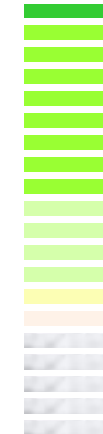


INTERNATIONAL TIN CODE OF CONDUCT REPORT: Operaciones Metalurgicas S.A.



| GENERAL INFORMATION | |
|--|---|
| Company details | Operaciones Metalurgicas S.A. Km 3,5 carretera a Cochabamba, Zona Industrial Huajara, Oruro, Bolivia |
| Date of this report | March 2019 (Published July 2020) |
| Date of previous report | Not Relevant |
| Report author(s) | Independent External Assessor Supply Chain Standards Manager, International Tin Association Ltd |
| Report verified by | Mariano Peró |
| Contact information | coc@internationaltin.org |
| About our company | Operaciones Metalurgicas S.A. (OMSA) was the first tin smelter to be established in Bolivia in 1937. The company is still managed by the same family and is a smaller tin producer using rotary kilns to produce tin metal and alloys from Bolivian minerals. It has a workforce of over 100 employees and is based in the Oruro region at the centre of the Bolivian tin producing region purchasing minerals produced by local cooperatives which are relatively large scale and well controlled under Bolivian law. The company has responded to new requirements by installing new equipment as environmental regulations are improved in the country. OMSA is now in the process of adopting ISO 9001; 19001; and 45001 and expects to be certified in 2019. The company has also developed clear child protection policies. |
| Significant changes from previous report | Not Relevant |
| Further information and references | <i>Update 27 Nov 2023: Due to human error, a small number of ratings have subsequently been identified as provisional or uncertain based on internal records. In the interests of transparency, these have been noted in this report using footnotes in the relevant standards. ITA regrets any inconvenience caused and is implementing measures to prevent future errors. If you have any further questions regarding this report, please contact tincode@internationaltin.org</i> |



Visual Progress Guide



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

Overview of Principle Performance

The company has several policies already in place and is making progress on developing a complete range covering all aspects of the Code. The company keeps up to date business registrations, licences and documents necessary to legally carry out business activity and is progressing with a formal approach to updating, as well as the development of a formal management system and all related procedures. It also has an informal approach in place which enables employees and stakeholders to report concerns. Provision of evidence of procedures regarding bribery and corruption could be beneficial, as well as provision of training related to this principle for staff and its contractors. Implementation of the Extractive Industries Transparency Initiative (EITI) is not relevant as Bolivia is not an implementing country.

| STANDARD | | RANKING | ADDITIONAL INFORMATION |
|----------|--|--------------|---|
| 1.1 | Policies Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code of Conduct. | Progressing | The company has some of the required policies through certification but could improve its rating by developing policies to address stakeholder identification and engagement (part of Principle 5 of the Code), community health and safety (part of Principle 6 of the Code), the use of private and public security services (part of Principle 7 of the Code) and the requirement to positively influence practices of suppliers of materials, goods and services (part of Principle 8 of the Code). |
| 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 developed and implemented elements of a formal system to manage legal compliance and governance issues; to improve its rating the company should develop and implement a comprehensive formal system. |
| 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 conforms with the requirement to have 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; to improve its rating the company could implement a system for monitoring updates in requirements. |
| 1.4 | Business integrity Companies will seek to prevent bribery and corruption. | Inadequate | The company has not yet provided evidence to demonstrate it has developed and implemented procedures to record and avoid bribery and corruption. |
| 1.5 | Transparency Companies will implement the Extractive Industries Transparency Initiative (EITI) if required by national government | Not Relevant | Conformance with the requirement is considered not relevant as Bolivia is not an implementing country of the EITI at present. |
| 1.6 | Whistleblowing Companies will develop and implement whistleblowing procedures to enable employees and stakeholders to report concerns related to company activities, including relevant expectations of the Code of Conduct. | Informal | The company has informal procedures in place for receiving concerns and complaints, including via email; to improve its rating the company could develop a formal |

