
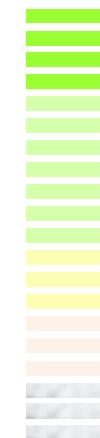




INTERNATIONAL TIN CODE REPORT: Operaciones Metalúrgicas S.A.

GENERAL INFORMATION	
Company details	<p>Operaciones Metalúrgicas S.A. Km 3.5 Carretera a Cochabamba, Zona Industrial Huajara, Oruro, Bolivia</p> 
Date of this report	Publication 27 December 2023
Date of previous report	March 2019
Report author(s)	Independent External Assessor Sustainability Standards Manager, International Tin Association Ltd
Report verified by	General Manager – Mariano Pero
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About our company	<p>Operaciones Metalúrgicas S.A. (hereinafter OMSA) was established in Oruro city, Bolivia, in 1937 by the Perú family and it consists of one smelter, which is the scope of this Tin Code report. The company produces around 320 tonnes of tin metal and alloys per month from minerals only sourced from Bolivia. It produces two qualities of high-purity tin metal sold worldwide.</p> <p>OMSA has a workforce of over 100 employees. It purchases minerals produced by local mining cooperatives from the Oruro tin region, which are relatively large-scale and well-controlled under Bolivian law. The minerals are in the majority sourced directly from cooperatives, although to a small degree through local traders. According to its website, the company has a Corporate Social Responsibility programme and has been supporting its local community through diverse social projects. OMSA is now in the process of adopting ISO 9001; 14001; and 45001 and expects to be certified in 2023.</p>
Significant changes from previous report	<p>This is the second Tin Code Report from the company, and it demonstrates the steps OMSA has taken to achieve a higher rating and highlights several areas of progress. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement.</p> <p>Since the previous report, OMSA has made progress on several standards, including:</p> <ol style="list-style-type: none"> 1. Developing and implementing several management procedures addressing governance, environmental, health and safety, and labour issues now achieving Conforming ratings for standards (SOP) 1.6, 2.7, 3.2, 3.3 and 3.4. 2. Progressing with the management of business integrity, some environmental, health and safety, and labour aspects, establishing a grievance mechanism and seeking to influence positively suppliers, achieving Progressing ratings for standards 1.4, 2.12, 2.15, 3.5, 4.4, 5.3, 8.1, 8.7 and 8.8.



Visual Progress Guide



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	<p>3. Working on documentation related to training on policies, and human rights aspects that address informally standards 1.7, 7.1 and 7.2.</p> <p>The company could regain higher ratings by providing evidence on understanding and managing discharges to surface water and groundwater (2.2) and implementing an H&S management system (3.1).</p> <p>Among other changes, SOP1.5 and SOP2.6, related to supporting transparency and managing greenhouse gas emissions, are now relevant to the company due to internal updates to the Tin Code standard.</p> <p>Notes:</p> <p>1) This report has been compiled to Tin Code standards updated in May 2022, including revisions to 1.4, 1.5, 2.6, 2.8, 4.2a), 4.2b), 4.3, 4.7, 6.9, 7.1, 7.3 and 10.2 standard numbers.</p> <p>2) Due to an inadvertent human error the previous report dated March 2019 was published with some uncertain or provisional ratings. Changes to ratings since the last report due to those errors have not been included in the above.</p>
Further information and references	<ol style="list-style-type: none">1. OMSA's website: https://www.omsabo.com/web3/2. Whistleblowing and grievance mechanism: https://www.omsabo.com/web3/claims/create3. Commercial policy: https://www.omsabo.com/web3/policy/trade



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

Overview of Principle Performance

The company has made improvements and now conforms by implementing a publicly available whistleblowing channel accessible from its website. The company has several policies in place addressing some of the principles of the Tin Code and has developed some elements of a formal integrated management system, which evidenced it is progressing with those expectations. Through its Code of Conduct, Commercial Policy and compliance matrix, the company evidenced it is progressing with keeping up to date all required registrations and licences and preventing bribery, corruption, and anti-competitive behaviours. Despite Bolivia being a non-implementing EITI country, OMSA publicly declared support to the EITI principles in its Commercial Policy (online). The company has a training-related procedure which addresses informally training expectations. The company could provide evidence of implementing the training procedure for employees and contractors to improve its rating.

