



INTERNATIONAL TIN CODE REPORT: Yunnan Tin Company Ltd

GENERAL INFORMATION		
Company details	Yunnan Tin Company Ltd 121 E.Jinhu Road, Gejiu City, Yunnan, China  Yunnan Tin Company Limited	 Visual Progress Guide
Date of this report	Reporting period January 2023 - December 2024	
Date of previous report	April 2020	
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About our company	Yunnan Tin Company Limited (hereinafter referred to as YTC) is the world’s largest tin explorer, producer, processor and exporter with a history extending as far back as 143 years to the Qing regime. The company is owned by Yunnan Tin Group (Holding) Company Limited and was the first listed company in the Chinese domestic tin industry having traded on the Shenzhen Stock Exchange since 2000 as ‘000960’. It is headquartered in Kunming City, in the Yunnan province, and has over 13,000 employees across local branches, domestic subsidiaries and offshore subsidiaries. YTC owns the Tin Smelting Branch of Yunnan Tin Co., Ltd. (Gejiu tin smelter), Chenzhou Yunxiang Mining and Metallurgy Co., Ltd. (Chenzhou tin smelter), Kafang branch (tin mine and processing), Laochang branch (tin mine and processing), Datun tin mine (tin mine and processing) and Hualian Zinc Indium branch (zinc indium mine which contains around 5000 tonnes tin content in the concentrate per year). The scope of this Tin Code report covers YTC’s tin mining, processing, and smelting operations in the Gejiu area; the Datun mine (solely its processing plant), the Laochang mine, Kafang mine, and the Gejiu Smelter as representative sites. The Gejiu Smelter is the company’s primary smelting facility, accounting for around 90% of YTC’s refined tin production, at around 70K tonnes/year. The Chenzhou Yunxiang smelter is out of scope of this Tin Code Report. In previous reporting periods, YTC (Tin Smelting Branch) was confirmed to have sourced tin concentrates from within China (including YTC group-owned mines) and outside China. Although the supply chain due diligence of the Gejiu Smelter under the Tin Smelting Branch has been audited by both RMI and CCCMC, no other publicly available information on the country of origin of minerals has been disclosed. The company holds ISO 9001, ISO 14001 and ISO 45001 certifications. Tin is registered on the London Metal Exchange (LME) under the brand ‘YT’.	

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Significant changes from previous report	This is the third Tin Code report from the company, and it demonstrates the steps YTC has taken to achieve higher ratings and highlights several areas of progress. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement. Since the previous report, the company maintained the majority of ratings at the highest level of Third-Party Verified or Conforming, furthermore various improvements have been made by the company, notably including: 1. Achieving third-party verification on managing water consumption and availability (2.3), minimising the production of hazardous wastes (2.9) and non-hazardous and inert wastes (2.10) through its ISO 14001 certification. 2. Conforming with implementing appropriate management systems (1.2), training on Principle 1 (1.7), implementing measures to eliminate potential negative health and safety impacts on local communities (6.2), minimising negative impacts on access to and availability of natural resources (6.9), training on community health and safety and cultural heritage (6.11), ASM formalisation (8.2), ASM forced labour (8.5), and ASM human rights (8.7) through the development of related procedures and implementing measures. 3. Progressing with human rights management (7.1), requesting major suppliers of LSM produced materials meet or work towards principles of this Tin Code (8.8), and implementing a system to check major suppliers of secondary materials are legally operating and request suppliers meet or work towards principles of this Tin Code (8.9) through developing related procedures. The company could regain higher ratings by third-party verification of greenhouse gases (2.6), and providing evidence of specific procedures and implementation evidence on tailings management (2.8), biodiversity management (2.12), closure and reclamation (2.14), training on Principle 5 (5.4), community and indigenous people management (6.1), and requesting major suppliers of goods and services meet or work towards principles of this Tin Code (8.10). Among other changes, Standard 1.5 related to supporting transparency is now relevant to the company due to internal updates to the Tin Code standard. Note: 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.
Further information and references	1. YTC website 2. 2024 Supply Chain Due Diligence Management Progress Report 3. CCCMC Mineral Supply Chain Due Diligence Assessment Summary Report 4. Supplier Code of Conduct 5. 2023 Supply Chain Due Diligence Report 6. 2024 Annual Sustainable Development Report 7. Supply Chain Due Diligence Management Policy 8. RMAP Assessment Report on the Tin Smelting Branch of Yunnan Tin Co., Ltd.



