




# INTERNATIONAL TIN CODE REPORT: Yunnan Tin Company Ltd

GENERAL INFORMATION	
Company details	<p>Yunnan Tin Company Ltd 121 E.Jinhu Road, Gejiu City, Yunnan, China</p>  Yunnan Tin Company Limited
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About our company	<p>Yunnan Tin Company Limited is the world’s largest tin explorer, producer, processor and exporter with a history extending as far back as 137 years to the Qing regime. The company is owned by Yunnan Tin Group (Holding) Company Limited and is the only listed company in the Chinese domestic tin industry having traded on the Shenzhen Stock Exchange since 2000 as “Yunnan Tin”. It is headquartered in Gejiu City in Yunnan Province, the site of the China’s largest tin deposits and has over 14,000 employees across local branches, domestic subsidiaries and offshore subsidiaries. Yunnan Tin Company Ltd produces tin from its own mines, and also purchases minerals mainly from China and Myanmar. The company has over 600 products including tin ingot, tin solder, tin based alloys and tin chemicals. It is registered on the London Metal Exchange (LME) under the brand ‘YT’. The company holds ISO 9001, ISO 14001 and ISO 45001 (formerly OHSAS 18001) standards. Website <a href="http://www.ytl.com.cn/">http://www.ytl.com.cn/</a></p>
Significant changes from previous report	<p>This second Tin Code report demonstrates the steps Yunnan Tin Company Ltd have taken to improve procedures and processes and highlights several areas of progress. The report also illustrates the company’s continued collaboration with the Tin Code team to achieve continuous improvement to standards of the Tin Code. Since the previous report improved ratings have been achieved for a number of standards, such as:</p> <ol style="list-style-type: none"> <li>1. Improved impact analysis and measurement of impact on biodiversity (2.12)</li> <li>2. Adoption of new and innovative approaches to training (2.15, 4.9, 7.4) including areas such as environmental management.</li> <li>3. Confirmation of implementation of measures to address stakeholder management (5.1, 5.2)</li> <li>4. Confirmation of conformance with Chinese laws and new consultation measures for communities (6.2)</li> <li>5. Collaborating and working with ITA to implement measures to positively influence practices of ASM (8.1 to 8.7)</li> </ol>



Visual Progress Guide



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### Further information and references

1. Yunnan Tin Company Ltd holds ISO 9001, ISO 45001 (formerly OHSAS 18001) and ISO 14001 standards
2. Environmental Impact Report of Tin Smelter Relocation and Upgrading Project of YTC (March 2018)
3. Corporate Social Responsibility Report 2019



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

#### Overview of Principle Performance

Yunnan Tin Company Ltd conforms with the standard to maintain registrations to legally operate, seek to prevent corruption and implement whistleblowing procedures. It has third party verified systems that manage quality, environment and health and safety through certification to ISO 9001, ISO 14001 and ISO 45001 standards as described in other Principles and is progressing with developing and implementing a formal system for legal compliance and governance issues. The company also is making progress in developing and publishing policies to support legal compliance and improve practices with respect to the Tin Code, as well as in its training activities for its employees on that topic. China is not an implementing country of the EITI at present so the standard on transparency is not relevant.

STANDARD		RATING	ADDITIONAL INFORMATION
1.1	<b>Policies</b> 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 is making progress in developing and publishing policies to support legal compliance and improve practices with respect to the expectations of the Tin Code; to improve its rating the company could develop policies on community health and safety (part of Principle 6), engaging with stakeholders using a participatory approach (Principle 5), avoiding contributing to serious human rights abuses and conflict (Principle 7) and seeking to positively influence practices of suppliers of materials, goods and services
1.2	<b>Management system</b> Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Progressing	The company is making progress in developing and implementing a formal system to manage legal compliance and governance issues
1.3	<b>Legal compliance</b> 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 conforms with the requirement to 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.
1.4	<b>Business integrity</b> Companies will seek to prevent bribery and corruption.	Conforming	The company has developed and implemented procedures to record and avoid bribery and corruption.
1.5	<b>Transparency</b> Companies will implement the Extractive Industries Transparency Initiative (EITI) if required by national government	Not Relevant	Conformance with the requirement is considered not relevant as China is not an implementing country of the EITI at present.
1.6	<b>Whistleblowing</b> 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 developed and implemented whistleblowing procedures for external and internal stakeholders.
1.7	<b>Training</b> Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 1 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company undertakes a wide range of training activities with its employees, including coverage of legal compliance and good practices (as defined in the Tin Code, Principle 1); to improve its rating, the company



