



INTERNATIONAL TIN CODE REPORT: Eloro Resources Ltd.

GENERAL INFORMATION		
Company details	Eloro Resources Ltd. 20 Adelaide Street East Suite 200 Toronto Ontario Canada M5C 2T6	<



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	A maiden NI 43-101 Inferred Mineral Resource Estimate was published in 2023, which includes a tin component within a broader polymetallic resource model. The resource remains open and is subject to ongoing refinement through continued drilling. Ongoing work includes further drilling and metallurgical testwork focused on improving understanding of the tin-bearing zone to support future technical evaluation of the project. Environmental work reported by the company is at an early-stage level consistent with exploration activities. In 2024, Eloro Resources took the initiative to voluntarily and proactively adopt Tin Code reporting becoming the first member of ITA E&D group to do so, a standard that had previously been adopted by full ITA members and large-scale producers. This report represents the company's first Tin Code Report and highlights areas of progress and company's commitment to continuous improvement.
Significant changes from previous report	Not Relevant as this is the company's first Tin Code Report.
Further information and references	1. Eloro Resources website 2. ESG Program 3. Code of Conduct 4. Iska Iska Project



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

Overview of Principle Performance

The company is progressing with expectations related to most standards of this Principle through developing and publishing policies covering some aspects related to social, labour and human rights, developing a Code of Conduct that addresses anti-competitive behaviour, corruption, bribery, alongside referring to the general process for whistleblowing to be followed by company directors, officers, employees and consultants, and providing evidence of its support for the implementation of the principles of the Extractive Industries Transparency Initiative (EITI). The company informally addresses expectations for its management systems and legal compliance. The company has not provided evidence related to training of aspects in Principle 1.

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 with this expectation through developing and/or publishing policies covering some aspects related to social, labour and human rights. The company has not provided evidence of policies for environmental management, occupational health and safety, stakeholder engagement, the use of private and state security personnel, the protection of cultural heritage and communities and indigenous peoples.
1.2	Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Informal	The company has demonstrated that it partially addresses this expectation through informal internal structures to manage legal compliance and governance issues defined in Principle 1. It has some policies and procedures in place but has not provided evidence of how these are implemented and monitored to assess performance.
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.	Informal	The company has demonstrated that it partially addresses this expectation through references to permits and licences necessary for legal operation, but these documents were not supplied for verification.
1.4	Business integrity Companies will seek to prevent anti-competitive behaviour, corruption and bribery, including facilitation payments which should be publicly disclosed if unavoidable.	Progressing	The company demonstrated it is progressing with this expectation through developing a Code of Conduct that addresses anti-competitive behaviour and corruption and bribery, but it has not provided evidence of how it addresses facilitation payments or of procedures to implement the Code of Conduct provisions and control bribery, corruption and facilitation payments risks.
1.5	Transparency Companies will support the implementation of the principles of the Extractive Industries Transparency Initiative (EITI) individually or through joint efforts, including through appropriate reporting ⁽¹⁾	Progressing	The company has demonstrated that it is progressing with this expectation through providing evidence of its support for the implementation of the principles of the Extractive Industries Transparency Initiative (EITI), but it has not provided evidence of a voluntary report confirming that all



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	⁽¹⁾ Reporting is required in an implementing country of EITI.		relevant taxes, fees and/or royalties have been paid to the government by the company. As an exploration company that is not located in an EITI implementing country, nor 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.	Progressing	The company demonstrated it is progressing with this expectation through developing a Code of Conduct that refers to the general process for whistleblowing to be followed by company directors, officers, employees and consultants. Directors and officers must acknowledge familiarity with the Code of Conduct annually by signature. Procedures could be strengthened to enable any interested external stakeholders to report concerns and ensure a systematic approach to investigating and resolving them.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking documentation to demonstrate that it trains workers on aspects relevant to their day-to-day activities, such as company policies, legal compliance and business integrity.

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company informally addresses expectations for several standards, including its environmental management systems, water quality, water consumption and availability, land and soil quality, air quality, hazardous waste management, non-hazardous and inert waste management, biodiversity protection, and training. The company has not provided evidence related to greenhouse gases, energy consumption, protected areas, and closure and reclamation. The company has a Prohibited Substances Policy, but this relates to substances that are prohibited for employee use rather than the chemicals/materials the company may use. Tailings management is not relevant to exploration activities.