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 demonstrated that it is progressing through developing and implementing some policies addressing some but not all the principles of the Tin Code. It has policies addressing legal compliance and business integrity (Principle 1), environmental (Principle 2), health and safety (Principle 3), supply chain, responsible sourcing, and human rights (Principle 7) policies and procedures.
1.2	Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.	Progressing	The company has demonstrated that it is progressing through developing and partially implementing elements of a formal integrated management system to manage legal compliance and governance issues, which is in progress towards full implementation.
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.	Progressing	The company has demonstrated that it is progressing through developing a matrix for the identification and assessment of compliance with legal requirements; and keeping up to date business registrations, licences and other documents necessary to legally carry out business activity and otherwise comply with relevant local laws, including health and safety and environmental requirements.
1.4	Business integrity Companies will seek to prevent anti-competitive behaviour, corruption and bribery, including facilitation payments which should be publicly disclosed if unavoidable.	Progressing	The company has demonstrated that it is progressing through developing a commercial policy, code of conduct and other procedures that address managing the risks related to bribery and corruption in the context of suppliers of primary materials and employees, but has not yet provided evidence related to implementation and procedures for managing anti-competitive behaviour.
1.5	Transparency Companies will support the implementation of the principles of the Extractive Industries Transparency Initiative (EITI) individually or through joint efforts, including through appropriate reporting ⁽¹⁾	Progressing	The company has demonstrated that it is progressing with this expectation through its publicly declared support to the EITI Principles in its Commercial Policy on its website but has not yet produced a voluntary report confirming that all relevant taxes, fees and/or royalties have been



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	⁽¹⁾ Reporting is required in an implementing country of EITI.		paid to governments. As a smelter without integrated mining operations that is not located in an EITI implementing country, nor is a paid member of the EITI Association, the company is out of scope of formal EITI reporting.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing whistleblowing procedures for employees and stakeholders, including a publicly available whistleblowing channel accessible from its website.
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.	Informal	The company has a training-related procedure for informing primary material suppliers of commercial requirements and expectations and is working on developing a personal training procedure, addressing informally this expectation. The company could improve its rating by implementing the training procedure for employees and contractors.

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company has made improvements for this reporting period and improved ratings on some standards of this Principle. It conforms with expectations related to reducing water consumption and to minimise negative impacts on water availability, reducing energy consumption, and respecting legally protected areas in accordance with local laws. Through the development of several standards and procedures related to a wide range of environmental aspects, OMSA evidenced that it is progressing in managing impacts on land and air, managing and disposing of hazardous wastes, segregating, recycling, and disposing of non-hazardous and inert wastes, not using banned substances, avoiding activities that significantly modify or degrade critical natural habitats and environmental training for employees. The company informally addresses expectations related to implementing an environmental management system and managing greenhouse gases, as limited evidence was provided for these subjects. The company could provide evidence of fully implementing the integrated management system, monitoring indirect emissions, and monitoring surface water and groundwater to improve its rating. Standards related to the management of tailings and closure and reclamation are not relevant due to the nature of the non-mining operation.

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.	Informal	The company has an integrated management system policy, which includes environmental commitments for the prevention of pollution, and is working on its implementation; and it also has other documents that provided limited evidence on this subject, addressing informally this expectation. The company could improve its rating by fully implementing the integrated management system, and providing documented evidence of additional procedures that supports the environmental management system.
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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of surface water and groundwater monitoring (including quality aspects as a means of protecting water quality and identifying contamination from unplanned 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.	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures to collect water use and availability data, and has implemented actions to reduce water consumption to 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 demonstrated that it is progressing through developing some procedures related to managing and minimising negative impacts on land. It has a monitoring programme and other procedures for monitoring soil and guidelines for sampling but has not yet provided evidence related to parameters and sampling locations.
2.5	Air quality	Progressing	The company has demonstrated that it is progressing through developing some procedures for managing and minimising

