
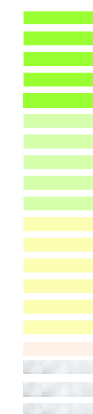




INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

GENERAL INFORMATION	
Company details	White Solder Metalurgia e Mineracao LTDA Highway BR 421, S/N, Zona Rural, 78932000, Ariquemes, Brazil 
Date of this report	September 2021
Date of previous report	Not Relevant – First report
Report author(s)	Independent External Assessor Sustainability Standards Manager, International Tin Association Ltd
Report verified by	Paulo Amparo, Commercial Director White Solder Group
Contact information	tincode@internationaltin.org
About our company	<p>White Solder Metalurgia e Mineracao LTDA (White Solder) is a Brazilian tin smelting company in Ariquemes, Rondônia with a recently expanded capacity of up to 7,200 tonnes tin per year production. The company produces tin from cassiterite sourced mainly from mining cooperatives in counties of Ariquemes and Monte Negro, in the state of Rondonia, Brazil. Cooperatives are licensed by the government and regularly inspected by agencies such as the National Mining Agency, Ministry of Labor and Welfare, and Brazilian Institute for the Environment and Natural Resources among others. White Solder is part of a group founded in 1999 which also includes a logistics operation and solder plants located in Brazil and Portugal which produce various alloys and forms of solder, and which hold ISO 9001 and ISO 14001. These operations are not assessed as part of this Tin Code report.</p> <p>White Solder holds ISO 37001 (antibribery) certification covering its Ariquemes smelter. It has been registered on the London Metal Exchange (LME) under the 'White Solder BR' brand since 2015.</p>
Significant changes from previous report	Not relevant
Further information and references	<ol style="list-style-type: none"> White Solder website: http://whitesolder.com.br/?lang=en Whistleblowing channel: http://www.torparticipacoes.com.br/canal-de-denuncia/ White Solder holds ISO 37001 certification of Ariquemes smelter Ministry of the Environment Brazilian Institute for the Environment and Renewable Natural Resources - Registrations and Certificates Municipal Secretariat for the Environment Brazilian Health and Safety Programmes (PCMSO and PPRA) Brazilian Labour Ministry - Onboarding handbook



Visual Progress Guide



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

Contents

PRINCIPLE 1: Maintain legal compliance and develop sound policies to improve practices	3
PRINCIPLE 2: Seek continual improvement of environmental performance	4
PRINCIPLE 3: Seek continual improvement of health and safety performance	6
PRINCIPLE 4: Seek continual improvement in labour practices.....	7
PRINCIPLE 5: Engage with stakeholders using a participatory approach	9
PRINCIPLE 6: Manage negative impacts on, and contribute to development of, local communities and indigenous peoples.....	10
PRINCIPLE 7: Avoid contributing to serious human rights abuses and conflict.....	12
PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services	14
PRINCIPLE 9: Encourage the understanding, and safe and appropriate use of tin products	17
PRINCIPLE 10: Work towards reporting against the International Tin Code	18
Appendix A – Description of Tin Code reporting	19



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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

Overview of Principle Performance

The company has achieved the highest rating of third-party verified in developing and implementing systems to avoid bribery, corruption and provide means for stakeholders to report concerns (whistleblowing), which are certified to the ISO 37001:2017 standard. It also conforms with the expectations to implement a management system to control relevant aspects of this Principle and, on keeping all business registrations, licences up to date. The company has made progress towards developing sound policies and periodic training. It has in place some policies addressing principles of the Tin Code, and evidenced training in antibribery to some staff. Implementation of the Extractive Industries Transparency Initiative (EITI) is not relevant as Brazil is not currently an implementing country of the EITI.