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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to environmental management, but has not provided evidence of how an environmental management system has been implemented and monitored.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to the management of water-related risks and impacts, but has not provided evidence that it collects sufficient data to define and manage potential risks and negative impacts for surface water and groundwater resources.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to the management of water-related risks and impacts and investing in water pumping capacity for local communities. However, the company has not provided evidence that it collects sufficient data to define and manage its own consumption of water or the potential risks and negative impacts to the availability of water to other users.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to pollution prevention. However, the company has not provided evidence that it collects sufficient data to define and manage the potential risks and negative impacts on land and soil quality.
2.5	Air quality Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to pollution prevention. However, the company has not provided evidence that it collects sufficient data to define and manage the potential risks and negative impacts on air quality.

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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.	Inadequate	The company has not provided evidence related to this expectation, lacking data collection on fuel and electricity consumption and using this to calculate associated greenhouse gas emissions using national or international methodologies.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking demonstration that it is tracking energy consumption and undertaking studies to identify opportunities to reduce consumption or source energy from renewable sources when feasible.
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.	Not relevant	This expectation is not relevant for exploration projects.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to pollution prevention. However, the company has not provided evidence that it collects sufficient data to define and manage its generation or disposal of hazardous wastes.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to pollution prevention. However, the company has not provided evidence that it collects sufficient data to define and manage its generation or disposal of non-hazardous and inert wastes.
2.11	Banned substances Companies will not use substances that are banned under international convention or local laws.	Inadequate	The company has a Prohibited Substances Policy, but this relates to substances that are prohibited for employee use rather than the chemicals / materials the company may use.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to biodiversity protection. However, the company has not provided evidence that it collects sufficient data to define and manage risks and negative impacts on biodiversity associated with its 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.	Inadequate	The company has not provided evidence to confirm whether it is operating within legally protected areas or is managing its negative impacts on areas adjacent to legally protected areas.
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.	Inadequate	The company has not provided evidence related to this expectation; of an ESIA specific to the exploration phase that refers to closure and reclamation or a separate closure and rehabilitation plan for areas affected by exploration activities and demonstrate it has sufficient financial resources to enable implementation of closure and reclamation.



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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.	Informal	The company has demonstrated that it partially addresses this expectation through references to induction training that has some environmental management content, but training materials and training records were not supplied for verification.
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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company informally addresses expectations for all standards of this Principle. Through policy-level references to the safety and well-being of workers, the company informally addresses health and safety management systems, safe working practices, incident investigations, and incident follow up. Through references to induction training that has some health and safety management content, the company informally addresses training.

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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to the safety and well-being of workers. However, the company has not provided evidence that it takes a systematic approach to managing occupational health and safety.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to the safety and well-being of workers. However, the company has not provided evidence of the measures it implements to minimise and seek to eliminate workplace fatalities, injuries and occupational diseases amongst employees, contractors and visitors.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to the safety and well-being of workers. However, the company has not provided evidence of the procedure it uses to document reportable health and safety incidents that allows affected workers and local communities to provide input.
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.	Informal	The company has demonstrated that it informally addresses this expectation through policy-level references to the safety and well-being of workers. However, the company has not provided evidence of how it defines and implements corrective actions or monitors the effectiveness of such actions.
3.5	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 3, require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas, and provide appropriate briefings to visitors to company facilities.	Informal	The company has demonstrated that it partially addresses this expectation through references to induction training that has some health and safety management content, but training materials and training records were not supplied for verification.

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company is progressing with most standards of this Principle, including discrimination, violence and harassment, forced labour, child labour – worst forms, and working hours. Through preparing a Code of Conduct that addresses some labour-related issues, a working hours policy, which mention fair and competitive compensation for work, the company informally addresses expectations for labour management systems and remuneration. The company informally addresses expectations for child labour – other forms through developing its forced and child labour policy and procedures, which prohibits employment of individuals below the minimum legal working age (as defined by Bolivian labour law and ILO standards). The company informally addresses expectations for training through references to training that has some labour-related content. The company has not provided evidence related to freedom of association and collective bargaining.

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.	Informal	The company has demonstrated that it addresses this expectation informally through preparing a Code of Conduct that addresses some labour-related issues, but it has not provided evidence of a labour management system for the exploration phase.
4.2a)	Discrimination Companies will implement an equality policy (including on gender) and not make employment related decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job.	Progressing	The company has demonstrated it is progressing with this expectation through developing its Code of Conduct and an anti-discrimination policy and procedures, but it has not provided evidence of implementation of the policy requirements and procedures, or how implementation is monitored during the exploration phase.
4.2b)	Violence and harassment Companies will avoid practices that may result in physical, psychological, sexual or economic harm to persons in the workplace, including gender-based violence and harassment	Progressing	The company has demonstrated it is progressing with this expectation through developing its Code of Conduct and an anti-violence and harassment policy and procedures, but it has not provided evidence of implementation of the policy requirements and procedures, or how implementation is monitored during the exploration phase.
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.	Informal	The company has demonstrated it addresses this expectation informally through developing its Code of Conduct and a working hours policy, which mention fair and competitive compensation for work. However, the company has not provided evidence of implementation of the policy requirements or how implementation is monitored during the exploration phase.
4.4	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Progressing	The company has demonstrated it is progressing with this expectation through developing its forced and child labour policy and procedures, but it has not provided evidence of implementation of the policy requirements and procedures, or how implementation is monitored during the exploration phase.

