



# INTERNATIONAL TIN CODE REPORT: Minsur S.A.

GENERAL INFORMATION	
Company details	Minsur S.A. Bernini 149, piso 5, San Borja, Lima 41, Lima - Peru
Date of this report	October 2021
Date of previous report	October 2018
Report author(s)	Independent External Assessor Sustainability Standards Manager, International Tin Association Ltd
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About our company	<p>Minsur S.A. (Minsur) was established by BRECA group as a 100% Peruvian mining company in 1977. Minsur is devoted to the exploration, exploitation, extraction, processing, and trade of minerals, mainly tin, gold and copper. Its tin operations, which are the scope of this report, include the San Rafael tin mining unit (MU) and the tin smelting plant and refinery (SPR) of Pisco, located in the Puno and Ica regions of Peru, respectively. It is also exploring tin resources in Puno through its Santo Domingo and Nazareth projects.</p> <p>Minsur owns or is major shareholder of other metal operations as well, aiming for growth and diversification. Among the list are the Pucamarca gold MU and Mina Justa copper project. The Pitinga tin MU and Pirapora tin SPR, managed by Mineração Taboca S.A., in Sao Paulo, Brazil, separately participates and reports to the Tin Code.</p> <p>Minsur states that it only uses tin concentrate from its own mines, refining the mineral in its Pisco smelter. It produces refined tin and tin products such as granules and flakes supplying local and global markets. The company has a public commitment to sustainability through the implementation of social development programmes in the areas surrounding the MU, as well as a commitment to environmental protection, operation according to international standards approaches, and public disclosure of sustainability aspects in their Annual, Sustainability and Tin Code Reports.</p> <p>The company holds ISO 9001, ISO 14001 and ISO 45001 certifications, covering the tin operations of scope in this report.</p>
Significant changes from previous report	This second Tin Code Report demonstrates the steps that Minsur has taken to achieve a higher rating and highlights several areas of progress. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement. Since the previous report, Minsur has made progress on several standards, including:



Visual Progress Guide



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	<ul style="list-style-type: none"><li>• Undertaken third-party verification of the Corporate Sustainability Report by PWC, thereby achieving a third-party verified rating for standards: 1.3, 1.4, 1.6, 2.2, 2.3, 2.5, 2.6, 2.8, 2.9, 2.10, 2.11, 2.12, 2.13, 2.14, 4.8, 5.1, 5.3, 6.1, 6.3, 6.8, 7.1 and 7.2.</li><li>• Updated policies to be closely aligned with the scope of the Tin Code, related to standards 1.1, 6.4 and 6.5.</li><li>• Progressed by requesting suppliers of goods and services to work towards the achievement of principles of the Tin Code, through its Code of Conduct and Ethics for suppliers and contractors, in standard 8.10.</li></ul> <p>The company could re-gain a higher rating by providing evidence on the management of land and soil quality (2.4), training in labour practices (4.9), economic compensation of economically displaced people, natural resource use and availability, and management of adverse impacts on cultural heritage (6.7, 6.9, 6.10)</p>
Further information and references	<ol style="list-style-type: none"><li>1. Minsur's website <a href="https://www.minsur.com/">https://www.minsur.com/</a></li><li>2. Séptimo Estudio de Conciliación Nacional – EITI Perú Períodos 2017 y 2018 [7<sup>th</sup> National Reconciliation Study – EITI Peru 2017-2018]: <a href="https://eiti.org/sites/default/files/attachments/vii_informe_nacional_eiti_peru_2017-2018.pdf">https://eiti.org/sites/default/files/attachments/vii_informe_nacional_eiti_peru_2017-2018.pdf</a></li><li>3. Annual Report 2020 <a href="http://www.minsur.com/relacion-con-inversionistas/memoria-anual/?lang=en">http://www.minsur.com/relacion-con-inversionistas/memoria-anual/?lang=en</a></li><li>4. Sustainability Report 2020 <a href="https://www.minsur.com/wp-content/uploads/2021/06/reporte_%20de_%20sostenibilidad_%202020.pdf">https://www.minsur.com/wp-content/uploads/2021/06/reporte_%20de_%20sostenibilidad_%202020.pdf</a> (third-party verified by PWC)</li></ol>



