




INTERNATIONAL TIN CODE REPORT: Fenix Metals

GENERAL INFORMATION	
Company details	<p>Fenix Metals Sp. z o.o. ul. Strefowa 13, 39-442 Chmielow, Poland</p> 
Date of this report	Period covered June 2023 - October 2025
Date of previous report	July 2021 (June 2022 - May 2023)
Report author(s)	Independent External Assessor Programme Manager (Tin Code), International Tin Association Ltd
Report verified by	Jolanta Sapielak, Quality Assurance Manager
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About our company	<p>Fenix Metals (hereinafter referred to as Fenix) is a recycler of secondary materials containing tin and lead located in Chmielow near Tarnobrzeg, in east Poland. It manufactures pure tin, tin alloys, tin-lead and lead alloys. The scope of this Tin Code Report includes the Fenix smelter in Poland.</p> <p>The raw materials processed by Fenix are primarily secondary materials, comprising either waste or processed metals created during product manufacturing. The company does not buy any tin mineral concentrates although it may treat by-product materials from other tin smelters all of whom the company states have undergone due diligence audits and are listed as 'conformant' status with RMAP. It has stated on its website its commitment for sustainability, which goes beyond tin recycling to include active support for initiatives that promote sustainable development, education, culture, and healthcare in the region where they operate.</p> <p>The company holds ISO 9001, ISO 14001, ISO 14021 and ISO 45001 certifications.</p>
Significant changes from previous report	<p>This is the company's fifth Tin Code report, demonstrating the steps Fenix has taken to progress. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement.</p> <p>Since the last report, the company maintained all ratings at the highest level of Third-Party Verified or Conforming, namely Priority Standards; 2.11 Banned substances, 2.13 Protected areas, 3.2 Safe working practices, 4.4 Forced labour, 4.5 Child labour – worst forms, 7.2 Use of private or state security personnel. The company made progress to be Third-Party Verified for 1.1 Policies, 1.3 Legal compliance, 2.6 Greenhouse gases, 7.3 Responsible Sourcing; 1.3 and 7.3 also being Priority Standards. The company made progress by Conforming with 4.2b Violence and harassment expectations through its grievance mechanism, Code of Conduct, and assessments of its efficacy of measure in place.</p>



Visual Progress Guide



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	<p>Notes: 1) 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.</p>
Further information and references	<ol style="list-style-type: none">1. Fenix website2. Certified Sustainability3. Corporate Social Responsibility4. CSR Policy5. Integrated Management System Policy6. Public Due Diligence Report and Supply Chain Policy



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

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating of two standards of this Principle. The company has achieved the highest rating of *third-party verified* in two standards and *conforming* in all of the other standards in this Principle. Through a third-party audit, it is third-party verified for the expectations related to policies and legal compliance. Through developing, publishing and implementing policies to support legal compliance and improve practices with respect to the standards of the Tin Code, and implementing a functional whistleblowing procedure, the company conforms with the expectations related to management systems, business integrity, transparency, whistleblowing and training on relevant aspects of this Principle.

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.	Third-party verified	The company has demonstrated that it conforms with this expectation by publishing policies to support legal compliance and improve practices with respect to the standards of the Tin Code. The complete set of publicly available policies that address the Tin Code have been verified by a third-party.
1.2	Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Conforming	The company has demonstrated that it conforms with this expectation by implementing a formal system to manage legal compliance and governance issues.
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.	Third-party verified	The company has demonstrated that it conforms with this expectation by keeping all business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including through the maintenance of legal registers with respect to health and safety and environmental requirements up to date. The Company's registrations, licences and other documents have been audited by a third-party and verified as complete and valid.
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.	Conforming	The company has demonstrated that it conforms with this expectation by implementing a policy to address and manage risks related to anti-competitive behaviour, corruption and bribery, including facilitation payments.
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.	Conforming	The company has demonstrated that it conforms with this expectation through its publicly declared support for the implementation of the principles of the Extractive Industries Transparency Initiative (EITI) in its Supply Chain Policy and has publicly confirmed that all relevant taxes, fees and/or royalties have been paid to governments on the UK Company Information (accounts) website, covering the Polish operation. As a smelter without integrated mining operations that is not located in an EITI



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			implementing country, nor is a paid member as an EITI Supporting Organisation, the company is out of scope of formal EITI reporting.
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 through a functional whistleblowing procedure that is accessible 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 through its training of employees and contractors on issues relevant to the scope of Principle 1, including legal compliance and the company's Code of Conduct and Ethics.

