
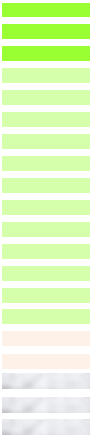




INTERNATIONAL TIN CODE REPORT: Bluestone Mines Tasmania JV Pty Ltd

GENERAL INFORMATION		
Company details	<p>Bluestone Mines Tasmania Joint Venture Pty Ltd Murchison Highway, Zeehan, Tasmania 7469</p> 	 <p>Visual Progress Guide</p>
Date of this report	Publication 9 April 2024	
Date of previous report	November 2020	
Report author(s)	Independent External Assessor Sustainability Standards Manager, International Tin Association Ltd	
Report verified by	Mark Recklies, Chief Operating Officer Bluestone Mines Tasmania Joint Venture Pty Ltd	
Contact information	tincode@internationaltin.org	
About our company	<p>Bluestone Mines Tasmania Joint Venture Pty Ltd (hereinafter Bluestone) manages the Renison Tin Operations on behalf of the Bluestone Mines Tasmania Joint Venture (BMTJV) partners. In the early 2000s, Renison Tin Operations was born under the operation of Bluestone Mines Tasmania Joint Venture, a partnership between Metals X Limited and Yunnan Tin Group.</p> <p>The Renison Tin Operations consist of the operating Renison Bell Tin Mine (Renison) and the Mt Bischoff Tin Mine (not currently operating). Renison Mine is located on the west coast of Tasmania and is a world-class hard rock tin deposit with mining operations spanning three centuries. It has between 320 - 340 employees, some of them based at the Renison Camp in Zeehan 16 km from the mine. The company has a community relations objective of growing long-term relationships and partnerships with local communities by developing a culture of mutual understanding, cooperation, consultation and respect.</p>	
Significant changes from previous report	<p>This is the company's third Tin Code report, demonstrating the steps Bluestone has taken to progress. The report also illustrates the company's continued collaboration with the Tin Code towards continuous improvement.</p> <p>Since the previous report, Bluestone has made progress on some standards, including Progressing with greenhouse gas emissions (2.6) and contributing to the local economic development of the community (6.8).</p> <p>The company could regain higher ratings by providing implementation evidence on several standards which were downgraded due to a lack of supporting evidence.</p> <p>Among other changes, due to internal updates to the Tin Code standard, SOP 1.5 related to transparency is now relevant.</p>	



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	<p>Note: 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>
Further information and references	<ol style="list-style-type: none">1. Bluestone website2. Metals X 2022 annual report here3. Metals X 2022 ESG annual report here4. Metals X 2022 quarterly reports here



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

Overview of Principle Performance

The company is progressing in most of the standards of this Principle. It's progressing with expectations related to developing and publishing policies, implementing appropriate management systems, legal compliance, business integrity, whistleblowing and training through its Code of Conduct, training procedures and disclosures in its public annual report. As a mining company that is not located in an EITI implementing country, nor is a paid member of the EITI Association, the company is out of the scope of formal EITI reporting. However, the company could improve its rating by providing evidence of a published statement supporting the 12 EITI Principles and a voluntary report confirming that all relevant taxes, fees and/or royalties have been paid to governments.

