

GENERAL INFORMATION			
Company details	Yunnan Tin Company Ltd 121 E.Jinhu Road, Gejiu City, Yunnan, China	Yunnan Tin Company Limited	
Date of this report	April 2019 (Published December 2019)		
Date of previous report	Not Relevant		
Report author(s)	Independent External Assessor Supply Chain Standards Manager, International Tin Asso	ciation Ltd	
Report verified by	Tang Fa, President of Yunnan Tin Company Limited		
Contact information	<u>coc@internationaltin.org</u>		Visual Progress Guide
About our company	Yunnan Tin Company Limited is the world's largest tin ex years to the Qing regime. The company is owned by Yu Chinese domestic tin industry having traded on the Sher Yunnan Province, the site of the China's largest tin depo- offshore subsidiaries. Yunnan Tin Company Ltd produc Myanmar. The company has over 600 products include London Metal Exchange (LME) under the brand 'YT'. <u>http://en.ytl.com.cn</u>	innan Tin Group (Holding) Company Limited and is t zhen Stock Exchange since 2000 as "Yunnan Tin". It is sits and has over 14,000 employees across local branc ces tin from its own mines, and also purchases min ng tin ingot, tin solder, tin based alloys and tin che	he only listed company in the headquartered in Gejiu City in hes, domestic subsidiaries and nerals mainly from China and micals. It is registered on the
Significant changes from previous report	Not Relevant		
Further information and references	1. Yunnan Tin Company Ltd holds ISO 9001,	OHSAS 18001 and ISO 14001 standards.	

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

Yunnan Tin Company Ltd conforms or is third party verified to more than 67% of the standards in this principle. I manages legal compliance and governance issues as well as quality, environment and health and safety through 14001 and OHSAS 18001 standards. The company also has a system in place to keep up to date all business regis documents necessary to legally carry out business activity, procedures to prevent bribery and corruption, and to company is making progress in developing and publishing policies to support legal compliance and good practice.			h and safety through certification to ISO 9001, ISO late all business registrations, licences and other nd corruption, and to enable whistleblowing. The ice and improve practices with respect to the Code of	
STA	NDARD		RANKING	ADDITIONAL INFORMATION
1.1	Policies Companies will develop and publish policies to support lega expectations of the International Tin Code of Conduct.	al compliance and improve practices with respect to the	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 m this Principle 1.	anagement systems to control and monitor relevant aspects of	Third-Party Verified	
1.3		rations, licences and other documents necessary to legally carry cal laws, including with health and safety and environmental	Conforming	
1.4	Business integrity Companies will seek to prevent bribery and corruption.		Conforming	
1.5	Transparency Companies will implement the Extractive Industries Transp	arency Initiative (EITI) if required by national government	Not Relevant	Conformance with the requirement is considered not relevant as China is not an implementing country of the EITI at present.
1.6	Whistleblowing Companies will develop and implement whistleblowing pro concerns related to company activities, including relevant e		Conforming	
1.7		d periodic training for employees regarding relevant aspects of workers on aspects relevant to their specific tasks and work	Progressing	The company undertakes a wide range of training activities with its employees, including coverage of legal compliance and good practices (as defined in the Tin Code of Conduct, Principle 1); to improve its rating, the company could demonstrate this training is also mandatory for contractors.

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Overview of Principle Performance

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PRINCIPLE 2: Seek continual improvement of environmental performance

