
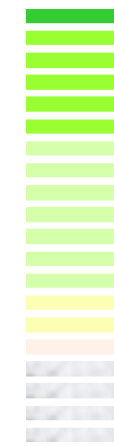




INTERNATIONAL TIN CODE OF CONDUCT REPORT: Mineração Taboca S/A

GENERAL INFORMATION	
Company details	Mineração Taboca S/A Estrada dos Romeiros, km 49 Guarapiranga-Pirapora do Bom Jesus -SP- 06550-000 Brazil 
Date of this report	October 2018
Date of previous report	Not Relevant
Report author(s)	Independent External Assessor Supply Chain Standards Manager, International Tin Association Ltd
Report verified by	Corporate Affairs Director - Gonzalo Quijandria
Contact information	Asuntoscorporativos@minsur.com
About our company	<p>Mineração Taboca S/A is a Brazilian mining company which has being in operation for over 40 years. It was acquired in 2008 by MINSUR.</p> <p>It's mine, Pitinga, is located in the Amazona's State of Brasil and is the world's largest tin reserve. The future life of mine is estimated at 31 years. Currently, Taboca only sources concentrate from its own mine and it is refined at its Pirapora Smelter located in Pirapora do Bom Jesus, Sao Paulo, Brazil. Taboca also produces Niobium and Tantalum ferroalloys, which are byproducts of tin production at Pitinga.</p> <p>Mineração Taboca S/A is ISO 9001 and ISO 14001 certified and is the largest producer of refined tin in Brazil, exporting most of its production in addition to supplying the domestic market. It is registered on the London Metal Exchange (LME) under the Mamoré brand.</p>
Significant changes from previous report	Not Relevant
Further information and references	<ol style="list-style-type: none"> 1. Mineração Taboca S/A holds ISO 9001 and ISO 14001 standards. 2. Annual Report http://www.mtaboca.com.br/port/nfe.html



Visual Progress Guide

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PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices			
Overview of Principle Performance			
STANDARD		RANKING	ADDITIONAL INFORMATION
1.1	Policies Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code of Conduct.	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 of Conduct, but some policies have not yet been developed.
1.2	Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Conforming	
1.3	Legal compliance Companies will have and keep up to date all business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including with health and safety and environmental requirements.	Conforming	
1.4	Business integrity Companies will seek to prevent bribery and corruption.	Conforming	
1.5	Transparency 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 Brazil is not an implementing country of the EITI at present.
1.6	Whistleblowing Companies will develop and implement whistleblowing procedures to enable employees and stakeholders to report concerns related to company activities, including relevant expectations of the Code of Conduct.	Conforming	
1.7	Training Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 1 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company undertakes a range of training activities, but to improve its rating it could demonstrate that training on legal compliance and governance issues (as defined in the Tin Code of Conduct, Principle 1) is mandatory for contractors.

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PRINCIPLE 2: Seek continual improvement of environmental performance		
Overview of Principle Performance		The company has developed and implemented a third-party verified ISO 14001 environmental management system, as well as verified means to manage tailings. It also conforms with standards of mine closure and reclamation and trains all relevant parties on environmental aspects. It has identified protected area issues, ranked their related impacts as part of its ISO 14001 certification, and is progressing to demonstrate the means of managing any negative impacts. It is also progressing with activities to improve specific understanding of biodiversity protection and measures to demonstrate the reduction of banned substances and wastes which are managed through existing plans. The company has also identified water, soil and air quality impacts and is progressing with plans to minimise those. It has a qualitative awareness of greenhouse gas emissions and informally aims to manage energy consumption which is from renewable hydroelectric sources.
STANDARD	RANKING	ADDITIONAL INFORMATION
2.1 Management system Companies will work towards implementing an environmental management system that utilises the mitigation hierarchy (avoid, minimise, mitigate, compensate) to control and monitor relevant aspects of this Principle 2.	Third-Party Verified	
2.2 Water quality Companies will seek to understand and manage discharges to surface waters and groundwater in order to minimise negative impacts on water quality.	Progressing	The company has identified water quality issues and ranked its related impacts as part of its ISO 14001 certification. It could improve its rating by demonstrating it has in place appropriate water treatment capacity.
2.3 Water consumption and availability Companies will seek to reduce water consumption in their operations in order to minimise negative impacts on water availability.	Progressing	The company has identified water consumption and availability issues and ranked related impacts as part of its ISO 14001 certification; to improve its rating the company could demonstrate it has in place measures or plans to reduce water consumption and minimise negative impacts on water availability.
2.4 Land and soil quality Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality.	Progressing	The company has identified land and soil quality issues and ranked related impacts as part of its ISO 14001 certification; to improve its rating the company could demonstrate it has in place measures or plans to manage discharges to minimise negative impacts on land and soil quality.
2.5 Air quality Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.	Progressing	The company has identified air quality issues and ranked related impacts as part of its ISO 14001 certification; to improve its rating the company could demonstrate it has in place measures or plans to minimise negative impacts on air quality.
2.6 Greenhouse gases Companies emitting more than 25,000 tonnes of CO ₂ -equivalent will seek to understand direct and indirect greenhouse emissions and consider economic reduction initiatives appropriate to the nature and scale of operations.	Informal	The company has a qualitative awareness of its greenhouse emissions and is considering informal economic reduction initiatives.
2.7 Energy consumption Companies will seek to identify technically and financially feasible measures for reducing the direct and indirect consumption of energy per unit of production or increasing the share from renewable sources.	Informal	The company demonstrates some informal activity relating to management of its direct and indirect consumption of energy.