STANDARD		RATING	ADDITIONAL INFORMATION
1.1	<p>Policies Companies will develop and publish policies to support legal compliance and improve practices with respect to the expectations of the International Tin Code.</p>	Progressing	The company has demonstrated that it is progressing through developing and publishing policies that cover some but not all of the principles of the Tin Code. It has published policies on Governance and Values, Code of Conduct, Environment and H&S.
1.2	<p>Management system Companies will work towards implementing appropriate management systems to control and monitor relevant aspects of this Principle 1.</p>	Progressing	The company has demonstrated that it is progressing through its Code of Conduct and the absence of material environmental breaches noted in its public annual report, but has not yet provided evidence of procedures implementing a management system relevant to this Principle.
1.3	<p>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.</p>	Progressing	The company has demonstrated that it is progressing through its public annual report which indicates the absence of material environmental breaches, but has not yet provided evidence of procedures implemented to track legal requirements and future changes that may apply.
1.4	<p>Business integrity Companies will seek to prevent anti-competitive behaviour, corruption and bribery, including facilitation payments which should be publicly disclosed if unavoidable.</p>	Progressing	The company has demonstrated that it is progressing through its Code of Conduct, which specifies business ethics requirements, including acting with integrity and in accordance with the law and policies, but has not yet provided evidence of related procedures to implement anti-bribery and anti-corruption policy and to manage the risk of anti-competitive behaviour.
1.5	<p>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⁾</p> <p>⁽¹⁾ Reporting is required in an implementing country of EITI.</p>	Inadequate	The company has not provided evidence related to this expectation. As a mining company that is not located in an EITI implementing country, nor is a paid member of the EITI Association, the company is out of the scope of formal EITI reporting. However, the company could improve its rating by providing evidence of a published statement supporting the 12 EITI Principles and a voluntary report



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			confirming that all relevant taxes, fees and/or royalties have been paid to the government.
1.6	<p>Whistleblowing</p> <p>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.</p>	Progressing	The company has demonstrated it is progressing through its Code of Conduct, which includes a requirement for reporting dishonest, unethical, fraudulent or corrupt behaviours and a requirement to report breaches internally or to relevant authorities, but has not yet provided evidence of the procedures or channels readily accessible to all stakeholders to report concerns.
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>	Progressing	The company has demonstrated it is progressing through developing training procedures and materials on some but not all aspects of this Principle and has not yet provided evidence that all employees and contractors are up to date with training.

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PRINCIPLE 2: Seek continual improvement of environmental performance

Overview of Principle Performance

The company has made improvements during this reporting period and has improved the rating of one standard of this Principle. It has achieved a high rating of *conforming* in expectations related to GHG emissions and biodiversity management through publicly disclosed data in its GHG report and biodiversity studies. It's progressing with most of the standards of this principle in expectations related to the implementation of an environmental management system, managing water, land, soil and air quality, energy consumption, tailings, hazardous waste, non-hazardous and inert waste, avoiding banned substances, respect of protected areas, closure and reclamation and environmental training.

STANDARD		RATING	ADDITIONAL INFORMATION
2.1	Management system Companies will work towards implementing an environmental management system that utilises the mitigation hierarchy (avoid, minimise, mitigate, compensate) to control and monitor relevant aspects of this Principle 2.	Progressing	The company has demonstrated it is progressing through its Environmental Policy statement, which covers the standards of the Tin Code and indicates that the company adopted a management system based on ISO 14001 according to its public annual report, but has not yet provided evidence of the procedures to implement this 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 has demonstrated it is progressing through the disclosure of some water quality management measures, such as the construction of the new contaminated water treatment plant and confirmation of compliance with all environmental regulations in its public annual report, but has not yet provided evidence of the procedures, plans or monitoring reports of surface water and groundwater for water quality management.
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 provided evidence related to this expectation. The company could improve its rating by providing evidence of managing water consumption and 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 it is progressing through the confirmation of compliance with all environmental regulations and no legal breaches related to environmental management in its public annual report, but has not yet provided evidence of procedures for land and soil quality management.
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 demonstrated it is progressing through the confirmation of compliance with all environmental regulations and no legal breaches related to environmental management in its public annual report, but has not yet provided evidence of procedures for air quality management.