Over	view of Principle Performance	The company achieved the ranking of "Conforming" or "Third-party verified" in over 85% of the required standards for this principle. It has developed and implemented a third-party verified ISO 14001 environmental management system and some associated topics, including water, air, land and soil quality undergo further scrutiny by Chinese government monitoring. The government also verifies appropriate tailings management and closure and reclamation plans, and a third party has verified the activities targeting energy efficiency and reduction of greenhouse gas emissions. It also has formal measures in place to manage the handling and disposal of hazardous and non-hazardous wastes, and also conforms with expectations to respect protected areas, implement measures to reduce water use, and does not use banned substances. The company is progressing to specifically understand its potential impacts on biodiversity and while it does undertake a wide range of training activities, these could be extended to all environment-related issues and management and mandatory for both employees and contractors.		
STA	NDARD		RANKING	ADDITIONAL INFORMATION
2.1	Management system Companies will work towards implementing an environmer (avoid, minimise, mitigate, compensate) to control and mo	ntal management system that utilises the mitigation hierarchy nitor relevant aspects of this Principle 2.	Third-Party Verified	
2.2	Water quality Companies will seek to understand and manage discharges impacts on water quality.	to surface waters and groundwater in order to minimise negative	Third-Party Verified	
2.3	Water consumption and availability Companies will seek to reduce water consumption in their availability.	operations in order to minimise negative impacts on water	Conforming	
2.4	Land and soil quality Companies will seek to understand and manage discharges quality.	to land in order to minimise negative impacts on land and soil	Third-Party Verified	
2.5	Air quality Companies will seek to understand and manage discharges	to air in order to minimise negative impacts on air quality.	Third-Party Verified	
2.6	Greenhouse gases Companies emitting more than 25,000 tonnes of CO2-equivalent will seek to understand direct and indirect greenhouse emissions and consider economic reduction initiatives appropriate to the nature and scale of operations.		Third-Party Verified	
2.7	Energy consumption Companies will seek to identify technically and financially for of energy per unit of production or increasing the share fro	easible measures for reducing the direct and indirect consumption m renewable sources.	Third-Party Verified	
2.8	Tailings management Companies will store or dispose of tailings in a manner that health.	minimises the risk of impacts to the environment and human	Third-Party Verified	

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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.	Conforming	
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.	Conforming	
2.11	Banned substances Companies will not use substances that are banned under international convention or local laws.	Conforming	
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, it could improve its rating by demonstrating 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.	Conforming	
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.	Third-Party Verified	
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.	Progressing	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to environment-related issues and management (as defined in the Code of Conduct, Principle 2) and that such training is mandatory for both employees and contractors.

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PRINCIPLE 3: Seek continual improvement of health and safety performance

	view of Principle Performance	The company achieved the highest achievable ranking of "Third-party verified" for all the standards for this principle. Having OHSAS accreditation demonstrates it has in place a robust system to maintain and continually improve health and safety for employees, contractors and visitors to its sites. Safe working practices are implemented and any incidents are reported to authorities and transparently investigated with defined corrective actions monitored for follow-up. Training is also provided as appropriate.			
STA	NDARD		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	Third-Party Verified		
3.2	Safe working practices Companies will maintain safe and healthy working condition workplace fatalities, injuries and occupational diseases amo	ns by implementing measures that minimise and seek to eliminate ongst employees, contractors and visitors.	Third-Party Verified		
3.3	Incident investigations Companies will document reportable health and safety inci- affected workers and local communities to provide input.	dents using a transparent and inclusive procedure that allows	Third-Party Verified		
3.4	Incident follow up Following a reportable health and safety incident, companie and monitor the effectiveness of such actions.	es will define and implement corrective actions in a timely fashion	Third-Party Verified		
3.5		r employees regarding relevant aspects of this Principle 3, require t to their specific tasks and work areas, and provide appropriate	Third-Party Verified		

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company conforms with most of the requirements of this principle through compliance with Chinese labour laws and the implementation of a formal labour management system. It has different "Policies" relating to labour management which set out the company's commitment to discrimination, remuneration, child labour, forced labour, working hours, and freedom of association and these commitments are clearly implemented. The law prohibits the employment of minors under the age of 16 and provides specific requirements when persons between the age of 16 and 18 are employed. The company does undertake a range of training activities although this could be extended to contractors.

STA	NDARD	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.	Conforming	
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).	Conforming	
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	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

Over	Overview of Principle Performance The company conforms with the expectation to establish an appropriate grievance mechanism to receive feedback from stakeholders progressing with implementing a systematic approach to stakeholder management as well as demonstrating that training on stakehol engagement and management issues is mandatory for contractors. Stakeholder mapping is currently informal and could be implement more systematic and formal manner.			ell as demonstrating that training on stakeholder
STA	NDARD		RANKING	ADDITIONAL INFORMATION
5.1	Stakeholder management Companies will work towards im to control and monitor relevant aspects of this Principle 5.	plementing a systematic approach to stakeholder management	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		cs and interests of stakeholders affected by, or with the potential ach to engagement including disadvantaged and vulnerable	Informal	The company has an informal approach to identifying the characteristics and interests of stakeholders; to improve its rating, the company could demonstrate it has a formalised system of stakeholder mapping and engagement.
5.3	Grievance mechanism Companies will establish an appropriate grievance mechani individuals, workers, communities or civil society organisati	sm to receive, and facilitate resolution of, concerns raised by ons regarding company activities.	Conforming	
5.4	Training Companies will provide appropriate and periodic training for require onsite contractors to train their workers on aspects	r employees regarding relevant aspects of this Principle 5 and 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

