
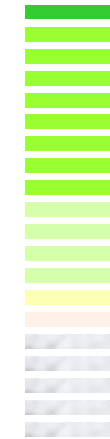


# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo



GENERAL INFORMATION	
Company details	Metallo Belgium Nieuwe Dreef 33, 2340 Beerse, Belgium 
Date of this report	February 2019 (Published January 2020)
Date of previous report	Not Relevant
Report author(s)	Independent External Assessor Supply Chain Standards Manager, International Tin Association Ltd
Report verified by	Inge Hofkens - Chief Sales Officer Bernard Rademakers - Regulatory Affairs Manager
Contact information	<a href="mailto:conflictreesourcing@metallo.com">conflictreesourcing@metallo.com</a>
About our company	<p>Metallo was founded in 1919 as 'La Metallo-Chimique N.V.' today it provides non-ferrous multi-metal recycling and refining services. The company offers smelting, converting, distillation, and electrolysis services. It produces metals, such as copper, tin, lead, nickel, tankhouse slimes, zinc oxide, and metamix.</p> <p>It is registered on the London Metal Exchange (LME) under the following brand MC.</p> <p>Metallo holds ISO 9001, OHSAS 18001 and ISO 1400 standards.</p>
Significant changes from previous report	Not Relevant
Further information and references	<ol style="list-style-type: none"> <li>1. Metallo Belgium holds ISO 9001, ISO 14001 and OHSAS 18001 standards.</li> <li>2. Internal Policies <a href="https://www.metallo.com/downloads">https://www.metallo.com/downloads</a></li> </ol>



Visual Progress Guide

# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo



PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices			
Overview of Principle Performance			
		STANDARD	RANKING
<p>The company conforms to the standard for implementing a formal management system and also keeps up to date all required registrations, licences and other document necessary for legal operation. It also has procedures to prevent bribery and implements a whistleblowing process but can improve its rating by demonstrating the whistleblowing procedures are available to external stakeholders. The company is also making progress in developing and publishing policies to support legal compliance and improve practices with respect to the Code of Conduct and implementing relevant training. It is not required to report under the Extractive Industries Transparency Initiative (EITI) as Belgium is not an implementing country of the EITI.</p>			
1.1	<p><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 of Conduct.</p>		Progressing
1.2	<p><b>Management system</b> Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.</p>		Conforming
1.3	<p><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.</p>		Conforming
1.4	<p><b>Business integrity</b> Companies will seek to prevent bribery and corruption.</p>		Conforming
1.5	<p><b>Transparency</b> Companies will implement the Extractive Industries Transparency Initiative (EITI) if required by national government</p>		Not Relevant
1.6	<p><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 Code of Conduct.</p>		Progressing
1.7	<p><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.</p>		Progressing

# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo



PRINCIPLE 2: Seek continual improvement of environmental performance		
Overview of Principle Performance		
STANDARD		RANKING
<p>The company conforms with the requirement to develop and implement an environmental management system with third-party verification to ISO 14001 standard. It also has a system in place to understand and manage water discharges which is verified by government monitoring and regulation. The company has also identified water consumption and availability issues and ranked its related impacts as part of its ISO 14001 certification. However, it can improve its rating by demonstrating it has in place measures or plans to reduce water consumption.</p> <p>As it is a recycling company, tailings from mineral processing activities is not a relevant requirement and does not apply.</p>		
2.1	<p><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.</p>	Third-Party Verified
2.2	<p><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.</p>	Third-Party Verified
2.3	<p><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.</p>	Progressing
2.4	<p><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.</p>	Progressing
2.5	<p><b>Air quality</b> Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.</p>	Third-Party Verified
2.6	<p><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.</p>	Progressing
2.7	<p><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.</p>	Progressing



## INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

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.	Not Relevant	Tailings from mineral processing activities are not relevant to recycling facilities and therefore this requirement does not apply.
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	
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	
2.11	<b>Banned substances</b> Companies will not use substances that are banned under international convention or local laws.	Conforming	
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.	Progressing	The company has identified and ranked environmental impacts as part of its ISO 14001 certification, to improve its rating it could demonstrate it has taking steps to specifically understand its potential impacts on biodiversity.
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.	Progressing	The company conforms with the requirement to respect legally protected areas in accordance with local laws, and is developing its understanding and management of 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.	Not Relevant	Conformance with the requirement is considered not relevant as closure and rehabilitation plans do not apply to non-mining operations and facilities.
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.	Conforming	



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

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

### Overview of Principle Performance

The company conforms with the requirement to develop and implement a health and safety management system and maintain safe and healthy working conditions. It has a transparent and inclusive procedure for reporting health and safety matters to the appropriate authorities that is inclusive and allows workers to provide input. The company formally defines health and safety corrective actions and monitors the effectiveness of such actions. It provides employees with health and safety related induction and refresher training, to improve its rating the company could demonstrate the training requirements also extend to contractors.

STANDARD		RANKING	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.	Conforming	
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	
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.	Conforming	
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.	Conforming	
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	

# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

PRINCIPLE 4: Seek continual improvement in labour practices			
<b>Overview of Principle Performance</b>		<p>The company conforms with the requirement to develop and implement a formal system to manage labour issues, risk of discrimination in employment decision, pay and statutory benefits requirements. Through meeting strict EU labour laws, it conforms with the requirement to eliminate the risk of forced labour and child labour concerns. It also conforms with the requirement on working hours and engages formally with all workers on freedom of association and collective bargaining in accordance with EU labour laws.</p> <p>The company undertakes a range of training activities, but could improve its rating through demonstrating that this extends to labour-related practices as defined in the Code of Conduct and that such training is mandatory for both employees and contractors.</p>	
STANDARD		RANKING	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	
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	
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	
4.4	<b>Forced labour</b> Companies will not use or support slavery, servitude, forced or compulsory labour.	Conforming	
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	
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	
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	
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	
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.	Informal	The company undertakes a range of training activities, but to improve its rating it could demonstrate that this extends to labour-related practices (as defined in the Tin Code of Conduct, Principle 4) and that such training is mandatory for both employees and contractors.