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2.6	<p>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.</p>	Conforming	The company has demonstrated that it conforms with this expectation through its independent greenhouse gas and energy assessment which calculates Scope 1, 2 and 3 emissions and assesses mitigation measures, and its national greenhouse and energy report (NGER), covering greenhouse gas emissions, energy production and consumption. Basic data from the NGER report is publicly disclosed.
2.7	<p>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.</p>	Progressing	The company has demonstrated it is progressing through its independent greenhouse gas and energy assessment which notes improvements to diesel use and electricity use efficiency, and its national greenhouse and energy report (NGER), covering energy production and consumption, but has not yet provided evidence of procedures or plans to reduce energy consumption.
2.8	<p>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.</p> <p>⁽²⁾ Including to design, build, operate, monitor and decommission for all life cycle stages.</p>	Progressing	The company has demonstrated it is progressing through its framework for the management of tailings and confirmation of compliance with all environmental regulations and no legal breaches related to environmental management in its public annual report, but has not yet provided evidence of procedures for tailings management.
2.9	<p>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.</p>	Progressing	The company has demonstrated it is progressing through the confirmation of compliance with all environmental regulations and no legal breaches related to environmental management in its public annual report, but has not yet provided evidence of procedures for hazardous waste management.
2.10	<p>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.</p>	Progressing	The company has demonstrated it is progressing through the confirmation of compliance with all environmental regulations and no legal breaches related to environmental management in its public annual report, but has not yet provided evidence of procedures for non-hazardous and inert waste management.
2.11	<p>Banned substances Companies will not use substances that are banned under international convention or local laws.</p>	Progressing	The company has demonstrated it is progressing through the confirmation of compliance with all environmental regulations and no legal breaches related to environmental management in its public annual report, but has not yet provided evidence of the routine review of new substances.
2.12	<p>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.</p>	Conforming	The company has demonstrated that it conforms with this expectation through its fauna, flora and habitat studies and assessments in order to understand potential impacts on biodiversity and avoid activities that significantly modify the habitat.



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2.13	<p>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.</p>	Progressing	The company has demonstrated it is progressing through the confirmation of compliance with all environmental regulations and no legal breaches related to environmental management in its public annual report, but has not yet provided evidence of procedures or plans to understand or manage potential impacts on adjacent zones.
2.14	<p>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.</p>	Progressing	The company has demonstrated it is progressing through the confirmation of compliance with all environmental regulations and no legal breaches related to environmental management in its public annual report, but has not yet provided evidence of allocation of adequate financial resources for closure and rehabilitation.
2.15	<p>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.</p>	Progressing	The company has demonstrated it is progressing through developing training procedures and materials on some but not all aspects of this Principle and has not yet provided evidence that all employees and contractors are up to date with training.



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PRINCIPLE 3: Seek continual improvement of health and safety performance

Overview of Principle Performance

The company is progressing in all the standards of this Principle. It's progressing with expectations related to implementing a systematic approach to health and safety, ensuring safe working practices, incident investigations and follow-up, and H&S training through its safety data and performance disclosed in its public annual report and H&S policy.

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 it is progressing through its Health and Safety Policy statement, which covers the standards of the Tin Code, and safety data disclosed in public annual reports, but has not yet provided evidence of an H&S management system and related implementing procedures.
3.2	Safe working practices Companies will maintain safe and healthy working conditions by implementing measures that minimise and seek to eliminate workplace fatalities, injuries and occupational diseases amongst employees, contractors and visitors.	Progressing	The company has demonstrated it is progressing through its safety data disclosed in public annual reports which includes safety working practices and performance, but has not yet provided evidence of its safety working procedures.
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 has demonstrated it is progressing through its safety data disclosed in public annual reports which includes incidents, but has not yet provided evidence of procedures for incident investigation.
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.	Progressing	The company has demonstrated it is progressing through its safety data disclosed in public annual reports which includes incidents, but has not yet provided evidence of procedures for incident follow-up or corrective actions implemented.
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 it is progressing through developing training procedures and materials on H&S for some employees, but has not yet provided evidence that all employees and contractors are up to date with training.

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PRINCIPLE 4: Seek continual improvement in labour practices

Overview of Principle Performance

The company is conforming in the expectation related to engaging with workers on freedom of association and collective bargaining through a signed agreement with workers. The company is progressing with expectations related to working towards a labour management system, managing discrimination, violence and harassment, remuneration, working hours and training on aspects of this Principle through its Code of Conduct and Enterprise Agreement. The company could improve its rating by providing evidence of procedures to manage the risk of forced labour and the worst and other forms of child labour.