STANDARD		RATING	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.	Progressing	The company has provided evidence of some policies addressing principles of the Tin Code.
1.2	Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Conforming	The company has provided evidence for Standards 1.3, 1.4 and 1.6 and conforms with managing legal compliance and developing policies and systems relevant to business integrity.
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	The company has provided evidence that it tracks legal requirements and compliance through the LEMA system, which assists in keeping all business registrations, licences, and other documents necessary to legally carry out business activity up to date.
1.4	Business integrity Companies will seek to prevent bribery and corruption.	Third-Party Verified	The company has developed and implemented procedures to record and avoid bribery and corruption and is certified to the ISO 37001:2017 standard (expiry January 2023).
1.5	Transparency Companies will implement the Extractive Industries Transparency Initiative (EITI) if required by national government	Not Relevant	Conformance with this expectation 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 Tin Code.	Third-Party Verified	The company has evidenced it developed and implemented whistleblowing procedures appropriate to the company structure and size and is certified to the ISO 37001:2017 standard (expiry January 2023).
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 has provided evidence of training in antibribery issues during the reporting period to some staff.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company conforms with the expectations of managing hazardous wastes and does not use banned substances in the Ariquemes site. It is also progressing overall on many of the standards including environmental management system, managing its discharges to surface and groundwater, reducing water consumption, managing air quality and emissions, reducing energy consumption, and non-hazardous waste management. Training needs are outlined in the employee manual, which supported an informal rating, and the company could provide additional evidence of environmental training completed by staff and contractors to improve its rating. The company could also provide evidence of managing land and soil quality, biodiversity and legally protected areas to improve their rating.

STANDARD		RATING	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.	Progressing	The company has provided evidence of compliance with planning, monitoring, and reporting of Brazilian governmental institutions requirements, which is reasonable evidence of a systematic approach to environmental management.
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 provided evidence that it is progressing with understanding and managing its water data, and it has identified its potential discharges.
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 provided evidence that it is progressing with understanding and managing its water data and has measures to reduce underground water consumption.
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.	Inadequate	No relevant evidence has been provided to support a higher rating in this reporting period. The company could improve its rating by providing analytical data for Ariquemes.
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 provided evidence of emission permits, treatment, and monitoring data but for one sampling location only.
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.	Progressing	The company has provided evidence it collects greenhouse emission data and is tracking emissions, for a rating of "Not relevant" the company could provide calculations showing the total greenhouse gas emissions for Ariquemes site and confirm these are below the threshold of 25,000 tonnes.
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.	Progressing	The company has provided information that it is progressing with this. 77% of electricity generated in Brazil is from renewable sources (hydro, wind and solar).
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.	Not Relevant	Tailings from mining activities are not relevant to the company.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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	The company has provided evidence that it disposes of its hazardous wastes (oil) through a waste disposal company.
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 provided evidence that it is progressing with this. It disposes of non-hazardous wastes through a homologated waste disposal company, but this does not recycle material yet.
2.11	Banned substances Companies will not use substances that are banned under international convention or local laws.	Conforming	The company has provided evidence that it does not use banned substances on Ariqueмес site.
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.	Inadequate	No relevant evidence has been provided to support a higher rating in this reporting period. The company could improve its rating by clarifying why biodiversity monitoring and management is not necessary in their surroundings.
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.	Inadequate	No relevant evidence has been provided to support a higher rating in this reporting period. The company could improve its rating by clarifying the status of forested areas and rivers within a 10 km radius of the site.
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.	Not Relevant	Conformance with the expectation is considered not relevant as closure and rehabilitation plans do not apply to non-mining operations and facilities.
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.	Informal	The company's employee manual notes that a training needs survey is carried out by the human resources department and the necessary training for each position is detailed in the respective job description. The company could improve its rating by providing evidence of environmental training completed by staff and contractors.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company conforms with the expectation to document reportable health and safety incidents using a transparent and inclusive procedure. It has developed procedures to comply with national legal requirements on occupational health and safety management and ILO Conventions 148 and 155, which demonstrate it is progressing towards a systematic OHS approach and safe working conditions. The company is also progressing by providing various OHS training for staff and contractors. It has provided evidence of a documented accident procedure which supports an informal rating, and the company could provide additional evidence to show how OHS incidents are formally addressed to improve its rating.