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			could demonstrate this training is also mandatory for contractors.
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### PRINCIPLE 2: Seek continual improvement of environmental performance

#### Overview of Principle Performance

The company has now achieved the ranking of “Conforming” or “Third-party verified” in 100% of the required standards for this principle. It has developed and implemented a third-party verified ISO 14001 environmental management on topics associated with the Tin Code, including water quality, air, land and soil quality. It undergoes scrutiny by Chinese government monitoring and verification of tailings management and closure and reclamation plans, and a third party has verified the activities targeting energy efficiency and reduction of greenhouse gas emissions. The provision of regular training to employees and contractors on environmental issues and management has also been verified by a third-party. It also has formal measures in place to manage the handling and disposal of hazardous and non-hazardous wastes, and also conforms with expectations to respect protected areas, implement measures to reduce water use, and does not use banned substances. The company also conforms with the requirement to understand its potential impacts on biodiversity.

STANDARD		RATING	ADDITIONAL INFORMATION
2.1	<b>Management system</b> 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 conforms with the requirement to develop and implement an environmental management system and this has been verified by an independent third-party.
2.2	<b>Water quality</b> 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 conforms with the requirement to seek to understand and manage discharges to surface waters and groundwater in order to minimise negative impacts on water quality; conformance with this requirement has been verified by government monitoring and regulation.
2.3	<b>Water consumption and availability</b> Companies will seek to reduce water consumption in their operations in order to minimise negative impacts on water availability.	Conforming	The company collects water use and availability data and is implementing actions to reduce water consumption and minimise negative impacts on water availability.
2.4	<b>Land and soil quality</b> 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 conforms with the requirement to seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality; conformance with this requirement has been verified by government monitoring and regulation.
2.5	<b>Air quality</b> Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.	Third-Party Verified	The company conforms with the requirement to seek to understand and manage discharges to air in order to minimise negative impacts on air quality; conformance with this requirement has been verified by government monitoring and regulation.
2.6	<b>Greenhouse gases</b> Companies emitting more than 25,000 tonnes of CO2-equivalent will seek to understand direct and indirect greenhouse emissions and consider economic reduction initiatives appropriate to the nature and scale of operations.	Third-Party Verified	The company is collecting direct and indirect greenhouse emission data and considering economically feasible reduction initiatives; conformance with this requirement has been verified by a third-party.
2.7	<b>Energy consumption</b> 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 set targets for energy efficiency and reducing energy consumption per unit of production; conformance with this requirement has been verified by a third-party.



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2.8	<b>Tailings management</b> Companies will store or dispose of tailings in a manner that minimises the risk of impacts to the environment and human health.	Third-Party Verified	The company conforms with the requirement to store or dispose of tailings in a manner that minimises the risk of impacts to the environment and human health; conformance with this requirement has been verified by government monitoring and regulation.
2.9	<b>Hazardous waste management</b> 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.	Conforming	The company has formal measures in place to manage the handling and disposal of hazardous wastes; to improve its rating the company could demonstrate it is implementing measures to reduce the generation of hazardous wastes where possible.
2.10	<b>Non-hazardous and inert waste management</b> 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.	Conforming	The company has formal measures in place to manage the handling and disposal of non-hazardous and inert wastes; to improve its rating the company could demonstrate it is also implementing measures to reduce the generation of these wastes.
2.11	<b>Banned substances</b> Companies will not use substances that are banned under international convention or local laws.	Conforming	The company conforms with the requirement to not use substances that are banned under international conventions or local laws.
2.12	<b>Biodiversity protection</b> 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.	Conforming	Through Environmental Impact Assessments, the company conforms with the requirement to understand potential impacts on biodiversity and avoid activities that significantly modify or degrade critical natural habitats through an appropriate action plan.
2.13	<b>Protected areas</b> 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 conforms with the requirement to respect protected areas and take steps to understand and manage potential impacts of operations on adjacent zones.
2.14	<b>Closure and reclamation</b> 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.	Third-Party Verified	The company conforms with the requirement to cost closure and reclamation plans and schedule implementation in accordance with Chinese law and the expectations of key stakeholders; conformance with this requirement has been verified by government monitoring and regulation.
2.15	<b>Training</b> 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 conforms with the requirement to provide employees and contractors with regular training on environmental issues and management and this has been verified by a third-party