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 it is progressing through its Code of Conduct and Enterprise Agreement, which provides a labour management framework (policy), but has not yet provided evidence of procedures used to implement this policy.
4.2a)	Discrimination Companies will implement an equality policy (including on gender) and not make employment related decisions based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age or sexual orientation unless clearly necessary due to inherent characteristics of the job.	Progressing	The company has demonstrated it is progressing through its Code of Conduct, which addresses anti-discrimination and harassment, but has not yet provided evidence of procedures used to implement it.
4.2b)	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 it is progressing through its Code of Conduct, which addresses violence and harassment, but has not yet provided evidence of procedures used to implement it.
4.3	Remuneration Companies will ensure workers receive fair remuneration ⁽³⁾ for standard and overtime hours worked that meets or exceeds the local legal minimum wage plus any applicable statutory benefits and provides equal pay for work of equal value. ⁽³⁾ In the absence of a minimum wage the prevailing competitive industry wage or the living wage if known.	Progressing	The company has demonstrated it is progressing through its Enterprise Agreement, which addresses remuneration issues, but has not yet provided evidence of procedures used to implement it.
4.4	Forced labour Companies will not use or support slavery, servitude, forced or compulsory labour.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of procedures to manage the risk of forced labour.
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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of procedures to manage the risk of worst forms of child labour.
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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of procedures to manage the risk of other forms of child labour.



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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 it is progressing through developing a policy framework for addressing employee labour relations, including working hours, but has not yet provided evidence of a procedure for implementing this policy.
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 as it engages with workers on freedom of association and collective bargaining through its signed Enterprise Agreement 2020-2023.
4.9	<p>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.</p>	Progressing	The company has demonstrated it is progressing through developing training procedures and materials on some, but not all aspects of this Principle, nor has it yet provided evidence that all employees and contractors are up to date with training.

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PRINCIPLE 5: Engage with stakeholders using a participatory approach

Overview of Principle Performance

The company is progressing in most of the standards of this Principle. It is progressing with expectations related to implementing a systematic approach to stakeholder management, stakeholder mapping and engagement and managing grievances through engagement with community, government and environmental state offices in Tasmania and expert consultants in the field. The company could improve its rating by providing evidence of training for employees and contractors on aspects of this Principle.

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.	Progressing	The company has demonstrated it is progressing with stakeholder management through engagement with the community, government and environmental state offices in Tasmania and expert consultants in the field, but has not yet provided evidence of a procedure for implementing a systematic and wider 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.	Progressing	The company has demonstrated it is progressing with stakeholder mapping through engagement with the community, government and environmental state offices in Tasmania and expert consultants in the field, but has not yet provided evidence of a procedure for stakeholder mapping, including wider 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.	Progressing	The company has demonstrated it is progressing through facilitating the resolution of concerns raised by communities or civil society through engagement with the community, government and environmental state offices in Tasmania and expert consultants in the field, but has not yet provided evidence of a documented grievance mechanism for external stakeholders.
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 for employees and contractors on aspects of this Principle.

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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 made improvements during this reporting period and has improved the rating of one standard of this Principle. The company has a high rating of *conforming* in the expectations related to community health and safety and avoiding adverse impacts on cultural heritage. The company is progressing with most of the standards of this Principle in expectations related to seeking free, prior and informed consent (FPIC) of indigenous peoples, land rights, use and access, physical and economic displacement, local economic development and natural resources use and availability. The company could improve its rating by providing evidence of implementing a systematic approach to the management of community and indigenous peoples' issues, consultation with local communities and training on these aspects.