STANDARD		RATING	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 has developed procedures to comply with national legal requirements and ILO Conventions 148 and 155.
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.	Progressing	The company has developed procedures to comply with national legal requirements and ILO Conventions 148 and 155.
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.	Conforming	The company has provided evidence that it conforms with the expectation to establish, implement, and maintain a process for reporting, investigating, and preventing incidents undertaken with input from affected workers.
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.	Informal	The company has provided evidence of a documented accident procedure. The company could improve its rating by providing additional evidence related to how health and safety incidents are addressed, and the steps taken to ensure they do not occur again.
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 has provided evidence of training undertaken on various OHS-related risks and issues.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company conforms with many of the expectations of this Principle. It has a formalised approach to remuneration and implemented procedures (Onboarding handbook) that addresses child and forced labour. It has evidenced the absence of any minors at the site. It also evidenced it supports freedom of association and collective bargaining. Through its handbook, the company evidenced that it is progressing with the expectations to implement a labour management system and avoid discrimination. It has implemented a policy of 44 working hours over 5 days, and agreed overtime with the workers syndicate, which evidenced it is progressing on this expectation. Training needs are outlined in the employee manual, which supported an informal rating, and the company could provide additional evidence on relevant training completed by staff and contractors to improve its rating.

STANDARD		RATING	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 has provided evidence of their employee manual (onboarding handbook) and management system of human resources, which covers some of the aspects of this Principle.
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.	Progressing	The company has provided evidence that there is no gender bias in management roles, and the employee manual notes that diversity is valued, and that employment decisions are based on technical and behavioural criteria.
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	The company conforms with this expectation and has provided evidence of a formalised approach to remuneration, equal pay for equal work, and a commitment to compliance with legal requirements, including minimum wage.
4.4	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Conforming	The company conforms with the expectation to avoid forced labour supported by procedures in its employee manual (onboarding handbook).
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	The company conforms with this expectation and has provided evidence of an employee manual (onboarding handbook) with a child labour policy and the absence of any minors working at the site.
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	The company conforms with this expectation and has provided evidence of an employee manual (onboarding handbook) with a child labour policy and the absence of any minors working at the site.
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 a policy for 44 working hours over 5 days and agreed with the worker's syndicate (a group of workers formed to pursue a common interest, also known as union) on the maximum overtime employees could do.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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	The company conforms with this expectation and has provided evidence of an employee manual (onboarding handbook), which implies that freedom of association and collective bargaining are supported, and collective agreements from the worker's syndicate.
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.	Informal	The company's employee manual notes that a training needs survey is carried out by the human resources department, and the necessary training for each position is detailed in the respective job description. The company could improve its rating by providing further detail on the relevant training delivered to management and workers.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company has implemented a systematic grievance mechanism via its website that allows any interested party to submit reports anonymously, conforming with this expectation. It had managed some aspects related to stakeholder issues and engaged with some stakeholders. The company could improve its rating by providing additional evidence of a formal stakeholder management system and wider stakeholder engagement. Training needs are outlined in the employee manual, which supported an informal rating, and the company could provide evidence on stakeholder management training completed by staff and contractors to improve its rating.

STANDARD		RATING	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.	Informal	The company has managed some aspects related to stakeholder issues. The company could improve its rating by providing additional evidence of a formal stakeholder management system extended to a broader range of stakeholders.
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.	Informal	The company has undertaken some stakeholder mapping and has engaged with some stakeholders focused on antibribery measures at the Group level. The company could improve its rating by providing additional evidence that it has mapped all relevant concerns, requirements, and expectations of stakeholders, and by considering a wider participatory approach to stakeholder engagement.
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.	Conforming	The company conforms with this expectation and has implemented a systematic grievance mechanism via its website, which allows any interested party to submit reports anonymously.
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.	Informal	The company's employee manual notes that a training needs survey is carried out by the human resources department and the necessary training for each position is detailed in the respective job description. The company could improve its rating by providing evidence of stakeholder management related training completed by staff and contractors.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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

Overview of Principle Performance

The company has developed an emergency action plan for Ariqueemes, which includes references to community aspects, demonstrating that it is progressing with managing community health and safety. It informally assisted the local community and applied measures to contribute to their economic development. Training needs are outlined in the employee manual, which supported an informal rating, and the company could provide additional evidence on relevant training completed by staff and contractors to improve its rating. Several standards related to free, prior, and informed consent (FPIC), land rights and use, economic or physical displacement, natural resource use and availability, and protection of cultural heritage are not relevant for the non-mining context of the company operations. The company could provide evidence on community and indigenous people consultation to improve its rating.