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| | | | whistleblowing mechanism to enable employees and stakeholders to report concerns related to company activities, including relevant expectations of the Tin Code of Conduct. |
| 1.7 | <p>Training</p> <p>Companies will work towards implementing appropriate and periodic training for employees regarding relevant aspects of this Principle 1 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas.</p> | Inadequate | The company has not yet provided evidence to demonstrate that it holds informal training sessions for employees and contractors on legal compliance and good practice aspects (as defined in the Tin Code of Conduct, Principle 1). |

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company conforms with the expectation to respect legally protected areas and is progressing with monitoring and reducing its impact on water, land, soil and air quality, as well as hazardous and non-hazardous waste management, monitoring energy consumption and use of banned substances. It currently has an informal environmental management system in place and a similarly informal approach to biodiversity protection. Expectations related to tailings management, mine closure and rehabilitation do not apply as its operations do not include mining. For a number of other standards, including on training, the lack of formal evidence has led to “inadequate” rankings and it would be beneficial to carry out additional analysis of water availability and use. The company’s CO2 emissions are below the reporting threshold.

| STANDARD | | RANKING | ADDITIONAL INFORMATION |
|----------|---|--------------|---|
| 2.1 | Management system Companies will work towards implementing an environmental management system that utilises the mitigation hierarchy (avoid, minimise, mitigate, compensate) to control and monitor relevant aspects of this Principle 2. | Informal | The company has informal procedures in place to manage environmental impacts, and is currently installing new equipment to meet the legal levels of emissions and international regulations; to improve its rating the company could work towards implementing a formal 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. | Progressing | The company is working towards understanding and managing discharges to surface waters and groundwater in order to minimise negative impacts on water quality; to improve its rating the company could demonstrate that it monitors both surface waters and groundwater potentially impacted by its activities. |
| 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. | Inadequate | The company has not yet provided evidence to demonstrate it has implemented actions to reduce water consumption and minimise negative impacts on water availability. |
| 2.4 | Land and soil quality Companies will seek to understand and manage discharges to land in order to minimise negative impacts on land and soil quality. | Progressing | The company has undertaken initial analysis of potential impacts on land and soil quality as part of its Environmental Impact Assessment; to improve its rating the company could demonstrate it has in place measures or plans to continue to monitor land and soil quality. |
| 2.5 | Air quality Companies will seek to understand and manage discharges to air in order to minimise negative impacts on air quality. | Progressing | The company has implemented air quality monitoring; to improve its rating it could demonstrate it has implemented measures or plans to minimise negative impacts on air quality. |
| 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. | Not Relevant | Conformance with the requirement is considered not relevant as the company’s emissions are below the threshold for reporting of 25,000 tonnes per annum. |
| 2.7 | Energy consumption | Progressing | The company is making progress in identifying and implementing measures to reduce the direct and indirect |

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| | 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. | | consumption of energy and increase the use of renewable energy. |
| 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 mineral processing activities are not relevant to smelting facilities and therefore this requirement does not apply. |
| 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 implemented measures to manage the handling and disposal of hazardous wastes in a manner that minimises negative impacts on human health and the environment; to improve its rating the company could implement initiatives to avoid or reduce the amount of hazardous waste generated or requiring final disposal. |
| 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 measures in place to manage the handling and disposal of non-hazardous and inert wastes; to improve its rating the company could implement initiatives to avoid or reduce the amount of non-hazardous and inert wastes generated or requiring final disposal. |
| 2.11 | Banned substances Companies will not use substances that are banned under international convention or local laws. | Progressing | To improve its rating the company could implement procedures to routinely review all substances it uses, or plans to use, and exclude those that are banned under international conventions and local laws. |
| 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. | Informal | The company could improve its rating by demonstrating it has taken formal steps to understand and mitigate its potential impacts on biodiversity. |
| 2.13 | Protected areas Companies will respect legally protected areas in accordance with local laws, and will seek to understand and manage potential impacts of operations on adjacent zones. | Conforming | |
| 2.14 | Closure and reclamation Companies will allocate adequate financial resources to enable implementation of closure and rehabilitation of operations in accordance with local requirements and expectations of key stakeholders. | Not Relevant | Conformance with the requirement is considered not relevant as closure and rehabilitation plans do not apply to non-mining operations and facilities |
| 2.15 | 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. | Inadequate | The company has not yet provided evidence demonstrate that its training activities extend to environment-related issues and management (as defined in the Tin Code of Conduct, Principle 2) and that such training is mandatory for both employees and contractors. |