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	Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality.		negative impacts on air. It has a monitoring programme and other procedures for monitoring soil and guidelines for taking samples but has not yet provided evidence related to parameters and sampling locations.
2.6	Greenhouse gases Companies will seek to measure, monitor and publicly disclose direct and indirect CO2 equivalent (GHG) emissions, and work towards economic reduction targets appropriate to the nature and scale of operations and relevant protocols.	Informal	The company monitors direct carbon dioxide emissions at multiple locations, addressing informally this expectation. The company could improve its rating by providing evidence that all direct emissions are measured, it is monitoring indirect emissions and developing targets to reduce emissions.
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.	Conforming	The company has demonstrated that it conforms with this expectation through developing procedures and implementing measures to reduce energy consumption by improving efficiency and replacing high-consumption equipment with lower-consumption alternatives where feasible.
2.8	Tailings management Companies will dispose of or store tailings ⁽²⁾ in a manner that minimises the risk of impacts to the environment and human health in accordance with recognised standards when available. ⁽²⁾ Including to design, build, operate, monitor and decommission for all life cycle stages.	Not Relevant	Conformance with this expectation is considered not relevant as tailings from mineral processing activities are not relevant to smelting facilities.
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 demonstrated that it is progressing through developing and implementing procedures related to managing and disposing of hazardous wastes in a manner that minimises negative impacts on human health and the environment but has not yet provided evidence of measures to avoid 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 demonstrated that it is progressing through developing and implementing procedures related to managing, segregating, recycling, and disposing of non-hazardous and inert wastes but has not yet provided evidence of measures to avoid the generation of non-hazardous wastes where possible.
2.11	Banned substances Companies will not use substances that are banned under international convention or local laws.	Progressing	The company has demonstrated that it is progressing by not using substances banned under international conventions or local laws but has not yet provided evidence of a systematic review of the list of new banned substances.
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 demonstrated that it is progressing by avoiding activities that significantly modify or degrade critical natural habitats as evidence provided shows the absence of protected areas likely to be affected, but it has not yet provided evidence on assessing impacts to 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	The company has demonstrated that it conforms with this expectation by respecting legally protected areas in accordance with local laws. Evidence provided by the company shows the absence of protected areas likely to be affected by the company's activity.



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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 this expectation is considered not relevant as closure and reclamation 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.	Progressing	The company has demonstrated that it is progressing through undertaking environmental training in some subjects of this Principle for some but not all employees, including providing training records and a training database.

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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company has made several improvements for this reporting period on standards of this Principle. As a result, the company conforms with the expectations of maintaining safe working practices, reporting incidents, and following them up through the development of several occupational health and safety (OHS) procedures. It is working on the implementation of an integrated management system (that includes OHS management) and undertook OHS training for some employees and contractors, demonstrating it is progressing towards a systematic OHS approach and training on relevant aspects of this Principle.

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 demonstrated that it is progressing through developing several occupational health and safety (OHS) procedures, which include an integrated management system policy, and OHS management system procedures, and is progressing towards the implementation of an integrated 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	The company has demonstrated that it conforms with this expectation through developing several OHS procedures and implementing measures to maintain safe and healthy working conditions, perform safety inspections, risk assessments, periodic health examinations, observation of tasks and permits for high-risk work.
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 demonstrated that it conforms with this expectation through developing and implementing procedures for the investigation of accidents and incidents related to OHS, and implementing corrective measures to prevent the repetition of similar events.
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	The company has demonstrated that it conforms with this expectation through developing and implementing procedures to follow up corrective actions in a timely fashion and monitor the effectiveness of such actions.
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 demonstrated that it is progressing through developing procedures and materials, and undertaking OHS training for some employees and contractors.

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company has made several improvements for this reporting period. As a result, it conforms with the expectations of paying fair and equal remuneration, addressing the risk of worst and other forms of child labour, and engaging with all workers on freedom of association and collective bargaining, which was supported by an Internal Works Regulations Handbook, salary agreements and agreements with the workers union. The Internal Works Regulations Handbook, Code of Conduct and other procedures evidenced that the company is progressing with implementing a labour management system, addressing violence and harassment, the risk of forced labour and complying with local laws on working hours. It informally addresses the risk of discrimination and training requirements on labour issues. The company could provide evidence of how anti-discrimination measures are implemented and monitored, and wider training activities related to labour for employees 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 demonstrated that it is progressing through managing most aspects related to labour issues through an internal work regulations handbook and code of conduct but has not yet provided evidence of implementation of a formal labour management system to further enhance its control and monitoring activities.
4.2 a)	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.	Informal	The company code of conduct contains only high-level or general references to the recruitment process and the risk of discrimination in employment decisions, addressing informally this expectation. The company could improve its rating by providing evidence of an extended procedure that specifies how anti-discrimination measures are implemented and monitored.
4.2 b)	Violence and Harassment Companies will avoid practices that may result in physical, psychological, sexual or economic harm to persons in the workplace, including gender-based violence and harassment.	Progressing	The company has demonstrated that it is progressing through its internal work regulations handbook that establishes policies and procedures for generating acceptable conditions and behaviours in the work environment but has not yet provided evidence of how measures are implemented and monitored.
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 has demonstrated that it conforms with this expectation through developing and implementing procedures, that include salary agreements and salary increases, to ensure it is paying workers at or above the local legal minimum and includes applicable statutory benefits and equal pay for work of equal value.
4.4	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Progressing	The company has demonstrated that it is progressing through its internal work regulations handbook and code of conduct that establishes acceptable conditions in the work environment and addresses forced labour but has not yet provided evidence of how measures are implemented and monitored.