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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.	Progressing	The company has demonstrated it is progressing with this expectation through developing its forced and child labour policy and procedures, but it has not provided evidence of implementation of the policy requirements and procedures, or how implementation is monitored during the exploration phase.
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.	Informal	The company has demonstrated it addresses this expectation informally through developing its forced and child labour policy and procedures, which prohibits employment of individuals below the minimum legal working age (as defined by Bolivian labour law). However, the company has not provided evidence of implementation of the policy requirements and procedures, or how implementation is monitored during the exploration phase.
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.	Progressing	The company has demonstrated it is progressing with this expectation through developing its working hours policy and procedures. However, the company has not provided evidence of implementation of the policy requirements and procedures or how implementation is monitored during the exploration phase.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking demonstration that it is engaging with workers on freedom of association and collective bargaining and make a public statement that it supports such rights for its workforce.
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.	Informal	The company has demonstrated that it informally addresses this expectation through references to training that has some labour-related content, but training materials and training records were not supplied for verification.

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PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company is progressing with most standards of this Principle. It has undertaken several community initiatives, and a grievance management procedure has been developed. The company informally addresses expectations for overall stakeholder management through the statement of policy regarding stakeholder engagement. The company has not provided evidence related to training.

STANDARD		RATING	ADDITIONAL INFORMATION
5.1	Stakeholder management Companies will work towards implementing a systematic approach to stakeholder management to control and monitor relevant aspects of this Principle 5.	Informal	The company has demonstrated that it is informally addressing this expectation through the statement of policy regarding stakeholder engagement but has not provided evidence of a systematic approach to stakeholder management during the exploration phase.
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.	Progressing	The company has undertaken several community initiatives but has not provided evidence of a procedure for identifying and prioritising stakeholders and identifying their needs. Although the company engages with stakeholders, it could improve its rating by developing and implementing a stakeholder engagement plan to coordinate such activities.
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.	Progressing	The company has demonstrated that it is progressing with this expectation by developing a grievance management procedure that includes external parties. To improve its rating, the company could provide evidence of the procedures it uses to investigate and resolve grievances raised by internal and external stakeholders and to communicate the outcomes of the grievance process.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking documentation of completed training addressing all relevant aspects of Tin Code Principle 5, which could include grievance management, external communication and stakeholder management.

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

Overview of Principle Performance

The company is progressing with three standards of this Principle including Community and indigenous people management, consultation, and local economic displacement. The company informally addresses expectations related to community health and safety, land rights, use and access, natural resource use and availability, and cultural heritage protection. The company has not provided evidence related to free, prior and informed consent (FPIC), physical displacement (resettlement), economic displacement (livelihoods) and training.

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.	Progressing	The company has demonstrated it is progressing with this expectation by establishing objectives and key actions for managing gender equality and social inclusion, and is engaging with local communities on development issues, but has not provided evidence of a systematic management plan in place for the management of community issues.
6.2	Community health and safety Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities.	Informal	The company has demonstrated it is informally addressing this expectation through community development projects that improve sanitation and road access for local communities. To improve its rating, the company could provide evidence of how potential negative health and safety impacts on local communities arising from exploration activities are being managed.
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 it is progressing with this expectation through a plan for community outreach and engagement with communities. To improve its rating, the company could provide evidence of how communities have expressed their views on risks, impacts and mitigation measures, and it has considered and responded to these views.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking demonstration that it is engaging and consulting with Indigenous Peoples in a way that is consistent with FPIC. The company has not demonstrated that this expectation is not relevant due to the absence of indigenous peoples in areas 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.	Informal	The company informally addresses this expectation through its guidance on Social and Environmental Safeguards, but this does not refer to land rights and land use explicitly. To improve its rating, the company could demonstrate it is minimising adverse impacts on land

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			rights, land use and access to land during the exploration phase.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking demonstration of how involuntary resettlement is being avoided or minimised during exploration and how impacts on displaced persons (if any) are mitigated.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking demonstration of how economic displacement is being avoided or minimised during exploration and how impacts on economically displaced persons (if any) are mitigated.
6.8	Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Progressing	The company has demonstrated it is progressing with this expectation through community development projects that improve sanitation and road access for local communities, lacking demonstration that it has analysed the needs of local communities and implemented relevant development activities during the exploration phase.
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.	Informal	The company has demonstrated it addresses this expectation informally through developing its Code of Conduct, which mentions the sustainable management of natural resources. However, the company has not provided evidence of the steps it takes to understand and minimise negative impacts on access to and availability of natural resources by local communities and indigenous people.
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.	Informal	The company has demonstrated it addresses this expectation informally through developing its Code of Conduct, which mentions respect for the culture of local communities. However, the company has not provided evidence of the steps it takes to avoid, minimise or mitigate negative impacts on cultural heritage during the exploration phase.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking documentation of completed training addressing all relevant aspects of Tin Code Principle 6.