Over	view of Principle Performance	The company conforms with expectations to support local economic development, and protect cultural heritage. It is also progressing with implementing a systematic approach to the management of community issues and a process of consultation that enables local communities to express their views. Note that the Chinese government does not recognise any indigenous peoples within its borders and interactions with ethnic minorities in China are addressed through the provisions for local communities. The company complies with local laws to protect basic farmland and cultivation conditions but is progressing regarding recognition of land rights more widely, and implementation of reasonable financial compensation for economically displaced people. It is also informally considering impacts on health and safety of communities. The company's operations and activities have not resulted or are not resulting in involuntary resettlement, but there is no evidence that any impact of use of natural resources on communities is being evaluated. An extension of training on managing local communities to employees and contractors could be beneficial.			
STAI	NDARD		RANKING	ADDITIONAL INFORMATION	
6.1	Community and indigenous people management Companies will consider implementing a systematic approa issues to control and monitor relevant aspects of this Princi	ach to the management of community and indigenous peoples iple 6.	Progressing	The company is progressing with activity relating to community and indigenous people management. <u>Noting that</u> Chinese government does not recognise any indigenous peoples within its borders, interactions with ethnic minorities in China <u>are addressed through the provisions for local communities within this Principle.</u> To improve its rating it could develop and implement a systematic approach to community management.	
6.2	Community health and safety Companies will seek to implement practical and reasonabl and safety impacts on local communities.	e measures with the goal of eliminating potential negative health	Informal	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 it could implement additional management measures to address residual health and safety issues missing from existing measures.	
6.3	Consultation Companies will plan a process of consultation that enables on risks, impacts and mitigation measures, and allows the o	local communities and indigenous peoples to express their views company to consider and respond to them.	Progressing	The company has implemented some measures that contribute to how it consults with local communities; to improve its rating, the company could implement a systematic approach to consultation and responding to the views of communities.	
6.4	Free, prior and informed consent (FPIC) Companies will seek the FPIC of indigenous peoples where be impacted by company activities.	their lands, access to natural resources or cultural heritage may	Not Relevant	This requirement is considered not relevant as the Chinese government does not recognise any indigenous peoples within its borders and interactions with ethnic minorities can instead be addressed through the other provisions of Principle 6.	

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6.5	Land rights, use and access Companies will seek to anticipate and avoid or minimise adverse impacts on land rights, land use and access to land and compensate for any significant residual impacts.	Progressing	The company comply with local laws to protect basic farmland and cultivation conditions. However, no evidence provided relates to potential impacts on land rights, land use and access to land for non-designated farmland or land used for non-agricultural purposes.
6.6	Physical displacement (resettlement) Companies will seek to avoid or minimise involuntary resettlement and take appropriate measures to mitigate adverse impacts on displaced persons.	Not Relevant	The company's operations and activities have not resulted or are not resulting in involuntary resettlement.
6.7	Economic displacement (livelihoods) Companies will financially compensate economically displaced people as required by local laws and plan a livelihoods restoration programme to ensure that there is no net negative impact on their livelihoods.	Progressing	Local laws address the requirement for reasonable compensation. However, no evidence provided relates to the company financially compensating economically displaced people.
6.8	Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Conforming	
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.	Inadequate	The company has not yet provided evidence it is collecting natural resource use and availability data and has implemented measures or plans to reduce impacts on local communities; to improve its rating, the company could provide such evidence.
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.	Conforming	
6.11	Training Companies will provide appropriate and periodic training for employees regarding aspects of this Principle 6 relevant to interactions with local communities and indigenous people that may occur during the course of their work. Companies will require onsite contractors to undertake the same training when relevant to their specific role.	Inadequate	The company undertakes a wide range of training activities, but to improve its rating it could demonstrate that this extends to local community issues (as defined in the International Tin Code of Conduct, Principle 6) and that such training is mandatory for both employees and contractors.