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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company's health and safety management system is "Third-party verified" by the Bolivian government and the company is progressing with formal implementation of health and safety practices and an inclusive approach to incident investigation. The company submits incident reports to relevant government agencies but the process for follow up and implementation of corrective actions has not yet been formalised. It currently takes an informal approach to providing related training to its employees, contractors and visitors.

| STANDARD | | RANKING | ADDITIONAL INFORMATION |
|----------|--|----------------------|--|
| 3.1 | Health and safety management systems Companies will work towards implementing a management system to monitor and control relevant aspects of this Principle 3. | Third-Party Verified | |
| 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 is working towards the requirement to maintain safe and healthy working conditions by implementing some measures that minimise and seek to eliminate workplace fatalities, injuries and occupational diseases amongst employees, contractors and visitors. |
| 3.3 | Incident investigations Companies will document reportable health and safety incidents using a transparent and inclusive procedure that allows affected workers and local communities to provide input. | Progressing | The company undertakes and reports to appropriate authorities formal incident investigations; the company could improve its rating by demonstrating it uses a transparent and inclusive procedure that allows affected workers to provide input. |
| 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 informally documents incident follow up; to improve its rating, the company could demonstrate it has a formal system to implement corrective actions and monitoring of the effectiveness of such actions following an incident and associated investigation. |
| 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. | Informal | The company provides employees with some health and safety-related training; to improve its rating the company could demonstrate it has a formal system in place that delivers appropriate health and safety-related training to employees, contractors and visitors. |

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company conforms with the requirement to pay workers at or above the local legal minimum wage and engages formally with all workers on freedom of association and collective bargaining in accordance with Bolivian labour laws. The company is progressing towards more formal management systems related to labour issues and applies local laws related to working hour's requirements, although it could further demonstrate that overtime is fully voluntary. The company has labour policies that addresses discrimination, forced labour and child labour which are informally implemented as the company considers the risk to be low in the context of their own smelting operations. The company could provide evidence of extending training on labour practices to employees and contractors in a more formal manner.

| STANDARD | | RANKING | ADDITIONAL INFORMATION |
|----------|--|--------------------------|--|
| 4.1 | Labour management systems Companies will work towards implementing a labour management system to control and monitor relevant aspects of this Principle 4. | Progressing | The company manages most aspects related to labour issues, but to improve its rating the company could implement a formal labour management system to further enhance its control and monitoring activities. |
| 4.2 | Discrimination Companies will not make employment decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job. | Informal | The company has a labour policy with a discrimination clause, but to improve its rating the company could provide evidence of implementation or monitoring. |
| 4.3 | Remuneration Companies will ensure workers receive fair remuneration for standard and overtime hours worked that meets or exceeds the local legal minimum plus any applicable statutory benefits and provide equal pay for work of equal value. | Conforming | |
| 4.4 | Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour. | Informal | The company has a labour policy with a forced labour clause, but to improve its rating the company could provide evidence of implementation or monitoring. |
| 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. | Informal ¹ | The company has a child labour policy with a clause to prevent the risk of the worst forms of child labour, but to improve its rating the company could provide evidence of implementation or monitoring. |
| 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. | Informal ² | The company has a child labour policy with a clause to prevent the risk of other forms of child labour, but to improve its rating the company could provide evidence of implementation or monitoring. |
| 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 ³ | The company has implemented plans to address compliance with local laws, but to improve its rating the company could demonstrate that overtime is requested on a voluntary basis. |

¹ SOP 4.5 Code of Conduct Report published in July 2020 notes 'Informal'. The assessor records note 'Conforming' (subject to provisos)

² SOP 4.6 Code of Conduct Report published in July 2020 notes 'Informal'. The assessor records note 'Conforming' (subject to provisos)

³ SOP 4.7 Code of Conduct Report published in July 2020 notes 'Progressing'. The assessor records note provisional rating 'Informal'

