




INTERNATIONAL TIN CODE REPORT: Operaciones Metalúrgicas S.A.

GENERAL INFORMATION	
Company details	<p>Operaciones Metalúrgicas S.A. Km 3.5 Carretera a Cochabamba, Zona Industrial Huajara, Oruro, Bolivia</p> 
Date of this report	Reporting period 1st January 2024 - 31st December 2024
Date of previous report	December 2023
Report author(s)	Independent External Assessor Programme Manager (Tin Code), International Tin Association Ltd
Report verified by	General Manager – Mariano Pero
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About our company	<p>Operaciones Metalúrgicas S.A. (hereinafter OMSA) was established in Oruro city, Bolivia, in 1937 by the Perú family and it consists of one smelter, which is the scope of this Tin Code report. The company produces around 320 tonnes of tin metal and alloys per month from minerals only sourced from Bolivia. It produces two qualities of high-purity tin metal sold worldwide.</p> <p>OMSA has a workforce of over 190 employees. It purchases minerals produced by local mining cooperatives from the Oruro tin region, which are relatively large-scale and well-controlled under Bolivian law. The minerals are in the majority sourced directly from cooperatives, although to a small degree through local traders. According to its website, the company has a Corporate Social Responsibility programme and has been supporting its local community through diverse social projects.</p> <p>OMSA holds ISO 9001, 14001 and 45001 certifications.</p>
Significant changes from previous report	<p>This is the company's third Tin Code report, and it demonstrates the steps OMSA has taken to achieve higher ratings and highlights areas of progress across over half of all standards. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement.</p> <p>Since the previous report, various improvements have been made by the company, notably including:</p> <ol style="list-style-type: none"> Achieving third-party verification on implementing an environmental management system (2.1), managing discharges to surface and/or groundwater (2.2), and to air (2.5), minimising the production of hazardous wastes (2.9) and non-hazardous and inert wastes (2.10), H&S management (3.1), safe working practices (3.2), incident investigation (3.3), incident follow-up (3.4) and H&S training



Visual Progress Guide



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	<p>(3.5) through its ISO certifications. The company also achieved third-party verification for its responsible sourcing (7.3) through its third-party assurance of OMSA's due diligence public reporting, policies and procedures that was undertaken against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021).</p> <ol style="list-style-type: none"> 2. Conforming with legal compliance (1.3), land and soil quality (2.4), labour management systems (4.1), discrimination (4.2a), violence and harassment (4.2b), forced labour (4.4), working hours (4.7), stakeholder management (5.1), stakeholder mapping and engagement (5.2), grievance mechanism (5.3), community and indigenous people's management (6.1), community health and safety (6.2), contributing to the economic development of local communities (6.8), training on interactions with local communities and indigenous people (6.11), Suppliers of ASM produced minerals (8.1), communicating the importance of formalisation to ASM suppliers (8.2), communicating guidance on managing environmental impacts to ASM suppliers (8.3), communicating guidance on managing health and safety impacts to ASM suppliers (8.4), communicating guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour to ASM suppliers (8.5), communicating guidance on negotiating with local communities to ASM suppliers (8.6), communicating guidance to raise awareness regarding concerns over serious human rights abuses and conflict to ASM suppliers (8.7), and suppliers of LSM produced minerals (8.8). 3. Progressing with training on legal compliance (1.7), greenhouse gases (2.6), training on labour practices (4.9), training on stakeholder engagement (5.4), human rights management (7.1), use of private or state security personnel (7.2), training on responsible sourcing (7.4), and communicating appropriate information (9.3). 4. Providing some evidence related to suppliers of goods and services (8.10) informally addressing this standard. <p>Notes: <i>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.</i></p>
Further information and references	<ol style="list-style-type: none"> 1. OMSA's website: https://www.omsabo.com/web3/ 2. Whistleblowing and grievance mechanism: https://www.omsabo.com/web3/claims/create 3. Commercial policy: https://www.omsabo.com/web3/policy/trade 4. Due Diligence (Step 5) Report: https://omsabo.com/web3/fivesteps 5. Public Assurance Report for responsible sourcing: http://tincode.org/wp-content/uploads/2025/02/240625-TC-Assurance-Report-OMSA-1-Jun-2023-30-Sep-2024-ITA-Revised-Final-V2.pdf 6. Responsible Supply Chain Policy: https://omsabo.com/web3/en/policy/chainsupply 7. Code of Conduct: https://omsabo.com/web3/conductcode