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

Overview of Principle Performance

The company has achieved a high rating of *conforming* in five standards of this Principle and is progressing in two standards, improving the rating of two standards of this Principle. It conforms with the expectations related to implementing appropriate management systems, legal compliance, preventing anti-competitive behaviour, corruption and bribery, developing and implementing appropriate whistleblowing procedures for all stakeholders, and training on relevant aspects of this Principle. The company is progressing in working towards expectations related to publishing appropriate policies to support legal compliance and improve practices with respect to the expectations of the Tin Code and supporting the implementation of the principles of the EITI.

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 policies addressing some but not all the principles of the Tin Code. It has published policies to support legal compliance and improve practices with respect to the expectations of the Tin Code (Principle 1).
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 developing and implementing a formal management system to control and monitor 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.	Conforming	The company has demonstrated that it conforms with this expectation as it keeps up to date all business registrations, licences and other documents necessary to legally carry out business activity and otherwise complies 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.	Conforming	The company has demonstrated that it conforms with this expectation as it has implemented policies and practices to manage the risk of bribery, corruption, facilitation payments and 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⁾ ⁽¹⁾ Reporting is required in an implementing country of EITI.	Progressing	The company has demonstrated that it is progressing with this expectation through developing and implementing an integrated internal control, risk management, and compliance governance management system. Its Supply Chain Policy advises suppliers in EITI countries to adhere to the EITI principles; however, the company has not provided a voluntary report confirming the payment of all relevant taxes, fees and/or royalties to the government, nor has it provided a general statement of support indicating that it applies the EITI principles itself. As a company that is not located in an EITI implementing



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			country, nor is an EITI Supporting Company, the company is out of the 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 that are 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 developing and implementing its training plan for new and existing employees that provides evidence of training on relevant aspects of this Principle.

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company achieved the highest rating of *third-party verified* in most of the relevant standards of this Principle, improving the rating of three standards of this Principle. Through its ISO 14001, ISO 50001, and additional supporting evidence, the company demonstrated the development and implementation of an environmental management system, management of water quality, water consumption, land and soil quality, air quality, energy consumption, disposal of hazardous and non-hazardous and inert waste, and training on relevant aspects of this Principle. Through its public disclosure of direct and indirect CO₂ emissions, management of the purchase and use of chemicals, and respecting legally protected areas; it conforms with the expectations related to greenhouse gases, not using banned substances, and respecting protected areas. It is progressing with the expectations related to tailings management, biodiversity protection, and closure and reclamation; through compliance with national standards for tailings management, its environmental management measures, and developing closure and reclamation plans.

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 certifications for its Datun, Laochang, Tin Branch, Kafang operations.
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.	Third-party verified	The company has demonstrated that it has developed and implemented measures to reduce water consumption in its operations to minimise negative impacts on water availability. This aspect has been third-party verified through its ISO 14001 certification.
2.4	Land and soil quality Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality.	Third-party verified	The company has demonstrated that it has developed and implemented measures to understand and manage discharges to land in order to minimise negative impacts on land and soil quality. This aspect has been third-party verified by its ISO 14001 certification.
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 in order to minimise negative impacts on air quality. This aspect has been third-party verified by its ISO 14001 certification.
2.6	Greenhouse gases Companies will seek to measure, monitor and publicly disclose direct and indirect CO ₂ equivalent (GHG) emissions, and work towards economic reduction targets appropriate to the nature and scale of operations and relevant protocols.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing measures to calculate and publicly disclose direct and indirect CO ₂ equivalent emissions using national protocols,