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

### Overview of Principle Performance

The company has made several improvements and achieved the highest rating of third-party verified in many standards of this Principle. The company maintained its ISO 9000, 14001 and 45001 certifications, which led to a third-party verified rating on management systems. Through its 2020 Sustainability Report assured by PWC, the company also achieved the highest rating on keeping up to date all required registrations and licences, preventing bribery and corruption, and on their whistleblowing procedure. The company reports under the Extractive Industries Transparency Initiative (EITI), as Peru is an implementing country, and this has been verified as complete through the EITI Reconciliation Study. It had in place several policies addressing most of the principles of the Tin Code, conforming with policy development and supporting its improvement of practices in general. The company continued to make progress by undertaking employee training activities, including coverage of legal compliance and good practices.

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.	Conforming	The company has demonstrated that it conforms with this expectation through several policies addressing most of the principles of the Tin Code, which support the improvement of practices in general.
1.2	<b>Management system</b> Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Third-Party Verified	The company has demonstrated it implemented a formal system to manage legal compliance and governance issues and is certified by ISO 9001, ISO 14001 and ISO 45001.
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.	Third-Party Verified	The company has demonstrated it kept 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 health and safety and environmental requirements. This aspect has been verified by a third party.
1.4	<b>Business integrity</b> Companies will seek to prevent bribery and corruption.	Third-Party Verified	The company has demonstrated it implemented procedures to record and prevent bribery and corruption. This aspect has been verified by a third party.
1.5	<b>Transparency</b> Companies will implement the Extractive Industries Transparency Initiative (EITI) if required by national government	Third-Party Verified	The company has demonstrated it supported the Extractive Industries Transparency Initiative (EITI) and has submitted relevant data to the EITI National Coordinator, which has been verified as complete through the EITI Reconciliation Study.
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.	Third-Party Verified	The company has demonstrated it implemented whistleblowing procedures, including specific guidance on reporting, investigation, follow-up and informant protection. This aspect has been verified by a third party.
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 has demonstrated it is progressing through undertaking a wide range of training activities with its employees but not contractors yet, including coverage of legal compliance and good practices (as defined under Tin Code, Principle 1).

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## PRINCIPLE 2: Seek continual improvement of environmental performance

### Overview of Principle Performance

The company has made several improvements in its environmental performance. As a result, it has achieved the highest rating of third-party verified on many of the relevant standards for this Principle. The company maintained its ISO 14001 environmental management system, which has been supplemented by its 2020 Sustainability Report assured by PWC. These two have supported the allocation of third-party verified ratings for 13 standards: environmental management system, management of discharges to surface waters and groundwater, water consumption reduction, air releases management, greenhouse emissions monitoring, tailings, hazardous and non-hazardous waste management, banned substances elimination, biodiversity protection, respect of legally protected areas, implementation of closure and rehabilitation measures, and environmental training for employees and contractors. The company continued to make progress in identifying measures to reduce energy consumption. The company provided evidence it monitored air emissions, effluents and wastes which indirectly contributes to the protection of soil quality, and it could provide evidence of specific soil data to improve its rating.

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 has demonstrated it implemented an environmental management system, and this has been verified through its ISO 14001 certification.
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 has demonstrated it understands and manages discharges to surface waters and groundwater to minimise negative impacts on water quality. This aspect has been verified by a third party.
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.	Third-Party Verified	The company has demonstrated it collects water use and availability data and has implemented actions to reduce water consumption and minimise negative impacts on water availability. This aspect has been verified by a third party.
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.	Informal	The company monitors air emissions, effluents, and wastes, which contribute indirectly to the protection of land and soil quality. The company could improve its rating by providing specific evidence regarding soil baseline data and management measures implemented to minimise the negative impacts of discharges on soil and land quality.
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 has demonstrated it understands and manages discharges to air in order to minimise negative impacts on air quality. This aspect has been verified by a third party.
2.6	<b>Greenhouse gases</b> Companies emitting more than 25,000 tonnes of CO <sub>2</sub> -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 has demonstrated it understands direct and indirect greenhouse emissions and is considering economic reduction initiatives appropriate to the nature and scale of its operations. This aspect has been verified by a third party.