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### PRINCIPLE 3: Seek continual improvement of health and safety performance

#### Overview of Principle Performance

The company has continued to maintain the highest achievable ranking of “Third-party verified” for all the standards for this principle. Having OHSAS accreditation demonstrates it has in place a robust system to maintain and continually improve health and safety for employees, contractors and visitors to its sites. Safe working practices are implemented and any incidents are reported to authorities and transparently investigated with defined corrective actions monitored for follow-up. Training is also provided for employees, contractors and visitors as appropriate.

STANDARD		RATING	ADDITIONAL INFORMATION
3.1	<b>Health and safety management systems</b> Companies will work towards implementing a management system to monitor and control relevant aspects of this Principle 3.	Third-Party Verified	The company conforms with the requirement to develop and implement a health and safety management system and this has been verified by a third-party.
3.2	<b>Safe working practices</b> 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 conforms with the requirement to implement measures to maintain safe and healthy working conditions and this has been verified by a third-party.
3.3	<b>Incident investigations</b> 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 conforms with the requirement to undertake and report to appropriate authorities' formal incident investigation using a transparent and inclusive procedure that allows affected workers to provide input and this has been verified by a third-party.
3.4	<b>Incident follow up</b> 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 formally defined corrective actions and monitors the effectiveness of such actions and this has been verified by a third-party.
3.5	<b>Training</b> 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 a formal system for health and safety related training for visitors, contractors as well as employees certified to OHSAS 18001 standards.





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### PRINCIPLE 4: Seek continual improvement in labour practices

#### Overview of Principle Performance

The company now conforms with all the requirements of this principle through compliance with Chinese labour laws and the implementation of a formal labour management system. It has different “Policies” relating to labour management which set out the company’s commitment to discrimination, remuneration, child labour, forced labour, working hours, and freedom of association and these commitments are clearly implemented. The law prohibits the employment of minors under the age of 16 and provides specific requirements when persons between the age of 16 and 18 are employed. The company undertakes appropriate and periodic training for employees and requires onsite contractors to train on aspects relevant to their specific tasks and work areas.

STANDARD		RATING	ADDITIONAL INFORMATION
4.1	<b>Labour management systems</b> Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4.	Conforming	The company conforms with the requirement to develop and implement a formal system to manage labour issues.
4.2	<b>Discrimination</b> Companies will not make employment decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job.	Conforming	The company conforms with the requirement to implement procedures to manage the risk of discrimination in employment decisions.
4.3	<b>Remuneration</b> Companies will ensure workers receive fair remuneration for standard and overtime hours worked that meets or exceeds the local legal minimum plus any applicable statutory benefits and provide equal pay for work of equal value.	Conforming	The company conforms with the requirement to pay workers at or above the local legal minimum and include applicable statutory benefits and equal pay for work of equal value.
4.4	<b>Forced labour</b> Companies will not use or support slavery, servitude, forced or compulsory labour.	Conforming	The company has a policy against forced labour and conforms with the requirement to eliminate the risk of forced labour through its employee selection procedures.
4.5	<b>Child labour – worst forms</b> 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 a child labour policy and conforms with the requirement to prevent the risk of the worst forms of child labour through employee selection procedures.
4.6	<b>Child labour – other forms</b> 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 a child labour policy and conforms with the requirement to prevent the risk of other forms of child labour through employee selection procedures.
4.7	<b>Working hours</b> Companies will comply with local laws and ensure that workers undertake overtime on a voluntary basis and have at least one day of rest for every 7-day period or as prescribed by local laws (whichever is higher).	Conforming	The company conforms with the requirement to comply with local laws and ensure 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	<b>Freedom of association and collective bargaining</b> Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.	Conforming	The company conforms with the requirement to engage formally with all workers on freedom of association and collective bargaining in accordance with local labour laws.

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4.9	<b>Training</b> 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 conforms with the requirement to provide appropriate and periodic training for employees on labour issues and requires onsite contractors to train on aspects relevant to their specific tasks and work areas.