STANDARD		RATING	ADDITIONAL INFORMATION
6.1	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.	Informal	The company has provided evidence that it informally supports and assists the local community. The company could improve its rating by providing additional evidence of a systematic approach to managing community issues.
6.2	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.	Progressing	The company has provided evidence that it is progressing with community health and safety, and there is an emergency action plan for Ariqueemes, which includes references to community aspects.
6.3	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.	Inadequate	No relevant evidence has been provided to support a higher rating in this reporting period. The company could improve its rating by providing evidence of its internal and external communication or consultation procedure.
6.4	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.	Not Relevant	Conformance with this expectation is considered not relevant as free, prior, and informed consent (FPIC) does not apply to the smelting operation.
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.	Not Relevant	Conformance with this expectation is considered not relevant as land rights, use and access does not apply to the smelting operation.
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	Conformance with this expectation is considered not relevant as physical displacement does not apply to the smelting operation.
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.	Not Relevant	Conformance with this expectation is considered not relevant as economic displacement does not apply to the smelting operation.
6.8	Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Informal	The company has provided evidence that it informally applies measures to contribute to the economic development of local communities and indigenous



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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.		peoples. The company could improve its rating by providing evidence of systematic procedures and plans to identify the development needs of communities and indigenous people.
6.10	Cultural heritage protection Companies will anticipate and wherever possible avoid adverse impacts on cultural heritage; when avoidance is not possible, companies will minimise, mitigate and/or compensate for such impacts.	Not Relevant	Conformance with this expectation is considered not relevant as access to and availability of natural resources by local communities and indigenous peoples does not apply to the smelting operation.
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.	Not Relevant	Conformance with this expectation is considered not relevant as protection of cultural heritage does not apply to the smelting operation.
		Informal	The company's employee manual notes that a training needs survey is carried out by the human resources department and the necessary training for each position is detailed in the respective job description. The company could improve its rating by providing additional evidence of local communities and indigenous peoples management-related training completed by staff and contractors.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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

Overview of Principle Performance

The company has demonstrated that it is progressing with many of the expectations of this Principle related to human rights management and responsible sourcing. The company obtains minerals from mining cooperatives in the state of Rondonia, Brazil, which, through informal assessment, the company does not consider to be linked to conflict or human rights abuses. It is RMAP compliant, however that assessment process has not yet been confirmed as fully OECD aligned and did not evaluate the company's assessment of supply risks that trigger the need for OECD due diligence on mineral sources. The company has a system in place for minerals sourced from Dodd-Frank countries which are from companies participating in the ITSCI programme, which aligns with OECD due diligence standards. It has developed a supply chain policy, which refers to human rights management, developed a due diligence process for approving suppliers of security and follows local laws regarding the use of security. The company informally follows the Voluntary Principles on Security and Human Rights and could provide additional formal evidence of its use to improve its rating. Training needs are outlined in the employee manual, which supported an informal rating, and the company could provide additional evidence on relevant training for this Principle completed by staff and contractors to improve its rating.

STANDARD		RATING	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.	Progressing	The company has provided evidence that it is progressing towards a systematic approach to human rights. It developed a supply chain policy, aimed at suppliers, which refers to human rights management.
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.	Informal	The company has provided evidence that it complies with local laws, developed a due diligence process for approving suppliers of private or state security personnel, and informally follows the Voluntary Principles on Security and Human Rights. The company could improve its rating by providing evidence that the security used is guided by the Voluntary Principles on Security and Human Rights or a more general focus on human rights.
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 obtains minerals from mining cooperatives in the state of Rondonia, Brazil, which, through informal assessment, the company does not consider to be linked to conflict or human rights abuses. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified, however, that assessment process has not yet been confirmed as fully OECD aligned and did not evaluate the company's assessment of supply risks that trigger the need for OECD due diligence on mineral sources. RMAP conformance is dated March 2018, and the company is on a 3-year assessment cycle. The company has a system in place for minerals sourced from Dodd-Frank countries which are from companies participating in the ITSCI programme, which aligns with OECD due diligence standards.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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.	Informal	The company's employee manual notes that a training needs survey is carried out by the human resources department and the necessary training for each position is detailed in the respective job description. The company could improve its rating by providing evidence of human rights-related training completed by staff and contractors.
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INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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