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| 4.8 | Freedom of association and collective bargaining Companies will engage with workers on freedom of association and collective bargaining as permitted by local laws. | Conforming | |
| 4.9 | Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 4 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas. | Informal | The company undertakes a range of training activities, but to improve its rating it could demonstrate that this extends to labour-related practices (as defined in the Tin Code of Conduct, Principle 4) and that such training is mandatory for both employees and contractors. |



PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company could provide evidence of stakeholder mapping and engagement and implement a mechanism for engaging with stakeholders to identify and address their concerns. It would be beneficial to formalise aspects of this principle in a management system. The company undertakes a range of training activities for employees and contractors, but it could demonstrate that this extends to covering stakeholder engagement and management issues.

| STANDARD | | RANKING | ADDITIONAL INFORMATION |
|----------|--|------------|--|
| 5.1 | Stakeholder management Companies will work towards implementing a systematic approach to stakeholder management to control and monitor relevant aspects of this Principle 5. | Inadequate | The company has not yet provided evidence of a stakeholder management system to enhance its control and monitoring activities. |
| 5.2 | Stakeholder mapping and engagement Companies will seek to identify and record the characteristics and interests of stakeholders affected by, or with the potential to affect, company activities, and plan a participatory approach to engagement including disadvantaged and vulnerable groups. | Inadequate | The company has not yet provided evidence of engaging with stakeholders; to improve its rating the company could demonstrate it has completed stakeholder mapping and engaged effectively with all its stakeholders. |
| 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. | Inadequate | The company has not yet provided evidence of a system for managing grievances; to improve its rating the company could demonstrate it has a formal mechanism that extends to local people, communities and civil society organisations. |
| 5.4 | Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 5 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas. | Inadequate | The company undertakes a range of training activities, but to improve its rating it could demonstrate that this extends to covering stakeholder engagement and management issues and that such training is mandatory for both employees and contractors. |

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

Overview of Principle Performance

The company contributes on an ad-hoc basis to various charitable organisations and welfare establishments to maintain good local relationships and is progressing towards a more formal evaluation of local needs through recorded consultations. The company has also implemented informal measures that contribute to good management of community and indigenous peoples. It could provide evidence that its operations and activities have not resulted and are not resulting in having negative impacts on access to and availability of natural resources by local communities. For a number of other standards, including training, cultural heritage protection, community health and safety and community consultation, some lack of formal evidence has led to “inadequate” rankings. A number of standards such as related to economic or physical displacement are not relevant for the non-mining context. There are no indigenous peoples located near the operation and FPIC and land rights issues are not relevant.

| STANDARD | | RANKING | 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 | To improve its rating the company could develop and implement a systematic approach to community management. |
| 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 yet provided evidence of implementing measures to manage the risk of impacts on community health and safety through the management of environmental and OHS issues and development of appropriate emergency response plans. |
| 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 yet provided evidence of a systematic approach to consultation and responding to the views of communities and indigenous peoples. |
| 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 ⁴ | 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 ⁵ | 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 ⁶ | The company's operations and activities have not resulted / are not resulting in involuntary resettlement |
| 6.7 | Economic displacement (livelihoods) | Not Relevant ⁷ | The company's operations and activities have not resulted / are not resulting in economic displacement. |

⁴ SOP 6.4 Code of Conduct Report published in July 2020 notes 'Not Relevant'. The assessor records note provisional rating 'Inadequate'

⁵ SOP 6.5 Code of Conduct Report published in July 2020 notes 'Not Relevant'. The assessor records note provisional rating 'Inadequate'

⁶ SOP 6.6 Code of Conduct Report published in July 2020 notes 'Not Relevant'. The assessor records note provisional rating 'Inadequate'

⁷ SOP 6.7 Code of Conduct Report published in July 2020 notes 'Not Relevant'. The assessor records note provisional rating 'Inadequate'