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			and work towards economic reduction targets for energy conservation and carbon emissions.
2.7	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.	Third-party verified	The company has demonstrated that it has developed and implemented measures to identify technically and financially feasible measures for reducing the direct and indirect consumption of energy per unit of production and increasing the share from renewable sources. This aspect has been third-party verified by ISO 50001 certification.
2.8	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. ⁽²⁾ Including to design, build, operate, monitor and decommission for all life cycle stages.	Progressing	The company has demonstrated that it is progressing with this expectation through complying with national standards for tailings management, but it has not provided evidence to confirm that these standards are consistent with 'recognised standards' for the design, construction, operation, monitoring and decommissioning of tailings storage facilities.
2.9	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.	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 by its ISO 14001 certification.
2.10	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.	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. This aspect has been third-party verified by its ISO 14001 certification.
2.11	Banned substances Companies will not use substances that are banned under international convention or local laws.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing its management of the purchase and use of chemicals, which requires compliance with legal and other requirements applicable to the management of hazardous and severely restricted chemical substances.
2.12	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.	Progressing	The company has demonstrated that it is progressing with this expectation through its environmental management measures such as those implemented to protect air, water and soil quality, but it has not provided evidence of a proactive approach to biodiversity management, where positive biodiversity outcomes are the primary target of company activities.
2.13	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.	Conforming	The company has demonstrated that it conforms with this expectation through providing evidence that it respects legally protected areas in accordance with local laws, and its operations are sufficiently distant from such areas to have no material adverse impact.
2.14	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.	Progressing	The company has demonstrated that it is progressing with this expectation through developing its closure and rehabilitation plans and has some budget information, but it has not provided evidence of a procedure for the



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			calculation of closure costs across multiple sites in order to allocate adequate financial resources, the current estimate of closure and rehabilitation costs for all the company's relevant operations and information on financial and other instruments used as security for mine closure and rehabilitation costs.
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 developed and implemented training on relevant aspects of this Principle. This aspect has been third-party verified through its ISO 14001 certification.

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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 development and implementation of a health and safety 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 investigations 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 maintained the high rating of *conforming* in all standards of this Principle. Through its Employee Handbook, labour management system, employment practices and contracts, employee selection procedures, voluntary overtime, labour union agreements and training of employees and contractors on relevant aspects of this Principle, 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, and Training.

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 a formal system to manage labour issues through a well-structured Employee Handbook covering the principal issues addressed by 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 procedures to manage the risk of discrimination in employment decisions in accordance with company and national regulations.
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	The company has demonstrated that it conforms with this expectation through developing and implementing requirements for the prevention of gender-based and other violence and harassment in its Employee Handbook alongside implementing company and national regulations to prevent and control practices that may result in physical, psychological, sexual or economic harm to persons in the workplace.
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 developing and implementing requirements to pay workers at or above the local legal minimum and include applicable statutory benefits and equal pay for work of equal value in its Employee Handbook alongside national regulations.
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 procedures for contracting employees and contractors that eliminate the risk of 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 employee selection procedures and review of ID cards (mandatory in China).

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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 employee selection procedures and defining the minimum employee age as 18 years.
4.7	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). ⁽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.	Conforming	The company has demonstrated that it conforms with this expectation through complying with local laws and ensuring that overtime is voluntary and workers have at least one day of rest for every 7-day period in accordance with Chinese labour laws applicable to the mining industry.
4.8	Freedom of association and collective bargaining Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing measures to engage with workers on freedom of association and collective bargaining and has Labour Union Agreement with the union.
4.9	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 4 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing appropriate and periodic training for employees on labour issues including interpretation of the Employee Handbook.

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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 the majority of standards of this Principle, and it addresses informally one standard. Through its ISO 9001, ISO 14001 and ISO 45001 certifications, and its whistleblowing procedures, it conforms with the expectations related to Stakeholder management, Stakeholder mapping and engagement, and Grievance mechanisms. It informally addresses the expectation related to Training on relevant aspects of this Principle, as limited evidence was provided.