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### PRINCIPLE 5: Engage with stakeholders using a participatory approach

#### Overview of Principle Performance

The company has updated its procedures for ISO 9001, ISO 45001 and ISO 14001 management systems to include expectations for the company to consider both the internal and external issues which address the Tin Code standards such as having a formal system for stakeholder management. The company continues to conform with the expectation to establish an appropriate grievance mechanism to receive feedback from stakeholders. The company undertakes a range of training activities and is progressing with demonstrating that training on stakeholder engagement and management issues is mandatory for contractors.

STANDARD		RATING	ADDITIONAL INFORMATION
5.1	<b>Stakeholder management</b> 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 implemented a systematic approach to stakeholder management and conforms with the requirement.
5.2	<b>Stakeholder mapping and engagement</b> 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 conforms with the requirement 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.
5.3	<b>Grievance mechanism</b> 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 established an appropriate grievance mechanism to receive feedback from stakeholder.
5.4	<b>Training</b> Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 5 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company undertakes a range of training activities, but to improve its rating it could demonstrate that training on stakeholder engagement and management issues (as defined in the Tin Code, Principle 5) is mandatory for contractors.



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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 conforms with expectations to support local economic development and protect cultural heritage. It has made further progress to manage health and safety impacts on local communities and is also progressing with implementing a systematic approach to the management of community issues and a process of consultation that enables local communities to express their views. Note that the Chinese government does not recognise any indigenous peoples within its borders and interactions with ethnic minorities in China are addressed through the provisions for local communities. The company complies with local laws to protect basic farmland and cultivation conditions and is progressing regarding recognition of land rights more widely, and implementation of reasonable financial compensation for economically displaced people. The company's operations and activities have not resulted or are not resulting in involuntary resettlement. The company is not currently evaluating the impact of its use of natural resources on communities. An extension of training on managing local communities to employees and contractors could be beneficial.

STANDARD		RATING	ADDITIONAL INFORMATION
6.1	<b>Community and indigenous people management</b> 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 progressing with activity relating to community and indigenous people management, but to improve its rating it could develop and implement a systematic approach to community and indigenous people management.
6.2	<b>Community health and safety</b> Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities.	Progressing	The company has implemented some measures that contribute to management of impacts on community health and safety (these measures generally relate to management of environmental and OHS issues rather than specifically targeting community health and safety); to improve its rating the company could implement additional management measures to address residual health and safety issues not addressed by existing measures.
6.3	<b>Consultation</b> 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 implemented some measures that contribute to how it consults with local communities and indigenous peoples; to improve its rating, the company could implement a systematic approach to consultation and responding to the views of communities and indigenous peoples.
6.4	<b>Free, prior and informed consent (FPIC)</b> 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 requirement is considered not relevant as the Chinese government does not recognise any indigenous peoples within its borders and interactions with ethnic minorities can instead be addressed through the other provisions of Principle 6.
6.5	<b>Land rights, use and access</b> 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.	Progressing	The company comply with local laws to protect basic farmland and cultivation conditions. However, no evidence provided relates to potential impacts on land



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			rights, land use and access to land for non-designated farmland or land used for non-agricultural purposes.
6.6	<b>Physical displacement (resettlement)</b> Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons.	Not Relevant	The company's operations and activities have not resulted or are not resulting in involuntary resettlement.
6.7	<b>Economic displacement (livelihoods)</b> 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.	Progressing	Local laws address the requirement for reasonable compensation. However, no evidence provided relates to the company financially compensating economically displaced people.
6.8	<b>Local economic development</b> Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Conforming	The company has implemented procedures and plans to identify the development needs of communities and indigenous peoples and contribute to their economic development, including social and environmental programmes and a local levy paid according to tin production.
6.9	<b>Natural resource use and availability</b> Companies will seek to minimise negative impacts on access to and availability of natural resources by local communities and indigenous people.	Inadequate	The company has not yet provided evidence it is collecting natural resource use and availability data and has implemented measures or plans to reduce impacts on local communities and indigenous people; to improve its rating, the company could provide such evidence.
6.10	<b>Cultural heritage protection</b> Companies will anticipate and wherever possible avoid adverse impacts on cultural heritage; when avoidance is not possible, companies will minimize, mitigate and/or compensate for such impacts.	Conforming	The company conforms with the requirement to anticipate and wherever possible avoid adverse impacts on cultural heritage based on compliance with the Chinese permitting process for industrial operations.
6.11	<b>Training</b> 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 undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to local community and indigenous people's issues (as defined in the International Tin Code, Principle 6) and that such training is mandatory for both employees and contractors.