Overview of Principle Performance

The company has declared compliance with Law No. 5,764/71 of the Brazilian Civil Code, which emphasises an obligation to support guiding principles of cooperative entrepreneurship, pointing out technical support to institutions and sources of funds for National Mining Cooperatives. Given this, the company informally works with suppliers of ASM produced minerals and towards communicating the importance of ASM sustainable practices, environmental impacts, health and safety issues, labour issues, communities and indigenous peoples' relations, and human rights management. Also, through its supplier approval process, the company informally met the expectation to request major suppliers and suppliers of goods and services to work towards principles of the Tin Code. Standard 8.9 relating to major suppliers of secondary materials is not relevant as the company currently has no major suppliers of secondary material.

STANDARD		RATING	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.	Informal	The company has informally met the expectation of working with suppliers of ASM produced minerals based on its declaration of compliance with Law No. 5,764 / 71 of the Brazilian Civil Code that emphasises an obligation of supporting guiding principles of cooperative entrepreneurship, pointing out technical support institutions and sources of funds for National Mining Cooperatives.
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.	Informal	The company has informally met the expectation of encouraging formalisation of ASM through suppliers of ASM produced minerals based on its declaration of compliance with Law No. 5,764 / 71 of the Brazilian Civil Code that emphasises an obligation of supporting guiding principles of cooperative entrepreneurship, pointing out technical support institutions and sources of funds for National Mining Cooperatives.
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.	Informal	The company has informally met the expectation of communicating guidance on managing environmental impacts of ASM through suppliers of ASM produced minerals based on its declaration of compliance with Law No. 5,764 / 71 of the Brazilian Civil Code that emphasises an obligation of supporting guiding principles of cooperative entrepreneurship, pointing out technical support institutions and sources of funds for National Mining Cooperatives.
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.	Informal	The company has informally met the expectation of communicating guidance on managing health and safety impacts through suppliers of ASM produced minerals based on its declaration of compliance with Law No. 5,764 / 71 of the Brazilian Civil Code that emphasises an obligation of supporting guiding principles of cooperative



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

			entrepreneurship, pointing out technical support institutions and sources of funds for National Mining Cooperatives.
8.5	<p>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.</p>	Informal	The company has informally met the expectation of raising awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour through suppliers of ASM produced minerals based on its declaration of compliance with Law No. 5,764 / 71 of the Brazilian Civil Code that emphasises an obligation of supporting guiding principles of cooperative entrepreneurship, pointing out technical support institutions and sources of funds for National Mining Cooperatives.
8.6	<p>Principle 6 ASM minerals (communities) Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.</p>	Informal	The company has informally met the expectation of communicating guidance on negotiating with local communities and indigenous peoples regarding access to land through suppliers of ASM produced minerals based on its declaration of compliance with Law No. 5,764 / 71 of the Brazilian Civil Code that emphasises an obligation of supporting guiding principles of cooperative entrepreneurship, pointing out technical support institutions and sources of funds for National Mining Cooperatives.
8.7	<p>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.</p>	Informal	The company has informally met the expectation of communicating guidance to raise awareness regarding concerns over serious human rights abuses and conflict through suppliers of ASM produced minerals based on its declaration of compliance with Law No. 5,764 / 71 of the Brazilian Civil Code that emphasises an obligation of supporting guiding principles of cooperative entrepreneurship, pointing out technical support institutions and sources of funds for National Mining Cooperatives.
8.8	<p>Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.</p>	Informal	The company has informally met the expectation of requesting major suppliers meet or work towards principles of the Tin Code through its approval process for the list of approved suppliers. As an opportunity to improve its rating the company could provide evidence that its system to update and monitor supplier's registrations, licenses, contracts, and due diligence applies to procurement from large-scale mining suppliers and extends to the principles the Tin Code.
8.9	<p>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 Tin Code.</p>	Not Relevant	This expectation is not relevant to the context in which the company operates as it currently has no major suppliers of secondary material.
8.10	<p>Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code.</p>	Informal	The company has informally met the expectation of requesting suppliers of goods and services to meet or work towards principles of the Tin Code through its approval process for the List of approved suppliers. As an