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 through its ISO 9001, ISO 14001 and ISO 45001 certifications and through engagement with communities on emergency planning, grievances and economic development (other engagement with communities is the responsibility of the government rather than the company).
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 identifying and recording the characteristics and interests of stakeholders affected by, or with the potential to affect, company activities through ISO 9001, ISO 14001 and ISO 45001 certification, and takes a participatory approach to engagement for those aspects for which it is responsible, rather than the government.
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 whistleblowing procedures that are accessible to internal and external stakeholders and considered the equivalent of a grievance mechanism.
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.	Informal	The company has provided some evidence of training of stakeholders (suppliers) addressing informally this expectation. The company could improve its rating by providing evidence of training materials for all aspects covered under 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 achieved a high rating of *conforming* in the majority of the relevant standards of this Principle, improving the rating of five standards of this Principle. Through its emergency planning, management of potential negative impacts on local communities, local development initiatives, ISO 14001 certification, compliance with Chinese permitting laws and Training on relevant aspects of this Principle, it conforms with the expectations related to Community health and safety, Local economic development, Natural resource use and availability, Cultural heritage protection and Training. It is progressing with the expectation related to consultation, through undertaking limited consultation in the form of receiving grievances from stakeholders. It informally addresses the expectation related to Community and indigenous people management, as limited evidence was provided. Note that the term "indigenous peoples" is not defined or recognised in China's laws and regulations, and interactions with ethnic minorities in China are addressed through the provisions for local communities, hence, free prior and informed consent (FPIC) is not relevant. Another three standards were also assessed as not relevant as the government has the direct role, and not the company.

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.	Informal	The company has provided some evidence that it interacts with communities on emergency planning and economic development, but its overall approach to community management is limited. The company could improve its rating by providing evidence of a systematic approach to the management of communities.
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 interacting with communities in emergency planning and manages potential negative impacts on local communities through the monitoring and management of air quality, water quality, and soil and land quality and its drivers receive specific training for passage through sensitive areas, including 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.	Progressing	The company has demonstrated that it is progressing with this expectation through undertaking limited consultation in the context of receiving and addressing grievances from stakeholders, including communities, but has not provided evidence that it undertakes consultation that enables local communities to express their views on risks, impacts and mitigation measures, and allows the company to consider and respond to them.
6.4	Free, prior and informed consent (FPIC) Companies will seek the FPIC of indigenous peoples where their lands, access to natural resources or cultural heritage may be impacted by company activities.	Not relevant	This expectation is considered not relevant as the term "indigenous peoples" is not defined or recognised in China's laws and regulations, and the company cannot implement the related Tin Code standard.
6.5	Land rights, use and access Companies will seek to anticipate and avoid or minimise adverse impacts on land rights, land use and access to land and compensate for any significant residual impacts.	Not relevant	This expectation is considered not relevant as land rights are dealt with by the government (which owns the land) and the company has no direct role with respect to land rights, use and access (other than ensuring any proposed

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			land use plans align with provincial and national land use plans).
6.6	Physical displacement (resettlement) Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons.	Not relevant	This expectation is considered not relevant as land rights and resettlement are dealt with by the government (which owns the land) and the company has no direct role with respect to involuntary resettlement and mitigation of adverse impacts on displaced persons (other than ensuring any proposed land use plans align with provincial and national land use plans).
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	This expectation is considered not relevant as land rights and economic displacement are dealt with by the government (which owns the land) and the company has no direct role with respect to the compensation of economically displaced people and the planning of a livelihood's restoration programme (other than ensuring any proposed land use plans align with provincial and national land use plans).
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 developing and implementing local development and assistance initiatives, including in rural areas.
6.9	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. ⁽⁵⁾ Including air, sunlight, soil, and water.	Conforming	The company has demonstrated that it conforms with this expectation through achieving ISO 14001 certification of its environmental management system and implementation of related environmental protection measures. Land rights are dealt with by the government (which owns the land) and the company has no direct role with respect to land rights, use and access (other than ensuring any proposed land use plans align with provincial and national land use plans).
6.10	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.	Conforming	The company has demonstrated that it conforms with this expectation through compliance with the Chinese permitting process for industrial operations and the company contributes to the promotion of tin-related cultural heritage through its museum in Gejiu.
6.11	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.	Conforming	The company has demonstrated that it conforms with this expectation through undertakings training on the two most relevant aspects of Principle 6 (community health and safety and cultural heritage).