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

#### Overview of Principle Performance

The company has an informal approach to human rights management in its operations. While progressing with the appropriate use of security by following local laws it could implement a system to reflect the Voluntary Principles on Security and Human Rights and extend training related to minimising serious human rights abuses and conflict to employees and contractors. The company sources minerals from both inside and outside China. It sometimes performs site visits to review production trends and obtain general information and is continuing to develop its internal management systems to identify conflict and high-risk areas according to the OECD due diligence guidance. The company is aware of questions over potential risks relating to minerals from the Special Zone 2 of Myanmar and has discussed this with their suppliers. Due to a number of prevailing limiting factors, it has so far not been possible for the company to address the questions in a full risk assessment or other formal manner. The company was RMAP conformant during the period of Code reporting with the source of mineral inputs and throughput mass balance third-party verified with additional actions on risk assessment planned. The company now undertakes a range of formal training activities but could progress with induction and refresher training of employees on human rights and conflict-related issues and require such training for contractors.

STANDARD	RATING	ADDITIONAL INFORMATION
<p>7.1 <b>Human rights management</b> Companies will work towards implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7.</p>	Informal	The company informally manages some aspects related to human rights and conflict issues, but to improve its rating the company could develop a systematic approach to human rights management to enhance formal control and monitoring.
<p>7.2 <b>Use of private or state security personnel</b> Companies using direct or contracted workers to provide security will be guided by the Voluntary Principles on Security and Human Rights and by applicable local law.</p>	Progressing	The company complies with local laws and is progressing with complying the Voluntary Principles on Security and Human Rights; to improve its rating it could implement a systematic approach to implementing the Voluntary Principles for its direct and contracted security workers.
<p>7.3 <b>Responsible sourcing</b> Companies will evaluate potential risks when sourcing minerals and seek to avoid purchases that may support conflict or human rights abuses according to international expectations and laws.</p>	Progressing	The company sources minerals from both inside and outside China. It sometimes performs site visits to review production trends and obtain general information and is continuing to develop its internal management systems to identify conflict and high-risk areas according to the OECD due diligence guidance. The company is aware of questions over potential risks relating to minerals from the Special Zone 2 of Myanmar and has discussed this with their suppliers. Due to a number of prevailing limiting factors, it has so far not been possible for the company to address the questions in a full risk assessment or other formal manner. The company was RMAP conformant during the period of Code reporting



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			with the source of mineral inputs and throughput mass balance third-party verified with additional actions on risk assessment planned. The company now undertakes a range of formal training activities but could progress with induction and refresher training of employees on human rights and conflict-related issues and require such training for contractors.
7.4	<p><b>Training</b></p> <p>Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 7 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.</p>	Progressing	The company undertakes a range of training activities, but to improve its rating the company could demonstrate that induction and refresher training of employees extends to human rights and conflict-related issues (as defined in the Tin Code, Principle 7) and that such training is also required for contractors.



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

#### Overview of Principle Performance

The company continues to conform with expectations to have a system to evaluate suppliers of goods and services to work towards principles of the Code and this is described in its CSR report. The company is now also progressing with developing general guidance that encourages suppliers of all artisanal and small-scale ASM minerals to communicate and support the standards of the Code, potentially through practical project opportunities. There remains an opportunity for the company to implement a system of checks on major secondary suppliers and to work to encourage adoption of Code principles by suppliers of both secondary materials and minerals from large scale producers.