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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 and now conforms with the expectation related to legal compliance through developing and implementing a matrix for the identification and assessment of compliance with legal requirements; and keeping up to date business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws. Through its publicly available whistleblowing channel accessible from its website it is also *conforming* with the expectation related to whistleblowing. The company has several policies in place addressing some of the principles of the Tin Code, it has developed some elements of a formal integrated management system, a commercial policy and code of conduct and ethics that address managing the risks related to bribery and corruption, has publicly declared its support to the EITI principles in its Commercial Policy, and is training its employees on some aspects of this principle; which evidenced it is *progressing* with those expectations.

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.	Progressing	The company has demonstrated that it is progressing through developing and implementing some policies addressing some but not all the principles of the Tin Code. It has policies addressing legal compliance and business integrity (Principle 1), environmental (Principle 2), health and safety (Principle 3), supply chain, responsible sourcing, and human rights (Principle 7) policies and procedures.
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 through developing and implementing some elements of a formal integrated management system to manage legal compliance and governance issues, which is in progress towards full implementation.
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 through developing and implementing a matrix for the identification and assessment of compliance with legal requirements; and keeping up to date business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including health and safety and environmental requirements.
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 has demonstrated that it is progressing through its commercial policy and code of conduct and ethics that address managing the risks related to bribery and corruption in the context of suppliers of primary materials and employees but has not yet provided evidence related to implementation and procedures for managing anti-competitive behaviour.
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⁾	Progressing	The company has demonstrated that it is progressing through its publicly declared support to the EITI Principles in its Commercial Policy on its website but has not yet produced a voluntary report confirming that all relevant



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	(¹) Reporting is required in an implementing country of EITI.		taxes, fees and/or royalties have been paid to governments. 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.
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 developing and implementing whistleblowing procedures for employees and stakeholders, including a publicly available whistleblowing channel accessible from its website.
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.	Progressing	The company has demonstrated that it is progressing through developing training procedures and materials and providing training on some but not all aspects relevant to this Principle.

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company has made improvements for this reporting period and improved ratings on seven standards of this Principle. Through its ISO 14001 certification it is now *third-party verified* on the expectations related to implementation of an environmental management system, water quality management, air quality management, hazardous, and non-hazardous and inert waste management. It conforms with expectations related to reducing water consumption and to minimise negative impacts on water availability, land and soil quality management, reducing energy consumption, and respecting legally protected areas in accordance with local laws. Through the development of several standards and procedures related to a wide range of environmental aspects, OMSA evidenced that it is *progressing* in greenhouse gases management, not using banned substances, and environmental training for employees. Expectations related to the management of tailings, biodiversity protection, 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 a systematic approach to an environmental management system. This aspect has been third-party verified through its ISO 14001 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 demonstrated that it has developed and implemented measures to manage discharges to surface waters and groundwaters to minimise impacts on water quality. This aspect 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.	Conforming	The company has demonstrated that it conforms with this expectation through developing procedures to collect water use and availability data and has implemented actions to reduce water consumption to minimise negative impacts on water availability.
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 developing and implementing procedures related to managing and minimising negative impacts on land, a monitoring programme and other procedures for appropriate monitoring of soil quality and guidelines for sampling.
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 measures to understand and manage discharges to air to minimise negative impacts on air quality. This aspect 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.	Progressing	The company has demonstrated that it is progressing through developing a methodology and template for calculating its greenhouse gas emissions but has not completed the calculations or publicly disclosed greenhouse gas emission data.