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

Overview of Principle Performance

The company is progressing with expectations related to human rights management through developing a policy and outlining a human rights management system. The company has not provided evidence related to use of private or state security personnel, and training. To improve its rating, it could provide evidence of procedures or training that ensures site security is guided by local laws and the Voluntary Principles on Security and Human Rights (VPSHR) and providing evidence of completed training addressing all relevant aspects of Tin Code Principle 7. Responsible sourcing is not relevant to the company's current exploration activities.

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 it is progressing with this expectation through developing a policy and outlining a human rights management system supplemented by procedures addressing human rights issues for employees and consultants. However, at present, the company has not evidenced how it implements and monitors systematic approaches to human rights management or how it addresses human rights risks and issues that may arise for external stakeholders.
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.	Inadequate	The company has not provided evidence related to this expectation. The company should demonstrate that it is aware of the requirement for direct or contracted security workers to be guided by the Voluntary Principles on Security and Human Rights and by applicable local law, and has developed and implemented relevant procedures and 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.	Not relevant	This expectation is not relevant for exploration projects.
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.	Inadequate	The company has not provided evidence related to this expectation, lacking documentation of completed training addressing all relevant aspects of Tin Code Principle 7.

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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 not provided evidence related to suppliers of goods and services, lacking documentation of requesting major suppliers of goods and services working towards the principles of the Tin Code. All other standards within this Principle, which relate to influencing suppliers of ASM-produced minerals, LSM-produced minerals, and secondary materials, are not relevant to the company's current exploration activities.

STANDARD		RATING	ADDITIONAL INFORMATION
8.1	Suppliers of ASM produced minerals, general Companies will request suppliers declare that they will work towards understanding their supply chain and communicating through suppliers the objectives of International Tin's Code, information and guidance to encourage improvements.	Not relevant	This expectation is not relevant for exploration projects.
8.2	Principle 1 ASM minerals (compliance and policies) Suppliers will be requested to communicate the importance of formalisation and potential opportunities to engage in practical projects encouraging formalisation of ASM as appropriate (based on feedback) to the production area.	Not relevant	This expectation is not relevant for exploration projects.
8.3	Principle 2 ASM minerals (environment) Suppliers will be requested to communicate guidance on managing environmental impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not relevant	This expectation is not relevant for exploration projects.
8.4	Principle 3 ASM minerals (health and safety) Suppliers will be requested to communicate guidance on managing health and safety impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not relevant	This expectation is not relevant for exploration projects.
8.5	Principle 4 ASM minerals (labour) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not relevant	This expectation is not relevant for exploration projects.
8.6	Principle 6 ASM minerals (communities) Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.	Not relevant	This expectation is not relevant for exploration projects.
8.7	Principle 7 ASM minerals (human rights and conflict) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict, as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not relevant	This expectation is not relevant for exploration projects.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.	Not relevant	This expectation is not relevant for exploration projects.
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	This expectation is not relevant for exploration projects.



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8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code.	Inadequate	The company has not provided evidence related to this expectation, lacking documentation of requesting major suppliers of goods and services working 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

The expectations of this principle are not relevant for exploration projects.

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.	Not relevant	This expectation is not relevant for exploration projects.
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	Not relevant	This expectation is not relevant for exploration projects.
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.	Not relevant	This expectation is not relevant for exploration projects.



INTERNATIONAL TIN CODE REPORT: Eloro Resources Ltd.

PRINCIPLE 10: Work towards reporting against the International Tin Code

Overview of Principle Performance

The management and staff of Eloro Resources have taken ownership of reporting on the Tin Code and there is a clear commitment to providing evidence on conformance and making continued progress with the standards of the Tin Code. They proactively worked with the Independent External Assessor and the International Tin Association to develop this report on the Tin Code, conforming with most of the reporting expectations. The company is informally addressing the expectation related to policy review through the company representatives are beginning to plan for the annual review of policies.

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	Informal	The company representatives are beginning to plan for the annual review of policies.
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 Eloro Resources 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 Eloro Resources 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.