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2.8	Tailings management 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	
2.9	Hazardous waste management Wherever possible companies will avoid the generation of hazardous wastes; where this is not possible companies will manage and dispose of wastes in a manner that minimises negative impacts on human health and the environment.	Progressing	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	Non-hazardous and inert waste management Wherever possible companies will minimise the production of non-hazardous and inert wastes and consider reuse and recycling options before disposing of them in an appropriate manner.	Progressing	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	Banned substances Companies will not use substances that are banned under international convention or local laws.	Progressing	The company has identified banned substance issues and ranked related impacts as part of its ISO 14001 certification; to improve its rating the company could demonstrate it has in place measures or plans to exclude all substances that are banned under international conventions and local laws from its operations.
2.12	Biodiversity protection Companies will seek to understand potential impacts on biodiversity and avoid activities that significantly modify or degrade critical natural habitats through an appropriate action plan.	Progressing	The company has identified and ranked environmental impacts as part of its ISO 14001 certification; to improve its rating the company could demonstrate it has taking steps to specifically understand its potential impacts on biodiversity.
2.13	Protected areas Companies will respect legally protected areas in accordance with local laws, and will seek to understand and manage potential impacts of operations on adjacent zones.	Progressing	The company has identified protected area issues and ranked related impacts as part of its ISO 14001 certification; to improve its rating the company could demonstrate it has in place measures or plans to manage negative impacts on areas adjacent to legally protected areas.
2.14	Closure and reclamation Companies will allocate adequate financial resources to enable implementation of closure and rehabilitation of operations in accordance with local requirements and expectations of key stakeholders.	Conforming	
2.15	Training Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 2 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Conforming	

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PRINCIPLE 3: Seek continual improvement of health and safety performance			
Overview of Principle Performance		<p>The company is making progress in developing and implementing a health and safety management system. It does not have third-party accreditation but it has in place conforming measures to maintain and continually improve health and safety for staff and visitors to its sites, including appropriate follow up on incidents. The company is progressing development of a transparent and inclusive systematic process to record, investigate and report qualifying incidents to appropriate authorities. Investigation of incidents and reporting to authorities is with development of a transparent and inclusive systematic process to record, investigate and report qualifying incidents to appropriate authorities. It also provides employees with induction and refresher training and requires contractors to do the same with their workers in line with the requirements of the principle.</p>	
STANDARD		RANKING	ADDITIONAL INFORMATION
3.1	Health and safety management systems Companies will work towards implementing a management system to monitor and control relevant aspects of this Principle 3.	Progressing	The company is making progress in developing and implementing a health and safety management system.
3.2	Safe working practices Companies will maintain safe and healthy working conditions by implementing measures that minimise and seek to eliminate workplace fatalities, injuries and occupational diseases amongst employees, contractors and visitors.	Conforming	
3.3	Incident investigations Companies will document reportable health and safety incidents using a transparent and inclusive procedure that allows affected workers and local communities to provide input.	Progressing	The company is progressing development of a transparent and inclusive systematic process to record, investigate and report qualifying incidents to appropriate authorities.
3.4	Incident follow up Following a reportable health and safety incident, companies will define and implement corrective actions in a timely fashion and monitor the effectiveness of such actions.	Conforming	
3.5	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 3, require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas, and provide appropriate briefings to visitors to company facilities.	Progressing	The company provides employees with induction and refresher training and requires contractors to do the same with their workers as relevant to Principle 3 and their specific tasks and work areas; to improve its rating the company could demonstrate it also provides appropriate health and safety briefings to facility visitors.