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4.5	<p>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.</p>	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures (internal work regulations handbook) to prevent the risk of the worst forms of child labour, which indicate that the minimum working age is 18 or older verified through the provision of identity papers to the company.
4.6	<p>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.</p>	Conforming	The company has demonstrated that it conforms with this expectation through developing and implementing procedures (internal work regulations handbook) to prevent the risk of other forms of child labour, which indicate that the minimum working age is 18 or older verified through the provision of identity papers to the company.
4.7	<p>Working hours Companies will comply with local laws on working hours and provide paid annual and statutory leave, and ensure that workers undertake overtime on a voluntary basis and have at least one day of rest for every 7-day period⁽⁴⁾ or as prescribed by local laws (whichever is higher).</p> <p>⁽⁴⁾ In circumstances such as shift work the averaging of working hours over a different period is permitted as recognised by the ILO and/or local laws.</p>	Progressing	The company has demonstrated that it is progressing through its internal work regulations handbook that addresses working hours and overtime for some staff (administrative) but has not yet provided evidence on what measures apply to shift workers and the voluntary basis of overtime work.
4.8	<p>Freedom of association and collective bargaining Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws.</p>	Conforming	The company has demonstrated that it conforms with this expectation through the confirmation of the workers union, and formally engaging with all workers on freedom of association and collective bargaining per local labour laws.
4.9	<p>Training Companies will provide appropriate and periodic employee training regarding relevant aspects of this Principle 4 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.</p>	Informal	The company has provided limited evidence that it is undertaking training activities for a few employees only, addressing informally this expectation. The company could improve its rating by providing evidence of wider training activities related to labour for employees and contractors.

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PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company has made some improvements and is now progressing with developing and implementing measures to establish a grievance mechanism to receive stakeholders' concerns. It has a complaint and suggestions mailbox for workers inside its facilities, and a grievance channel accessible from its website. The company could provide evidence of a systematic approach to stakeholder management, stakeholder mapping, and relevant training on these aspects to employees 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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of a systematic approach to stakeholder management.
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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of stakeholder mapping and developing a 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.	Progressing	The company has demonstrated that it is progressing through developing and implementing procedures and measures to establish an appropriate grievance mechanism. It has a complaint and suggestions mailbox for workers inside its facilities, and a grievance channel accessible from its website but has not yet provided evidence of alternative channels to access the grievance mechanism for people with no access to the internet.
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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of training to employees and contractors covering stakeholder engagement and management issues.

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

Overview of Principle Performance

The company has supported community development by implementing some social projects to address children's domestic violence and prohibition of child labour in one mining community, which demonstrated that it is progressing with supporting the economic development of local people, and addresses informally community management. The company could provide evidence on community health and safety considerations, consultation with local communities and relevant training to employees and contractors on issues of this Principle to improve its rating. Several standards related to FPIC, land rights issues, physical and economic displacement, natural resource use and cultural heritage are not relevant since there are no indigenous peoples located near the operation and due to the industrial setting surrounding the company.