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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>	Conforming	The company has demonstrated that it conforms with this expectation through developing procedures and implementing measures to reduce energy consumption by improving efficiency.
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	Conformance with this expectation is considered not relevant as 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 measures to manage and dispose of hazardous wastes in a manner that minimises negative impacts on human health and the environment. This aspect has been third-party verified through its ISO 14001 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 demonstrated that it has developed and implemented measures to minimise the production of non-hazardous and inert wastes and consider reuse and recycling options, in a manner that minimises negative impacts. This aspect has been third-party verified through its ISO 14001 certification.
2.11	<p>Banned substances Companies will not use substances that are banned under international convention or local laws.</p>	Progressing	The company has demonstrated that it is progressing by not using substances banned under international conventions or local laws but has not yet provided evidence of a procedure for systematically reviewing and updating the list of banned substances based on changes to national laws and international conventions.
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	Conformance with this expectation is considered not relevant as the site is located in an industrial park in an area where urban and industrial development have resulted in limited biodiversity value in the existing environment and the absence of any critical natural habitat that could be impacted by the company's activities.
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 respecting legally protected areas in accordance with local laws. Evidence provided by the company shows the absence of protected areas likely to be affected by the company's activity.
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	Conformance with this expectation is considered not relevant as closure and reclamation plans do not apply to non-mining operations and 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 that it is progressing through developing training procedures and materials and providing training on some but not all aspects relevant to this Principle.

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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company has made improvements for this reporting period on every standard of this Principle. As a result, the company has achieved the highest rating of *third-party verified* in all standards of this Principle. Through its ISO 45001 certification it is *third-party verified* for the expectations related to implementing a health and safety management system, safety procedures to ensure safe working conditions are maintained, incident investigations and follow up procedures, 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 developed and implemented training on relevant aspects of this Principle. 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 for this reporting period and improved ratings on six standards of this Principle. As a result, it conforms with the expectations related to labour management systems, discrimination, violence and harassment, remuneration, forced labour, child labour – worst and other forms, working hours, freedom of association and collective bargaining. The company is *progressing* with the expectations related to 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 policies and procedures for managing aspects related to labour issues such as an internal work regulations handbook, a Code of Conduct and Ethics and through negotiations and agreements with the workers' union.
4.2 a)	Discrimination Companies will not make employment decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing policies and procedures to prevent discrimination.
4.2 b)	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	The company has demonstrated that it conforms with this expectation through developing and implementing policies and procedures to prevent workplace violence and harassment.
4.3	Remuneration Companies will ensure workers receive fair remuneration for standard and overtime hours worked that meets or exceeds the local legal minimum plus any applicable statutory benefits and provide equal pay for work of equal value.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing policies and procedures, that include salary agreements and salary increases, to ensure it is paying workers at or above the local legal minimum and includes applicable statutory benefits and equal pay for work of equal value.
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 developing and implementing policies and procedures to prevent forced 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 developing and implementing policies and procedures, including internal regulations, to manage the risk of the worst forms of child labour in its own operations and its supply chain.
4.6	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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing policies and procedures, including internal regulations, to manage the risk of other forms of child labour in its own operations and its supply chain.



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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 through developing and implementing its internal work regulations handbook and proof of leave, days of rest and the voluntary nature of 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 through the confirmation of the workers union and formally engaging with all workers on freedom of association and collective bargaining per local labour laws.
4.9	<p>Training Companies will provide appropriate and periodic employee training 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 that it is progressing through developing training procedures and materials and providing training on some but not all aspects relevant to this Principle.

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PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company has made improvements for this reporting period on every standard of this Principle. As a result, it conforms with the expectations related to stakeholder management, stakeholder mapping and engagement, and grievance mechanisms. It has a complaint and suggestions mailbox for workers inside its facilities, and a grievance channel accessible from its website. The company is *progressing* with the expectations related to training on relevant aspects of this Principle.