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| | 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. | | |
| 6.8 | Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples. | Progressing | The company contributes to various charitable organisations and welfare establishments. This is done to maintain a good relationship but to improve its rating the company could provide evidence of analysis of development needs of local communities and records of consultations with local communities addressing local economic development. |
| 6.9 | Natural resource use and availability Companies will seek to minimise negative impacts on access to and availability of natural resources by local communities and indigenous people. | Inadequate | The company has not yet provided evidence it is collecting natural resource use and availability data and has implemented measures or plans to reduce impacts on local communities and indigenous people; to improve its rating, the company could provide such evidence. |
| 6.10 | Cultural heritage protection Companies will anticipate and wherever possible avoid adverse impacts on cultural heritage; when avoidance is not possible, companies will minimize, mitigate and/or compensate for such impacts. | Inadequate | To improve its rating the company could provide evidence that its operations and activities have not had / are not having negative impacts on cultural heritage. |
| 6.11 | Training Companies will provide appropriate and periodic training for employees regarding aspects of this Principle 6 relevant to interactions with local communities and indigenous people that may occur during the course of their work. Companies will require onsite contractors to undertake the same training when relevant to their specific role. | Inadequate | To improve its rating the company could demonstrate that training for employees and contractors extends to local community and indigenous peoples issues (as defined in the Tin Code of Conduct, Principle 6). |

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

Overview of Principle Performance

The company sources minerals from a number of Bolivian sources and has some procedures in place to assess associated risk. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified, however that audit did not evaluate the company's assessment of supply risks that trigger the need for OECD due diligence on mineral sources. The company could provide evidence on its approach to human rights management in the context of its operations and how local laws regarding use of security are applied. It could also take steps to increase training on these issues.

| STANDARD | | RANKING | ADDITIONAL INFORMATION |
|----------|--|-------------|---|
| 7.1 | Human rights management Companies will work towards implementing a systematic approach to human rights management to control and monitor relevant aspects of this Principle 7. | Inadequate | The company has not yet provided evidence to confirm it has developed and implemented a systematic approach to human rights management; to improve its rating the company could provide such evidence if it exists or take steps to develop and implement a systematic approach to human rights management if not. |
| 7.2 | Use of private or state security personnel Companies using direct or contracted workers to provide security will be guided by the Voluntary Principles on Security and Human Rights and by applicable local law. | Inadequate | To improve its rating, the company could demonstrate the company's direct or contracted security workers are guided by the Voluntary Principles on Security and Human Rights and by applicable local laws. |
| 7.3 | Responsible sourcing Companies will evaluate potential risks when sourcing minerals and seek to avoid purchases that may support conflict or human rights abuses according to international expectations and laws. | Progressing | The company sources minerals from a number of Bolivian sources and has some procedures in place to assess the risks associated with supplies, including some site visits. The company is RMAP compliant with the source of mineral inputs and throughput mass balance third-party verified, however that audit did not evaluate the company's assessment of supply risks that trigger the need for OECD due diligence on mineral sources. |
| 7.4 | Training Companies will provide appropriate and periodic training for employees regarding relevant aspects of this Principle 7 and require onsite contractors to train their workers on aspects relevant to their specific tasks and work areas. | Inadequate | To improve its rating the company could demonstrate its training of employees and contractors extends to human rights and conflict-related issues (as defined in the Tin Code of Conduct, Principle 7). |

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

Overview of Principle Performance

The company conforms to expectations to encourage formalisation of artisanal and small scale mining (ASM); in Bolivia ASM is carried out by organised government regulated cooperatives that benefit from social privileges mandated by Bolivian Nation's Labour Law and which also cover health and safety and labour requirements. Beyond that, the company has taken steps to evaluate risks of child labour in its supply chain by developing a specific policy and working with NGO's to implement measures committed to respecting and supporting better businesses for children. The company is yet to informally or formally request suppliers of artisanal, small-scale or large scale mined minerals or suppliers of goods and services to understand and support the objectives and standards of the Code. General guidance for ASM had not been developed by ITA for first year reporting and the company does not have its own materials. It does not source from suppliers of secondary materials and those expectations are not relevant.