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 supported community development by implementing social projects to address children's domestic violence and prohibition of child labour in one mining community, which addresses informally this expectation. The company could improve its rating by providing evidence of implementing a formal community and indigenous people's management system.
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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence that community health and safety measures have been considered.
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	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of consultation with local communities.
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 no indigenous peoples are located near to or impacted by the company's operations.
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 no land rights, land use or access is impacted by the company's operations.
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 the company's operations and activities have not resulted/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.	Not Relevant	Conformance with this expectation is considered not relevant as the company's operations and activities have not resulted/are not resulting in economic displacement.
6.8	Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.	Progressing	The company has demonstrated that it is progressing through developing and implementing social projects in



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			one mining community. It has coordinated a social project in one mining community that supports local people's development but has not yet provided evidence of broader support to local people.
6.9	<p>Natural resource use and availability Companies will seek to understand and minimise negative impacts on access to and availability of natural resources⁽⁵⁾ by local communities and indigenous people.</p> <p>⁽⁵⁾ Including air, sunlight, soil, and water.</p>	Not Relevant	Conformance with this expectation is considered not relevant as evidence provided by the company shows that immediate surroundings are other industrial operations, and given the industrial setting and urban environment, negative impacts on access to and availability of natural resources are not considered relevant.
6.10	<p>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.</p>	Not Relevant	Conformance with this expectation is considered not relevant as evidence provided by the company shows that immediate surroundings are other industrial operations, and given the industrial setting, established nature and urban environment, negative impacts on cultural heritage are not considered relevant.
6.11	<p>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.</p>	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence on training in community management, development, and consultation to 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 made improvements for this reporting period and improved ratings on some standards of this Principle. OMSA only sources minerals from Bolivian mining cooperatives (supplied directly by them or to a smaller degree through local traders) and has a Commercial Policy and procedures for selecting, registering, and monitoring suppliers of primary materials and purchasing primary materials, which addresses supply chain transparency and traceability, and assess risks associated with suppliers. OMSA is on the RMAP conformant list (with an audit dated 2018 which used the audit protocol of 21 Nov 2013) and is reported to be in the process of re-assessment. RMAP assessment processes have not yet been confirmed as fully OECD aligned and may not have fully evaluated the company's assessment of supply risks according to OECD due diligence. Through its Code of Conduct and by the use of an authorised and licenced security company, the company addresses informally human rights management and management of state security. The company could provide evidence of human rights-related training to employees and contractors to improve its rating.

STANDARD		RATING	ADDITIONAL INFORMATION
7.1	<p>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.</p>	Informal	The company has a code of conduct that contains high-level and broad references to human rights, addressing informally this expectation. The company could improve its rating by implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7.
7.2	<p>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.</p>	Informal	The company uses an authorised and licenced security company, addressing informally this expectation. The company could improve its rating by providing information that the activities and approaches used by security are guided by the Voluntary Principles on Security and Human Rights.
7.3	<p>Responsible sourcing Companies^(6,7) will evaluate potential risks, seek to avoid support to conflict, human rights and other significant abuses and publicly report on their efforts according to international expectations and laws, in particular the OECD Due Diligence Guidance 3T Supplement.</p> <p>⁽⁶⁾ Companies with smelters will seek to be third-party assessed against recommended criteria. ⁽⁷⁾ Companies without smelters will seek to apply aspects of the recommended criteria relevant to their own circumstances.</p>	Progressing	The company has demonstrated that it is progressing through developing and implementing due diligence procedures to assess the risks associated with the supply of tin ore. OMSA only sources minerals produced by Bolivian mining cooperatives (supplied directly by them or to a smaller degree via local traders). It has a commercial policy and procedures for selecting, registering, and monitoring suppliers of primary materials and purchasing primary materials, which addresses supply chain transparency and traceability. OMSA is on the RMAP conformant list (with an audit dated 2018 which used the audit protocol of 21 Nov 2013) and is reported to be in the process of re-assessment. RMAP assessment processes have not yet been confirmed as fully OECD aligned and may not have fully evaluated the company's assessment of supply risks according to OECD due diligence. The company has not yet provided evidence to show



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7.4	<p>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.</p>	<p>Inadequate</p>	<p>equivalence of RMAP to OECD or the recommended Criteria 7.3.</p> <p>The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence on training in human rights and conflict-related issues (as defined under Principle 7) to employees and contractors.</p>
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PRINCIPLE 8: Seek to positively influence practices of suppliers of materials, goods and services

