Date: 22 October 2025

To: All ITA Registered Auditors and participating companies

Subject: **Clarification Notice # 2**
ITA-RMI Assessment Criteria for Tin Smelting Companies v2 (“Criteria”)

Step 1C – Establish a system of controls and transparency over the minerals supply chain, **Sub-criteria 1C:8 Requirements for secondary sourcing**

The following shall not be considered as an absolute requirement under the expected process to obtain and retain information on receipts of secondary materials;

1C:8.3 ***Transport*** *documentation from the* ***immediate supplier***

It is recognised that the ***immediate supplier*** to a company may be a trading company and not the original source of the delivered materials. Trading companies may facilitate the delivery of materials from the location generating those materials - to the smelter - without the materials passing through their own trader location. For that reason the location of the ***immediate supplier*** may be irrelevant.

The company may make alternative appropriate efforts to obtain and retain suitable information that allows them to identify the plausibility of the secondary nature of its receipts, and to reach a justifiable conclusion in Step 2A:7.6 (secondary materials verified to be out-of-scope).

Susannah Costley-White
Tin Code Programme Manager
International Tin Association
tincode@internationaltin.org