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

Overview of Principle Performance

The company is progressing in all standards of this Principle, improving the rating of one standard of this Principle. Through various policies that address some aspects of human rights management, training of private and state security service providers in accordance with national laws, and undertaking a range of training activities including security workers and in the context of responsible sourcing. The company has demonstrated it is progressing in responsible sourcing in line with international expectations and laws, including the OECD Due Diligence Guidance 3T Supplement. During the due diligence reporting periods (25 September 2021-31 December 2023 for RMAP audit and 25 July 2023-24 July 2024 for CCCMC audit), YTC Tin Branch received minerals at the Gejiu smelter from both inside and outside China. The company stated to the Code independent assessor that some minerals at the Tin Smelting Branch Gejiu smelter were sourced from CAHRAs (for which YTC participates in the ITSCI programme for support) and has been independently confirmed as fully OECD-aligned. No other evidence or public country of origin information was available. YTC has a public Responsible Mineral Sourcing Supply Chain Policy and a Due Diligence Report available on its website and is rated Level A against the Chinese Due Diligence Guidelines for Mineral Supply Chain with an audit report stating assessment dates as 12-15 November 2024 is on the RMAP Conformant List with an audit dated 7 March 2024. However, the Chinese Due Diligence Guidelines for Mineral Supply Chain (Second Edition) and RMAP 2017 standard and assessment processes had not yet been confirmed as fully OECD-aligned publicly. The company could add content to their public due diligence report to be more informative including outcomes of red flag review and steps taken to manage risks. The company could also provide information on auditor qualifications.

STANDARD		RATING	ADDITIONAL INFORMATION
7.1	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.	Progressing	The company has demonstrated that it is progressing with this expectation through various policies that collectively address some aspects of human rights management but has not provided evidence that human rights are not specifically targeted.
7.2	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.	Progressing	The company has demonstrated that it is progressing with this expectation through the training of private and state security service providers in accordance with national laws but has not provided evidence that the Voluntary Principles on Security and Human Rights are integrated in such training.
7.3	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⁾ . ⁽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.	Progressing	The company has demonstrated it is progressing in responsible sourcing according to international expectations, including the OECD Due Diligence Guidance 3T supplement. YTC Tin Branch Gejiu Smelter receives minerals from both inside and outside China. Some minerals sourced from the CAHRAs country supported by the ITSCI programme which has been independently confirmed as fully OECD-aligned. No other evidence or public country of origin was available. YTC has a public Supply Chain Policy and Due Diligence Report available on its website and scored 'Level A' in the Mineral Supply Chain Due Diligence Assessment of the China Chamber of



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			Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) with an audit report dated November 2024 (covering 25 July 2023 – 24 July 2024) and on the RMAP conformant list with an audit dated December 2024 (covering 25 September 2021-31 December 2023) which used the audit protocol of '2017'. However, neither the CCCMC and RMAP 2017 standard and assessment processes had yet been confirmed as fully OECD-aligned publicly. The company could add content to their public due diligence report to be more informative including outcomes of red flag review and steps taken to manage risks. The company could also provide information on auditor qualifications.
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 with this expectation through undertaking a range of training activities including security workers and in the context of responsible sourcing, but has not provided evidence that induction and refresher training of employees extends to human rights.

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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 a high rating of *conforming* in four standards of this Principle; it is progressing with the remaining standards, overall improving the rating of six standards of this Principle. Through exclusively purchasing from ITSCI members, it conforms with the expectations related to ASM formalisation, ASM health and safety, ASM forced labour, and ASM human rights and conflict. It is progressing with the expectations related to suppliers of LSM produced materials, suppliers of secondary materials, and suppliers of goods and services, suppliers of ASM minerals, ASM environmental impacts, and ASM local communities, indigenous peoples and land access.