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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.	Progressing	The company has demonstrated it is progressing through developing some procedures, such as guidelines and plans to reduce emissions of greenhouse gases, manage energy efficiently, and for energy performance improvement.
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 has demonstrated it disposes of tailings in an engineered disposal facility in a manner that minimises the risk of impacts to the environment and human health. This aspect has been verified by a third party.
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.	Third-Party Verified	The company has demonstrated it implemented measures to avoid the generation of hazardous wastes where possible and otherwise dispose of waste in a manner that minimises negative impacts on human health and the environment. This aspect has been verified by a third party.
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.	Third-Party Verified	The company has demonstrated it implemented measures to avoid the generation of non-hazardous and inert wastes and identified reuse and recycling opportunities to reduce the volume of waste disposed using appropriate methods. This aspect has been verified by a third party.
2.11	<b>Banned substances</b> Companies will not use substances that are banned under international convention or local laws.	Third-Party Verified	The company has demonstrated it does not use substances that are banned under international conventions or local laws and routinely reviews new substances it may plan to use to ensure they are not subject to such bans. This aspect has been verified by a third party.
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.	Third-Party Verified	The company has demonstrated it understands potential impacts on biodiversity and avoids activities that significantly modify or degrade critical natural habitats through an appropriate action plan. This aspect has been verified by a third party.
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.	Third-Party Verified	The company has demonstrated it respects legally protected areas in accordance with local laws and seeks to understand and manage potential impacts of operations on adjacent zones. This aspect has been verified by a third party.
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 has demonstrated it costed closure, developed reclamation plans and scheduled implementation in accordance with local laws and the expectations of key stakeholders. This aspect has been verified by a third party.
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 has demonstrated it provided employees and contractors with regular training on environmental issues and management. This aspect 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 maintained its ISO 45001 certification (formerly OHSAS 18001) in health and safety management systems and achieved the highest achievable rating of third-party verified for all the standards of this Principle. By having ISO accreditation, the company demonstrated it had in place a robust system to maintain and continually improve health and safety for staff, contractors, and visitors to its sites. Any incidents are reported to authorities and transparently investigated with defined corrective actions monitored for follow-up. Also, the company demonstrated appropriate training for employees and contractors.

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 has demonstrated it developed and implemented an occupational health and safety management system. This has been verified by a third party through ISO 45001 certification.
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 has demonstrated it implemented measures to maintain safe and healthy working conditions. This has been verified by a third party through ISO 45001 certification.
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 has demonstrated it undertook and reported to appropriate authorities' formal incident investigation using a transparent and inclusive procedure that allows affected workers to provide input. This has been verified by a third party through ISO 45001 certification.
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 demonstrated it formally defined corrective actions and monitored the effectiveness of such measures. This has been verified by a third party through ISO 45001 certification.
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 demonstrated it implemented a formal system for health and safety-related training for contractors as well as employees. This has been verified by a third party through ISO 45001 certification.

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## PRINCIPLE 4: Seek continual improvement in labour practices

### Overview of Principle Performance

The company has made several improvements for this reporting period. As a result, it achieved the highest rating of third-party verified in one standard and conforming ratings in most of the relevant standards for this Principle. Through its 2020 Sustainability Report assured by PWC, the company demonstrated it engaged with all workers on freedom of association and collective bargaining. It had in place an Internal Work Regulations Handbook and other procedures, which evidenced that it conforms with the expectations to develop and implement formal systems to manage the risk of discrimination, fair and equal remuneration, comply with local laws regarding overtime and eliminate the risk of forced and child labour. The company has made progress in developing and implementing a formal system to manage labour issues. Training materials have been developed with respect to child labour and forced labour for employees, and the company could provide evidence related to employee and contractor training addressing all aspects of Principle 4 to improve its rating.