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.	Inadequate	The company has not provided evidence related to this expectation. The company could improve its rating by providing evidence of implementing a systematic approach to the management of community and indigenous peoples' issues.
6.2	Community health and safety Companies will seek to implement practical and reasonable measures with the goal of eliminating potential negative health and safety impacts on local communities.	Conforming	The company has demonstrated that it conforms with this expectation through assessments of groundwater impacts, acid-mine drainage, air emissions, noise and traffic impact assessments relevant to community health and safety.
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 and indigenous peoples' to express their views.
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.	Progressing	The company has demonstrated it is progressing with seeking free, prior and informed consent (FPIC) of indigenous peoples through compliance with Australian laws, but it has not yet provided evidence of FPIC-related procedures to ensure compliance with such laws.
6.5	Land rights, use and access Companies will seek to anticipate and avoid or minimise adverse impacts on land rights, land use and access to land and compensate for any significant residual impacts.	Progressing	The company has demonstrated it is progressing with seeking to anticipate and avoid or minimise adverse impacts on land rights, use and access through compliance with Australian laws, but it has not yet provided evidence of related procedures to ensure compliance with such laws.
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.	Progressing	The company has demonstrated it is progressing with seeking to avoid or minimise involuntary resettlement through compliance with Australian laws, but it has not yet provided evidence of procedures to ensure compliance with such laws.



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6.7	<p>Economic displacement (livelihoods) Companies will financially compensate economically displaced people as required by local laws and plan a livelihoods restoration programme to ensure that there is no net negative impact on their livelihoods.</p>	Progressing	The company has demonstrated it is progressing in financially compensating economically displaced people and ensuring that there is no net negative impact on their livelihoods through compliance with Australian laws, but has not yet provided evidence of procedures to ensure compliance with such laws.
6.8	<p>Local economic development Companies will seek to contribute to the economic development of local communities and indigenous peoples.</p>	Progressing	The company has demonstrated it is progressing through charitable donations made to local community organisations and some apprenticeship opportunities in schools, but it has not yet provided evidence of a formal procedure for the identification of the development needs of local communities and indigenous peoples.
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>	Progressing	The company has demonstrated it is progressing with seeking to understand and minimise negative impacts on access to and availability of natural resources by local communities through compliance with Australian laws, but has not yet provided evidence of procedures to ensure compliance with such laws.
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>	Conforming	The company has demonstrated that it conforms with this expectation through its Cultural Heritage certificate by the Tasmanian Heritage Council confirming that the Renison Bell Township, Murchison Highway, Zeehan is not affected by any action of the Minister or the Heritage Council made under the Historic Cultural Heritage Act 1995 or any decision or determination under the Act.
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 of training for employees and contractors on aspects of this Principle.



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

Overview of Principle Performance

The company is progressing in most of the standards of this Principle. It's progressing with expectations related to implementing a systematic approach to human rights management, guidance on the Voluntary Principles on Security and training on some relevant aspects of this Principle and training documentation. The expectation for responsible sourcing is not relevant as the company does not source minerals from external parties and the company's own impacts are assessed through other Principles of the Tin Code.

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 in accordance with internationally recognised human rights frameworks and relevant domestic laws.</p>	Progressing	The company has demonstrated it is progressing with human rights management through compliance with Australian laws, but has not yet provided evidence of procedures implemented to ensure compliance with such laws for assessing and managing human rights risks and impacts.
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>	Progressing	The company has demonstrated it is progressing with respect to the use of private or state security personnel through compliance with Australian laws, but has not yet provided evidence of procedures implemented to ensure compliance with such laws for assessing and managing security-related risks and impacts.
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⁽⁸⁾.</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 ⁽⁸⁾ The criteria recommended for standard 7.3 is the ITA-RMI Assessment Criteria for Tin Smelting Companies v2 (Mar 2021) criteria 7.3. Other criteria may be utilised if deemed equivalent after equivalence checks against criteria 7.3 and 7.3 guidance by ITA experts.</p>	Not Relevant	This expectation is not relevant to mining companies without a smelter and without tin mineral/material purchases. Responsible sourcing of minerals for a mining company is covered by the other standards of the Tin Code.
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>	Progressing	The company has demonstrated it is progressing through developing training procedures and materials on some but not all aspects of this Principle, but has not yet provided evidence that all employees and contractors are up to date with training.