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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance	The company is progressing with establishing a formal labour management system, but conforms with the expectation to commit to and implement most labour standards such as discrimination, remuneration, forced and child labour, as well as freedom of association by means which include having an “Employee Handbook”. A “Progressing” ranking has been allocated in relation to working hours as the company has implemented plans to address compliance with local laws and workers have at least one day of rest for every 7-day period but could further demonstrate that overtime requests are voluntary. The company is also progressing towards training requirements for contractors.
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STANDARD		RANKING	ADDITIONAL INFORMATION
4.1	Labour management systems Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4.	Progressing	The company manages most aspects related to labour issues, but to improve its rating the company could implement a formal labour management system to further enhance its control and monitoring activities.
4.2	Discrimination 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	Remuneration 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	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Conforming	
4.5	Child labour – worst forms Companies will not engage in the worst forms of child labour as defined by Article 3 of ILO Convention No. 182 including that which is likely to harm the health, safety or morals of children.	Conforming	
4.6	Child labour – other forms Companies may employ children of minimum age 14 years, or older as defined by local laws, to undertake non-hazardous, light work that does constrain their ability to gain an education.	Conforming	
4.7	Working hours 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).	Progressing	The company has implemented plans to address compliance with local laws, but to improve its rating the company could demonstrate that overtime is requested on a voluntary basis.
4.8	Freedom of association and collective bargaining Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.	Conforming	
4.9	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 4 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company undertakes a range of training activities, but to improve its rating it could demonstrate that training on labour-related practices (as defined in the Tin Code of Conduct, Principle 4) is mandatory for contractors.

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PRINCIPLE 5: Engage with stakeholders using a participatory approach			
Overview of Principle Performance			
STANDARD		RANKING	ADDITIONAL INFORMATION
5.1	Stakeholder management Companies will work towards implementing a systematic approach to stakeholder management to control and monitor relevant aspects of this Principle 5.	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	Stakeholder mapping and engagement Companies will seek to identify and record the characteristics and interests of stakeholders affected by, or with the potential to affect, company activities, and plan a participatory approach to engagement including disadvantaged and vulnerable groups.	Progressing	The company is making progress in stakeholder mapping and is engaging with some stakeholders, including indigenous peoples.
5.3	Grievance mechanism Companies will establish an appropriate grievance mechanism to receive, and facilitate resolution of, concerns raised by individuals, workers, communities or civil society organisations regarding company activities.	Progressing	The company is aware of the need to manage grievances and does so in an informal manner; to improve its rating the company could implement a formal mechanism to address concerns raised by individuals, workers, communities or civil society organisations.
5.4	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 5 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	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 of Conduct, 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			
		STANDARD	RANKING
			ADDITIONAL INFORMATION
<p>The company is progressing with procedures to identify the development needs of communities and indigenous peoples and contribute to their economic development, including social and environmental programmes. It notes that there is no need for additional land beyond the current property boundary, hence there could be no need in the foreseeable future physical resettlement of communities, and economic displacement is considered not relevant. The company also informally manages activities to consider relations with communities and indigenous peoples and consults on an ad-hoc basis, as well as informally considering cultural heritage. For a number of other standards a lack of available information on implementing activities has led to “inadequate” rankings.</p>			
6.1	<p>Community and indigenous people management Companies will consider implementing a systematic approach to the management of community and indigenous peoples issues to control and monitor relevant aspects of this Principle 6.</p>	Informal	The company is undertaking informal activities relating to community and indigenous people management and has some control and understanding of the relevant aspects.
6.2	<p>Community health and safety Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities.</p>	Inadequate	To improve its rating, the company could demonstrate the measures put in place or planned to eliminate negative project-related health and safety impacts on local communities.
6.3	<p>Consultation Companies will plan a process of consultation that enables local communities and indigenous peoples to express their views on risks, impacts and mitigation measures, and allows the company to consider and respond to them.</p>	Informal	The company informally consults on an ad hoc basis with local communities and indigenous peoples and responds in some way to their views.
6.4	<p>Free, prior and informed consent (FPIC) Companies will seek the FPIC of indigenous peoples where their lands, access to natural resources or cultural heritage may be impacted by company activities.</p>	Not Relevant	No indigenous peoples are located near to or impacted by the company's operations. 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
6.5	<p>Land rights, use and access Companies will seek to anticipate and avoid or minimise adverse impacts on land rights, land use and access to land and compensate for any significant residual impacts.</p>	Inadequate	It is not clear whether or how the company has implemented procedures and plans for assessing and addressing adverse impacts on land rights, land use and access to land or how it compensates for any residual impacts; to improve its rating the company could describe such procedures and plans if they exist already, or develop and implement them if not.
6.6	<p>Physical displacement (resettlement) 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>Economic displacement (livelihoods) Companies will financially compensate economically displaced people as required by local laws and plan a livelihoods restoration programme to ensure that there is no net negative impact on their livelihoods.</p>	Not relevant	Since purchase of operations, the company's operations and activities have not resulted / are not resulting in economic displacement.
6.8	<p>Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.</p>	Progressing	The company has some procedures and plans in place to identify the development needs of communities and indigenous peoples and contribute to their economic development.