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.	Progressing	The company has demonstrated it is progressing through managing some aspects related to labour issues and developed comprehensive work regulations (Internal Work Regulations Handbook).
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 has demonstrated that it conforms with this expectation by implementing 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 has demonstrated that it conforms with this expectation by paying workers at or above the local legal minimum and including 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 demonstrated that it conforms with the expectation to eliminate the risk of forced labour through its corporate human rights policy and internal work regulations.
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 demonstrated that it conforms with this expectation by implementing a child labour policy and preventing 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 demonstrated that it conforms with this expectation by implementing a child labour policy and preventing 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 has demonstrated that it conforms with this expectation by implementing plans to address compliance with local laws, and overtime is requested on a voluntary basis (except in emergency situations).





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4.8	<p><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.</p>	Third-Party Verified	The company has demonstrated it engages formally with all workers on freedom of association and collective bargaining in accordance with local labour laws. This aspect has been verified by a third party.
4.9	<p><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.</p>	Informal	The company has indicated in their Sustainability Report that training materials have been developed with respect to child labour and forced labour. The company could improve its rating by providing specific evidence of appropriate and periodic training for employees regarding all aspects of Principle 4 or that it requires onsite contractors to train their workers 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 achieved the highest rating of third-party verified in implementing a systematic approach to stakeholder management and establishing a grievance mechanism to receive concerns. It has mapped its stakeholders and is engaged with them, conforming with this expectation. Through evidence of training programmes in social and human rights issues, the company has demonstrated it is progressing with this expectation.

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.	Third-Party Verified	The company has demonstrated it implemented a systematic approach to stakeholder management. This aspect has been verified by a third party.
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 has demonstrated that it conforms with this expectation through mapping of its stakeholders and demonstrating that it is engaging with them.
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.	Third-Party Verified	The company has demonstrated it established an appropriate grievance mechanism. This aspect has been verified by a third party.
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 has demonstrated it is progressing through undertaking a range of training activities, including social and human rights training for employees, but not contractors yet.

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

### Overview of Principle Performance

The company has made several improvements and achieved the highest rating of third-party verified in three standards of this Principle. Through its 2020 Sustainability Report assured by PWC, the company demonstrated it implemented a systematic approach to the management of community and indigenous peoples, enabled consultation from local communities and indigenous peoples and contributed to the economic development of local communities. It also demonstrated it seeks the free, prior and informed consent (FPIC) of indigenous peoples and anticipated or avoided adverse impacts on land rights, conforming with these expectations. The company has a social management system in place, which evidenced it is progressing with community health and safety. It also made progress in mitigating adverse impacts of physical displacement, avoiding adverse impacts on cultural heritage, and providing relevant training on aspects of this Principle, evidenced by several social management procedures and archaeological remains standards. The company could provide evidence on economic displacement and natural resource use and availability to improve those ratings.

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.	Third-Party Verified	The company has demonstrated that it implemented a systematic approach to community and indigenous peoples management. This aspect has been verified by a third party.
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 demonstrated it is progressing through developing some measures to contribute to the management of impacts on community health and safety. It has a social management system, a corporate social management policy and other social risk management procedures in place. These measures generally relate to the management of environmental and OHS issues and contributing to community health initiatives.
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.	Third-Party Verified	The company has demonstrated it implemented plans for consulting with local communities and indigenous peoples and that responded to their views. This aspect has been verified by a third party.
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.	Conforming	The company has demonstrated that it conforms with this expectation through seeking the FPIC of indigenous peoples where their lands, access to natural resources or cultural heritage may be impacted by company activities.
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.	Conforming	The company has demonstrated that it conforms with this expectation through seeking to anticipate and avoid or minimise adverse impacts on land rights, land use and access to land and compensate for any significant residual impacts.

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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.	Progressing	The company has demonstrated that it is progressing through developing some procedures to avoid or minimise involuntary resettlement. It has a resettlement guideline that relates to physical or economic displacement of families in the surrounding area, and restitution of goods and resources affected.
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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence that economic displacement only occurs through land purchase as a voluntary standard, commercial transaction at market prices.
6.8	<b>Local economic development</b> Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Third-Party Verified	The company has demonstrated it implemented procedures and plans to identify the development needs of communities and indigenous peoples and contribute to their economic development. This aspect has been verified by a third party.
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 provided evidence related to this expectation. The company could improve its rating by providing evidence that it is collecting natural resource use and availability data, and the implementation of measures or plans to reduce impacts on local communities and indigenous people.
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 minimise, mitigate and/or compensate for such impacts.	Progressing	The company has demonstrated it is progressing through developing some procedures to avoid adverse impacts on archaeological remains. It has a mining exploration and archaeological remains standard in place which notes work must stop when encountering archaeological remains during exploration activities and guidelines for remains protection.
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.	Progressing	The company has demonstrated it is progressing by developing some training procedures. It has an internal training in social management document which establishes relevant training required on social issues and commitments for employees, but not contractors yet.