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating of one standard of this Principle. The company achieved the highest rating of *third-party verified* in most of the relevant standards of this Principle. Through its ISO 14001 and additional supporting evidence, the company demonstrated the implementation of an environmental management system, management of water quality, water consumption, air quality, energy consumption, hazardous and non-hazardous and inert waste, biodiversity protection, and training on relevant aspects of this Principle. Through an independent energy audit, the company demonstrated the measurement, monitoring and public disclosure of greenhouse gases. It conforms with the expectations related to land and soil quality, not using banned substances and respecting protected areas. Expectations related to tailings management 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 demonstrated that it has developed and implemented an environmental management system. This aspect has been third-party verified through its ISO 14001 certification for its operation.
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 demonstrated that it has developed and implemented procedures to monitor and manage wastewater generation and discharges, enabling it to control the risk of adverse impacts on water quality. This has been third-party verified through its ISO 14001 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 demonstrated that it has developed and implemented procedures to manage water consumption and availability. This aspect has been third-party verified through its ISO 14001 certification for its operation.
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.	Conforming	The company has demonstrated that it conforms with this expectation through its application of the mitigation hierarchy to limit releases likely to adversely impact land and soil quality and routine assessment of soil contamination risks and pathways.
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 demonstrated that it has developed and implemented procedures to monitor and manage discharges to air, enabling it to control the risk of adverse impacts on air quality. This has been third-party verified through its ISO 14001 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.	Third-party verified	The company has demonstrated it has calculated GHG emissions according to a nationally recognised standard, publicly disclosed emissions data and is implementing technical changes to reduce GHG emissions. The company's GHG emission calculations and an energy audit targeting reduced energy consumption and GHG



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			emissions have been undertaken by independent third parties.
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 demonstrated that it has developed and implemented procedures and measures to monitor and manage energy consumption per unit of production. This has been third-party verified through an independent energy audit and supported by evidence of implemented energy-efficiency measures and tracking of energy consumption per tonne of product.
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 demonstrated that it has developed and implemented procedures to monitor and report the generation of hazardous waste and manage the risk of adverse impacts on human health and the environment. This has been third-party verified through its ISO 14001 certification and data submitted to the regulator.
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 demonstrated that it has developed and implemented procedures to monitor and report the generation of non-hazardous and inert waste and manage the risk of adverse impacts on human health and the environment. This has been third-party verified through its ISO 14001 certification and data submitted to the regulator.
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 through compiling, maintaining and complying with legal registers covering health and safety, and environmental operational aspects. This provides evidence it has a system in place to ensure it does not use substances that are banned under international convention or local laws.
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>	Third-party verified	The company has demonstrated that it has developed and implemented biodiversity management and protection, and it is subject to environmental impact assessment (including protection of biodiversity) for new activities at its site using expert third parties to undertake biodiversity impact analysis.
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>	Conforming	The company has demonstrated that it conforms with this expectation by evidencing that it respects legally protected areas in accordance with local laws and that its operation is outside zones that are adjacent to protected areas.
2.14	<p>Closure and reclamation</p>	Not Relevant	Closure and reclamation are not relevant to smelting facilities.



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	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.		
2.15	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.	Third-party verified	The company has demonstrated that it has provided training on environment-related topics to its employees and contractors. This has been third-party verified through its ISO 14001 certification and supporting evidence of environmental training of employees and contractors.

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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company has achieved the highest rating of *third-party verified* in all of the standards of this Principle. Through its ISO 45001 certifications, it demonstrates the implementation of a health and safety (H&S) management system, safe working practices, documentation of incident investigations and follow-up, and training on relevant aspects of this Principle.

STANDARD		RATING	ADDITIONAL INFORMATION
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.	Third-party verified	The company has demonstrated that it has developed and implemented an occupational health and safety management system. This has been third-party verified through its ISO 45001 certification for its operation.
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.	Third-party verified	The company has demonstrated that it has developed and implemented safety procedures and measures that minimise and seek to eliminate workplace fatalities, injuries and occupational diseases among employees, contractors and visitors. This has been third-party verified through its ISO 45001 certification.
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.	Third-party verified	The company has demonstrated that it has developed and implemented procedures that document reportable health and safety incidents using a transparent and inclusive procedure that allows affected workers to provide input. This has been third-party verified through its ISO 45001 certification.
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.	Third-party verified	The company has demonstrated that it has developed and implemented procedures that following a reportable health and safety incident, will define and implement corrective actions in a timely fashion and monitor the effectiveness of such actions. This has been third-party verified through its ISO 45001 certification.
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.	Third-party verified	The company has demonstrated that it has provided appropriate and periodic training for employees regarding relevant aspects of occupational health and safety. This has been third-party verified through its ISO 45001 certification.