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.	Progressing	The company has demonstrated that it is progressing with this expectation through providing evidence that it has provided a copy of the Tin Code to all its direct suppliers of ASM produced minerals, but the company has not provided evidence that these suppliers have provided ASM producers with information and guidance to encourage improvements (where possible) or have communicated the Code's objectives through the supply chain.
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 only purchasing ASM produced minerals from members of the ITSCI programme which addresses the benefits and opportunities for ASM formalisation.
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.	Progressing	The company has demonstrated that it is progressing with this expectation through providing evidence that it has provided a copy of the Tin Code to all its direct suppliers of ASM produced minerals, but the company has not provided evidence that these suppliers have provided ASM producers with information and guidance on environmental management or discussed potential opportunities for ASM producers to engage in practical projects to improve environmental management where possible) or have communicated the Code's objectives through the supply chain.
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.	Progressing	The company has demonstrated that it is progressing with this expectation through only purchasing ASM produced minerals from members of the ITSCI programme, which records health and safety incidents and targets improved health and safety performance at some ASM sites in areas covered by the programme.
8.5	Principle 4 ASM minerals (labour)	Conforming	The company has demonstrated that it conforms with this expectation through only purchasing ASM produced



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	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.		minerals from members of the ITSCI programme which addresses forced or compulsory labour and the worst forms of child labour at ASM sites and the implementation of measures to eliminate these.
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.	Progressing	The company has demonstrated that it is progressing with this expectation through providing evidence that it has provided a copy of the Tin Code to all its direct suppliers of ASM produced minerals, but the company has not provided evidence that these suppliers have provided ASM producers with guidance on negotiating with local communities and indigenous peoples regarding access to land where possible or have communicated the Code's objectives through the supply chain.
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 only purchasing ASM produced minerals from members of the ITSCI programme which addresses human rights abuses and conflict at and around ASM sites and the implementation of measures to manage related-risks.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.	Progressing	The company has demonstrated that it is progressing with this expectation through providing suppliers of LSM produced minerals with the OECD DDG requirements, but the company has not provided evidence that suppliers of LSM producer minerals have been provided with a copy of the Tin Code or directly requested to work towards its principles.
8.9	Suppliers of secondary materials Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Tin Code.	Progressing	The company has demonstrated that it is progressing with this expectation through training major suppliers of secondary materials on some aspects of the Tin Code, but has not provided evidence that it checks that these suppliers are operating legally.
8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code.	Progressing	The company has demonstrated that it is progressing with this expectation through including provisions in its contracts with suppliers of goods and services that are relevant to some of the principles of the Tin Code, but has not provided evidence that major suppliers are provided with the Tin Code or requested to work towards its principles.

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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 expectations to support the understanding of the potential effects of tin on humans and the environment and encourages the safe, appropriate and efficient use of tin. The company communicates information on tin, and the tin industry, to users in the value chain and wider stakeholders, including extensive tin-related exhibits at the company's Gejiu Tin Museum.

STANDARD		RATING	ADDITIONAL INFORMATION
9.1	Understanding potential impacts of tin Companies will seek to advance the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data.	Conforming	Through its membership of International Tin Association, the company conforms with the expectation to regularly support activities to review, lead and advance understanding of the properties and potential effects of tin as found necessary.
9.2	Encouraging safe and appropriate use Companies will support research, innovation and collaboration that promotes safe and efficient production, use and recycling of tin, including to ensure regulatory compliance and efficient use of energy and natural resources	Conforming	Through its membership of International Tin Association, the company conforms with the expectation to regularly support research and innovation and leading collaboration that promotes the safe, appropriate, and efficient use of tin.
9.3	Communicating appropriate information Companies will communicate accurate information on impacts and use of its products, to workers, users in the value chain and wider stakeholders, accounting for the need for appropriate confidentiality.	Conforming	The company has demonstrated that it conforms with this expectation by disclosing information relating to its own sites and operations and has provided evidence of its contribution to the disclosure of more general information related to tin and the tin industry, including extensive tin-related exhibits at the company's Gejiu Tin Museum.



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PRINCIPLE 10: Work towards reporting against the International Tin Code

Overview of Principle Performance

The management and staff of YTC 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 representatives were knowledgeable about the standards of the Tin Code and the need to review and update policies. They actively participated in reviewing and updating policies and procedures when required.
10.2	Communicating reporting information Companies will support and agree to the annual publication of a report of activities against the Principles and Standards of the Code	Conforming	The management of YTC 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 YTC 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.