Overview of Principle Performance

The company has made improvements for this reporting period and improved ratings on some standards of this Principle. The company is progressing in communicating suppliers (mainly local mining cooperatives and some local traders) information and guidance on Tin Code's objective, labour practices, human rights and conflict by developing procedures addressed to suppliers, such as a Commercial Policy and 'Know your Counterparty' procedure, which focuses on informing primary material suppliers of OMSA's requirements and expectations, visiting suppliers and checking the workplace. Through procedures for selecting, registering, and monitoring suppliers of primary materials (including monitoring legal compliance aspects) and purchase of primary materials, the company informally encourages the formalisation of ASM suppliers as appropriate. The company could provide evidence of how it encourages suppliers to manage the environment, health and safety and local communities, and requesting suppliers of goods and services to work towards principles of the Tin Code to improve its rating. It does not source LSM produced materials nor secondary materials; hence these expectations are not relevant.

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.	Progressing	The company has demonstrated that it is progressing through developing and implementing policies and procedures addressed to suppliers. It has a commercial policy and another procedure for informing primary material suppliers of OMSA's requirements and expectations, focused on commercial, legal compliance, business integrity, responsible sourcing and human rights aspects but has not yet provided evidence that the company has communicated this policy to all suppliers.
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 procedures for selecting, registering, and monitoring suppliers of primary materials (including monitoring legal compliance aspects) and purchase of primary materials, which addresses supply chain transparency and traceability, addressing informally this expectation. The company could improve its rating by providing evidence on communicating the importance of formalisation to all suppliers as appropriate.
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	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence on communicating guidance on managing environmental impacts to all suppliers as appropriate.
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	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence on communicating guidance on health and safety impacts to all suppliers as appropriate.
8.5	Principle 4 ASM minerals (labour)	Progressing	The company has demonstrated that it is progressing through developing and implementing policies and



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	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.		procedures addressed to suppliers. It has a commercial policy and 'Know your Counterparty' procedure for informing primary material suppliers of OMSA's requirements and expectations, visiting suppliers and checking the workplace. This was supplemented by a social project focused on sharing OMSA's commercial policy and communicating the prohibition of child labour in one mining cooperative area. The company has not yet provided evidence that it has communicated this policy to all its suppliers as appropriate.
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	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence on communicating guidance on negotiating with local communities and indigenous peoples for access to land to all suppliers as appropriate.
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.	Progressing	The company has demonstrated that it is progressing through developing and implementing policies and procedures addressed to suppliers. It has a commercial policy and 'Know your Counterparty' procedure for informing primary material suppliers of OMSA's requirements and expectations, visiting suppliers and checking the workplace. This was supplemented by a social project focused on sharing OMSA's commercial policy and communicating the prohibition of child labour in one mining cooperative area. The company has not yet provided evidence that it has communicated this policy to all suppliers as appropriate.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.	Not Relevant	Conformance with this expectation is considered not relevant as the company does not source LSM produced minerals.
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 Tin Code.	Not Relevant	Conformance with this expectation is considered not relevant as the company does not source secondary materials.
8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence on requesting suppliers of goods and services meet or work towards the principles of the Tin Code.

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

Overview of Principle Performance

Through its membership in the International Tin Association, the company conforms with the expectations to support the understanding of potential effects on humans and the environment, and has encouraged the safe, appropriate, and efficient use of tin. The company communicated some general information on its website regarding the impacts and use of its products to users in the value chain with no noted breaches under data protection laws, addressing informally this expectation. The company could improve its rating by providing more detailed information to workers and other stakeholders about the impact and use of its products.

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 in International Tin Association, the company conforms with the expectation to regularly support activities to review, lead and advance understanding of tin's properties and potential effects as 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 in International Tin Association, the company conforms with the expectation to regularly support research and innovation and leads collaboration that promotes the 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 communicated some general information on its website regarding the impacts and use of its products to users in the value chain, addressing informally this expectation. The company could improve its rating by providing more detailed information to workers and other stakeholders about the impact and use of its products with no noted breaches under data protection laws.



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PRINCIPLE 10: Work towards reporting against the International Tin Code

Overview of Principle Performance

The management and staff of OMSA have taken ownership of reporting on the Tin Code, and there is a clear commitment to providing evidence of 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 Tin Code Report, conforming 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 OMSA agreed to the publication of this report on 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 OMSA approved the content of this report.



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Appendix A – Description of Tin Code reporting

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

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

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

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

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