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating of one standard of this Principle. The company has achieved a high rating of *conforming* in all standards of this Principle. Through the development of labour-related policies and legal compliance with strict Polish laws, internal regulations and its approach to equitable remuneration, the company conforms with the expectations related to labour management systems, management of the risk of discrimination, violence and harassment, remuneration, forced labour, child labour (worst and other forms), working hours and freedom of association, collective bargaining and training on relevant aspects of this Principle.

STANDARD		RATING	ADDITIONAL INFORMATION
4.1	Labour management systems 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 labour-related policies and internal regulations and systematically manages issues under Principle 4.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing an Equality Policy (including on gender) and does 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.
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	Conforming	Fenix has a grievance procedure for employees and contractors and requirements related to avoiding discrimination and includes expectations in its Code of Conduct regarding workplace violence and harassment. The company has provided evidence of assessments to determine the efficacy of measures in place.
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 through providing evidence of wages that exceed the legal minimum, and that overtime and statutory payments are made in compliance with strict Polish laws.
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 through legal compliance with strict Polish laws, internal regulations and its approach to equitable remuneration. Based on this, there is no indication that the company uses or supports slavery, servitude, forced or compulsory labour.
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 through legal compliance with strict Polish laws and internal regulations. Based on this, there is no indication that the company engages in any form of child



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			labour (including the worst forms as defined by Article 3 of ILO Convention No. 182 including that which is likely to harm the health, safety or morals of children).
4.6	<p>Child labour – other forms</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 legal compliance with strict Polish laws and internal regulations. Based on this, there is no indication that the company engages in any form of child labour.
4.7	<p>Working hours</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⁽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 through providing evidence that normal and overtime hours are within legal limits, the provision of certain benefits and that overtime is voluntary in accordance with strict Polish laws.
4.8	<p>Freedom of association and collective bargaining</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 Polish law allows for the right to form organisations in order to represent and defend one's rights and interests and to join these organisations.
4.9	<p>Training</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>	Conforming	The company has demonstrated that it conforms with this expectation through providing appropriate and periodic training for employees and contractors regarding relevant aspects of labour practices and management.

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PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company has achieved a high rating of *conforming* in all of the standards of this Principle. Through developing and implementing a systematic approach to stakeholder management, stakeholder mapping, grievance resolution and training on relevant aspects of this Principle, the company conforms with the expectations related to stakeholder management, stakeholder mapping, and engagement, grievance mechanism and training.

STANDARD		RATING	ADDITIONAL INFORMATION
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 through developing and implementing a systematic approach to stakeholder management to control and monitor relevant aspects of Tin Code Principle 5.
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 through undertaking stakeholder mapping and engagement.
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 through developing and implementing an appropriate grievance mechanism to receive and facilitate resolution of concerns raised by individuals, workers, communities or civil society organisations regarding company activities and engages with stakeholders during the process of investigating and resolving grievances.
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 through providing appropriate and periodic training for employees regarding relevant aspects of this Principle and requires onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.

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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 has achieved a high rating of *conforming* in five standards of this Principle, and all other standards are not relevant. The company is conforming against expectations related to community management, community health and safety, consultation with local communities, contributing to local economic development, and training on relevant aspects of this Principle. 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	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 through the development of documentation, including an Integrated Management System (IMS) Policy, a CSR Policy, and evidence of consultations with members of local communities, which together reflect a systematic approach to the management of community issues.
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 is conforming with this expectation through developing and implementing a procedure to identify and manage potential negative health and safety impacts on local communities.
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 through interacting with communities on local economic development initiatives and implementing plans for consulting with local communities and actively responding to their views. Consultations as part of EIAs are managed by local competent authorities (and are therefore, not the responsibility of the company). Consultations as part of EIAs are managed by local competent authorities (and are therefore not the responsibility of the company).
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	Poland does not have indigenous peoples; hence this standard is not relevant.
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	The company's site is part of a larger industrial estate with no material adverse impacts on land rights, land use and access to land; hence this standard is not relevant.
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	The company's site is part of a larger industrial estate with no requirement for involuntary resettlement or creation of displaced persons; hence this standard is not relevant.



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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	The company's site is part of a larger industrial estate with no requirement for economic displacement; hence this standard is not relevant.
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 through developing and implementing local development and assistance initiatives.
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	The company's site is part of a larger industrial estate with no material negative impacts on access to and availability of natural resources by local communities, hence this standard is not relevant.
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	The company's site is part of a larger industrial estate with no material negative impacts on cultural heritage; hence this standard is not relevant.
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 through developing and implementing training materials on relevant aspects of this Principle and provided evidence that this training has been rolled out to employees.