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DISCLAIMER: While we have made every attempt to ensure that the information contained in this report has been obtained from reliable sources, International Tin Association and reporting company is not responsible for any errors or omissions, or for the results obtained from the use of this information. All information in this in this report is provided in good faith.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

			opportunity to improve its rating the company could provide evidence that its system to update and monitor supplier registrations, licenses, contracts, and due diligence applies to procurement from suppliers of goods and services and extends to the principles of the Tin Code.
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INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

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 understanding of the potential effects of tin on humans and the environment, and has encouraged the safe, appropriate, and efficient use of tin. The company provided guidance on the final disposal of its products and associated packaging on its website. It could provide more formal evidence of occasionally communicating accurate public information on tin to the tin industry and its users with no noted breaches in data protection law.

STANDARD		RATING	ADDITIONAL INFORMATION
9.1	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	Through its membership of International Tin Association, the company conforms with the expectation to regularly support activities to review, lead and advance understanding of the properties and potential effects of tin as found necessary.
9.2	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	Through its membership of International Tin Association, the company conforms with the expectation to regularly support research and innovation and leading collaboration that promotes safe, appropriate, and efficient use of tin.
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.	Informal	The company has provided brief guidance on the final disposal of its products and associated packaging on its website. The company could improve its rating by giving examples of information it provides to stakeholders using channels such as ITA, IPC, and the Brazilian syndicate of Tin (SNIEE).



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

PRINCIPLE 10: Work towards reporting against the International Tin Code

Overview of Principle Performance

The management and staff of White Solder have taken ownership of reporting on the Tin Code and there is a clear commitment to providing evidence on conformance and making continued progress with the standards of the Tin Code. They proactively worked with the Independent External Assessor and the International Tin Association to develop this first company report on the Tin Code and conform with reporting expectations.

STANDARD		RATING	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	The company representatives were knowledgeable about the expectations of the Tin Code and the need to review and update policies. They actively participated in reviewing and updating policies and procedures when required.
10.2	Communicating reporting information Companies will agree to the publication of a report of activities against the Principles and Standards of the Code.	Conforming	The management of White Solder agreed to the publication of this report of activities against the Principles and Standards of the Tin Code.
10.3	Management Review Companies will ensure the above public information related to the Code is approved by senior responsible management	Conforming	The management of White Solder approved the content of this report.



INTERNATIONAL TIN CODE REPORT: White Solder Metalurgia e Mineracao LTDA

Appendix A – Description of Tin Code reporting

Evidence review process: The assessment of conformance with the Principles and Standards relies on detailed evaluation of documentary evidence and discussion with the company to ensure a full understanding of progress. ITA encourages members to provide maximum available information and collates this into an evidence dossier for submission to the Independent Assessor. During a period of feedback and consultation the company may submit further evidence to clarify or add to the information originally provided in order to improve accuracy. The Independent Assessor then determines the final Rating and agrees the text included in this report.

The Independent Assessor: ITA engages an expert to make the assessment of evidence separately and independently from the views of the ITA or its members. The Independent Assessor for this report is a consulting firm with more than 25 years' experience working on environmental and social issues and impacts in the natural resource sector. It specialises in analysis, prevention and management of environmental and social issues in the oil and gas, mining and aggregates industries worldwide and is familiar with large scale and artisanal mining, and acts as auditor and/or advisor to other commodity standards initiatives such as Bettercoal.

Reporting guide: The 'visual progress guide' on the title page is a general representation of the proportion of ratings overall.

Not Relevant	The Standard is not appropriate or does not apply to the company.
Third-party verified	Company activity has been verified by a third party recognised qualified body, for example during audit or inspection.
Conforming	Company activity is formally documented and implemented with evidence of conformance with the Standard.
Progressing	Company activity is documented but may benefit from formalisation in a procedure or expansion to the Standard.
Informal	Company activity is underway but may benefit from being documented more formally to the Standard.
Inadequate	There is insufficient evidence available to achieve other ratings.

Additional information: This provides information on the evidence that was made available by the company to demonstrate its activities and show progress.