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

Overview of Principle Performance	The company has an informal approach to human rights management in its operations. While progressing with the appropriate use of security by following local laws it could implement a system to reflect the Voluntary Principles on Security and Human Rights.
	The company sources minerals from both inside and outside China. It sometimes performs site visits to review production trends and obtain general information and is developing its internal management systems to identify conflict and high risk areas according to the OECD due diligence guidance. The company is aware of questions over potential risks relating to minerals from the Special Region 2 of Myanmar and has discussed this with their suppliers. Due to a number of limiting factors it has so far not been possible for the company to address the questions in a full risk assessment or other formal manner. The company does not currently source from Dodd Frank countries. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified, however that audit did not evaluate the company's assessment of supply risks that trigger the need for OECD due diligence on mineral sources.
	The company could extend training related to minimising serious human rights abuses and conflict to employees and contractors.

STAI	NDARD	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.	Progressing	The company complies with local laws and is progressing with complying follows the Voluntary Principles on Security and Human Rights; to improve its rating it could implement a systematic approach to implementing the Voluntary Principles for its direct and contracted security workers.
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.	Progressing	The company sources minerals from both inside and outside China. It sometimes performs site visits to review production trends and obtain general information and is developing its internal management systems to identify conflict and high risk areas according to the OECD due diligence guidance. The company is aware of questions over potential risks relating to minerals from the Special Region 2 of Myanmar and has discussed this with their suppliers. Due to a number of limiting factors it has so far not been possible for the company to address the questions in a full risk assessment or other formal manner. The company does not currently source from Dodd Frank countries. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified, however that audit did not

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			evaluate the company's assessment of supply risks that trigger the need for OECD due diligence on mineral sources.
7.4	Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 7 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.	Inadequate	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.

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

Overview of Principle Performance

The company conforms with the requirement to have a system to evaluate suppliers of goods and services to work towards principles of the Code attested to in its CSR report. Though, it has so far not informally or formally encouraged or requested suppliers of artisanal, small-scale or large scale mined minerals to understand and support the objectives and standards of the Code.

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.	Inadequate	To improve its rating, the company could demonstrate it has formally requested its ASM suppliers to declare they will work towards understanding their supply chain or communicating the objectives of the Tin Code.
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.	Inadequate	To improve its rating, the company could demonstrate it has made formal attempts to engage with ASM suppliers and distribute information on formalisation and has collected feedback on suitability to the ASM mineral source area(s).
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.	Inadequate	To improve its rating, the company could demonstrate it has made formal attempts to engage with ASM suppliers and distribute relevant guidance on managing environmental impacts and has collected feedback on suitability to the ASM mineral source area(s).
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.	Inadequate	To improve its rating, the company could demonstrate it has made formal attempts to engage with ASM suppliers and distribute relevant guidance on managing health and safety and has collected feedback on suitability to the ASM mineral source area(s).
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.	Inadequate	To improve its rating, the company could demonstrate it has made formal attempts to engage with ASM suppliers and distribute relevant guidance on managing labour issues and has collected feedback on suitability to the ASM mineral source area(s).
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.	Inadequate	Company has made limited attempts to engage with suppliers regarding the communication of guidance on negotiating with local communities and indigenous peoples regarding access to land.
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.	Inadequate	Company has made limited attempts to engage with suppliers regarding the communication of guidance on human rights abuses and conflict

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8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Inadequate	The company has not yet provided evidence to confirm it has formally requested major suppliers of LSM produced minerals meet or work towards principles of this Code of Conduct.
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.	Inadequate	To improve its rating, the company could demonstrate it has requested major suppliers of secondary materials meet or work towards principles of this Code of Conduct.
8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Code of Conduct.	Conforming	

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

Overview of Principle Performance		Through its membership of International Tin Association, the company conforms with the expectation to support the development of improved understanding of the properties and potential effects of tin on humans and the environment as well as other standards of this principle. In addition to working with ITA on research and innovation the company and has also invested in a research and development (R&D) centre. The company was able to provide evidence of occasionally communicating accurate public information on tin to the tin industry and its users with no noted breaches in data protection law.		
STANDARD			RANKING	ADDITIONAL INFORMATION
9.1	Understanding potential impacts of tin Companies will seek to advance the understanding of the p the environment through sound science and data.	roperties of tin and any potential effects on human health and	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	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

Overv	view of Principle Performance	The management and staff of Yunnan Tin Company Ltd have tak providing evidence on conformance and making continued prog Independent External Assessor and the International Tin Associa reporting requirements.	ress with the standards o	f the Code. They proactively worked with the
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.

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