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6.9	Natural resource use and availability Companies will seek to minimise negative impacts on access to and availability of natural resources by local communities and indigenous people.	Informal	Company is aware of qualitative indicators of natural resource use and availability and informally applies measures to minimise negative impacts.
6.10	Cultural heritage protection 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.	Informal	The company informally applies measures to anticipate and reduce impacts on cultural heritage.
6.11	Training Companies will provide appropriate and periodic training for employees regarding aspects of this Principle 6 relevant to interactions with local communities and indigenous people that may occur during the course of their work. Companies will require onsite contractors to undertake the same training when relevant to their specific role.	Progressing	The company undertakes a range of training activities, but to improve its rating it could demonstrate that training on local community and indigenous peoples issues (as defined in the Tin Code of Conduct, Principle 6) is mandatory for contractors.

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

Overview of Principle Performance

The company currently manages some aspects of human rights and conflict issues informally. It does not source minerals from external suppliers, smelting minerals only from its own mine, and therefore standard 7.3 is not relevant as there are no suppliers on whom to perform due diligence. The company's own standards are described in other principles. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified. The company is progressing regarding the application of training requirements for contractors but does not currently provide information to guide security services in good practices.

STANDARD		RANKING	ADDITIONAL INFORMATION
7.1	Human rights management Companies will work towards implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7.	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.
7.2	Use of private or state security personnel Companies using direct or contracted workers to provide security will be guided by the Voluntary Principles on Security and Human Rights and by applicable local law.	Inadequate	To improve its rating, the company could demonstrate the company's direct or contracted security workers are guided by the Voluntary Principles on Security and Human Rights and by applicable local laws.
7.3	Responsible sourcing 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. The company is RMAP compliant.
7.4	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 7 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Progressing	The company undertakes a range of training activities, but to improve its rating it could demonstrate that training on human rights and conflict-related issues (as defined in the Tin Code of Conduct, Principle 7) is mandatory 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 does not source minerals from external parties and therefore conformance with the standards relating to influencing large or small mineral suppliers, or secondary material suppliers of materials is not relevant. It does not yet have any measures in place to evaluate the performance of major suppliers of goods and services.	
STANDARD		RANKING	ADDITIONAL INFORMATION
8.1	Suppliers of ASM produced minerals, general Companies will request suppliers declare that they will work towards understanding their supply chain and communicating through suppliers the objectives of International Tin's Code, information and guidance to encourage improvements.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this requirement is not relevant
8.2	Principle 1 ASM minerals (compliance and policies) Suppliers will be requested to communicate the importance of formalisation and potential opportunities to engage in practical projects encouraging formalisation of ASM as appropriate (based on feedback) to the production area.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this requirement is not relevant
8.3	Principle 2 ASM minerals (environment) Suppliers will be requested to communicate guidance on managing environmental impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this requirement is not relevant
8.4	Principle 3 ASM minerals (health and safety) Suppliers will be requested to communicate guidance on managing health and safety impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this requirement is not relevant
8.5	Principle 4 ASM minerals (labour) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this requirement is not relevant
8.6	Principle 6 ASM minerals (communities) Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this requirement is not relevant
8.7	Principle 7 ASM minerals (human rights and conflict) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict, as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not Relevant	The company does not source minerals from ASM suppliers and therefore this requirement is not relevant
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Not Relevant	The company does not source minerals from LSM suppliers and therefore this requirement is not relevant
8.9	Suppliers of secondary materials Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Code of Conduct.	Not Relevant	The company does not source from suppliers of secondary materials and therefore this requirement is not relevant
8.10	Suppliers of goods and services 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

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			Code of Conduct.
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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, and the REACH consortium, 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. It also supports research and innovation to promote the safe, appropriate and efficient use of tin. 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		RANKING	ADDITIONAL INFORMATION
9.1	Understanding potential impacts of tin Companies will seek to advance the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data.	Conforming	
9.2	Encouraging safe and appropriate use Companies will support research, innovation and collaboration that promotes safe and efficient production, use and recycling of tin, including to ensure regulatory compliance and efficient use of energy and natural resources	Conforming	
9.3	Communicating appropriate information Companies will communicate accurate information on impacts and use of its products, to workers, users in the value chain and wider stakeholders, accounting for the need for appropriate confidentiality.	Conforming	



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

Overview of Principle Performance

The management and staff of Mineração Taboca S/A 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		RANKING	ADDITIONAL INFORMATION
10.1	Policy Review Companies will review published policies at least annually to reflect any changes to company expectations in relation to standard 1.1	Conforming	
10.2	Communicating reporting information Companies will agree to the publication of a report of activities against the Principles and Standards of the Code.	Conforming	
10.3	Management Review Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	



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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 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.