STANDARD		RATING	ADDITIONAL INFORMATION
8.1	<b>Suppliers of ASM produced minerals, general</b> 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 is progressing with requests to suppliers to improve their understanding of the upstream supply chain, the location and importance of ASM producers, and to encourage communication through suppliers on the objectives of the Code and guidance on ASM practices.
8.2	<b>Principle 1 ASM minerals (compliance and policies)</b> 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.	Progressing	The company is progressing with requests to suppliers to communicate the importance of formalisation and engaging in practical projects to encourage formalisation of ASM practices.
8.3	<b>Principle 2 ASM minerals (environment)</b> 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 is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on managing environmental impacts in ASM as appropriate to the production area.
8.4	<b>Principle 3 ASM minerals (health and safety)</b> 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 is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on managing health and safety impact in ASM as appropriate to the production area.
8.5	<b>Principle 4 ASM minerals (labour)</b> 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.	Progressing	The company is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on raising awareness regarding concerns over forced or compulsory labour impact in ASM as appropriate to the production area.
8.6	<b>Principle 6 ASM minerals (communities)</b> Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.	Progressing	The company is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on raising awareness regarding negotiating with communities and indigenous peoples on the impact of access to land issues in ASM as appropriate to the production area.
8.7	<b>Principle 7 ASM minerals (human rights and conflict)</b>	Progressing	The company is progressing with requests to suppliers to communicate guidance and proactively engage in practical projects on raising awareness regarding serious





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	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.		human rights abuses and conflict issues in ASM as appropriate to the production area.
8.8	<b>Suppliers of LSM produced minerals</b> Companies will request major suppliers meet or work towards principles of this Tin Code.	Inadequate	The company is not yet requesting major suppliers to meet or work towards principles of this Code of Conduct
8.9	<b>Suppliers of secondary materials</b> Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Tin Code.	Inadequate	To improve its rating, the company could demonstrate it has requested major suppliers of secondary materials meet or work towards principles of this Tin Code.
8.10	<b>Suppliers of goods and services</b> Companies will request major suppliers meet or work towards principles of this Tin Code.	Conforming	The company conforms with the requirement to have a system to evaluate suppliers of goods and services to work towards principles of the Code attested to in its CSR report.



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### PRINCIPLE 9: Encourage the understanding, and safe and appropriate use of tin products

#### Overview of Principle Performance

Through its membership of International Tin Association, the company conforms with the expectation to support the development of improved understanding of the properties and potential effects of tin on humans and the environment as well as other standards of this principle. In addition to working with ITA on research and innovation the company and has also invested in a research and development (R&D) centre. The company was able to provide evidence of occasionally communicating accurate public information on tin to the tin industry and its users with no noted breaches in data protection law.

STANDARD		RATING	ADDITIONAL INFORMATION
9.1	<b>Understanding potential impacts of tin</b> 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 requirement to regularly support activities to review, lead and advance understanding of the properties and potential effects of tin as found necessary.
9.2	<b>Encouraging safe and appropriate use</b> Companies will support research, innovation and collaboration that promotes safe and efficient production, use and recycling of tin, including to ensure regulatory compliance and efficient use of energy and natural resources	Conforming	Through its membership of International Tin Association, the company conforms with the requirement to regularly support research and innovation and leading collaboration that promotes safe, appropriate and efficient use of tin.
9.3	<b>Communicating appropriate information</b> 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 communicates accurate public information on tin, and the tin industry, to users in the value chain and wider stakeholders with no noted breaches under data protection laws.



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### PRINCIPLE 10: Work towards reporting against the International Tin Code

#### Overview of Principle Performance

The management and staff of Yunnan Tin Company Ltd have taken ownership of reporting on the 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 first company report on the Code and conform with reporting requirements.

STANDARD		RATING	ADDITIONAL INFORMATION
10.1	<b>Policy Review</b> Companies will review published policies at least annually to reflect any changes to company expectations in relation to standard 1.1	Conforming	The company representatives were knowledgeable about the expectations of the International Tin Code and the need to review and update policy. They actively participated in reviewing and updating policies and procedures when required.
10.2	<b>Communicating reporting information</b> Companies will agree to the publication of a report of activities against the Principles and Standards of the Tin Code.	Conforming	The management of Yunnan Tin Company Ltd agreed to the publication of this report of activities Yunnan Tin Company Ltd against the Principles and Standards of the Code.
10.3	<b>Management Review</b> Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	The management of Yunnan Tin Company Ltd approved the content of this report.



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## Appendix A – Description of 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 pilot reporting 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:** In the reporting format, details of 'Additional Information' is not included for 'Conforming' and 'Third-party Verified' standards but is provided in the case of other Ratings as a useful guide to show progress.