonstrated it is progressing in responsible sourcing according to international expectations, including the OECD Due Diligence Guidance 3T supplement. Thaisarco receives metals and secondary materials, as well as minerals. During the RMAP audit period the company reported mineral supply from the countries: the Democratic Republic of the Congo, Rwanda, Namibia, Australia, Portugal, Spain, Brazil, Burundi, Myanmar, Nigeria, Tanzania and Thailand. Minerals sourced from Dodd-Frank countries are partly sourced with support of the ITSCI programme which has been |



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| | | | independently confirmed as fully OECD-aligned. Thisarco has a public Supply Chain Policy and Due Diligence Report available on its website and is on the RMAP conformant list with an audit dated February 2023 which used the audit protocol of '2017'. However, the RMAP 2017 standard and assessment processes have not yet been confirmed as fully OECD-aligned publicly. The company could add content to their public due diligence report to be more quantitative and informative, including aligning the public report with the transactions listed for the period. The company could also provide information on auditor qualifications. |
| 7.4 | <p>Training</p> <p>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.</p> | Progressing | The company has demonstrated it is progressing with this expectation through developing training procedures and materials, and providing training on relevant aspects of this Principle, but not evidence relevant to the implementation of training on VPSHR to security personnel. |

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

Overview of Principle Performance

The company improved ratings in one standard of this Principle and conforms with the expectation to positively influence suppliers of goods and services since it implemented a code of conduct covering all Principles of the Tin Code addressed to them. It is progressing with expectations related to raising awareness regarding concerns over forced or compulsory labour, managing the worst forms of child labour, managing serious human rights abuses, and positively influencing suppliers of secondary materials through developing some documentation which requests supplier due diligence, references the company's use and engagement through ITSCI for some minerals and by conducting its own visits to some suppliers. By purchasing from some suppliers who have their own Code of Conduct, which includes several ESG-related requirements, the company informally meets expectations related to influencing positively suppliers of ASM and LSM-produced minerals and providing guidance on the importance of formalisation and compliance, managing environmental and H&S impacts and negotiating with communities. The company could improve its rating by taking a proactive approach to influencing suppliers positively and reviewing existing documentation to make specific references to expectations of the Tin Code.

| STANDARD | | RATING | ADDITIONAL INFORMATION |
|----------|---|----------|--|
| 8.1 | Suppliers of ASM produced minerals, general 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. | Informal | Thaisarco purchases from traders, some with their own Code of Conduct. By purchasing from suppliers who have their own Code of Conduct, which includes several ESG-related requirements, the company informally meets the expectation of positively influencing suppliers of ASM-produced minerals and communicating the objectives of the Tin Code. This was evidenced for some suppliers but has not yet been evidenced for most of its suppliers. The company could improve its rating by implementing a proactive approach to influencing suppliers and reviewing existing documentation to make specific references to aspects of the Tin Code. |
| 8.2 | Principle 1 ASM minerals (compliance and policies) 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. | Informal | Thaisarco purchases from traders, some with their own Code of Conduct. By purchasing from suppliers who have their own Code of Conduct, which includes several ESG-related requirements, the company informally meets the expectation of communicating the importance of formalisation and compliance. This was evidenced for some suppliers but has not yet been evidenced for most of its suppliers. The company could improve its rating by implementing a proactive approach to influencing suppliers and reviewing existing documentation to make specific references to formalisation and compliance. |
| 8.3 | Principle 2 ASM minerals (environment) 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. | Informal | Thaisarco purchases from traders, some with their own Code of Conduct. By purchasing from suppliers who have their own Code of Conduct, which includes several ESG-related requirements, the company informally meets the expectation of communicating guidance on managing |



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| | | | environmental impacts. This was evidenced for some suppliers but has not yet been evidenced for most of its suppliers. The company could improve its rating by implementing a proactive approach to influence suppliers and review existing documentation to make specific references to environmental management. |
| 8.4 | <p>Principle 3 ASM minerals (health and safety) 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 | Thisarco purchases from traders, some with their own Code of Conduct. By purchasing from suppliers who have their own Code of Conduct, which includes several ESG-related requirements, the company informally meets the expectation of communicating guidance on managing H&S impacts. This was evidenced for some suppliers but has not yet been evidenced for most of its suppliers. The company could improve its rating by implementing a proactive approach to influence suppliers and review existing documentation to make specific references to H&S management. |
| 8.5 | <p>Principle 4 ASM minerals (labour) 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> | Progressing | The company has demonstrated that it is progressing in communicating guidance to raise awareness regarding concerns over forced or compulsory labour and the worst forms of child labour through developing some documentation which references the company's use and engagement through ITSCI and by conducting its own visits to some suppliers. This was evidenced for some suppliers but has not yet been evidenced for most of its suppliers. |
| 8.6 | <p>Principle 6 ASM minerals (communities) Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.</p> | Informal | Thisarco purchases from traders, some with their own Code of Conduct. By purchasing from suppliers who have their own Code of Conduct, which includes several ESG-related requirements, the company informally meets the expectation of communicating guidance on negotiating with communities. This was evidenced for some suppliers but has not yet been evidenced for most of its suppliers. The company could improve its rating by implementing a proactive approach to influence suppliers and review existing documentation to make specific references to community management. |
| 8.7 | <p>Principle 7 ASM minerals (human rights and conflict) 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.</p> | Progressing | The company has demonstrated it is progressing in communicating guidance to raise awareness regarding concerns over serious human rights abuses and conflict through developing some documentation which references the company's use of and engagement through ITSCI and by conducting its own visits to some suppliers. This was evidenced for some suppliers but has not yet been evidenced for most of its suppliers. |
| 8.8 | <p>Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.</p> | Informal | Thisarco purchases from some large-scale mines, some with their own Code of Conduct. By purchasing from suppliers who have their own Code of Conduct, which includes several ESG-related requirements, the company informally meets the expectation of positively influencing |



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| | | | suppliers of LSM-produced minerals and communicating the objectives of the Tin Code. This was evidenced for some suppliers but has not yet been evidenced for most of its suppliers. The company could improve its rating by reviewing existing documentation to make specific references to aspects of the Tin Code. |
| 8.9 | Suppliers of secondary materials Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Tin Code. | Progressing | The company has demonstrated that it is progressing with this expectation through developing some documentation and requirements related to supplier due diligence, but it is not clear that these major suppliers have been requested to meet or work towards all principles of the Tin Code. |
| 8.10 | Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code. | Conforming | The company has demonstrated that it conforms with this expectation as it developed and implemented a Code of Conduct for major suppliers of goods and services covering all Principles of the Tin Code. |



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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 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 has provided information on using tin products on its website with no noted breaches under data protection laws.

| STANDARD | | RATING | ADDITIONAL INFORMATION |
|----------|---|------------|--|
| 9.1 | Understanding potential impacts of tin 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 | Encouraging safe and appropriate use 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 | Communicating appropriate information 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 it developed procedures for communicating information to workers and stakeholders and communicated further information to users in the value chain and wider stakeholders on its website with no noted breaches under data protection laws. |



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PRINCIPLE 10: Work towards reporting against the International Tin Code

Overview of Principle Performance

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

| STANDARD | | RATING | ADDITIONAL INFORMATION |
|----------|---|------------|---|
| 10.1 | Policy Review 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 | Communicating reporting information 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 Thaisarco agreed to the publication of this report on activities against the Principles and Standards of the Tin Code. |
| 10.3 | Management Review Companies will ensure the above public information related to the Code is approved by senior responsible management | Conforming | The management of Thaisarco approved the content of this report. |



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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.

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| 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.