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

Overview of Principle Performance

The company has achieved a high rating of *conforming* in three standards of this Principle; with the expectations related to providing guidance on the Voluntary Principles on Security and Human Rights (VPSHR), training through compliance with local laws, human rights management and the development of training materials on relevant aspects 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 Due Diligence Guidance 3T Supplement. During the RMAP assessment period (1 July 2023 - 31 December 2024), the company reported that it primarily sourced secondary material (recycled/scrap). The company also stated that any 'tin materials' sourced were obtained solely from other smelters included on the RMAP conformant list. The company has a public Responsible Supply Chain Policy and Due Diligence Report available on its website. The company's due diligence management systems have been third-party verified against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021), with a conformance letter dated 22 April 2025. The independent Alignment Assessment of the standards of the Criteria together with the audit management process under the RMAP shows 'fully aligned'. Some opportunities for continual improvement were noted regarding implementation of the company's grievance mechanism and KYC process. These did not significantly impact the company's ability to avoid supply chain abuses.

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>	Conforming	The company has demonstrated that it conforms with this expectation by implementing an approach to human rights management that is compliant with Polish and EU laws, supported by environmental management, stakeholder engagement, and community and worker management systems.
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>	Conforming	The company has demonstrated that it is conforming with this expectation through using direct or contracted workers complies with local laws and has provided evidence that security is guided by the Voluntary Principles on Security and Human Rights.
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>	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 Due Diligence Guidance 3T Supplement. During the RMAP assessment period (1 July 2023 - 31 December 2024), the company reported that it primarily sourced secondary material (recycled/scrap). The company also stated that any 'tin materials' sourced were obtained solely from other smelters included on the RMAP conformant list. The company has a public Responsible Supply Chain Policy and Due Diligence Report available on its website. The



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			company's due diligence management systems have been third-party verified against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021), with a conformance letter dated 22 April 2025. The independent Alignment Assessment of the standards of the Criteria together with the audit management process under the RMAP shows 'fully aligned'. Some opportunities for continual improvement were noted regarding implementation of the company's grievance mechanism and KYC process. These did not significantly impact the company's ability to avoid supply chain abuses.
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>	Conforming	The company has demonstrated that it conforms with this expectation through developing training procedures and materials, providing periodic training on principal human rights and conflict-related issues, and including these topics in induction and refresher training for both employees and contractors.



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

Overview of Principle Performance

The company has achieved the highest rating of *third-party verified* in the two relevant standards of this Principle. Through its independent report verifying the legality of suppliers verified by RSM, it demonstrates it implemented a system to check major suppliers of secondary materials and goods and services are legally operating, and requests suppliers meet or work towards the principles of this Tin Code. The company does not source ASM or LSM-produced minerals, therefore most of the standards of this Principle are not relevant to the company.

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.	Not Relevant	This standard is not relevant as the company does not source ASM-produced minerals.
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.	Not Relevant	This standard is not relevant as the company does not source ASM-produced minerals.
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.	Not Relevant	This standard is not relevant as the company does not source ASM-produced minerals.
8.4	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.	Not Relevant	This standard is not relevant as the company does not source ASM-produced minerals.
8.5	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.	Not Relevant	This standard is not relevant as the company does not source ASM-produced minerals.
8.6	Principle 6 ASM minerals (communities) Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.	Not Relevant	This standard is not relevant as the company does not source ASM-produced minerals.
8.7	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.	Not Relevant	This standard is not relevant as the company does not source ASM-produced minerals.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.	Not Relevant	This standard is not relevant as the company does not source LSM-produced minerals.
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.	Third-party verified	The company has demonstrated that it has developed and implemented a system to check major suppliers of secondary materials are legally operating and request suppliers meet or work towards the principles of this Tin



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8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code.	Third-party verified	Code. This has been third-party verified by RSM in its independent report verifying the legality of suppliers.
			The company has demonstrated that it has developed and implemented a system to check major suppliers of goods and services are legally operating and request suppliers meet or work towards the principles of this Tin Code. This has been third-party verified by RSM in its independent report verifying the legality of suppliers.



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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 properties and potential effects of tin on humans and the environment; and has also encouraged the safe, appropriate and efficient use of tin. The company also conforms in communicating information on tin and the tin industry 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 advance the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data.
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 requirement to 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.
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 by disclosing information relating to its site and operations and has provided evidence of its contribution to the disclosure of more general information related to tin and the tin industry, 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 Fenix Metals 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 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	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 has demonstrated that it conforms with this expectation through providing evidence that policies relevant to the Tin Code are reviewed and updated at least annually.
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 Fenix Metals 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 Fenix Metals 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.

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.