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 procedures that address the management of a wide range of internal and external stakeholder groups.
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 is conforming with this expectation through developing and implementing stakeholder mapping and engagement with a wide range of appropriate internal and external stakeholder groups.
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 is conforming with this expectation by developing and implementing an appropriate grievance mechanism, a grievance channel accessible from its website and provides phone and email contact details.
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.	Progressing	The company has demonstrated that it is progressing through developing training procedures and materials and providing training on some but not all aspects relevant to this Principle.

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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 made improvements for this reporting period on every relevant standard of this Principle. As a result, it conforms with the expectations related to community and indigenous people management, community health and safety, local economic development and training on relevant aspects of this Principle.

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 developing and implementing the management of community health and safety risks and its approach to purchasing from local suppliers of minerals and other goods and services.
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 through developing and implementing procedures to manage the potential risks to community health and safety through air quality management, safe driving, securing the site against unauthorised access and retaining wastewater and solid wastes within the site boundary.
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.	Not Relevant	Conformance with this expectation is considered not relevant as consultation in the urban environment in which the company operates (city of Oruro, population 359,000) is not considered necessary (city residents are able to express their views via the company's grievance mechanism).
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	Conformance with this expectation is considered not relevant as no indigenous peoples are located near to or impacted by the company's operations.
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	Conformance with this expectation is considered not relevant as no land rights, land use or access is impacted by the company's operations.
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	Conformance with this expectation is considered not relevant as the company's operations and activities have not resulted/are not resulting in involuntary resettlement.
6.7	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.	Not Relevant	Conformance with this expectation is considered not relevant as the company's operations and activities have not resulted/are not resulting in economic displacement.
6.8	Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Conforming	The company has demonstrated that it conforms with this expectation through the positive impacts of purchasing



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			primary materials from local and regional mining cooperatives and procurement of goods and services mainly from local and regional companies. Additional contributions to local economic development are not considered relevant given the urban environment in which the company operates.
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	Conformance with this expectation is considered not relevant as evidence provided by the company shows that immediate surroundings are other industrial operations, and given the industrial setting and urban environment, negative impacts on access to and availability of natural resources are not considered 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	Conformance with this expectation is considered not relevant as evidence provided by the company shows that immediate surroundings are other industrial operations, and given the industrial setting, established nature and urban environment, negative impacts on cultural heritage are not considered 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 made improvements for this reporting period and improved ratings on all standards of this Principle. The company publicly reports on its efforts according to international expectations and laws, including the OECD DD Guidance 3T supplement. During the due diligence reporting period (1 June 2023 – 30 September 2024), the OMSA smelter reported sourcing minerals originating 100% from Bolivia. The company has a public Supply Chain Policy and Due Diligence Report available on its website. The company's due diligence management systems have been *third-party verified* through assurance against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021) with an audit report dated 20 November 2024. The independent Alignment Assessment against OECD Guidance of the standards of the Criteria and the audit management process under the Tin Code shows 'fully aligned'. The company is *progressing* with expectations related to human rights management, use of private or state security personnel, and training on relevant aspects of 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.</p>	Progressing	The company has demonstrated that it is progressing through references to the management of human rights risks in its Code of Conduct and Ethics, Commercial Policy, Supply Chain Policy, Internal Regulations (that guide labour relations), training for internal and external security staff and site-visit based due diligence on mining cooperative suppliers, but has not carried out an overall human rights risk assessment for its own operations to inform its management of such risks.
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 that it is progressing through its use of an authorised and licenced external security company and internal security staff that comply with national legal requirements but has not yet ensured that activities and approaches used by external and internal security are guided by and aligned with 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.</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.</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 DD Guidance 3T supplement. During the due diligence reporting period (1 June 2023 – 30 September 2024), the OMSA smelter reported sourcing minerals originating 100% from Bolivia. The company has a public Supply Chain Policy and Due Diligence Report available on its website. The company's due diligence management systems have been third-party verified through assurance against the ITA-RMI Assessment Criteria for Tin Smelters (v2 Mar 2021) with an



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			audit report dated 20 November 2024. The independent Alignment Assessment against OECD Guidance of the standards of the Criteria and the audit management process under the Tin Code shows 'fully aligned'.
7.4	Training 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.	Progressing	The company has demonstrated that it is progressing through developing training procedures and materials and providing training on some but not all aspects relevant to this Principle.