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

Overview of Principle Performance

Through its Terms & Conditions for contractors that cover expectations of the Tin Code, the company evidenced it is progressing with positively influencing its suppliers to work towards the Tin Code's expectations. It does not source minerals or other tin materials from external parties, hence most of the standards of this Principle are not relevant to the company.

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.	Not Relevant	This expectation is not relevant as the company does not source minerals from external parties.
8.2	Principle 1 ASM minerals (compliance and policies) Suppliers will be requested to communicate the importance of formalisation and potential opportunities to engage in practical projects encouraging formalisation of ASM as appropriate (based on feedback) to the production area.	Not Relevant	This expectation is not relevant as the company does not source minerals from external parties.
8.3	Principle 2 ASM minerals (environment) Suppliers will be requested to communicate guidance on managing environmental impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not Relevant	This expectation is not relevant as the company does not source minerals from external parties.
8.4	Principle 3 ASM minerals (health and safety) Suppliers will be requested to communicate guidance on managing health and safety impacts as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not Relevant	This expectation is not relevant as the company does not source minerals from external parties.
8.5	Principle 4 ASM minerals (labour) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over forced or compulsory labour, and the worst forms of child labour as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not Relevant	This expectation is not relevant as the company does not source minerals from external parties.
8.6	Principle 6 ASM minerals (communities) Suppliers will be requested to communicate guidance on negotiating with local communities and indigenous peoples regarding access to land.	Not Relevant	This expectation is not relevant as the company does not source minerals from external parties.
8.7	Principle 7 ASM minerals (human rights and conflict) Suppliers will be requested to communicate guidance to raise awareness regarding concerns over serious human rights abuses and conflict, as well as potential opportunities to engage in practical projects encouraging implementation by ASM as appropriate to the production area.	Not Relevant	This expectation is not relevant as the company does not source minerals from external parties.
8.8	Suppliers of LSM produced minerals Companies will request major suppliers meet or work towards principles of this Tin Code.	Not Relevant	This expectation is not relevant as the company does not source minerals from external parties.
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	This expectation is not relevant as the company does not source secondary materials.



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8.10	Suppliers of goods and services Companies will request major suppliers meet or work towards principles of this Tin Code.	Progressing	The company has demonstrated it is progressing through its Terms and Conditions procedure addressed to contractors which covers expectations of the Tin Code, but has not yet addressed to major suppliers of goods and services.
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PRINCIPLE 9: Encourage the understanding, and safe and appropriate use of tin products

Overview of Principle Performance

Through its membership of International Tin Association, the company conforms with the expectation to regularly support the understanding of the potential effects of tin on humans and the environment and has also encouraged the safe, appropriate, and efficient use of tin. The company has provided limited information on communication of appropriate information and through its membership in the International Tin Association, the company informally addresses this expectation.

STANDARD		RATING	ADDITIONAL INFORMATION
9.1	Understanding potential impacts of tin Companies will seek to advance the understanding of the properties of tin and any potential effects on human health and the environment through sound science and data.	Conforming	Through its membership of International Tin Association, the company conforms with the expectation to regularly support activities to review, lead and advance understanding of the properties and potential effects of tin as found necessary.
9.2	Encouraging safe and appropriate use Companies will support research, innovation and collaboration that promotes safe and efficient production, use and recycling of tin, including to ensure regulatory compliance and efficient use of energy and natural resources	Conforming	Through its membership of International Tin Association, the company conforms with the expectation to regularly support research and innovation and leading collaboration that promotes 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 is a member of the International Tin Association, but there is no other evidence of communicating information on the impacts and use of tin products to workers, users in the value chain, and wider stakeholders, addressing informally this expectation. The company could improve its rating by providing evidence of public information communicated to users in the value chain and wider stakeholders 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 Bluestone have taken ownership of reporting on the Code and there is a clear commitment to providing evidence on conformance and making continued progress with the standards of the Code. They proactively worked with the Independent External Assessor and the International Tin Association to develop this report on the Tin Code, conforming with all 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 support and agree to the annual publication of a report of activities against the Principles and Standards of the Code	Conforming	The management of Bluestone 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 Bluestone 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.