| STANDARD | | RANKING | ADDITIONAL INFORMATION |
|----------|---|--------------------------|---|
| 8.1 | Suppliers of ASM produced minerals, general Companies will request suppliers declare that they will work towards understanding their supply chain and communicating through suppliers the objectives of International Tin's Code, information and guidance to encourage improvements. | Inadequate | To improve its rating, the company could demonstrate it has formally requested its ASM suppliers to declare they will work towards understanding their supply chain or communicating the objectives of the Tin Code. |
| 8.2 | Principle 1 ASM minerals (compliance and policies) Suppliers will be requested to communicate the importance of formalisation and potential opportunities to engage in practical projects encouraging formalisation of ASM as appropriate (based on feedback) to the production area. | Conforming ⁸ | |
| 8.3 | Principle 2 ASM minerals (environment) Suppliers will be requested to communicate guidance on managing environmental impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area. | Inadequate | To improve its rating, the company could demonstrate it has made formal attempts to engage with ASM suppliers and distribute relevant guidance on managing environmental impacts and has collected feedback on suitability to the ASM mineral source area(s). |
| 8.4 | Principle 3 ASM minerals (health and safety) Suppliers will be requested to communicate guidance on managing health and safety impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area. | Conforming ⁹ | |
| 8.5 | Principle 4 ASM minerals (labour) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area. | Conforming ¹⁰ | |
| 8.6 | Principle 6 ASM minerals (communities) Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land. | Inadequate | Company has made limited attempts to engage with suppliers regarding the communication of guidance on |

⁸ SOP 8.2 Code of Conduct Report published in July 2020 notes 'Conforming'. The assessor records note provisional rating 'Inadequate'

⁹ SOP 8.4 Code of Conduct Report published in July 2020 notes 'Conforming'. The assessor records note provisional rating 'Inadequate'

¹⁰ SOP 8.5 Code of Conduct Report published in July 2020 notes 'Conforming'. The assessor records note provisional rating 'Inadequate'

INTERNATIONAL TIN CODE OF CONDUCT REPORT: Operaciones Metalurgicas S.A.



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| | | | negotiating with local communities and indigenous peoples regarding access to land. |
| 8.7 | Principle 7 ASM minerals (human rights and conflict) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict, as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area. | Inadequate | Company has made limited attempts to engage with suppliers regarding the communication of guidance on human rights abuses and conflict |
| 8.8 | Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Code of Conduct. | Inadequate | The company has not yet provided evidence to confirm it has formally requested major suppliers of LSM produced minerals meet or work towards principles of this Code of Conduct. |
| 8.9 | Suppliers of secondary materials Companies will implement a system to check major suppliers are legally operating and request suppliers meet or work towards principles of this Code of Conduct. | Not Relevant | The company does not source from suppliers of secondary materials and therefore this requirement is not relevant. |
| 8.10 | Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Code of Conduct. | Inadequate | The company has not yet provided evidence to confirm it has requested major suppliers of goods and services meet or work towards principles of this Code of Conduct. |

INTERNATIONAL TIN CODE OF CONDUCT REPORT: Operaciones Metalurgicas S.A.



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

Overview of Principle Performance

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

| STANDARD | | RANKING | ADDITIONAL INFORMATION |
|----------|---|--------------------------|------------------------|
| 9.1 | Understanding potential impacts of tin Companies will seek to advance the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data. | Conforming | |
| 9.2 | Encouraging safe and appropriate use Companies will support research, innovation and collaboration that promotes safe and efficient production, use and recycling of tin, including to ensure regulatory compliance and efficient use of energy and natural resources | Conforming | |
| 9.3 | Communicating appropriate information Companies will communicate accurate information on impacts and use of its products, to workers, users in the value chain and wider stakeholders, accounting for the need for appropriate confidentiality. | Conforming ¹¹ | |

¹¹ SOP 9.3 Code of Conduct Report published in July 2020 notes 'Conforming'. The assessor records note 'Informal'



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

Overview of Principle Performance

The management and staff of Operaciones Metalurgicas S.A. (OMSA) have taken ownership of reporting on the Code and there is a clear commitment to providing evidence on conformance and making continued progress with the standards of the Code. They proactively worked with the Independent External Assessor and the International Tin Association within their available resources to develop this first company report on the Code.

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

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Appendix A – Description of Code reporting

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

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

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

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

Additional Information: In the reporting format, details of 'Additional Information' is not included for 'Conforming' and 'Third-party Verified' standards, but is provided in the case of other rankings as a useful guide to show progress.