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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 made improvements for this reporting period on every relevant standard of this Principle. Through developing and implementing its commercial policy, 'Know your Counterparty' procedure and procedures, and procedures for selecting, registering, and monitoring suppliers of primary materials (including monitoring legal compliance aspects) and purchase of primary materials, it conforms with the expectations related to influencing suppliers of ASM and LSM produced minerals positively. The company informally addresses the expectation of influencing suppliers of goods and services positively as limited evidence was provided.

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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing policies and procedures addressed to suppliers. It has a commercial policy and another procedure for informing primary material suppliers of OMSA's requirements and expectations, focused on commercial, legal compliance, business integrity, responsible sourcing and human rights aspects and has provided evidence that the company has communicated this policy to mining cooperative suppliers and undertaken site visits to some of these suppliers to review their performance.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures for selecting, registering, and monitoring suppliers of primary materials (including monitoring legal compliance aspects) and purchase of primary materials, which addresses supply chain transparency and traceability, and developing materials and implementing measures to communicate the importance of formalisation to its mining cooperative suppliers of 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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing its commercial policy and 'Know your Counterparty' procedure for informing primary material suppliers of OMSA's requirements and expectations, visiting suppliers and checking the workplace, and implementing measures to communicate guidance on managing environmental impacts to its mining cooperative suppliers of 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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing its commercial policy and 'Know your Counterparty' procedure for informing primary material suppliers of



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			OMSA's requirements and expectations, visiting suppliers and checking the workplace, and implementing measures to communicate guidance on managing health and safety impacts to its mining cooperative suppliers of 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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing its commercial policy and 'Know your Counterparty' procedure for informing primary material suppliers of OMSA's requirements and expectations, visiting suppliers and checking the workplace, and implementing measures to communicate guidance to its mining cooperative suppliers of minerals to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour to its mining cooperative suppliers.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing its commercial policy and 'Know your Counterparty' procedure for informing primary material suppliers of OMSA's requirements and expectations, visiting suppliers and checking the workplace, and implementing measures to communicate guidance on negotiating with local communities to its mining cooperative suppliers of minerals, recognising that in most cases, the mining cooperatives supplying the company are an integral part of the local community.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing its commercial policy and 'Know your Counterparty' procedure for informing primary material suppliers of OMSA's requirements and expectations, visiting suppliers and checking the workplace, and implementing measures to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict to its mining cooperative suppliers of minerals.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.	Not Relevant	Conformance with this expectation is considered 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.	Not Relevant	Conformance with this expectation is considered not relevant as the company does not source secondary materials.
8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code.	Informal	The company has provided evidence that it monitors the performance of the transport providers it uses, informally addressing this expectation. The company could improve its rating by providing evidence that it requests these providers or other major suppliers meet or work towards the 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 in the International Tin Association, the company conforms with the expectations to support the understanding of potential effects on humans and the environment, and has encouraged the safe, appropriate, and efficient use of tin. The company is *progressing* with expectations related to communicating appropriate information through compiling information relevant to its products and communicating some general information on its website regarding the impacts and use of its products to users in the value chain 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 in International Tin Association, the company conforms with the expectation to regularly support activities to review, lead and advance understanding of tin's properties and potential effects as 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 in International Tin Association, the company conforms with the expectation to regularly support research and innovation and leads 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.	Progressing	The company has demonstrated it is progressing with this expectation by compiling information relevant to its products and communicating some general information on its website regarding the impacts and use of its products to users in the value chain, but has not provided evidence this has been shared with internal and external stakeholders.



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PRINCIPLE 10: Work towards reporting against the International Tin Code

Overview of Principle Performance

The management and staff of OMSA have taken ownership of reporting on the Tin Code, and there is a clear commitment to providing evidence of 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 Tin Code Report, conforming with 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 agree to the publication of a report of activities against the Principles and Standards of the Code.	Conforming	The management of OMSA 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 OMSA 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.