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

#### Overview of Principle Performance

The company has achieved the highest rating of third-party verified on implementing a systematic approach to human rights and following the Voluntary Principles on Security and Human Rights when using private security contractors. This has been third-party verified using the 2020 Sustainability Report assured by PWC. The company has stated that it does not source minerals from external suppliers and smelts minerals only from its own associated mine in Peru; therefore, standard 7.3 is not relevant as there are no suppliers on whom to perform due diligence. The company was listed as RMAP conformant in the reporting period; however, that assessment process has not yet been confirmed as fully OECD aligned. Through evidence of training in human rights issues to its employees, the company has demonstrated it is progressing with this expectation.

STANDARD		RATING	ADDITIONAL INFORMATION
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.	Third-Party Verified	The company has demonstrated it implemented a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7. This aspect has been verified by a third party.
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.	Third-Party Verified	The company has demonstrated it follows the Voluntary Principles on Security and Human Rights when using private security contractors. This aspect has been verified by a third party.
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.	Not Relevant	This standard is not relevant to Minsur as according to the declaration of the company in their 2020 Sustainability Report, the SPR of Pisco refines tin concentrate from San Rafael MU – sourcing minerals from their own mine. The company was listed as RMAP conformant in the reporting period; however, that assessment process using the 2017 RMAP Tin and Tantalum Standard has not yet been confirmed as fully OECD aligned.
7.4	<b>Training</b> Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 7 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company has demonstrated it is progressing by undertaking some training related to human rights with its employees, but not contractors yet.



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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 stated that it does not source tin containing materials from external parties and therefore standards relating to influencing large or small mineral suppliers, or secondary material suppliers are not relevant. The company has a Code of Ethics and Conduct for suppliers and contractors in place, which evidenced it is progressing with the expectation of major suppliers meeting or working towards principles of the Tin Code.

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.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this expectation is not relevant.
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.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this expectation is not relevant.
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.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this expectation is not relevant.
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.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this expectation is not relevant.
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.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this expectation is not relevant.
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.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this expectation is not relevant.
8.7	<b>Principle 7 ASM minerals (human rights and conflict)</b> 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	The company does not source minerals from ASM suppliers and therefore this expectation is not relevant.
8.8	<b>Suppliers of LSM produced minerals</b> Companies will request major suppliers meet or work towards principles of this Tin Code.	Not Relevant	The company does not source minerals from other LSM suppliers and therefore this expectation is not relevant.
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.	Not Relevant	The company does not source from suppliers of secondary materials and therefore this expectation is not relevant.



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8.10	<b>Suppliers of goods and services</b> Companies will request major suppliers meet or work towards principles of this Tin Code.	Progressing	Through its Code of Ethics and Conduct for suppliers and contractors, the company has demonstrated it is progressing by requesting suppliers of goods and services to meet or work towards many, but not all, of the principles of the Tin Code.
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## INTERNATIONAL TIN CODE REPORT: Minsur S.A.

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

#### Overview of Principle Performance

Through its membership of International Tin Association and the REACH consortium, the company conforms with the expectation to support the understanding of the potential effects of tin on humans and the environment, and has encouraged the safe, appropriate, and efficient use of tin. The company provided evidence of occasionally communicating accurate public information on tin to the tin industry and its users with no noted breaches in data protection law, conforming with this expectation.

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 expectation 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 expectation to regularly support research and innovation and lead 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 has demonstrated that it conforms with this expectation by communicating 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 Minsur 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 second Tin Code Report, conforming with reporting expectations.

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 Tin Code and the need to review and update policies. 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 Code.	Conforming	The management of Minsur agreed to the publication of this report of activities against the principles and standards of the Tin 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 Minsur 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.