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

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

STANDARD		RANKING	ADDITIONAL INFORMATION
<b>Overview of Principle Performance</b> <p>In meeting its requirements for ISO accreditation, the company has undertaken procedures to identify and assess all internal and external issues that could impact upon their ISO accredited management system's ability to deliver its intended results. As such it manages some aspects related to stakeholder issues, but to improve its rating the company could implement a formal stakeholder management system to further enhance its control and monitoring activities and demonstrate related training is mandatory for contractors.</p>			
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.	Progressing	The company manages some aspects related to stakeholder issues, but to improve its rating the company could implement a formal stakeholder management system to further enhance its control and monitoring activities.
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	
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.	Informal	The company is aware of the need to manage grievances (deviations from good practice) and does so in an informal manner; to improve its rating the company could implement a formal mechanism that extends to local people, communities and civil society organisations.
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 this extends to covering stakeholder engagement and management issues (as defined in the Tin Code of Conduct, Principle 5) and that such training is mandatory for contractors.

# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo



PRINCIPLE 6: Manage negative impacts on, and contribute to development of, local communities and indigenous peoples			
Overview of Principle Performance			
STANDARD		RANKING	ADDITIONAL INFORMATION
<p>The company has implemented some measures that contribute to management of impacts on community health and safety. It's operations and activities have not resulted and are not resulting in involuntary resettlement, economic displacement or having negative impacts on access to and availability of natural resources by local communities. The company could improve its rating by demonstrating it has or is developing procedures and plans to identify the development needs of communities, contribute to their economic development and implement additional management measures.</p>			
6.1	<p><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.</p>	Conforming	
6.2	<p><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.</p>	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	<p><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.</p>	Conforming	
6.4	<p><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.</p>	Not relevant	No indigenous peoples are located near to or impacted by the company's operations.
6.5	<p><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.</p>	Not relevant	The lands, access to natural resources or cultural heritage of indigenous peoples have not and are not negatively impacted by the company's operations and activities.
6.6	<p><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.</p>	Not relevant	The company's operations and activities have not resulted / are not resulting in involuntary resettlement.
6.7	<p><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.</p>	Not relevant	The company's operations and activities have not resulted / are not resulting in economic displacement.
6.8	<p><b>Local economic development</b> Companies will seek to contribute to the economic development of local communities and indigenous peoples.</p>	Inadequate	To improve its rating, the company could demonstrate it has or is developing procedures and plans to identify the development needs of communities and indigenous



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo



			peoples and contribute to their economic development.
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.	Not relevant	The company's operations and activities have not had / are not having negative impacts on access to and availability of natural resources by 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 minimize, mitigate and/or compensate for such impacts.	Not relevant	The company's operations and activities have not had / are not having negative impacts on cultural heritage (this information might be presented in environmental and social impact assessments for the company's operations and activities).
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	To improve its rating the company could demonstrate that induction and refresher training of employees extends to local community and indigenous peoples issues (as defined in the Tin Code of Conduct, Principle 6) and that such training is also required for contractors.



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

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

### Overview of Principle Performance

The company has implemented a systematic approach to human rights and security management through compliance EU laws. As a recycler it does not source minerals from external parties and therefore standard 7.3 on Responsible Sourcing is not relevant. It undertakes a wide range of training activities for its employees and contractors but could improve its rating by demonstrating human rights related training is mandatory for both employees and contractors.

STANDARD		RANKING	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.	Conforming	
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.	Conforming	
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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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	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 of Conduct, Principle 7) and that such training is also required for contractors.



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

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

<b>Overview of Principle Performance</b>	<p>The company does not source minerals from external parties and therefore conformance with the requirements standards relating to influencing large and small mineral suppliers of materials is not relevant.</p> <p>The company has relevant requirements in its “General Conditions of Purchase” to ensure major suppliers of secondary materials meet the requirements of the Code and a method of informally evaluating if major suppliers meet or are working towards some of the relevant requirements of the Code. It could to improve its rating the by demonstrating further measure are being taking to positively influence practices of suppliers of materials, goods and services and that these are implemented and monitored.</p>
--	--

STANDARD		RANKING	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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
8.8	<b>Suppliers of LSM produced minerals</b> Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Not relevant	Conformance with the requirement is considered to be not relevant as the company does not source minerals from external parties.
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 Code of Conduct.	Conforming	

# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo



8.10	<b>Suppliers of goods and services</b> Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Informal	The company has informally requested major suppliers of goods and services meet or work towards principles of this Code of Conduct.
------	---	----------	---



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

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

### Overview of Principle Performance

Through its membership of ITA, the company conforms with the requirement to regularly support activities to review, lead and advance understanding of the properties and potential effects of tin and support research and innovation that leads to collaboration and promotes safe and efficient use of tin. The company communicates information on tin, and the tin industry, to users in the value chain and wider stakeholders through its membership of the Tin REACH Consortium with no noted breaches under data protection laws..

STANDARD		RANKING	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	
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	
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	



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

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

### Overview of Principle Performance

The management and staff of Metallo 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.

STANDARD		RANKING	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	
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	
10.3	<b>Management Review</b> Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	



# INTERNATIONAL TIN CODE OF CONDUCT REPORT: Metallo

## 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 ranking 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 rankings 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 rankings.

**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 rankings as a useful guide to show progress.